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TARDAEWETHER Kellen * ODOE

From: Colin Andrew <candrew@eou.edu>
Sent: Thursday, August 27, 2020 4:12 PM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE
Subject: [Fortimail Spam Detected] CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE
Attachments: B2H Contested Case - Colin Andrew.pdf

Dear Ms Greene-Webster,
Please accept the attached request for a contested case for the proposed site certificate for the boardman to Hemingway transmission line.
Thank you for your attention to this matter.

Sincerely

Colin Andrew

August 27, 2020

To: Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED_OAH_Referral@oregon.gov
cc: kellen.tardaewether@oregon.gov

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

My name is Colin Andrew and my home address is 95 Oak St, La Grande OR 97850.

I am not represented by an attorney but reserve the right to one should I be accepted into the case as a full party.

I am requesting to file as a party.

My interest in the contested case concerns the impacts of the proposed B2H transmission line on the recreational, scenic, and economic value of Morgan Lake Park. These impacts will degrade the recreational and scenic value of Morgan Lake (and adjacent Twin Lake) enjoyed by myself and my family, as well by thousands of regular visitors from the local community and beyond. They will also cause long-term financial harm to an economically disadvantaged region by ruining a key local tourism asset. Because of my extensive personal experience with the value of Morgan Lake Park over the past 19 years, I am the only person that can represent my particular issues in this contested case. These impacts are also suffered by the public.

Morgan Lake Park is a jewel within the La Grande Parks system. It offers year-round recreational opportunities, including hiking, bird watching, and canoeing, as well as seasonal camping and fishing. Because Morgan Lake Park lies just a few miles from La Grande's city limits it's easily accessible to the local community and beyond. The popularity of the Park has prompted the city to invest in improved camping and recreational facilities. Since there are no user or camping fees, it is truly a "people's park". For my family (and many other La Grande residents), Morgan Lake Park is our first stop for accessing nature throughout the year. The Park's accessible and scenic location also makes it a popular seasonal destination for fishing and overnight camping. At the same time, its pristine mountain location allows people to experience nature in peace and solitude throughout the year. My family and I regularly enjoy watching the resident bald eagles snatch fish from the lake against a backdrop of stunning views. Even in the busier summer months, we can visit Morgan Lake Park around sunset to enjoy the birdlife and trees set against spectacular skies, while listening to the "sounds of stillness".

The proposed B2H project would forever ruin the Morgan Lake experience. It would degrade our quality of life, and would also have an adverse economic impact on our community. Morgan Lake is featured prominently in city and county tourism marketing, and it helps attract people to live and work in this community. It was a key selling point from my prospective employer when I moved here nearly 20 years ago. Now, when recruiting new employees, I also make sure to "seal the deal" by driving them up to Morgan Lake to experience the sights and sounds

first hand. I can only imagine their disappointment on seeing the Park if the B2H project were to go ahead.

I previously commented on the detrimental impacts of the Morgan Lake Alternative on the recreational, scenic, and economic value of Morgan Lake to the local community by letter on August 21, 2019. Outlined below are specific issues as to why I am dissatisfied with the Proposed Order's decision:

ISSUE 1: As the reference for its visual assessments, the applicant fails to use the updated USFS document, "Landscape Aesthetic, Scenic Management System" by Jack Ward Thomas. (The reference cited in applicant's Application for Site Certificate (ASC) 2018 and Department's Proposed Order (DPO) 2020 is the VMS (1974) which was replaced by "Landscape Aesthetic, Scenic Management System" (SMS) in 1995).

The 1995 SMS publication focuses on the importance of viewer's experience, perceptions, and feelings about the scenery in places they value. These issues are not addressed in the 1974 Handbook, and they were not assessed in Idaho Power's ASC or in the DPO.

The visual impact assessment in Exhibit R, and IPC's conclusions whether the project will result in a significant visual impact <u>*is based entirely on impact assessment methodologies used by the BLM and USFS*</u>*.* [1] *Although EFSC rules do not mandate a particular visual assessment methodology (only that it be described in detail), the basis of the EFSC findings pertaining to IPC's compliance with the Scenic Resource Standard (and the findings related to protected areas and recreation areas) is whether the facility will have a "significant adverse impact" after taking into account mitigation (see OAR 345-022-0080).*

Since applicant and DOE use the USFS criteria for visual assessment, they must use <u>valid</u> USFS criteria. This material error invalidates applicant's visual assessments of the Protected Areas, Scenic Resources and Important Recreational Opportunities in the Proposed Order. DOE and EFSC should require applicant to reassess all the areas in question.

ISSUE 2: In my previous written comments (August 21, 2019) I stated the concern that the project would undermine the original management plan of the park: "…a goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation and limited visibility of users…"
This concern has not been adequately addressed.

In describing Morgan Lake Park, the DPO states *"The landscape character is natural appearing. Scenic integrity is high as the human developments are harmonious with the landscape."*

However, Idaho Power claims: "*Morgan Lake Park is not analyzed under the Scenic Resources Standard because it is not identified as an important or significant scenic resource or value in a* <u>*local*</u>*, tribal, or federal land use plan".*

This claim relies on narrow legalistic definitions of "scenic". As I have outlined earlier in this letter, Morgan Lake by common definition and understanding is an incredibly scenic location.

The scenic value of Morgan Lake Park was subsequently recognized: "*Council has changed analysis of low resource change to high resource change because the landscape character and scenic attractiveness of the park will be reduced … vegetation will provide no or limited screening … visual contrasts will be strong, proposed facility will be dominant …,*

However, the mitigation proposed by Idaho Power is woefully inadequate, and in fact appropriate mitigation is simply not possible. Visitors' negative reaction to 180 ft transmission towers dominating the skyline of the park is not mitigated by making the towers shorter. The experience of camping, hiking, fishing and nature study in a park surrounded by highly visible 130 ft towers is not the experience of a park preserved for its scenic and natural setting. Nor, were visitors to the Park intended to suffer the crackling corona noise from high voltage electrical cables. The Park's remote natural areas will in no way benefit from the improved toilet facilities and signage that Idaho Power has inappropriately agreed to purchase for the park as a trade-off for protecting the city's viewshed.

I also object to the Council's assessment that there will be "no significant impact on recreation," even though the Morgan Lake Park plan specifically defines recreation as "fishing, bird watching, nature study and boating"– all activities enhanced by the Park's "rare, irreplaceable" unspoiled natural setting.

In conclusion, it is incumbent on the Council to require a complete, relevant and appropriate documentation of the conclusions presented in Idaho Power's application, and a complete and accurate objective assessment of the impact of the proposed B2H transmission line on Morgan Lake Park. Until that information is provided, Applicant's Site Certificate should be denied.

Sincerely

Colin Andrew

TARDAEWETHER Kellen * ODOE

From: Kathryn Andrew <lkathrynandrew@gmail.com>
Sent: Thursday, August 27, 2020 10:38 AM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE; info@stopb2h.org
Subject: CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE
Attachments: standing letter final.docx

Dear Ms. Greene-Webster:

Please accept the attached letter as request to contest the proposed site certificate for above referenced project.

Kathryn Andrew

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED_OAH_Referral@oregon.gov
also send copies to: kellen.tardaewether@oregon.gov **and** info@Stopb2h.org

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

My name is Kathryn Andrew. I live at 95 Oak Street in La Grande, Oregon. I request to file as a party. I live nearby to the route and my economic, recreational, spiritual and health interests would be significantly and negatively impacted by construction of the B2H line. Our family regularly enjoys the scenic beauty and sounds of nature at Morgan Lake. I also exercise in the wilderness near to the proposed route most days. My regular enjoyment of the beauty and sounds of nature by my home is the main reason I have chosen to live in La Grande and are a pillar in the care of my mental, spiritual and physical health. I have also worked for my father who was a land appraiser. I understand the economic factors that influence land value and the value that undisturbed scenic nature adds to land. The beauty of our landscape is a major economic resource for our city and the Grande Ronde Valley. The B2H line would forever diminish this resource and change character of our valley for the worse. I am the best person to represent these interests. These impacts are also suffered by the public.

Issue #1:
Misrepresentation of Loss of Forest Land:

The percentage calculation errors which misrepresent the portion of forestland taken in Umatilla and Union County is still present in the revised PO on page 251. This math error, which gravely underestimates the amount of potentially impacted forestland, was addressed in my comment letter sent August 19th, 2019:

"Idaho Power was speaking to the significance of the B2H's impact on forest lands in section 7.0, Attachment K-2 of Exhibit K, the Right-of-Way Clearing Assessment when they calculated percentage of total forest land acreage taken in Umatilla and Union Counties. In Section 7.0, Idaho Power states that Union County has 889,000 acres of forestland, 530.1 acres of which they propose to obtain to build the transmission line. They calculate the percentage of this taking as .00059 percent when the percentage is actually .059. The acreage proposed to be taken in Umatilla County is also misrepresented, given as .0034 when it is actually .034 percent. These mistakes are a clear misrepresentation of the significance of impact to forest lands and their inclusion in summary information puts in question the reliability of information given by Idaho Power in their EFSC application."

Issue #2:
Loss of Recreational Opportunities

The loss of recreational opportunities afforded by forestlands has not been adequately addressed in the PO. Statewide Land Use Goal #4 includes the intention of forestlands to "provide for recreational opportunities". The loss of forestland at Morgan Lake to the buzzing high voltage towers planned to transverse the park would be in direct violation of the intention of Goal #4. Mitigation of $100,000 (page 243) to build toilets, an access road, gate and signs does nothing to address the impact of buzzing towers for citizens that go to Morgan Lake to watch birds, fish and enjoy the sounds and beauty of the outdoors and spiritual solace that the

park gives us. In addition, potential impacts to recreation opportunities in beloved Wallowa Whitman National Forest by the B2H Line have not been considered.

Issue #3:
Misrepresentation of Forestland Acreage:
Other factors important in the definition of forested lands have not been considered in the PO including: 1) lands composed of existing and potential forest lands which are suitable for commercial forest uses; 2) other forested lands needed for watershed protection, wildlife and fisheries habitat and recreation; 3) lands where extreme conditions of climate, soil and topography require the maintenance of vegetative cover irrespective of use; 4) other forested lands in urban and agricultural areas which provide urban buffers, wind breaks, wildlife, and fisheries habitat, livestock habitat, scenic corridors and recreation use; 5) means any woodland, brushland, timberland, grazing land or clearing that, during any time of the year, contains enough forest growth, slashing or vegetation to constitute, in the judgment of the state forester, a fire hazard, regardless of how the land is zoned or taxed. All of these Considering this, subtracting acreage from being counted as "forest land" because of current use is not in compliance with statutes.

Issue #4:
Unmitigated Future Loss of Timber Harvest
Financial loss from future timber harvest on forestlands was calculated to be $21.3 million for Union County and $9.5 million for Umatilla County on page 239 of the PO. Although this loss was calculated there is no means proposed in the PO to mitigate this loss. A loss of this magnitude has significant economic impacts for residents of Union County and mitigated in an accountable way.

In summary, I request to contest this case based on the under representation of the impact the Boardman to Hemingway Transmission Line would have on forestlands. This impact is in direct violation of the intention of Statewide Land Use Goal #4. Forestland is under represented through incorrect mathematical calculation of percentages, and through a noncomprehensive inventory of forestlands. This under representation is compounded by the fact that forestlands not currently considered to be used as forest have been subtracted from inventoried acreages in violation of accepted definitions of forestlands. Loss of recreational opportunities in forestlands have not been adequately identified or mitigated, and calculated future financial losses from timber harvests have no enforced mitigation. Until these issues have been adequately addressed, all impacts have not been considered or mitigated. Thank you for your consideration of my request.

Sincerely,

Kathryn Andrew

TARDAEWETHER Kellen * ODOE

From: Karen Antell <kantell@eou.edu>
Sent: Thursday, August 27, 2020 10:47 AM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE; Christopher Burford
Subject: [Fortimail Spam Detected] B2H Contested Case Request Eastern Oregon University
Attachments: B2H Contested Case Request Eastern Oregon University.docx; B2H Contested Case Request Eastern Oregon University.docx.pdf

We are submitting this Contested Case Request regarding the proposed site certificate for the Boardman to Hemingway Transmission Line on behalf of Eastern Oregon University.

Should you have any questions, please contact Christpher Burford, General Counsel and Board Secretary, Eastern Oregon University:

Christopher Burford, General Counsel/Board Secretary
Office of the President, Eastern Oregon University
541-962-4101
cburford@eou.edu

Sincerely,

Dr. Karen Antell
Professor of Biology
Rebarrow Research Forest Advisory Board
kantell@eou.edu

Attached: B2H Contested Case Request Eastern Oregon University

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED_OAH_Referral@oregon.gov ; kellen.tardaewether@oregon.gov

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

a. My name and address:

Dr. Karen Antell, Professor of Biology
Eastern Oregon University, Science Office
One University Blvd.
La Grande, OR 97850

b. Attorney name and address (if you have one--otherwise state you are not represented by an attorney)

Christopher Burford, General Council and Board Secretary
Office of the President

MAIL: Eastern Oregon University
One University Blvd.
La Grande, OR 97850
EMAIL: cburford@eou.edu
TELEPHONE: 541-962-4101

c. Requesting to file as a "party" or "limited party" :

We are requesting to file as a "party".

d. What is your interest and how will it be affected?

I have served as Chair of Eastern Oregon University's Rebarrow Research Forest Advisory Board for many years. Eastern Oregon University owns 360 acres of property on Glass Hill within close proximity to the proposed B2H route. This property is designated as the Rebarrow Research Forest and has been used for university education and research, and for community education outreach since its acquisition over 20 years ago.

Adverse impacts of line construction and operation will significantly decrease the educational and research values of the property. Movement of wildlife throughout the area currently is enhanced by low human and livestock presence in and around the Rebarrow Forest. The forest and adjacent natural areas, especially Winn Meadow, together comprise a very important wildlife corridor from higher elevation summer range down to winter forage in the Grande Ronde Valley. Construction and operation of a powerline of the magnitude of the proposed B2H project will render the Rebarrow Research Forest and surrounding natural lands virtually worthless, both to the university and to the wildlife and other native species that future students may wish to study.

e. If it is a public interest, how will it be affected?

Eastern Oregon University is the only 4-year public university serving the eastern two-thirds of the state of Oregon. EOU's service area is primarily rural, and is heavily dependent upon maintaining healthy natural ecosystems. Our students expect to receive an education that prepares them for careers in rural Oregon. The EOU Biology Program also serves as a resource for many agencies, schools, and individuals within our regional communities. The Rebarrow Research Forest has provided research and educational opportunities that help prepare students for productive careers in fields such as Fisheries Biology, Forest Management, Rangeland Management, and both Primary and Secondary Education throughout the 10 counties of Eastern Oregon.

f. Can others represent your issue(s) or do you need to represent them yourself?

A designated representative of Eastern Oregon University other than myself can represent EOU's issues.

g. A short statement of your issue and why you are requesting a contested case.

I have several concerns regarding the following three sections of the Proposed Order:

IV.H. Fish and Wildlife Habitat: OAR 345-022-0060, p. 305
IV.I. Threatened and Endangered Species: OAR 345-022-0070, p. 367
IV.E. Land Use: OAR 345-022-0030, p. 103 and IV.E.4 Goal 4 Exception, p. 246

Fish and Wildlife Habitat:

My Concerns:

The Proposed Order confirms that of all of the routes considered, the selected route puts Fish and Wildlife Habitat at high risk of both temporary and permanent impact. The Proposed Order clearly does not provide sufficient protections for current or future fish and wildlife populations on Glass Mountain (Hill) in Union County.

The Proposed Order acknowledges explicitly that out of all of the routes under consideration, the Proposed Route "represents the greatest permanent and temporary habitat impacts" to Fish and Wildlife Habitat (p. 317, lines 25-26). **This represents a complete failure of the EFSC process to ensure that the best interests of all Oregonians and the natural environment are being protected in the site selection process.** The enormous estimated impact to Fish and Wildlife Habitat alone should disqualify this project from being permitted by the EFSC in Oregon.

The process used for determination of numbers of acres designated for mitigation is based on long-standing erroneous ideas about the effectiveness of mitigation, that

have become codified in Oregon statutes. Protecting or enhancing habitat someplace else confers no benefit to the area in which the disturbance is taking place. Because of its geology and geography, Glass Mountain (Hill) in Union County supports unique and irreplaceable biological environments that cannot simply be recreated someplace else, rendering mitigation virtually useless in this case.

The Proposed Order states the following:

"As presented in Table FW-1, Estimated Temporary and Permanent Habitat Impacts and Proposed Mitigation–Proposed Route, the proposed facility would temporarily disturb approximately 2,123, ~~948~~345, 165 and 329 acres of Category 2, 3, 4 and 5 habitat, respectively, resulting in temporary and temporal habitat impacts. The proposed facility would permanently disturb approximately 883, 489, 26 and 43 acres of Category 2, 3,4 and 5 habitat, respectively. **While the applicant requests Council approval of the proposed and four alternative route segments, the proposed route represents the greatest permanent and temporary habitat impacts."** (Proposed Order, p. 317, lines 19-26)

Threatened and Endangered Species:

My Concerns:

The Plan does not include consideration of the following: 1) compounding impacts on Threatened and Endangered species due to climate change; 2) there is no provision for continued species monitoring; and 3) no surveys were conducted for many important groups of species, such as invertebrates, non-vascular plants, and fungi.

The B2H construction and operation plans consider only the immediate impact to species that currently are state or federally listed. The plan does not include a discussion of expected long-term impacts due to climate change, or due to expansion of invasive species into the disturbed project areas.

It is naive to expect that populations already under duress due to warmer, drier climate and increased pressure from competition of invasive species, will survive the additional impacts of construction and operation of this powerline.

Also, there is no provision within the plan for continued monitoring and subsequent mitigation for populations that decline after project construction.

Surveys for invertebrate animal species, non-vascular plants and fungi were not conducted. Biodiversity on the private lands of Glass Mountain (Hill) remains largely undocumented, especially for invertebrate animals, non-vascular plants, and fungi. Absence of these species from ODFW, ODA and federal lists should not exclude them from consideration of protection in high impact, permitted projects such as the B2H powerline.

The Proposed Order states the following: "The Threatened and Endangered Species standard requires the Council to find that the design, construction, and operation of

the proposed facility is not likely to cause a significant reduction in the likelihood of survival or recovery of a *fish, wildlife, or plant species* listed as threatened or endangered by Oregon Department of Fish and Wildlife (ODFW) or Oregon Department of Agriculture (ODA)." (p. 375, lines 3-7).

These documents from ODFW and ODA recognize only vertebrate animals and vascular plants, which represent only a small percentage of total biodiversity in any given area. There are vastly more species of invertebrates and fungi than vertebrates and vascular plants combined. Because the state of Oregon has a program tasked with identifying and ranking these species groups for protected status, there is no good reason why these species should be excluded in the process of issuing a site certificate.

Invertebrate and non-vascular plant sensitive species are listed by the Oregon Biodiversity Information Center at the Institute for Natural Resources at Portland State University. https://inr.oregonstate.edu/sites/inr.oregonstate.edu/files/2019-rte-book.pdf. This list includes invertebrate animals, mosses, lichens, and fungi. For example, several species of Bumblebees are listed for Union County (*Bombus ferridus, Bombus occidentalis occidentalis, Bombus suckleyi*).

Statewide Planning Goal 4, Forest Lands

My Concern:

The B2H powerline project is in direct conflict with the intent of Oregon's Statewide Planning Goal 4, protecting Forest Lands.

The Proposed Order states that: "The third reason relied upon to support the request for a Goal 4 exception is that the proposed facility components outside of the 300-foot right-of-way would result in minimal impacts to forest lands" (p. 249 lines 34-36).

This is a false statement. In fact, virtually the entire section of the proposed route, including access roads, through Union County will have significant impact on forest lands.

The Proposed Order states that the proposed facility represents a conditional use "authorized under (4)(q) of the rule". While construction of the B2H powerline might meet carefully worded legal criteria for a conditional permit, it does not meet a commonsense interpretation of the stated purpose of Goal 4, which has as its intended purpose the conservation of forestlands for the benefit of all Oregonians. A powerline of this magnitude represents a significant disruption to the public enjoyment of Oregon's protected Forest Lands.

h. State *when* in your written or verbal comments you brought up this concern (date of letter or testimony at hearing)

I brought these concerns to the attention of the Energy Facilities Siting Council, on behalf of Eastern Oregon University, in a letter to the EFSC, Dated 19 August 2019.

ANY OTHER INFORMATION YOU WANT TO ADD:

TARDAEWETHER Kellen * ODOE

From: Alisha Till <alisha@mrg-law.com>
Sent: Thursday, August 27, 2020 4:20 PM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Cc: Jocelyn Pease; Lisa Rackner
Subject: B2H - Applicant's Petition Identifying Contested Case Issues
Attachments: Applicant's Petition Identifying Contested Case Issues.pdf; Applicant's Attachment 1 to Petition.pdf

Attached for filing in the proposed Boardman to Hemingway Transmission Line matter, is the Applicant's Petition Identifying Contested Case Issues.

Please contact this office with any questions.

Alisha Till
Paralegal
McDowell Rackner Gibson PC
419 SW 11th Ave, Suite 400 Portland, OR 97205
Direct: 503-290-3628 | Fax: 503-595-3928
Website: www.mrg-law.com | Email: alisha@mrg-law.com

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BEFORE THE ENERGY FACILITY SITING COUNCIL

OF THE STATE OF OREGON

In the Matter of the Application for Site Certificate for the BOARDMAN TO HEMINGWAY TRANSMISSION LINE	APPLICANT IDAHO POWER COMPANY'S PETITION IDENTIFYING CONTESTED CASE ISSUES

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1 **I. INTRODUCTION**

2 In accordance with OAR 345-015-0230(4) and the Notice of Proposed Order ("Notice")
3 issued by the Oregon Department of Energy ("ODOE") in the above-referenced proceeding on
4 July 2, 2020, as modified by the Extension of Deadline to Request Party Status in Contested Case
5 issued on July 24, 2020, Idaho Power Company ("Idaho Power" or "Applicant"), submits this
6 Petition Identifying Contested Case Issues ("Petition"). Pursuant to ORS 469.370(5), the
7 Applicant is automatically granted party status, and as such, intends to participate in the contested
8 case to address any and all issues raised by other parties and limited parties. Although Applicant
9 is automatically granted party status, Idaho Power also sets forth the required information for a
10 petition for party status in accordance with OAR 137-003-0005(3). In addition, Idaho Power
11 wishes to raise several issues of its own in the contested case, as set forth below.

12 **II. OAR 137-003-0005(3)**

13 In accordance with OAR 137-003-0005(3), Applicant provides the following information:

14 **(a) Names and addresses of the petitioner and of any organization the petitioner**
15 **represents;**

Joseph Stippel
Idaho Power Company
1221 West Idaho Street
Boise, Idaho 83702
JStippel@idahopower.com

16 **(b) Name and address of the petitioner's attorney, if any;**

Lisa Rackner
Jocelyn Pease
McDowell Rackner Gibson PC
419 SW 11th Ave, Suite 400
Portland, OR 97205
lisa@mrg-law.com
jocelyn@mrg-law.com

David Stanish
Idaho Power Company
1221 West Idaho Street
Boise, Idaho 83702
DStanish@idahopower.com

(c) A statement of whether the request is for participation as a party or a limited party, and, if as a limited party, the precise area or areas in which participation is sought;

In accordance with ORS 469.370(5), Applicant is automatically a party to the contested case. Applicant intends to participate as a party, and because Applicant has the burden of proof in this case, Applicant intends to address all issues raised by other parties or limited parties.

(d) If the petitioner seeks to protect a personal interest in the outcome of the agency's proceeding, a detailed statement of the petitioner's interest, economic or otherwise, and how such interest may be affected by the results of the proceeding;

The Applicant's interest is in permitting and constructing the Boardman to Hemingway Transmission Line Project ("B2H Project"), which will be directly impacted by the outcome of this proceeding.

(e) If the petitioner seeks to represent a public interest in the results of the proceeding, a detailed statement of such public interest, the manner in which such public interest will be affected by the results of the proceeding, and the petitioner's qualifications to represent such public interest;

Not applicable.

(f) A statement of the reasons why existing parties to the proceeding cannot adequately represent the interest identified in subsection (3)(d) or (e) of this rule.

The Applicant has the burden of proof in this case, and accordingly is in the best position to represent its interests in this proceeding.

III. APPLICANT'S PROPOSED CONTESTED CASE ISSUES

In accordance with ORS 469.370(5), "[i]ssues that may be the basis for a contested case shall be limited to those raised on the record of the public hearing" unless "[t]he action recommended in the proposed order, including any recommended conditions of the approval, differs materially from that described in the draft proposed order, in which case only new issues

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related to such differences may be raised." Thus, in order to be included in the contested case, an issue must have been raised on the record of the Draft Proposed Order ("DPO") or relate to a new issue or new condition language in the Proposed Order. For contested case issues raised on the record of the DPO, EFSC rules further provide that the issue must be within the jurisdiction of the Council, the petitioner must have raised the issue in person or in writing on the record of the public hearing on the Draft Proposed Order, and the issue must have been presented "with sufficient specificity to afford the decision maker an opportunity to respond to the issue."[1] To have raised an issue with sufficient specificity, the person must have presented facts at the public hearing that support the person's position on the issue.[2]

A. Land Use – Clarification that Court Has Jurisdiction to Determine Compensation for Loss of Land and Timber Production.

In the Proposed Order, ODOE included new discussion regarding compensation for impacts to timber lands at page 235 as follows:

> In addition, the applicant would compensate underlying landowners for the loss of land and timber production opportunity, for the life of the facility, based on a certified appraisal of the land value. Compensation would be implemented via private easement agreement or through negotiated settlement. Because this would occur during landowner negotiation or condemnation proceedings under the Oregon Public Utilities Commission, it is not specifically imposed as a site certificate condition or mitigation plan requirement. The Department recommends, however, that Council consider these processes, which would be outside of EFSC jurisdiction, to also provide mitigation consistent with OAR 345-010-0010(33) and would reduce potential impacts to accepted forest practices.

While ODOE is correct that compensation for the loss of land and timber production would occur outside the EFSC process, this discussion incorrectly states that compensation would occur "as part of the condemnation proceedings under the Oregon Public Utilities Commission." In accordance with ORS 758.015, the Public Utility Commission of Oregon ("OPUC") has authority to issue a certificate of public convenience and necessity for a transmission line, which is

[1] OAR 345-015-0016(3).
[2] OAR 345-015-0016(3).

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prerequisite to initiating condemnation. However, the OPUC *does not* have authority to determine compensation for the loss of land or timber impacts. Instead, the compensation for the loss of land and timber production would occur either through right-of-way negotiations between the Applicant and the landowner, or through condemnation proceedings before a local court. Idaho Power proposes that the above-referenced discussion should be modified accordingly (Idaho Power's edits are shown in blue):

> In addition, the applicant would compensate underlying landowners for the loss of land and timber production opportunity, for the life of the facility, based on a certified appraisal of the land value. Compensation would be implemented via private easement agreement or through negotiated settlement. Because this would occur during landowner negotiation or condemnation proceedings ~~under the Oregon Public Utilities Commission~~ initiated in a local court, it is not specifically imposed as a site certificate condition or mitigation plan requirement. The Department recommends, however, that Council consider these processes, which would be outside of EFSC jurisdiction, to also provide mitigation consistent with OAR 345-010-0010(33) and would reduce potential impacts to accepted forest practices.

B. Land Use – High Value Farmland Consultation.

In Idaho Power's Comments on the DPO, Idaho Power had proposed that ODOE include analysis and a recommended condition to address compliance with ORS 215.276, which requires a utility to consult with a landowner regarding siting a transmission line on high value farmlands.[3] Idaho Power explained that its compliance approach is to consult with *all landowners* regarding micrositing of the project within the site boundary, which will necessarily include landowners of high-value farmland.[4] In its DPO Comments, Idaho Power proposed the following condition to address this issue:

[3] See Attachment 4: DPO Comment, Applicant Responses, Department Response in Proposed Order Crosswalk Tables at PDF page 23 (B2HAPP DPO Applicant DPO Comments – ODOE Comments at 20).
[4] See Attachment 4: DPO Comment, Applicant Responses, Department Response in Proposed Order Crosswalk Tables at PDF page 23 (B2HAPP DPO Applicant DPO Comments – ODOE Comments at 20).

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Recommended Land Use Condition ##: Prior to construction, the certificate holder shall consult with all landowners, including landowners of high-value farmland, regarding micrositing of the project.[5]

In the Proposed Order, page 226-227 and Attachment K-1, Agricultural Land Assessment, page 36, ODOE included new discussion and new condition language regarding landowner consultation for high value farmlands in accordance with ORS 215.276. Idaho Power agrees with the new discussion regarding landowner consultation in accordance with ORS 215.276, which is consistent with the recommendations in Idaho Power's DPO Comments. However, ODOE included new proposed condition language providing that Idaho Power must identify and track the record owners of high value farmland, as well as Idaho Power's efforts to communicate with the record owners:

- Prior to construction, the applicant shall provide notification to the record owner of any agricultural lands containing high-value farmland, as defined in ORS 195.300(10), of the opportunity to consult with IPC for the purpose of locating and constructing the transmission line in a manner that minimizes impacts to high-value farmland farming operations.
    - The initial notification to the record owner shall allow two weeks to respond to the opportunity to consult with applicant. If the record owner does not respond to applicant within two weeks of the initial notification, applicant shall provide a second notification of the opportunity to consult with applicant via certified mail. If the record owner does not respond within two weeks of the second notification, applicant will have satisfied its obligation to consult pursuant to ORS 215.276(2).
    - Applicant shall establish the notification list using georeferenced maps containing property owner taxlot information, obtained from the most recent county tax assessor roll, and ORS 195.300(10) high value farmland as mapped based on available state and local data sources.
    - Applicant shall maintain the georeferenced map and notification list, including a list of record owners that completed consultation and record owners that failed to respond.[6]

[5] See Attachment 4: DPO Comment, Applicant Responses, Department Response in Proposed Order Crosswalk Tables at PDF page 23 (B2HAPP DPO Applicant DPO Comments – ODOE Comments at 20).
[6] Attachment K-1, Agricultural Land Assessment, Page 36.

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Based on Idaho Power's prior consultation with the Department of Land Conservation and Development, Idaho Power understands that there is no single statewide database for spatial information regarding high value farmland. Instead, identifying all high value farmland within the site boundary would require an extensive and complicated GIS analysis.

Because Idaho Power ultimately proposes to consult with *all* landowners and not just landowners of high value farmland, Idaho Power will achieve the required consultation in accordance with ORS 215.276 without needing to perform the burdensome GIS analysis contemplated in ODOE's proposed condition. Idaho Power proposes that this condition language should be modified as follows (Idaho Power's edits are shown in blue):

- Prior to construction, applicant shall provide notification to the record owner of any ~~agricultural lands containing high value farmland, as defined in ORS 195.300(10),~~ land within the site boundary of the opportunity to consult with IPC for the purpose of locating and constructing the transmission line in a manner that minimizes impacts to ~~high value farmland~~ farming operations or other operations or land uses for non-agricultural lands.
    - The initial notification to the record owner shall allow two weeks to respond to the opportunity to consult with applicant. If the record owner does not respond to applicant within two weeks of the initial notification, applicant shall provide a second notification of the opportunity to consult with applicant via certified mail. If the record owner does not respond within two weeks of the second notification, applicant will have satisfied its obligation to consult pursuant to ORS 215.276(2).
    - Applicant shall establish the notification list using georeferenced maps containing property owner taxlot information, obtained from the most recent county tax assessor roll~~, and ORS 195.300(10) high value farmland as mapped based on available state and local data sources~~.
    - Applicant shall maintain the georeferenced map and notification list, including a list of record owners that completed consultation and record owners that failed to respond.

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C. Fish and Wildlife Condition 12, 14, 15, and 16 – Protocol-Level Wildlife Surveys.

In the Proposed Order at pages 339, 347, and 348, ODOE made several revisions to the biological survey conditions set forth in Fish and Wildlife Conditions 12, 15, and 16. Relevant excerpts of Fish and Wildlife Conditions 12, 14, 15, and 16 are set forth below.

> **Fish and Wildlife Condition 12:** During construction, if active pygmy rabbit colonies or the roost of a State Sensitive bat species is observed during the biological surveys set forth in Fish and Wildlife Condition~~s 14, 15 and~~ 16, the certificate holder shall submit to the Department for its approval a notification addressing the following:
> a. Identification of the State Sensitive bat species observed;
> b. Location of pygmy rabbit colony or bat roost; and
> c. Any actions the certificate holder will take to avoid, minimize, or mitigate impacts to pygmy rabbit colony or bat roost.
> d. The Department in consultation with the Oregon Department of Fish and Wildlife (ODFW) will review and approve the proposed avoidance, minimization, or mitigation measures prior to the action by the certificate holder to impact State Sensitive bat species roosts or hibernacula.

> **Fish and Wildlife Condition 14:** During construction, the certificate holder shall not conduct ground-disturbing activities within the following timeframes and spatial buffers surrounding occupied nests of certain raptor species. Upon request by the certificate holder, the Department in consultation with ODFW may provide exceptions to this restriction. The certificate holder's request must include a justification for the request, including any actions the certificate holder will take to avoid, minimize, or mitigate impacts to the raptor and its nest.

Raptor Nest Buffers		
Nesting Species	Spatial Buffers (radius around nest site):	Temporal Restrictions
Bald eagle	0.5 mile	January 1 to August 15
Golden eagle	0.5 mile	February 1 to August 15
Ferruginous hawk	0.50 mile	March 15 to August 15
Flammulated owl	0.25 mile	March 1 to August 15
Great gray owl	0.25 mile	March 1 to August 15
Northern goshawk	0.5 mile	May 1 to August 15
Peregrine falcon	0.25 mile	January 1 to July 1
Prairie falcon	0.25 mile	March 15 to July 1
Red-tailed hawk	300 to 500 feet	March 1 to August 15
Swainson's hawk	0.25 mile	April 1 to August 15
Western burrowing owl	0.25 mile	April 1 to August 15

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Fish and Wildlife Condition 15: Prior to construction of a phase or segment of the facility, the certificate holder shall conduct, as applicable, the following biological surveys on those portions of the site boundary that have not been surveyed at the time of issuance of the site certificate, based on the survey protocols included in ASC Exhibit P Attachment P1-2 Revised Final Biological Survey Work Plan, unless otherwise approved by the Department in consultation with ODFW:

a. Northern Goshawk;
b. American Three-Toed Woodpecker;
c. Great Gray Owl;
d. Flammulated Owl;
e. Terrestrial Visual Encounter Surveys;
f. Wetlands; and
g. Fish Presence and Crossing Assessment Surveys.

Fish and Wildlife Condition 16: Prior to construction of a phase or segment of the facility, the certificate holder shall conduct, as applicable, the following biological surveys on all portions of the site boundary, regardless of whether those portions have been surveyed at the time of issuance of the site certificate, based on the survey protocols included in ASC Exhibit P Attachment P1-2 Revised Final Biological Survey Work Plan, unless otherwise approved by the Department in consultation with ODFW:

a. Washington ground squirrels;
b. Raptor nests;
c. Pygmy rabbits;
~~e.~~d. State Sensitive bat species;
~~d.~~e. State-listed Threatened and Endangered plants (in areas of known or anticipated occurrences)

1. Fish and Wildlife Conditions 12 and 16 – State-Sensitive Bat Surveys.

ODOE added State Sensitive Bat Species to the list of survey requirements in Condition 16, which provides for protocol-level surveys. However, Idaho Power believes this change is in error.

First, protocol-level State Sensitive bat surveys are not appropriate or necessary for the B2H Project. Protocol-level bat surveys are time and resource intensive, and typically require using bat detectors to identify bat species by their calls and/or performing nighttime emergence surveys to detect trees/cliffs from which a large number of bats emerge during dusk hours. To perform an inventory of bat usage along the length of the B2H Project route may require dozens of bat detectors running for the better part of a year to identify resident and migratory bat usage or similarly dozens of nighttime emergence survey stations. As an alternative to protocol-level

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surveys for State Sensitive bat species, Idaho Power would track bat roosts and hibernacula identified incidentally to the other biological surveys being conducted along the project and apply the reporting, avoidance, minimization, and mitigation measures described in Fish and Wildlife Condition 12 to any such identified roosts and hibernacula.

Second, no commenters, including ODFW, argued in their DPO comments that Idaho Power's survey approach to State Sensitive bat surveys was insufficient or that Idaho Power should conduct protocol-level surveys for those species.

Accordingly, Idaho Power requests the following change to Fish and Wildlife Condition 16 (Idaho Power's edits are shown in blue):

> **Fish and Wildlife Condition 16:** Prior to construction of a phase or segment of the facility, the certificate holder shall conduct, as applicable, the following biological surveys on all portions of the site boundary, regardless of whether those portions have been surveyed at the time of issuance of the site certificate, based on the survey protocols included in ASC Exhibit P Attachment P1-2 Revised Final Biological Survey Work Plan, unless otherwise approved by the Department in consultation with ODFW:
> a. Washington ground squirrels;
> b. Raptor nests;
> c. Pygmy rabbits;
> ~~e.d. State Sensitive bat species;~~
> d.~~d.e~~. State-listed Threatened and Endangered plants (in areas of known or anticipated occurrences)

2. Fish and Wildlife Condition 12 – Cross References to Fish and Wildlife Conditions 14 and 15

ODOE revised Fish and Wildlife Condition 12 to remove the cross-references to Fish and Wildlife Conditions 14 and 15, which Idaho Power believes is in error. The intent of that condition is, and has been, to recognize that Idaho Power would identify bat roosts and hibernacula observed incidental to the other biological surveys (including those listed in Fish and Wildlife Conditions 14 and 15) and not just the surveys in Fish and Wildlife Condition 16.

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To implement these recommendations, Idaho Power proposes the following revisions to Fish and Wildlife Conditions 12 and 16 (Idaho Power's edits are shown in blue):

> **Fish and Wildlife Condition 12:** During construction, if active pygmy rabbit colonies or the roost of a State Sensitive bat species is observed during the biological surveys set forth in Fish and Wildlife Conditions 14, 15 and ~~s 14, 15 and~~ 16, the certificate holder shall submit to the Department for its approval a notification addressing the following:
> a. Identification of the State Sensitive bat species observed;
> b. Location of pygmy rabbit colony or bat roost; and
> c. Any actions the certificate holder will take to avoid, minimize, or mitigate impacts to pygmy rabbit colony or bat roost.
> d. The Department in consultation with the Oregon Department of Fish and Wildlife (ODFW) will review and approve the proposed avoidance, minimization, or mitigation measures prior to the action by the certificate holder to impact State Sensitive bat species roosts or hibernacula.

D. Fish and Wildlife Condition 17 – Traffic Assumptions Associated with Access Control.

ODOE revised Fish and Wildlife Condition 17 regarding indirect impacts to sage-grouse habitat associated with access roads. The relevant portions of Fish and Wildlife Condition 17 are set forth below:

> **Fish and Wildlife Condition 17:** At least 90 days prior to construction of a facility phase or component in sage-grouse habitat as mapped by The Oregon Department of Fish and Wildlife (ODFW) at that time, unless otherwise agreed to by the Department, the certificate holder shall finalize, and submit to the Department for its approval, in consultation with ODFW, a final Sage-Grouse Habitat Mitigation Plan for the phase or segment to be constructed.
> . . .
> b. The final Sage-Grouse Habitat Mitigation Plan shall address the potential sage-grouse habitat impacts through mitigation banking, an in-lieu fee program, development of mitigation projects by the certificate holder, or a combination of the same.
>
> . . .
> iii. The final Sage-Grouse Habitat Mitigation Plan shall include compensatory mitigation sufficient to address direct impacts from, at a minimum, all facility components except indirect impacts from existing access roads substantially modified for the facility (related or supporting facilities). For calculation purposes, new facility roads without access control will be assigned a "no-traffic" designation, and new roads with access control will be assigned a "low-traffic"

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designation. As referenced in Fish and Wildlife Condition 19, the certificate holder shall demonstrate during or about the third year of operation that sage-grouse habitat mitigation shall be commensurate with the final compensatory mitigation calculations~~, which will be based on the as- constructed facility and will include indirect impacts from access roads~~, either by showing the already-implemented mitigation is sufficient to cover all facility component impacts, or by proposing additional mitigation to address any ~~uncovered~~ impacts incremental to the initial calculation. The final compensatory mitigation calculations must be based on the as-constructed facility as well as the pre- and post- construction traffic studies, and must include the addition of indirect impacts from substantially modified existing access roads.

. . .

In response to comments raised by ODFW, Idaho Power proposed revisions to this condition to clarify how access control will inform the calculation of indirect impacts from roads.[7] However, the traffic assumptions assigned to new roads appears to be wrong. ODOE's revised condition language provides that new roads without access control would be assumed "no traffic," while new roads with access control would be assumed "low traffic." Consistent with Idaho Power's comments, it should be the other way around: If the new roads are gated and limiting access, the assumption should be that there is no traffic. If the new roads are not gated and left open, the assumption should be that there is low traffic. This appears be a transcription error that should be corrected. Idaho Power proposes the following corrections to address this issue (Idaho Power's edits are shown in blue):

Fish and Wildlife Condition 17: At least 90 days prior to construction of a facility phase or component in sage-grouse habitat as mapped by The Oregon Department of Fish and Wildlife (ODFW) at that time, unless otherwise agreed to by the Department, the certificate holder shall finalize, and submit to the Department for its approval, in consultation with ODFW, a final Sage-Grouse Habitat Mitigation Plan for the phase or segment to be constructed.

. . .

b. The final Sage-Grouse Habitat Mitigation Plan shall address the potential sage-grouse habitat impacts through mitigation banking, an in-lieu fee program, development of mitigation projects by the certificate holder, or a combination of the same.

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[7] See Attachment 4: DPO Comment, Applicant Responses, Department Response in Proposed Order Crosswalk Tables at PDF page 65 (B2HAPP DPO Applicant Responses – ODOE Comments – ODFW at 5).

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. . .

iii. The final Sage-Grouse Habitat Mitigation Plan shall include compensatory mitigation sufficient to address direct impacts from, at a minimum, all facility components except indirect impacts from existing access roads substantially modified for the facility (related or supporting facilities). For calculation purposes, new facility roads with~~out~~ access control will be assigned a "no-traffic" designation, and new roads without access control will be assigned a "low-traffic" designation. As referenced in Fish and Wildlife Condition 19, the certificate holder shall demonstrate during or about the third year of operation that sage-grouse habitat mitigation shall be commensurate with the final compensatory mitigation calculations~~, which will be based on the as- constructed facility and will include indirect impacts from access roads~~, either by showing the already-implemented mitigation is sufficient to cover all facility component impacts, or by proposing additional mitigation to address any ~~uncovered~~ impacts incremental to the initial calculation. The final compensatory mitigation calculations must be based on the as-constructed facility as well as the pre- and post- construction traffic studies, and must include the addition of indirect impacts from substantially modified existing access roads.

. . .

E. Scenic Resources – Incorrect Terminology for New Analysis of Grande Tour Route

ODOE revised pages 411 and 412 of the Proposed Order to provide additional discussion regarding the Grande Tour Route:

> Although the proposed facility would be viewed from a neutral or low position, the change in viewer perception is described as high magnitude due to its location primarily in the foreground/middle ground distance zone.[8]
>
> Based on the applicant's assessment, views of the proposed facility from the Ground Tour Route within the vicinity of Ladd Marsh WMA would result in a high magnitude change in viewer perception because the proposed towers would appear dominant and would lower the scenic quality component score for cultural modification.[9]

This new discussion requires minor revisions because it uses incorrect terminology regarding viewer perception. As explained in the Visual Resources Impact Assessment Methodology provided in Exhibit R, Attachment R-1, the assessment of viewer perception informs

[8] Proposed Order at 411.
[9] Proposed Order at 412.

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the evaluation of the "magnitude" of the impact, but the viewer perception assessment itself is not expressed in terms of magnitude.[10] Instead, viewer perception may be ranked as low, medium, or high based on the location of the viewer relative to the impact (i.e., elevated, neutral, or inferior vantage point, and whether views are predominantly peripheral, or head-on) and the duration the impact would be viewed (episodic, intermittent, or continuous).[11] To address this issue (and also correct a typo in the name of the resource, the Grande Tour Route), Idaho Power proposes the following revisions (Idaho Power's edits are shown in blue):

> Although the proposed facility would be viewed from a neutral or low position, the change in viewer perception is described as high ~~magnitude~~ due to its location primarily in the foreground/middle ground distance zone.
>
> Based on the applicant's assessment, views of the proposed facility from the Grande ~~Ground~~ Tour Route within the vicinity of Ladd Marsh WMA would result in a high magnitude ~~change in viewer perception~~ impact to scenic quality because the proposed towers would appear dominant and would lower the scenic quality component score for cultural modification.[12]

F. Public Services - Application of the Fire Prevention and Suppression Plan During Operation

ODOE revised Section 1.4 of the Fire Prevention and Suppression Plan, Attachment U-3, to add the following discussion on fire response agreements:

> In areas not covered by a fire response organization or located on federal land, the certificate holder will attempt to negotiate an agreement with the relevant fire response organization or federal agencies as presented in Table 2 above, outlining communication and response procedures for potential fires within their boundaries during facility construction and operation. In those areas not covered by a fire response organization and not located on federal land, the certificate holder will attempt to negotiate an agreement with nearby fire response organizations or the federal agencies to provide fire response. If no such agreements can be reached, the certificate holder will propose alternatives such as contracting with a private fire response company or providing additional firefighting equipment at those sites. The certificate shall provide documentation to the Oregon

[10] The determination of magnitude is used as the basis for evaluating the level of change to scenic quality and landscape character of the resource (resource change) and how that change would be perceived by viewers (viewer perception). B2HApp Exhibit R, Attachment R-1, page R-1-14.
[11] B2HApp Exhibit R, Attachment R-1, page R-1-15.
[12] Proposed Order at 412.

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Department of Energy, demonstrating the final agreements or alternative contract agreements for fire response.

In response to concerns regarding wildfire response responsibilities in areas along the transmission line that fall outside the boundaries of a fire district, Idaho Power proposed certain measures it would take during construction of the B2H Project. However, in the text above, ODOE incorrectly applied those same measures to the operational phase of the project.

During construction, Idaho Power proposed that it would attempt to negotiate agreements with neighboring fire districts or governmental agencies to provide coverage in areas outside established fire district boundaries. If no such agreements could be made, Idaho Power would provide alternatives such as having private fire response companies on site or having the construction contractor have additional firefighting equipment on site. Having Idaho Power provide those additional firefighting capabilities during construction is appropriate because Project representatives would already be on site and thus would be in the best position to respond quickly in the event of a fire. Applying those same measures during operation of the Project does not make sense, however, because Idaho Power representatives generally will no longer be on site. Further, the risk that Idaho Power equipment may be the cause of a potential wildfire is also lower during operations.

During operation, Idaho Power will similarly attempt to negotiate agreements with neighboring fire districts or governmental agencies to provide coverage in areas outside established fire district boundaries. However, if such agreements cannot be made, Idaho Power will consult with the local dispatch centers responsible for mobilizing wildfire response resources and report to ODOE the dispatch center's procedures for responding to wildfires in those areas without fire district coverage.

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For these reasons, the Applicant proposes the following changes to Attachment U-3, the Fire Prevention and Suppression Plan, and also proposes a minor typographical correction (Idaho Power's edits are shown in blue):

> In areas not covered by a fire response organization or located on federal land, the certificate holder will attempt to negotiate an agreement with the relevant fire response organization or federal agencies as presented in Table 2 above, outlining communication and response procedures for potential fires within their boundaries during facility construction and operation. In those areas not covered by a fire response organization and not located on federal land, the certificate holder will attempt to negotiate an agreement with nearby fire response organizations or the federal agencies to provide fire response. If no such agreements can be reached during construction, the certificate holder will propose alternatives such as contracting with a private fire response company or providing additional firefighting equipment at those sites. If no such agreements can be reached during operation, the certificate holder will consult with the local dispatch centers and report to the ODOE the dispatch center's procedures for responding to wildfires in those areas without fire district coverage. The certificate holder shall provide documentation to the Oregon Department of Energy, demonstrating the final agreements or alternative contract agreements for fire response, or dispatch center procedures as applicable.

G. Public Services - Fire Response Roles and Responsibilities During Operation

In the Proposed Order at page 583, ODOE added Recommended Public Services Condition 7, requiring a Wildfire Mitigation Plan to be implemented during operation:

> **Recommended Public Services Condition 7:** The certificate holder shall:
> a. Prior to operation, provide a copy of its Wildfire Mitigation Plan to the Department and each affected county which provides a wildfire risk assessment and establishes action and preventative measures based on the assessed operational risk from and of wildfire in each county affected by the facility. The plan shall address facility and emergency contacts, agency coordination and responsibilities, necessary fire-fighting equipment, and long-term agreements with service providers, as needed.
> b. During operation, the certificate holder shall update the Wildfire Mitigation Plan on an annual basis, or frequency determined acceptable by the Department in consultation with the Oregon Public Utilities Commission.
> c. During operation, for the service territories the facility would be located within, the certificate holder shall provide to each of the fire districts and rural fire protection a contact phone number to call in the event a district needs to request an outage as part of a fire response.
> d. Any Wildfire Mitigation Plan required by the Oregon Public Utilities Commission shall be considered by EFSC as meeting the requirements of this condition.

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Idaho Power agrees with the majority of the Wildfire Mitigation Plan requirements. However, the plan requirements in the second sentence of subsection (a) are redundant of the subsection (c) provisions or are redundant of the provisions in the Fire Prevention and Suppression Plan: "The plan shall address facility and emergency contacts, agency coordination and responsibilities, necessary fire-fighting equipment, and long-term agreements with service providers, as needed." First, facility and emergency contact information is already required under subsection (c) of Public Services Condition 7, making its reference in subsection (a) duplicative and unnecessary. Second, agency coordination and responsibilities, necessary fire-fighting equipment, and long-term agreements with service providers are addressed in Section 1.4 of the Fire Prevention and Suppression Plan, as discussed in section III.F of this Petition.

To implement these recommendations, Idaho Power proposes the following edits to Public Services Condition 7 (Idaho Power's edits are shown in blue):

> **Recommended Public Services Condition 7:** The certificate holder shall:
> a. Prior to operation, provide a copy of its Wildfire Mitigation Plan to the Department and each affected county which provides a wildfire risk assessment and establishes action and preventative measures based on the assessed operational risk from and of wildfire in each county affected by the facility. ~~The plan shall address facility and emergency contacts, agency coordination and responsibilities, necessary fire-fighting equipment, and long-term agreements with service providers, as needed.~~
> b. During operation, the certificate holder shall update the Wildfire Mitigation Plan on an annual basis, or frequency determined acceptable by the Department in consultation with the Oregon Public Utilities Commission.
> c. During operation, for the service territories the facility would be located within, the certificate holder shall provide to each of the fire districts and rural fire protection a contact phone number to call in the event a district needs to request an outage as part of a fire response.
> d. Any Wildfire Mitigation Plan required by the Oregon Public Utilities Commission shall be considered by EFSC as meeting the requirements of this condition.

IV. REVISIONS TO CORRECT TYPOGRAPHICAL ERRORS

In addition to the issue raised above, the Applicant recommends that ODOE incorporate into the Final Order and Site Certificate the proposed corrections to typographical errors identified

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Portland, OR 97205

1 in Attachment 1 to this Petition.

2 **V. CONCLUSION**

3 For the foregoing reasons, the Applicant respectfully requests that the Hearing Officer
4 include the Applicant's proposed contested case issues as outlined above.

DATED: August 27, 2020

MCDOWELL RACKNER GIBSON PC

Lisa F. Rackner, OSB No. 837844
lisa@mrg-law.com
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419 SW 11th Avenue, Suite 400
Portland, Oregon 97205
Telephone: (503) 595-3925
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Attorneys for Idaho Power Company

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on August 27, 2020, the foregoing **APPLICANT IDAHO POWER COMPANY'S PETITION IDENTIFYING CONTESTED CASE ISSUES** was filed by electronic mail as indicated below:

Alison Greene-Webster
Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol Street NE, Salem, OR 97301
Fax: 503-373-7806
Email: OED_OAH_Referral@oregon.gov

I further certify that on August 27, 2020, the foregoing **APPLICANT IDAHO POWER COMPANY'S PETITION IDENTIFYING CONTESTED CASE ISSUES** was served by electronic mail as indicated below:

Kellen Tardaewether
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Phone: (503) 373-0214
Email: Kellen.Tardaewether@oregon.gov

DATED: August 27, 2020

MCDOWELL RACKNER GIBSON PC

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Attorneys for Idaho Power Company

ATTACHMENT 1

to

Applicant's Petition Identifying

Contested Case Issues

Attachment 1 to Petition
Revisions to Correct Typographical Errors

Proposed Order			
Page	Line	Citation to be Corrected	Correction (if known)
iii	Table SR-2	OAR 345-001-0005(53)	OAR 345-001-0010(52)
1	28	ORS 469.300(11)(C)	ORS 469.300(11)(a)(C)
4	19	OAR 345-001-0010	OAR 345-001-0010(51)
8	FN 18	OAR 345-015-0220(4)(b)	OAR 345-015-0220(5)(b)
9	2	OAR 345-015-0220(4)(b)	OAR 345-015-0220(5)(b)
12	8	(CFR) §1502.14	40 C.F.R. §1502.14
12	30	OAR 345-0220-000(1)(a)	OAR 345-022-0000(1)(a)
13	14 and 16	OAR 345-021-0010(b)(D)	OAR 345-021-0010(1)(b)(D)
13	FN 27	OAR 344-021-0010(1)(b)(D)	OAR 345-021-0010(1)(b)(D)
16	FN 31	Section 3.1	Section 3.1.5
17	FN 32 and 33	FN 32: OAR 345-001-0010(54) FN 33: OAR 345-001-0010(55)	Should be one footnote, not two, citing to OAR 345-001-0010(54)
52	5	public and agency comments	public, ~~and~~ agency, and applicant comments
53	16	OAR 345-015-0006(4)	OAR 345-015-0085(8)
53	19	OAR 345-027-0000	OAR 345-027-0313
54	39–40	OAR 345-010-0010(12)	OAR 345-001-0010(12)
58	13	OAR 345-001-0010	OAR 345-001-0010(12)
58	41–42	OAR 345-027-0100	OAR 345-027-0400
61	18	Exhibit M (Financial Assurance)	Exhibit M (Applicant's Financial Capability)
67	FN 71	OAR 860-023-0100, 0110, 0120	OAR 860-023-0091, 0101, 0111
73	5–6	OAR 345-001-0010(55)	OAR 345-001-0010(54)
90	5	Recommended Structural Standard Conditions 2 through 4	Recommended Structural Standard Conditions 3 through 5
102	11	during initial five-year period	during an initial five-year period
104	23 and 27	ORS 469.300(10)(a)(C) to (E)	ORS 469.300(11)(a)(C) to (E)
110	Note 1	ORS 215.283(1)	ORS 215.283(1)(c)
112	27–28	ORS 215.283(1)	ORS 215.283(1)(c)
121	19	Figure 22	Figure K-22
129	16	Figures K-28	Figure K-28
132	Note 1 to Table LU-2	Table K-9	Table K-13
134	10	ORS 215.283(1)	ORS 215.283(1)(c)
141	15-16	The applicant . . . requests that the use be evaluated under UCDC 152.283(CCC) – utility facility as provided in UCDC 152.616.	The applicant . . . requests that the use be evaluated under UCDC 152.283(D) – utility facility as provided in UCDC 152.616(CCC).
149	11	Based on the analysis provided in Section IV.E.2.1., ORS 215.283, ORS 215.275 and ORS 215.296 . . .	Based on the analysis provided in Section IV.E.2.1., ORS 215.283, and ORS 215.275 ~~and ORS 215.296~~
156	37	ORS 215.283(1)	ORS 215.283(1)(c)

Attachment 1 to Petition
Revisions to Correct Typographical Errors

167	8	Figure K-31a	Figure K-41
172	33	*(2) Review Classification*	*(3) Review Classification*
172	FN 177	K-232	K-255
177	23	Figures K-47	Figure K-47
179	Note 1 to Table LU-6	1. Omitted zoning provisions include:	1. ASC Exhibit K Table K-28 includes "potentially applicable substantive criteria" identified by the SAG and the applicant. Omitted zoning provisions include: . . . .
180	32	ORS 215.283(1)	ORS 215.283(1)(c)
183	FN 183	K-301	K-296
185	15	NHRP-eligible	NRHP-eligible
192	10	Figures K-54	Figure K-54
194	Note 1 to Table LU-7	1. Code provisions identified by the applicant as potentially applicable substantive criteria include . . .	1. Code provisions identified by the applicant in ASC Exhibit K Table K-34 as potentially applicable substantive criteria include . . .
195	FN 186	In ASC Exhibit K, the applicant describes that Umatilla County identified UCDC Sub-section 152.060(G) Personal Use Airports as potentially applicable to the helipads to be located within each of six multi-use areas in EFU-zoned land. Because the multi-use area is an ancillary facility to the proposed facility, the Department recommends Council evaluate all facility components within EFU-zoned land as a utility facility necessary for public service. In the alternative, however, the applicant provides a compliance demonstration if UCDC Sub-section 15.2060(G) is determined applicable, which is incorporated into ASC Exhibit C, K and the draft Helicopter Use Plan (Recommended Public Services Condition 3, to be provided to the Department and applicable counties prior to helipad use.	In ASC Exhibit K, the applicant describes that Malheur County indicated that the land use decision provisions of MCC 6-3A-2 applicable to utility facilities in the EFU and ERU zones may not cover the helipads associated with the multi-use areas and light-duty fly yards. The County indicated that, instead, the provisions of MCC 6-3A-3(I) relating to personal-use airports might apply. Because the multi-use areas and light-duty fly yards are ancillary facilities to the proposed facility, the Department recommends Council evaluate all facility components within EFU- and ERU-zoned land as a utility facility necessary for public service under MCC 6-3A-2. In the alternative, however, the applicant provides a compliance demonstration if MCC 6-3A-3(I) is determined applicable, which is incorporated into ASC Exhibit C, K and the draft Helicopter Use

			Plan (Recommended Public Services Condition 3, to be provided to the Department and applicable counties prior to helipad use).
200	FN 192	K-301	K-332
204	Note 1 to Table LU-8	1. Code provisions identified by the applicant for informational purposes include	1. Code provisions identified by the applicant for informational purposes in ASC Exhibit K Table K-25 include . . . .
207	21	Figures K-53	Figure K-53
213	27	ORS 215.275(2)€	ORS 215.275(2)(e)
214	18	two of the factors set forth in subsection (2)	three of the factors set forth in subsection (2)
214	34	ORS 215.296	ORS 215.275(5)
214	34–35	draft proposed order	~~draft~~ proposed order
234	22	OAR 629-044-0200	OAR Chapter 629
235	34	OAR 345-010-0010(33)	OAR 345-001-0010(33)
238	29	OAR 345-022-0030	OAR 345-022-0030(2)(b)
239	2	OAR 345-022-0030(A)	OAR 345-022-0030(2)(b)(A)
249	FN 222	317-318	K-352–353
253	9	ORS 469.504(2)(C)	ORS 469.504(2)(c)
253	9	OAR 345-022-0030(2)(C)	OAR 345-022-0030(2)(b)(C)
256	FN 226	OAR 345-001-0010(53)	OAR 345-001-0010(52)
263	20	OAR 345-022-0040(3)	OAR 345-022-0040(2)
271	33	OAR 345-001-0010(53)	OAR 345-001-0010(52)
271	FN 238	Id, Section 3.2.4	B2HAPPDoc3-20 ASC 12_Exhibit L_Protected Areas_ASC 2018-09-28, Section 3.2.4
272	6 and 26	OAR 345-001-0010(53)	OAR 345-001-0010(52)
273	5	OAR 345-001-0010(53)	OAR 345-001-0010(52)
277	FN 249	Id. See Section 3.3.2.5, page R-82.	B2HAPPDoc3-35 ASC 18_Exhibit R_Scenic Resources_ASC 2018-09-28, Section 3.3.2.5, page R-82.
278	FN 251	Under OAR 345-021-0010(1)(bb), is the ASC location for any other information that the Department requests in the project order.	Under OAR 345-021-0010(1)(bb), Exhibit BB is the ASC location for any other information that the Department requests in the project order.
280	FN 255	Id. See also ASC Exhibit L, Attachment L-3, Section 3.20.	B2HAPPDoc3-20 ASC 12_Exhibit L_Protected Areas_ASC 2018-09-28, Page L-39. See also ASC Exhibit L, Attachment L-3, Section 3.20.

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Revisions to Correct Typographical Errors

281	FN 257	Id.	B2HAPPDoc3-20 ASC 12_Exhibit L_Protected Areas_ASC 2018-09-28, Page L-39.
281	FN 258	Id.	B2HAPPDoc3-20 ASC 12_Exhibit L_Protected Areas_ASC 2018-09-28, Page L-40.
284	FN 265	Id.	B2HAPPDoc3-20 ASC 12_Exhibit L_Protected Areas_ASC 2018-09-28, Attachment L-3, Section 3.13.
287	FN 270	Id.	Id. ASC Exhibit L, Attachment L-3, Section 3.6.
287	FN 271	Id. See also ASC Exhibit L, Attachment L-3, Section 3.6.	Id. ~~See also ASC Exhibit L, Attachment L-3, Section 3.6.~~
307	FN 311	Section 3.2.3	Section 3.3.1
307	FN 312	P. p1-21	p. P1-22
318	FN 334	(26)	ORS 469.300(26)
326	26	ASC P3	ASC Exhibit P3
344	10	Exhibit BB, Attachment BB-3	Exhibit BB, Attachment BB-2
344	FN 367	Attachment P1-4, Vegetation Management Plan	Attachment P1-4, Vegetation Management Plan, Section 3.1
348	24	Exhibit BB, Attachment BB-3	Exhibit BB, Attachment BB-2
351	21	OAR 345-001-0010(55)	OAR 345-001-0010(54)
355	1	Road Classification Guide and Access Management Plan (Attachment B-5)	Road Classification Guide and Access Control Plan (Attachment B-5)
355	1–2	Traffic and Transportation Management Plan (Attachment U-2)	Transportation and Traffic Plan (Attachment U-2)
355	36	with more greater use	with ~~more~~ greater use
357	39	OAR 660-023-0115(17) and (18)	OAR 660-023-0115(16) and (17)
358	5	during construction facility phase	during construction of a facility phase
363	12-13	Sage Grouse Mitigation Plan (Attachment P2-3)	Greater Sage Grouse Mitigation Plan
363	35	"permanent indirect impacts"	"temporary indirect impacts"
369	FN 390	Section 3.2.1	3.2.1.4
377	38	Fish Habitat and Stream Crossing Assessment Report	Fish Habitat and Stream Crossing Assessment Summary Report
383	9	OAR 345-001-0010(55)	OAR 345-001-0010(54)
390	10, 11	Grand Tour	Grande Tour
390	FN 410	Grand Tour Management Plan	Grande Tour Management Plan

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392	FN 415	Id.	B2HAPPDoc3-35 ASC 18_Exhibit R_Scenic Resources_ASC 2018-09-28, Section 3.3.1.5
393	FN 418	Id.	B2HAPPDoc3-35 ASC 18_Exhibit R_Scenic Resources_ASC 2018-09-28, Section 3.3.1.5
395	FN 420	Id.	B2HAPPDoc3-35 ASC 18_Exhibit R_Scenic Resources_ASC 2018-09-28, Section 3.3.1.5
397	1	Section IV.F	Section IV.F.5
397	4, 10	OAR 345-001-0010(53)	OAR 345-001-0010(52)
397	Table SR-2 Title	OAR 345-001-0010(53)	OAR 345-001-0010(52)
400	31	OAR 345-001-0010(53)	OAR 345-001-0010(52)
400	41	Section IV.F	Section IV.F.5
401	FN 425	ASC Exhibit L, Section 3.3.3	ASC Exhibit R, Section 3.3.3.1
402	7	OAR 345-001-0010(53)	OAR 345-001-0010(52)
405	2	ASC Exhibit R Attachment R-1	ASC Exhibit R Attachment R-3
405	20	Section IV.K., *Councils Historic, Cultural and Archaeological Resources standard*	Section IV.K., ~~*Council's*~~ *Historic, Cultural and Archaeological Resources* ~~*standard*~~
407	38	Figure R-3-37	Figure R-3-5
410	1	Section IV.K., *Councils Historic, Cultural and Archaeological Resources standard*	Section IV.K., ~~*Council's*~~ *Historic, Cultural and Archaeological Resources* ~~*standard*~~
410	27, 28	Grand Tour Route	Grande Tour Route
411	5	Grand Tour Route	Grande Tour Route
412	1-2	Ground Tour Route	Grande Tour Route
412	29	Grand Tour Route	Grande Tour Route
418	4	NHOTIC has having	NHOTIC ~~h~~as having
427	FN 461	See Section 3.3.2.7 and Attachment R-3 Section 22.0	See Section 3.3.2.7 ~~and Attachment R-3 Section 22.0~~
427	FN 462	ASC Exhibit R, page R-109	ASC Exhibit R, page R-108
429	FN 465	Section 3.3.2.9	Section 3.3.2.6
430	FN 466	Attachment R-3 Section 20.0	Attachment R-3 Sections 20.0, 21.0
442	3	Section IV.F.1.	Section IV.F.5.
453	19	ASC Exhibit S Attachment D-10	ASC Exhibit S Attachment S-10
463	5	were the proposed facility	where the proposed facility
464	Table Name	Table HCA-5b	Table HCA-4b

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464	Table HCA-4b, Row 2	NHRP-eligible	NRHP-eligible
465	Table Name	Table HCA-5b	Table HCA-4b
465	16–17	NHRP-eligible	NRHP-eligible
467	33	OAR 345-001-0010(52)	OAR 345-001-0010(51)(o)
473	9, 12, 13, 18, 20	Table HCA-6	Table HCA-7
493	33	Recommended Historic, Cultural, and Archaeological Resources 2	Recommended Historic, Cultural, and Archaeological Resources Condition 2
494	4, 10	Table HCA-7	Table HCA-8
500	18	Table HCA-7	Table HCA-8
502	19	Table HCA-8 through Table HCA-10	Table HCA-9 through Table HCA-11
509	7	OAR 345-001-0010(53)	OAR 345-001-0010(52)
510	Table R-1; Row 4	Grand Tour Scenic Bikeway	Grande Tour Scenic Bikeway
516	FN 507	Figure 12: Common Noise Sources and Expected Noise Levels	Figure 13: Common Noise Sources and Expected Noise Levels
517	23	IV.M.6., Public Services; IV.M.6., Traffic Safety	IV.M.6., Public Services; ~~IV.M.6.,~~ Traffic Safety
518	FN 512	Section 3.4.4.1 and Attachment T-3 Section 3.1	Section 3.4.4.1 and Attachment T-4 Section 3.1
519	Fns. 513, 514	Attachment T-3	Attachment T-4
520	FN 515	Attachment T-3	Attachment T-4
521	FN 518	Attachment T-3	Attachment T-4
524	FN 524	OAR 345-001-0010(53)	OAR 345-001-0010(52)
526	FN 530	Attachment T-3	Attachment T-4
527	FN 531, 532	Attachment T-3	Attachment T-4
529	FN 534	Attachment T-3	Attachment T-4
530	FN 535, 536	Attachment T-3	Attachment T-4
531	FN 537, 538	Attachment T-3	Attachment T-4
532	FN 539	Attachment T-3	Attachment T-4
533	FN 540	Attachment T-3	Attachment T-4
533	22	ASC Exhibit R, Attachment R-3, Figure R-3-14	ASC Exhibit R, Attachment R-3, Figure R-3-15
534	FN 541, 542	Attachment T-3	Attachment T-4

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535	FN 543	Attachment T-3	Attachment T-4
536	FN 544, 545	Attachment T-3	Attachment T-4
542	12	Attachment O-1 of ASC Exhibit W	Attachment O-1 of ASC Exhibit O
542	33	Attachment U-1 of ASC Exhibit U	Attachment U-1F of ASC Exhibit U
543	FN 555	B2HAPPDoc8-1 All DPO Comments Combined-Rec'd 2019-05-22 to 08-22. B2HAPPDoc8-074 DPO Public Comment Chamberlain 2019-06-18 to 08-19 (PDF Page 938/6396).	B2HAPPDoc8-1 All DPO Comments Combined-Rec'd 2019-05-22 to 08-22. B2HAPPDoc8-074 DPO Public Comment Chamberlin 2019-06-18 to 08-19 (PDF Page 938/6396).
545	7	Attachment U-1 to ASC Exhibit U	Attachment U-1A to ASC Exhibit U
549	FN 560	Section 3.3.1	Section 3.1.6
566	10–11	section IV.Q.1., *Noise Control Regulations and Variances*	section IV.Q.1., *Noise Control Regulations* ~~and Variances~~
582	FN 588	Attachment K-2, p. 22.	Attachment K-2, p. 22–23.
596	10	OAR 860-038-0080	OAR 860-027-0400
598	3	OAR 345-023-0030	OAR 345-023-0020
617	15	(2) Measurement	(3) Measurement
617	26	(3) Monitoring and Reporting	(4) Monitoring and Reporting
620	9	Figure 12, *Common Noise Sources and Expected Noise Levels*	Figure 13, *Common Noise Sources and Expected Noise Levels*
626	FN 661	OAR 340-35-0015(38)	OAR 340-035-0015(38)
631	Row 2	ASC Exhibit X, Attachment X-2, p.25	ASC Exhibit X, Attachment X-2, p.26
631	Row 7	ASC Exhibit X Attachment X-5, Maps 17-18	ASC Exhibit X Attachment X-5, Maps 18-19
634	Row 1	ASC Exhibit X Attachment X-5, Maps 31-33	ASC Exhibit X Attachment X-5, Maps 30-33
639	6	Figure 12, *Common Noise Sources and Expected Noise Levels*	Figure 13, *Common Noise Sources and Expected Noise Levels*
639	15	"it is a more conservative definition of the weather conditions likely to result in maximum corona noise used by the CAFE program (one mm/hour)"	"it is a more conservative definition of the weather conditions likely to result in maximum corona noise than the standard used by the CAFE program (one mm/hour)"
642	10	OAR 340-035-0035(1)(b)(B)(ii)	OAR 340-035-0035(1)(b)(B)(i)
651	34	Attachment X-5	Attachment X-5, Map 15
665	16	Section IV.Q.5	Section IV.Q.4
667	FN 709, 711	Section 3.4.6	Section 3.4.6.2
672	35	Attachment I	Appendix I

Attachment 1 to Petition
Revisions to Correct Typographical Errors

680	12, 31	OAR 141-085-0510(43)	OAR 141-085-0510(46)
686	9	ASC Attachment BB-2, and to this order	ASC Exhibit B, Attachment B-5, and Attachment B-5 to this order
686	20	Section 3.2	ASC Exhibit BB, Attachment BB-2, Section 3.2
686	20	Section 4.1	ASC Exhibit BB, Attachment BB-2, Section 4.1
686	24	4.1.2 Rock Creek, Site R-33011	~~4.1.2~~ Rock Creek, Site R-33011
686	25	4.1.3 Rock Creek, Site R-33033	~~4.1.3~~ Rock Creek, Site R-33033
686	26	4.1.4 Rock Creek, Site R-33147	~~4.1.4~~ Rock Creek, Site R-33147
Attachment U-3 Fire Prevention and Suppression Plan			
Missing page number	Section 1.4	"The certificate shall provide documentation"	"The certificate holder shall provide documentation"

TARDAEWETHER Kellen * ODOE

From: GARCIA Lucy M * OED on behalf of OED_OAH_REFERRAL * OED
Sent: Friday, August 28, 2020 8:42 AM
To: 'Owyhee Oasis'
Cc: TARDAEWETHER Kellen * ODOE
Subject: RE: Opuc contested case against b2h

The Office of Administrative Hearings is in receipt of your email.

Thank you,

Lucy for
Anesia Valihov | Hearings Coordinator
Office of Administrative Hearings
4600 25th Ave. NE, Suite 140
Salem, OR 97303-4924

Phone: (503) 947-1510
Fax: (503) 947-1923
Email: OED_OAH_REFERRAL@oregon.gov

From: Owyhee Oasis <owyheeoasis@gmail.com>
Sent: Thursday, August 27, 2020 2:53 PM
To: OED_OAH_REFERRAL * OED <REFERRAL.OED_OAH_REFERRAL@oregon.gov>
Subject: Opuc contested case against b2h

To whom it may concern:
Attn: Ms. Greene-Webster

Hello, I hope this message finds you well. My name is Janet Aston. My mailing address is 3902 west angus drive, South Jordan, Utah, 84009. I purchased the property at 2104 Owyhee lake road, Nyssa, Oregon 97913, 2 years ago to open a well rounded recreational resort with my daughter, Miranda Aston and her Partner Tim Proesch who reside at the property (2104 Owyhee lake road) with their 4 young children. I do not have legal representation at this time but will not hesitate if it deem necessary. I am filing as a party In this contested case. With the recreational resort we plan to, as well as have started the ground work for RV campsites, dry camping, tent camping, “glamping” (cabin camping , fully accessible pond, hot tubs, a fully stocked food truck, wedding venue with all the amenities as well as holiday events such as Halloween trunk or treat, pumpkin patch, Christmas wonderland with Santa and sleigh rides, Easter egg hunts and so much more. This toxic transmission line Idaho power is wanting to bring in will effect everything we have planned and worked daily to accomplish and
Complete. The noise that will be emitted from this line will detour business. The eyesore of a giant transmission line will detour people from choosing to recreate at our business because, as I have heard from several friends and close family members (will provide a list with names if requested for personal testimony) they do not want to camp somewhere that contains these potentially hazardous, noisy and eyesore of a transmission lines while they are out camping in the country setting. People come here recreationally to see the wildlife come through and graze. This transmission line could bring that to a halt completely. There is no scientific research done to show any cause & effect from a line of this magnitude over any given amount of time. We do not know the dangers it can bring to us, the health and safety of our patrons , the wildlife, the natural hot water that runs beneath us as well as our irrigation lines. It has been proven over time to erode the water lines and piping beneath the surface in return costing me more money in repairs in the long run. The hundred, if not thousands of animals (some being on the verge of extinction, indigenous to this area or see this area as their safe
Haven) that migrate, breed and graze here can cease to exist completely in return contaminating them and/or detouring revenue for animal enthusiasts. The amount of business that I stand to lose will be detrimental to my well being, my child’s wellbeing and to my retirement. The amount we stand to gain off of the RV/camp spots alone is 10.8 million over 20 year span. I know we are surrounded by BLM public land as well as an existing power corridor. If this project truly is for the people then it should be built on public land or in the existing corridor as to preserve the country atmosphere surrounding us. I am urging you to please read my words and all of the other contested writings and please see where we are coming from and vote against the b2h power line Idaho power is trying to put through. Thank you for your time.

Regards,
Janet Aston
8015410650

owyheeoasis@gmail.com

TARDAEWETHER Kellen * ODOE

From: timothy proesch <tranquilhorizonscooperative@gmail.com>
Sent: Thursday, August 27, 2020 2:31 PM
To: TARDAEWETHER Kellen * ODOE
Subject: Opuc contested case against b2h

To Whom it may concern
Attn: Ms. Greene-Webster

I hope this message finds you well, my name is Miranda Aston and I reside at 2104 Owyhee Lake Road, Nyssa, OR, 97913 on the way to the Owyhee Reservoir. I am representing myself In this matter for time being unless it becomes necessary to get legal representation. I am going to request to file as a Party. I am writing this contested case because Idaho Power wants to come onto my property, my residence and put this transmission line. They are wanting to put the power line in the exact spot we are wanting to build our house. My concerns for our health is as followed; there are no long term testing of the side effects of a transmission line of this magnitude therefore, no way to say whether or not it will be safe or harmful and that is not a risk on my life, my partner or our children that I am willing to take. It is a risk to my entire family, my visiting family, and patrons of our recreational resort. The noise this transmission line will put out will be impossible to muffle. Why should We have to live with “noise canceling” blinds and not be able to let the sun shine into our home? Our patrons are not going to want to visit a place with the eyesore of a tower they are bringing in nor the risk to their health and well being. The hundreds if not thousands of different species that migrate through our property as well as graze here will be forced to change their path if not risk possible contamination due to this line. The amount of business we stand to lose will be astronomical. It affects all of us in this area, those that live here, vacation here, hunt & fish here as well as take day trips up here In return will also take a detrimental toll on the income our city gets from the traffic that comes through. We are already a financially depressed community and we rely heavily on the money brought to town by those traveling to the lake which could cease to exist if this transmission line is put in. I have a list of several close friends and family members who have stated that they would not want to visit a place with these toxic and visually unappealing transmission lines. We all feel very strongly that the nature needs to be preserved and is not being taken into account through this process whatsoever. Our property was purchase for $632,000.00. It was purchased with and by my mother Janet Aston who has commented prior as well. It was purchased with the intention to start a recreational resort. We plan to as well as already have started to update our sewer system, install RV spots, dry camping areas, update the landscape, open our Food truck as soon as possible as well as open our wedding wedding venue. After doing the math on every camp/rv spot being full we stand to lose 10.8 million over 20 years and that is not taking into account all of our other amenities that are available at the recreational resort. That is just a small fraction of business lost if this line gets approved. Due to the fight with Idaho Power we have already lost revenue due to the amount of time & energy going into this fight as it stands. We were never asked if we were okay with this and have been bullied and threatened by Idaho power as well as potential bribes. There is an existing power corridor that needs to be taken into account as well as BLM land that can be use to stop the negative affect on myself, my family and our neighbors, friends and everyone else effected by this b2h line. I am strongly urging you to please read my words, read my neighbors words and try to see where we are coming from. Years and years of hard work, blood, sweat and tears have gone into our farms/land/businesses and this corporation wants to come and take it. I am against the b2h transmission line and everything it stands for.

Thank you for your time
Miranda Aston
541-212-4611
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TARDAEWETHER Kellen * ODOE

From: Susan Badger Jones <sbadgerjones@eoni.com>
Sent: Thursday, August 27, 2020 3:15 PM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE
Subject: [Fortimail Spam Detected] Contested Case Request
Attachments: B2H Contested Case Submission. Susan Badger-Jones. Aug 27.2020.pdf

Importance: High

Attached should be my Contested Case Request.
If there are any questions please contact me ASAP

Susan Badger-Jones
Pronouns: she/her/hers

sbadgerjones@eoni.com
541.263.1103

August 25, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol Street NE, Salem, OR 97301
OED_OAH_Referral@oregon.gov

Cc: kellen.tardaewether@oregon.gov

Contested Case Request regarding Proposed Site Certificate for the Boardman to Hemingway Transmission Line (B2H).

Dear Ms. Greene-Webster:

A. My name is Susan Badger-Jones; I reside at 412 H Ave, La Grande, OR 97850
B. I am not represented by an attorney.
C. I request to file as a "Party."
D. My interests are protection of Morgan Lake Road and adjacent areas. I use this road many times a week to access the Morgan Lake Park and adjacent natural areas, as well as to reach homes of friends who live along the Road. This provides me with important recreation, social and general health benefits
E. The public interest is served by holding the applicant to rules of process law in order to give citizens honest and complete disclosure about impact to publicly owned infrastructure, privately owned property, and disruption to usual, customary and emergency travel on a primitive single-access road.
F. I believe I am uniquely positioned to represent this issue:
    a. I live a half mile from the Morgan Lake Road. For more than 30 years—in all seasons—I have regularly and directly experienced the issues of steepness, narrowness, periodic road slumping, guard rails "falling off," and varying maintenance issues.

b. For the last 15 years I have worked professionally to advance energy efficiency and renewable energy development in rural Oregon, bringing me frequently in contact with investor-owned utility methods and attitudes.

G. I provided comment at the public hearing in La Grande on June 19, 2019

H. Idaho Power failed to include The Morgan Lake Road as an access road within the Site Boundaries of the Mill Creek and Morgan Lake Alternative routes.

"Maps shall clearly show the boundaries of the proposed corridor within which the transmission line would be constructed, and shall include familiar landmarks such as roads and existing power lines that reviewing agencies and affected landowners may use to identify the proposed route. Aerial photographs with all roads identified are helpful for public interpretation and review. The site boundaries of all proposed related or supporting facilities, including but not limited to access roads, temporary lay down areas, switching stations/substations, must also be identified. Maps showing access roads included as related or supporting facilities shall clearly depict where existing roads or road segments are proposed to be in the site boundary." (ASC, Exhibit C, Project Location, p. C-32)

Application maps do not show names of streets and thus lack detail required by state of Oregon to meet ordinance OAR 345-001001-(55)

Thus began a cascade of IPC-caused circumstances leading today to missing necessary actions and information:

a. Morgan Lake Road was not shown in the boundary so landowners near the road were not notified (as required by OR 345-021-0010(1)(x)(E)) Thus they were prevented from making necessary input on the road,
b. Technical assessment of Morgan Lake Road was dismissively relegated to a foot note essentially saying it could be "done later". (Footnote 562, pg 550; Boardman to Hemingway Transmission Line Application for Site Certificate=Proposed Order July 2 2020).
c. *Thus*, Landowners along the road now have no idea if/what road modifications may be needed and those how will impact their property.
d. Citizens have no idea what modifications to road surfaces will be required.
e. *Thus*, time it will take to make those modifications (lets be honest here and say construction) are not available.
f. *Thus* there is no reliable estimate of about how much time " road modifications" could add to road closures and travel interruptions estimated by IPC of their Phases I-IV.
g. *Thus,* IPCs estimates for road closure/travel interruptions of Morgan Lake Road are not true. (Morgan Lake Park—Recreation Standard Analysis

November 7, 2019, 4 of 23 Traffic Impacts). Conservative compilations IPC last estimates currently are for minimum1845 to 2800 Morgan Lake Road trips depending on which transmission line route is selected.

What's the big deal?

Morgan Lake Road is proposed access to tower sites for BOTH the Mill Creek and Morgan Lake Alternative transmission lines. It's the only access between La Grande and Morgan Lake Park. It's also the only access route between the city of La Grande and more than 30 homeowners who rely on it multiple times a day for trips to schools, work, shopping, other essential and emergency services. Access, good quality of the road matter. Yet Idaho Power has completely failed to technically assess whether this narrow dirt road can stand up to or not be irreparably damaged by months of repeated use by extra-heavy construction equipment, cement trucks, and commercial rigs hauling massive cranes, tower parts and other equipment.

So? Look at the conditions of Morgan Lake Road:

a. It is a narrow, steep (17 percent grade) bladed dirt road—never really "constructed" to conventional or modern weight-bear specifications.
b. It's 2.1 miles from the end of the pavement on Walnut street to where it meets the turn off to Morgan Lake Park. For more than a mile of that length, during its steepest grades and narrowest widths, the road's *down*-slopes fall away extremely steeply, typically beginning right at the road edge; across the road along that same stretch there is consistent *up*slope, with significant visible rock which could require blasting for widening. The mile also includes an active "slump" zone that in 2019 reduced the road to one lane for more three weeks. This trifecta alone would make the average "observer" understand that early technical assessment is necessary
c. Condition of this road varies greatly, sometimes allowing travel at 20 mph but frequently reduced to as little as 5 mph.

d. The road-side edge and close upslope include mature trees and more than a dozen power poles with lines crossing the road.

The Morgan Lake Road assessment must be done at some point. If the news is going to be as good and modifications as minimal as IPC suggests, then it should have been done upfront and the good news used to advance the project.

Summary: Idaho Power's omission of the Morgan Lake Road from the Site Boundary and failure to adequately identify roads on the application maps mislead the public and manipulated the process. IPC choose to kick a critical can down the road and needs to be called on the deceit.

#

TARDAEWETHER Kellen * ODOE

From: lois barry <loisbarry31@gmail.com>
Sent: Thursday, August 27, 2020 3:40 PM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE
Subject: Requests for Contested Case
Attachments: STOP Lois Contested Case Letter.doc

Please find attached my request letter, dated 27 August 2020.

August 27, 2020

To: Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED_OAH_Referral@oregon.gov
cc: kellen.tardaewether@oregon.gov

CONTESTED CASE REQUESTS REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

My name is Lois Barry. I reside at 60688 Morgan Lake Road, La Grande, Oregon 97850 (mailing address: PO Box 566 La Grande, OR 97850)

I am not represented by an attorney but reserve the right to one should I be accepted into the case as a full party.

I am requesting to file as a party.

My interest in the contested case is in achieving a complete and accurate objective assessment of the impact of the proposed B2H transmission line on Morgan Lake Park.

As a close neighbor to the park, I represent my own interests and the public interest of visitors to the park who share my goal of retaining the park's natural setting.

Other parties to this petition are likely to add important comments on this section of the Proposed Order, but I believe I am exceptionally qualified by my experience and professional training to analyze the Department's assessment of the park's scenic and recreational values. I have lived a mile below Morgan Lake Park for more than 50 years; I am a retired Professor of English and Writing. During the early years I often visited the park, and since retiring in 1987 I have walked 2 miles around the lake almost daily spring through fall, and snow levels permitting, often ski around or on the lake in winter.

In 1973, our home was destroyed in the Rooster Peak forest fire that threatened Morgan Lake Park. Howard Fisk, one of the authors of the Morgan Lake Recreation and Development Plan, told me that in efforts to save the park, a backfire was set to burn through our 150 forested acre property on the hillside below the lake. That was a good decision; the park was saved; we built another house, planted 2,000 trees, and still enjoy Morgan Lake Park, a unique recreational opportunity which is truly irreplaceable.

I have read thousands of pages of B2H documents, written comments on the ASC, testified at the EFSC meeting in La Grande on June 19, 2020, and commented in writing on the DPO in various letters dated 5-22 August 2019, all in defense of Morgan Lake Park, a natural park area acknowledged as *irreplaceable* by applicant and as *an important*

opportunity primarily because of its unique designation status as a city park, rareness, and special qualities.[1] I am especially aware of language and its misuse to obscure truth and to evade responsibility. As I remarked in my numerous comments on the DPO, Idaho Power's Application is definitely substandard, characterized by numerous errors of fact and unsupported conclusions.

ISSUE 1: In the ASC, DPO and Proposed Order, visual assessments have been based on an outdated 1974 USFS Handbook. I am requesting a contested case based on applicant's use of an outdated USFS Reference as a basis for conclusions on visual analysis methodology. This material error invalidates Applicant's conclusions on visual impacts on Morgan Lake Park and other Protected Areas, Scenic Resources and Important Recreational Opportunities.

The reference cited in applicant's ASC 2018 and DPO 2020 is *National Forest Landscape Management, Volume 2, Chapter 1, The Visual Management System* (VMS) 1974; <u>it was superceded</u> by *Landscape Aesthetics, Scenic Management System* (SMS) in 1995. [2]

Since applicant uses the USFS criteria for visual assessment, <u>valid</u> USFS criteria must be used. USFS assessments are now in two parts: visual assessment and constituent assessment. DOE and EFSC should require applicant to reassess all the areas in question using criteria provided in the SMS.

The visual impact assessment in Exhibit R, and IPC's conclusions whether the project will result in a significant visual impact <u>is based entirely on impact assessment methodologies used by the BLM and USFS</u>. [3] The 1995 publication (SMS) focuses on the importance of viewer's experience, perceptions, and feelings about the scenery in places they value. These issues are not addressed in the 1974 Handbook (VMS), and they were not assessed in Idaho Power's Application for Site Certificate or in the Department's Proposed Order.

How will the significance of impacts from a facility's construction to a natural park and the area surrounding it be determined? In my comments on the DPO, I questioned the basis for applicant's conclusions, based on what I assumed to be common sense, reasonable expectations. I wrote: *Admittedly "viewer perception" and "enjoyment" are subjective. … Of course it is possible to fish and picnic and camp within sight of mega-towers supporting crackling, popping transmission lines, but to say that the impact of those towers on the experience will be "less than significant" is corporate self-serving and disingenuous. Unless these conclusions are supported by valid research showing*

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[1] OAR 345-021-0010(1)(t)(A).

[2] *Conceptually, the SMS differs from the VMS in that: it increases the role of constituents throughout the inventory and planning process; and it borrows from and is integrated with the basic concepts and terminology of Ecosystem Management. The Scenery Management System provides for improved integration of aesthetics with other biological, physical, and social/cultural resources in the planning process.)*

[3] APPLICATION FOR SITE CERTIFICATE R-1 -1

that recreationists make no distinction between rural campsites in natural settings and noisy developed camp grounds, they are invalid.

I also wrote: *Applicant's conclusion that the B2H project will not preclude visitors from enjoying the day use and overnight facilities offered at the Morgan Lake Park (ASC T-4-56) is not supported with credible data.*

Applicant responded: *Commenter's assertion* <u>*lacks specificity*</u> *as to why Idaho Power's conclusion is not "supported with credible data," and Idaho Power respectfully disagrees.*

In the section on Morgan Lake submitted by STOP B2H I wrote: … *conclusions are unsupported with relevant credible data and fail to consider Oregonians' subjective "opinion/evaluation" of their scenic and recreational resource. Current* tourism *promotion of local scenic and recreational assets, as well as data from Chamber of Commerce records or campground host daily logs could give a more accurate measure of the resources.*

Applicant responded: *Idaho Power and its expert visual resources consultant developed the methodology for evaluating the potential impacts of the project to scenic resources, which is presented in ASC Exhibit R, Attachment R-1 – Scenic Resources Impact Assessment Methodology ("Scenic Resources Methodology").*

DOE added: *Comment does not identify specific issue with the applicant's methodology. No edits to the proposed order made. The Council's rules do not require, or provide, a specific methodology for evaluating visual impacts to Scenic resources, Protected Areas, or Recreational resources.* <u>*The applicant proposes a specific methodology based on prescribed methods used by the BLM and the US Forest Service for assessing visual impacts,*</u>

In the process of researching my response to the Proposed Order, I Googled "USFS Scenic Resources." The first document that appeared was "Landscape Aesthetics, Scenic Management System" (SMS) by Jack Ward Thomas. It definitely seemed to support my contention that applicant had not provided credible data for conclusions on visual impacts.

As I continued my research I checked a Proposed Order footnote reference to the "Department's Review of the Handbook." (pp. 406-407) [4] The Handbook cited was The National Forest Landscape Management Volume 2, April 1974. I then checked back to "Landscape Aesthetics." United States Department of Agriculture, Forest Service Agriculture Handbook Number 701. Landscape Aesthetics: A Handbook for Scenery Management, Jack Ward Thomas, December 1995. <u>*This handbook supercedes AH-462, National Forest Landscape Management*</u>*, Volume 2, Chapter 1, The Visual Management System (49 pages) Issued April 1974.*

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[4] (fn 424) B2HAPPDoc3-35 ASC 18_Exhibit R_Scenic Resources_ASC 2018-09-28, Section 3.2.2 and the National Forest Landscape Management Volume 2, April 1974; https://www.nrc.gov/docs/ML1224/ML12241A372.pdfAccessed 06-26-2020

In my previous comments I did not cite *Landscape Aesthetics: A Handbook for Scenery Management* because I was unaware of the reference until last week. I did, however, make specific references to the kinds of constituent data the SMS requires. Applicant and DOE did not include the SMS in their references or citations.

With respect to Morgan Lake Park, I will quote at some length from the SMS:

Landscape Visibility is composed of two parts: human values as they relate to the relative importance to the public of various scenes and the relative sensitivity of scenes based on distance from an observer. Human values that affect perceptions of landscapes are derived from constituent analysis. This information may be derived from many sources including, but not limited to: independent research; other facets of ecosystem assessments; local, regional, and national studies. (SMS p.7)

The most difficult situation is where proposed deviations are in direct opposition to the dominance elements of valued landscape character being viewed. Examples include a horizontal road (line) in an otherwise vertical landscape above tree line or... a metal lattice work utility tower in the middle of a highly valued historic village.[or bordering a park valued for its natural forest and lake area.] *The first approach should be to relocate such deviations so they are not evident or can be subdued to be visually subordinate. ...The evaluations of deviations in the Very High Scenic Integrity Level is based on a viewer wandering through any part of the area*. (SMS p. 60)

The Council is well aware of Union County residents' multiple comments about the Park's personal meaning to them, the emotional impact of losing an opportunity to hike and camp in a beautiful natural area close to their homes. According to the SMS, this information should be included in assessment of potential impacts on important recreation opportunities, protected areas and scenic resources. The Proposed Order contains no such data in its assessments.

Morgan Lake Park is important to the people who live near it, to the community of La Grande and to Union County residents. During this challenging summer of 2020, more citizens than ever before have been driving up the narrow, steep Morgan Lake Road in order to visit the park, seeking respite in its beautiful natural surroundings.

Research findings support the logic that scenic quality and naturalness of the landscape directly enhance human well-being, both physically and psychologically, and contribute to other important human benefits. Specifically, these benefits include people's improved physiological well-being as an important by-product of viewing interesting and pleasant natural appearing landscapes with high scenic diversity. (SMS, p.20)

Last year, when the Parks Department considered closing the park to overnight camping, almost a hundred concerned citizens crowded the Park Department's office, narrating heartfelt stories of their families' experiences dating back three generations, how they were introduced to camping in the wild "up on the mountain." They had taken their children and then their grandchildren to the Park where they learned to fish, took nature

hikes, felt like they were "in the wild, but so safe and close to town." Because local residents would not tolerate losing that traditional family experience, overnight camping was continued, but reduced from seven to three nights to accommodate additional demand by campers.

Trips to Morgan Lake are embedded in the culture of La Grande. Altering the serenity of the Morgan Lake Park, three miles from downtown, a mountain top setting in harmony with the natural world, will change the experience of hiking, birding, fishing and camping at Morgan Lake forever.

Landscapes that contain both diversity and harmony have the greatest potential for high scenic value. … Desires of constituents must be considered. … They have expectations, desires, preferences, behaviors, acceptable levels of quality, and values of landscape character and scenic integrity. (SMS p.32) Note: The SMS uses the word *natural* 63 times.

The Landscape Character description is used as a reference for the Scenic Integrity of all lands. Scenic Integrity indicates the degree of intactness and wholeness of the Landscape Character; conversely, Scenic Integrity is a measure of the degree of visible disruption of the Landscape Character. A landscape with very minimal visual disruption is considered to have high Scenic Integrity. Those landscapes having increasingly discordant relationships among scenic attributes are viewed as having diminished Scenic Integrity. (SMS p. 13)

ISSUE 2. The Department's legalistic language restrictions, requiring exact terminology within the most limited parameters, defies accepted language usage.

For example, *the relevant planning document, the Morgan Lake Recreational Use and Development Plan, identifies a park objective as a "quality outdoor recreational experience harmonious with a natural forest and lake area" and a park goal to "preserve the maximum of natural setting." Idaho Power conservatively interpreted this to mean that scenery is therefore considered a valued attribute of this recreation opportunity, but arguably [by applicant] the resource is managed for recreation activities such as fishing, camping, picnicking, and boating and not for scenic views or vistas.*

Valued is an accepted synonym for important; however, failure to use the term important is cited as a determining factor in deciding that Morgan Lake Park does not qualify as a Scenic Resource.

The DOE, however, often is less precise in its own use of language:

. . . the second amended project order issued by the Department explains that local land use plans include state and city planning documents or inventories for scenic resources. (p. 396 of 699)

Morgan Lake Park is an important opportunity primarily because of its unique designation status as a city park, rareness, and special qualities per OAR 345-021-0010(1)(t)(A).

Idaho Power claims:

Morgan Lake Park is not analyzed under the Scenic Resources Standard because it is not identified as an important or significant scenic resource or value in a local, tribal, or federal land use plan.

DOE then states: *Applicant response accurate. The evaluation for the Scenic resources standard looks at land use planning documents and management plans for local (County)* [sic] *tribal, or federal land use plan to determine whether scenic resources were identified as significant or important within the analysis area.*

This shift from defining local as *county*, rather than *city* is inappropriate; it allows applicant to reject comments on the validity of defining Morgan Lake Park as a scenic resource.

Applicant further claims that Morgan Lake Park is not a "scenic resource" because the land use plan does not specify management for scenic values.

… significance was determined based on if the valued scenic attributes of the protected area could persist, or not, based on the proposed facility's potential impact." (273)

What are the synonyms for scenic? "Scenery Assessment: Scenic Beauty at the Ecoregion Scale," a 40 page government report, uses the term "natural landscape" 6 times and "scenic resource" 5 times. The article lists 70 references; only one of which uses "scenic resource" in its title. [5] Morgan Lake Park is managed to retain "quality outdoor recreational experience harmonious with a natural forest and lake area" and a park goal to "preserve the maximum of natural setting." (Morgan Lake Recreation and Development Plan)

Obviously a natural forest and lake area in an undeveloped setting on the top of hill is scenic. The Council admits this in its assessment:

Council has changed analysis of low resource change to high resource change because the landscape character and scenic attractiveness of the park will be reduced … vegetation will provide no or limited screening … visual contrasts will be strong, proposed facility will be dominant …,

ISSUE 3. DOE is unresponsive to comments:

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[5] Steven J. Galliano and Gary M. Loeffler, Interior Colombia Basin Ecosystem Management Project: Scientific Assessment, Thomas Quigley, editor, U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station, Portland, Oregon General Technology Report PNW-GTR-472, February 2000.)

Scenic impacts on an area within 10 miles of a proposed project, and recreational opportunities within a 2 mile area of proposed facility are to be evaluated.

As one crests the hill of the Morgan Lake Road, 2 miles from La Grande, suddenly there is a breathtaking, wide open landscape like those often seen in western films. Cloud formations fill the sky. They are the only impediment to a 360 degree view of the forested hills at least 20 miles to the west, Mount Emily to the north, rolling pasture land to the south, and to the east, a view across the entire Grande Ronde Valley, as far the Blue Mountains and Eagle Cap. This is a stunning viewscape, unmarred by buildings or power lines.

…the deglared steel is darker, less reflective, and better able to recede into the landscape when seen against a terrain backdrop. (401)

The Morgan Lake alternative would be located 0.2 mile southwest of the park, Little Morgan Lake at its closest point. At .3 miles from the park boundary, a concrete block communication center, a pulling and tension site, and two 130' transmission towers -- not even partially shielded by vegetation, stark industrial silhouettes against the western sky -- would dominate the entrance to the park.

I commented on these structures' impact on the natural surroundings on the park because: "A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users..."

DOE responded: *the applicant is not proposing any facility components within the Park boundaries.* (529/699) This response is unacceptable; it is evasive and irrelevant.

ISSUE 4. Applicant's assessment of Morgan Lake Park focuses on a small portion of the Park, ignoring the valued wild and undeveloped areas that will be most severely impacted by the facility.

In response to Comments on the DPO, the applicant provided additional maps and visual simulations for the proposed Morgan Lake alternative route. The simulations illustrate the visual impacts of towers potentially visible from the main parking lot area at the lake where the boat dock and restroom facilities are located and assume an average height of 80-feet for existing trees.[6] *The applicant chose this location because it represents a high-traffic area where most users of the park will interact with the park's recreation opportunities.* (526)

This choice ignores the visitors who do not use the park's "day use and overnight facilities," but who value and recreate in the more than 160 acres of undeveloped park land and lake. This choice also is not supported by the requisite analysis of Constituent

[6] The trees are a maximum height of 80', not an average height of 80'.

experience. It fails to recognize the significance of the facility's permanent intrusion on visitors' experience in the valued undeveloped and natural surroundings of the park.

The Morgan Lake Alternative will pass within .2 miles of Twin Lake, aka Little Morgan Lake. *The Park "shall be managed and improved in a manner consistent with the objective of providing a quality outdoor recreational experience harmonious with a natural forest and lake area.* (Morgan Lake Recreational Use and Development Plan)

The Little Morgan Lake area of the Morgan Lake Park should be left as a natural habitat for birds and animals with little change or interference from man's activities. (Morgan Lake Recreation and Development Plan)

Morgan Lake Park planners intended to assure isolation and solitude in the Park to those who choose to avoid the main parking lot, boat dock and camp sites and hike west downhill to Little Morgan Lake, a completely undeveloped wildlife area, to watch hundreds of ducks, including buffleheads, mergansers, grebes and loons, navigating a carpet of yellow water lilies; to look for osprey, cormorants and great blue herons; to listen to song birds and to relax in the isolation of this natural area.

Additionally, there are two trails, each almost a mile long, on the east side of Morgan Lake, one along the shore and one through the forest. I've hiked those trails hundreds of times, reveling in the quiet, admiring the delicate silhouette of pine trees to the west across the lake. White tail deer often observe hikers from the eastern hill, bear and cougar are occasionally sighted.

Following this incomplete assessment, the Council concluded there will be "no significant impact on recreation," even though the Morgan Lake Park plan specifically defines recreation as "fishing, bird watching, nature study and boating"– all activities enhanced by the Park's "rare, irreplaceable" unspoiled natural setting."

ISSUE 5. The Department's conclusions about effective mitigation would not be validated by the SMS.

Several comments on the record of the DPO expressed concerns about visual impacts from the proposed Morgan Lake alternative on users of Morgan Lake Park. In totality, the Department maintains that this indicates the magnitude and likelihood of an impact on the affected human population. (524)

Based on the analysis presented here, the Department recommends that the Council find that the proposed Morgan Lake alternative facility <u>with recommended mitigation would not cause a significant adverse impact to the recreational opportunities</u> at Morgan Lake Park. (pp. 531-531)

Following two pages of <u>visual assessment</u>, the Department found no adverse impacts on <u>recreation</u>. One may optimistically assume that such confusing and inappropriate conclusions are unlikely to result from assessments following the SMS.

Summary and Conclusion:
The Proposed Project will result in long-term visual impacts to Morgan Lake Park. Impacts will be medium intensity as measured by visual contrast and scale dominance, resource change, and viewer perception. Visual impacts will not preclude visitors from enjoying the day use and overnight facilities offered at the Morgan Lake Park. Therefore, visual impacts to Morgan Lake Park will be less than significant. (p. T-4-56)

Applicant concluded that an impact would be "less than significant" if the valued scenic attributes of the resource could persist. For Morgan Lake, the valued scenic attributes of the resource could not persist. Preservation allows for ecological changes only. Management activities, except for very low visual impact recreation facilities, are prohibited.

The Park's remote natural areas will in no way benefit from the "facilities" applicant has inappropriately agreed to purchase for the park as a trade-off for protecting the city's viewshed. Appropriate mitigation is impossible.

Visitors' negative reaction to 180' transmission towers bordering the park and dominating the skyline is not mitigated by making the towers shorter. The experience of camping, hiking, fishing and nature study in a park surrounded by 130' towers is not the experience of a park preserved for its natural setting.

If my father-in-law installs his ugly12' metal sculptures beside my 4' azalea hedge, writing me a check to remodel the bathroom will not improve my feelings about the view from my window. If I am forced to attach an 18 pound weight to my ankle, decreasing the weight to 13 pounds will not make me comfortable. I will be miserable in either case. The only way to assure my comfort is to remove the sculpture and the weights altogether.

It is incumbent on the Council to require a complete reassessment of the conclusions presented in Idaho Power's application. Until that process is completed satisfactorily, Applicant's Site Certificate should be denied.

TARDAEWETHER Kellen * ODOE

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 27, 2020 4:07 PM
To: OED-OAH-Referral@oregon.gov; TARDAEWETHER Kellen * ODOE; OED_OAH_REFERRAL * OED
Subject: a note regarding the b2h proposed order and my submission/proposed order/Contested Case

Hello Allison,

My name is Peter,

I just learned your name and that you will be the Hearing Officer for the Contested Cases concerning the b2h transmission line application.

I write to you as a fellow Human/Person/ Oregonian and Citizen. I must admit I am both overwhelmingly sad, and angry about this proposal and the process. Please, please take a moment to read my concerns.

My purpose in writing to you directly is that I have a request -- a plea. You have the power in this situation to 'rubber stamp' the Idaho Power application, as the complicit and sadly corrupted EFSC process has been doing. I hope you instead provide the justice and due process Democracy intends for us all. The greatest virtue of this nation.

This EFSC process by any estimation is not serving the Citizens and does not in any way rise to the simple standards of 'serving the public' or the future, nor even embodies simple common-sense. I thought the law was essentially based on 'what a common sense person would do.' (Because this process does not follow these bed rock values, there have been recent legislative hearings concerning EFSC/DOE.)

My request is that you apply your rational and legal mind to the real situation at hand, and apply not only the law, but the intent of the law, to these many significant and fundamental issues raised by concerned Citizens. I ask you not to be complicit in this Kafkaesque charade, but to be the true patriot, the voice of reason and fairness as our system is meant to be. You have the power to protect our State, our process, and in some way to bolster Democracy rather than continue this sham that degrades its promise. My hope, and my expectation, is that you of course see yourself as an autonomous human, with exceedingly high standards and free will and judgment. That you will hold them accountable--if not you, who?

You alone can give these many serious issues, that do legitimately rise to the level of Contested Cases, the due fair process and evidentiary considerations they deserve.

As you are probably well aware, the EFSC process is not only fraught with jargon and legalese, rather than simple straight forward fact-based/verifiable approaches --- but worse, the application and public comment process is, from its very inception and practice, biased against the Citizens and rate payers of the State of Oregon. In no way can it be legitimately argued that this is not so.

The corporations have lobbied successfully in our own State House (and that of Idaho too) for the rules to be the way they are. They invent the 'application' and 'need', and then they shepherd it through the process.

Corporate staff 'assist' the DOE staff to attempt to comprehend the intentionally obtuse and flawed tens-of-thousands of pages of (mis)information, they PAY for the staff and all expenses and of course form relationships with the ODE/EFSC staff (all aspects of Regulatory Capture). I can only assume they pay the Hearings Officers salary and expenses as well. Of course they should bear the costs---but you see how this appears to the Citizens---and worse, how it corrupts the supposedly fair system. This is not a 'level playing field' for the Citizens and rate payers by any stretch of imagination.

Busy Citizens with real lives and families and all the normal responsibilities of life, must attempt to read thousands of pages of technical and poorly executed applications, research endlessly, travel across the State to meetings and spend thousands of hours of their lives to making obvious the many flaws in this application. Hundreds of more hours are spent educating not only themselves but fellow Citizens, and organizing and fund raising for basic costs and then of course for expensive legal fees. (Hundreds turned out in our little town out of grave concerns for this project.) Small towns with little money and staff are out gunned from the start to finish. In total contrast, Idaho Power and its co-applicants have the bottomless bank account from the rate-payers, a legion of staff and a phalanx of specialists, PR people and attorneys.

I give you one simple example that is germane, and in fact central, to this 'application' for a transmission line. (Of course, it has no bearing on the process....but how is this possible?) The applicant is required to pay the over-seeing agency, (in this case the BLM / Bureau of Land Management) to conduct an Environmental Impact Statement and to select a 'Preferred Route.' This process took approximately 2 years for many scientists and analysts to complete. The applicant, IP, paid millions of dollars for this process. (Actually of course, the Rate Payers had to bear the cost.) Idaho Power had said and written numerous times that it would wait until the BLM had completed the process before it chose a route (among many variations they proposed and which were each diligently researched by the BLM).

In fact, Idaho Power, just a few weeks before the BLM comprehensive report and EIS were finalized and released, IP announced their own 'preferred route.' They completely ignored the in-depth, 2 year, multi-million dollar study by hundreds of experts.

Near where my family home-land is to the West of La Grande, Idaho Power invented two alternative options/routes very late in the process (and so were not included in the BLM study nor allowed times for Citizens and land owners to study them.). IP listed these new alternative routes as their choice in the final application.

Idaho Power claims, with no push-back from EFSC, that the routes are 'close to the other routes' and so are virtually the same and need no actual legal or practical notification to the Citizens and local governing bodies, nor any specific investigation, nor due process, even though they are miles from other routes that were duly investigated and listed in previous documents for the public to review and comment on, and the BLM to vet.

In fact one of these 'preferred routes' would would place 180 foot tall towers all along the southern skyline of the entire City of La Grande viewshed, a town, like most that highly values its scenic attributes (which are protected in our foundational Planning Document). Why there? The other alternate route they invented and included, would have their mega towers and lines run just next to

one of the only natural lakes and Parks in the County --and of course much loved and cherished by the local people and many tourists.. The BLM vetted and declared "Preferred Route' would be miles away from either of these new alternative routes, and would be barely visible in the far distance. Unfathomably Idaho Power et al, can fabricate any 'route' they like, no matter how damaging.

{As you are no doubt aware, private land owners have absolutely no choice nor power in this situation. Their family land can be 'legally' taken by Idaho Power, and they are compensated at the most minimal rate. While the clear cut, roads and massive towers and cables persist for past their lifetimes, they are paid only for the 'footprint' of the towers --that is it. (Some other minor compensations are allowed for.)}

So not only does Idaho Power not live up to its 'word,' to wait for the BLM researched 'preferred route' to be announced, they invented new alternatives very late in this decade-long process and picked those. They and EFSC appear to have no interest in vetting them as per the normal process.

So the route deemed the least damaging and most practical by the huge team of experts, exists only in a report. How can this be? Its like you or me paying for multiple MRIs and tests and paying many doctors over two years to assess our painful condition, and then never even reading their report. Who does that? Do the Citizens of Oregon deserve better? Does the long term environmental health of public and private lands, the forests and wetlands and creeks and rivers....that this 300 mile long clear-cut would damage, have any bearing?

This issue of the 'Best Route' is not even up for debate and consideration in this EFSC process. Siting!? Is this not THE fundamental question about Siting? Where the line should go!? (assuming there were actually a 'need' for it) -- and the actual route and best alternatives to it are not up for real scrutiny? We all must guess as to why the route in the application is the route IP chose. They give no reason, and are not required to justify it. You can see why I am both so sad and so angry.

(Idaho Power sent out a letter to many of the people along one of the two 'alternate routes' saying "they would not be pursing this route any longer, and so these Citizens no longer need to be involved." They did not withdraw this route from their application. Are they lying again, deceiving us all, or what? Who can know?

Yet there are many other serious and fundamental issues with the Idaho Power's contrived application from the the most essential one --'Need' , to the cooking-up of assumptions, algorithms, conveniently excluding harsh factual realities and on and on. Some of these contested cases are big questions, many are more minor, but all are of great importance. All are backed up with solid research and the facts.

While Idaho Power and EFSC like to say an objection does not meet their 'specificity' test, or that IP somehow addresses it in its plan, with no real rationale or real mitigation, please consider that this monstrosity would be rammed into your backyard, or your favorite place. That Idaho Power is scheming to blast, bulldoze and permanently damage your special area,..and look at these objections and facts through those eyes ---that heart, that mind. In fact it is your 'back yard'---all of our backyards, when it comes to our Public lands being 'taken' for private profit with no proven 'need'--expect Shareholder Profit. Really. You do not have to imagine or dream it up --- the Citizens have found flaw after flaw, each of which deserves to be heard and legitimized.

Lastly, yet most importantly, Idaho Power and its co-conspirators in this scam, have not ever really proven 'need.' The 'need' has changed and morphed over the many years as their original 'reasons' were shown to have become obsolete or were untrue. No children in Boise or Portland will be unable to read their school books at night due to a lack of electricity, if the b2h is not built. Not now, not in 30 years. That is clear. As we all know, huge electrical grids are subject to huge failures, due to natural disasters, hacking and vulnerable to attacks of all kinds. The rapid transition to localized micro grids and alternative power sources is well under way for many good reasons. We are in no way going to experience a lack of electricity. Larger and smaller transmission line proposals all across the nation, that were touted as 'essential' -- have now been canceled after many years of process. Just recently BPA cancelled one from Portland northward.

We all enjoy and need electricity, but this project is simply a profit grab. Idaho Power and the others can and will charge rate payers approx 7% of the costs of construction ($1.3 billion conservatively) --- as profit for themselves. Pacific Power, owned by Warren Buffet, and Idaho Power can additionally lease the easement they would scam from the Public and Private lands for fiber optic, pipelines and the like, as well as charging rate payers to move any electricity across the lines. Make no mistake -- these utilities are huge for-profit corporations and monopolies that have no allegiance to rate payers nor the public in general. They are forced to come up with a One Dollar bond. That is an insult to all Oregonians.

Those of us that would suffer directly from this atrocity sound like NIMBYs --- and I will grant you, that my family does not want this line across our property. (One of the massive concrete tower bases proposed on our little 'ranch' would be blasted deep into a small hill-top where we scattered my fathers ashes. His favorite place on Earth. He and his friends fought Idaho Power decades ago to stop them from building a huge dam in Hells Canyon --to drown the last free flowing stretch of the mighty Snake River -- they saved it for all time--for all of us, it still flows free.) We, like our fellow town-folks, also do not want the towers destroying the beautiful scenic views from our town, nor do we want them right on the boundary of the locals' favorite little lake. No we don't. But, as one our neighbors said so simply --- "if they can really prove they need the line, put the damn towers right in my front yard, not by the town, or the lake or on the State's best elk calving ground."

There is no justifiable need. The application is also rife with mistakes, omissions, half-truths, misleading assumptions and out right erroneous data and I will say it straight up --lies too. Assertions they know are not true, but serve there purpose. My own submissions concerning the 'proposed order' were a last minute, scattershot attempt to show how our County Planning rules and intent disallowed any common sense placement of the line near the town of La Grande. Unlike so many others that have spend literally thousands of hours playing this game -- I have lost all faith in the process. When was the last time out of all the Siting applications has a Contested Case been won or had any significant impact. The Citizens have lost all sway. So what kind of Country do we live in now? Yes I am very sad and very angry.

You are in a singular and unique position in this disturbingly corrupt process. You alone can give the process the justice, and dignity that the People of Oregon deserve. I ask simply for the fairness and integrity you would want and expect at your own hearing. As my Constitutional Law professor would teach us, "judges are just like you and me. They have their own history and biases and can find a justification for deciding either way on a case". I ask you to find for the facts, the People, the environment, for the future. We are all your 'team' (even though ODE and EFSC are closer by). We The People of Oregon, all of 4 million of us, are counting on you.

Thank you very much for reading and considering these points.

Sincerely, Peter Barry
from the Home Ground

I appeal and request for Contest Case Status, as a Party, on the Idaho Powers response to my comment concerning Visual Impacts -- in fact Morgan Lake is a 'Protected Area' in status. As is the Ladd Marsh area. Idaho Power is wrong to assume that because the City of La Grande took their offer/bribe (it is a economically challenged small town), 'if' they built the line near Morgan Lake City Park, they would take whatever bribe/money they could get as they were told it was a limited time offer. That 'agreement in no way changes the impacts on visual values for the City Park. Additionally, my other valid objections (Submission 8-22-2019) based on the County Planning document were not responded to at all. This Document protects visual and other land values in our entire County, and were not even addressed by Idaho Power nor EFSC.

Peter Barry
PO BOX 566
La Grande, OREGON 97850

TARDAEWETHER Kellen * ODOE

From: Ryan Browne <browner@eou.edu>
Sent: Wednesday, August 26, 2020 6:14 PM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE
Subject: CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Ms. Greene-Webster,

Please accept my letter (attached) requesting party status regarding the proposed site certificate for the Boardman to Hemingway Transmission Line.

Thank you,

Ryan Browne

Contested Case Request

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED_OAH_Referral@oregon.gov
also send copies to: kellen.tardaewether@oregon.gov

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

Ryan W. Browne
10207 Leonard Ln.
Island City, OR. 97850
(541) 519-6942
browner@eou.edu

I am filing a contested case request and to also file as a "party" to the above referenced Boardman to Hemingway Transmission Line.

As you are well aware, I have some vested interest in this transmission line coming through our property via the Mill Creek Route, or even being built in general. My first issue is that the Webster family was not included in the original comment period as the first letter was sent in 2016. Since then, it has been a battle to even attempt to keep up with the process and rules. This is clearly used to exploit a "reasonable person" and to bully the line being built. There is no way a reasonable person has the means, or opportunity, to keep up with the process without legal assistance putting undue burden on families. I find this exploitation of families to be disgusting abuse of power and furthermore discriminating on the working class.

The Webster property fosters some of the most identifiable Oregon Trail Ruts in the State of Oregon. During the public comment period, the issue was brought to the attention of Idaho Power that the section of line running through the Webster property would significantly impact the route of the Oregon Trail. The Mill Creek Route comes within feet of identifiable ruts, a documented immigrant camp ground used during the Oregon Trail, as well as degrading the aesthetic viewshed of said areas. Idaho Power responded by stating, Idaho Power respectfully disagrees with commenter's assertions about the impacts of the Oregon Trail. Further it states that the comments are conclusory and not supported by evidence. It states that the commenter didn't provide proof Idaho Power's consideration of the impacts of the Oregon Trail and related mitigation doesn't meet Counsel's standards (Idaho Power's Response to Public Comments Page 222).

However, in direct contradiction to the statements, Exhibit S and Attachment S10, evidence that Idaho Power hasn't surveyed all properties in Union County and the document doesn't specify which properties have or have not been surveyed to the point a reasonable person could conclude appropriate efforts have been made. I can attest that no effort has been made to survey the Webster property for cultural and historical reasons. Therefore, Idaho Power cannot with reasonable evidence that appropriate mitigation measures have been verified and their burden met. Furthermore, the burden is on Idaho Power, not the land owner to prove.

In my reasonable efforts to research comments and responses, I cannot find any responses to my verbal testimony in regards to the threatened springs on our property. Currently there are three (3) natural springs within three hundred feet give or take from the Idaho Power proposed right-of-way. These springs are the lifeline of the ground, without them, there will be no ability to sustain cattle and/or wildlife on the property directly impacting our way of life. We had been told by Idaho Power that for mitigation to be considered for these springs, the landowner would have to conduct a flow test of all springs to establish a baseline flow rate and then conduct another flow test after construction to evidence a loss. That seems completely backwards and frankly criminal on behalf of Idaho Power. It should not be any inconvenience of the landowners or taxpayers to evidence their own loss for mitigation.

The ODOE, however in their Proposed Order agrees with me and has added a condition in the Draft framework Blasting Plan (Attachment G-5), "Design Feature 32." This was buried in the Attachments and therefore, not apparent in the PO nor the "conditions for site certificate" (Attachment 1), hence my Request for Contested Case Party Status.

I propose that the ODOE include this "design feature" as a mandated "condition" of a site certificate, if one is approved. I also propose that Idaho Power extend the surveys for water outside the boundary of the right-of-way up to one thousand feet or more, based on an expert hydro-geologist's advice based on our soil type, and conduct a flow test of all discovered water before AND after construction and provide mitigation to any documented loss. In addition, the landowners have the option to schedule surveys and be present to make sure all makers are documented.

The public has a vested interest in the preservation of the Oregon Trail. It is a documented historical site and pivotal time in American History. The mismanagement of historical sites cannot and will not be tolerated. Simply put, Idaho Power has contradicted themselves on this topic and has failed to conduct extensive research to conclude commenters have not supplied enough evidence. When in actuality, Idaho Power hasn't provided enough evidence to support moving forward with the transmission line over documented American History.

I am the only one who can speak to and/or represent these interests and will need to represent them myself in all future considerations. My comments were submitted in writing on August 20, 2019. Also verbally on June 20, 2019.

Sincerely,

Ryan W. Browne

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Saturday, August 22, 2020 10:43 AM
To: OED-OAH-Referral@oregon.gov
Cc: TARDAEWETHER Kellen * ODOE
Subject: Contested case B2H
Attachments: Carbiener Contested Case.docx

Alison Green-Webster, Senior Administrative Law Judge
Oregon Department of Energy

Attached is my petition for contested case.

Thank you
Gail Carbiener

PETITION FOR PARTY STATUS IN CONTESTED CASE PROCEEDING

BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Alison Green-Webster, Senior Administrative Law Judge

Oregon Department of Energy

500 Capitol Street NE, Salem, OR 97301

SUBMITTED VIA EMAIL: OED OAH Referral@oregon.gov

August 26, 2020

CONTESTED CASE REQUESTS FROM:

1. Gail Carbiener Petitioner; 2920 NE Conners Ave., Bend, OR 97701

I will be representing myself as a private party as well as the Oregon-California Trails Association (OCTA), 524 South Osage Street, Independence, MO 64051

In addition, since OCTA is a member of STOP B2H, my comments and requests will be included with the STOP B2H contested case petition.

2. At this time, I do not plan to be represented by an attorney.

3. I request participation as a full party for all areas because this transmission line would affect the National Historic Oregon Trail and related sites.

4. I have a substantial personal interest that needs protection because of the outcome of the agency's proceeding. Please refer to my qualifications to represent OCTA as they identify my personal involvement and interest in this development.

5. I will also be representing the public interest of the members of the Oregon-California Trails Association (OCTA) a 501(c)(3) nonprofit educational and historical organization. The primary mission of OCTA is to protect and preserve the emigrant trail for our future generations. The Boardman to Hemingway Transmission (B2H) line would result in significant negative impacts to this objective and to OCTA members. This transmission line will degrade or destroy the historical value of some of the most critical locations the trail crosses. Rather than allowing

the public to see and experience what the emigrants experienced, the Boardman to Hemingway transmission line will be the most predominant landmark.

6. I am OCTA's Preservation Officer. It is my responsibility to present and represent our members strong objection to the Proposed Order. My qualifications include over 25 years of Oregon Trail locating, mapping, marking, and providing public education. I have personally walked or driven over most of the Oregon Trail from the Missouri River to the Columbia River. I have extensive Trail experience in Oregon, am personally acquainted with the BLM and Forest Service personnel, and most private landowners that include the Oregon Trail.

There are other OCTA members who have years of experience and education regarding the Oregon Trail. Other OCTA members have not participated by attending BLM and EFSC meetings. I was a member of the BLM committee that developed the Programmatic Agreement. I attended nearly all the EFSC meetings, being an active participant. I wrote many letters in response to early project orders, draft proposed orders and now the draft project order.

I am, therefore, best suited to present contested case issues for the organization.

STATEMENT OF ISSUES FOR WHICH I AM REQUESTING A CONTESTED CASE HEARING

Issue 1. <u>Retirement and Financial Assurance:</u> OAR 345-022-0050

The Proposed Order fails to comply with past interpretations of OAR 345-025-0006(8) and the wording of this rule.

I have commented regarding this issue on more than one occasion, however, it is clearly stated on Page 2 of my July 8, 2019 comments that the lack of a bond places the risk the bond is intended to remove from the public and public agencies, back on the public.

It is not reasonable to suggest that this is the intent of the retirement standard. Both Bakeoven and Obsidian Solar recently have requested a similar reduction in the bond amount, which was reviewed by an outside consultant. Based upon the consultant's report, both requests were denied which is consistent with past practices.

The Siting Analyst, in the Obsidian Solar draft proposed order presented this analysis for not reducing the bond amount to $1.00 for 16 years.

> "Further, even assuming a low level of risk, the Department does not believe the applicant has provided substantial evidence that accepting a $1 security for approximately the first 16 years of the facility operation is an "amount satisfactory to

Council to restore the proposed facility site to a useful non-hazardous condition." If, in spite of there being only a low risk, the facility were abandoned, the State would be left with no options for recourse against the certificate holder and no means for covering the costs of decommissioning and site restoration. (This is unlike, for example, a utility that would still have a mechanism available to it to seek to recover such costs from ratepayers)"

Idaho Power has not provided any hard evidence that B2H will have a life of 50 years and more. In addition, the assumption that Idaho PUC would increase rates for Idaho residents to pay for cleanup of Oregon property is unlikely.

With the rapid changes in the energy markets and the increased risks that poses, it is irresponsible to place the risk on the residents of Oregon.

I am requesting a contested case regarding the above issue.

Issue 2. <u>Restoration</u>*:* OAR 345-021-0010(1)(w)(B):

The proposed site certificate fails to require restoration of the site to a useful, non-hazardous condition as noted in OAR 345-022-0050(l)

I commented on this issue on page 1 of my June 8, 2019 comments to the council.

The proposed site certificate requires removal of the transmission line concrete footings to a depth of one foot. This shallow depth does not comply with the rules requiring the site to be restored to a useful, non-hazardous condition.

The concrete footings can be up to 8 feet in diameter. A one-foot depth does not meet the requirement for the site to be left in a useful state. Erosion could easily remove a foot of topsoil leaving a jagged concrete block and rebar above ground. One-foot depth will inhibit or preclude the reestablishment of native grasses, shrubs, and trees. Artemisia or Sage roots easily grow to a dept of 6 feet, even fescue grasses grow roots to three feet deep.

There appears to be no other instance when this shallow a requirement was ever used. A three-foot depth is the normal requirement in site certificates, and it can be as deep as 5 feet which is being required in the Obsidian Solar development.

I am requesting a contested case hearing due to the failure of the proposed order to comply with the above requirement that the site be restored to a useful, non-hazardous condition.

Issue 3. **<u>Public Services, Fire Protection IV.M.8 (starting on page 571)</u>**

The proposed site certificate fails to provide adequate analysis of the Public Services Standard (OAR) 345-022-0110. This standard provides that during construction and operation, when considering mitigation, it is not likely that either will result in significant adverse impact to the ability of public and private providers to provide fire protection.

I commented on this issue at the public meeting on June 20, 2019 and in more detail in several of my letters, more specifically in my letter of June 7, 2019.

In proposed Condition 7(a), page 583; Staff is requiring Idaho Power to provide a copy of its Final Wildfire Mitigation Plan to the Department and each affected county.

1. There is no provision for the public to have an opportunity to review or comment, no matter where their property is located.
2. I have suggested that Idaho Power include specific prevention items. My suggestions include cameras and procedures during Red Flag conditions, neither of which were acknowledged or received comment.

Proposed Condition 7(d), page 583; EFSC removes themselves from responsibility for a Wildfire Plan, no matter what the Oregon Public Utility Commission determines as their Transmission System Wildfire Plan. The Governor's Executive Order 19-01 has no reference to EFSC standards and does not apply to any specific Energy Project.

The Oregon Public Utility Commission has completed their first workshop on May 21, 2020 in what they call Wildfire Mitigation Plans. Idaho Power was present and made a presentation that included only State of Idaho.

<u>Attachment U-3: Draft Fire Suppression and Plan (modified July 2020</u>)

Fire Prevention Measures 2.1.5 Equipment:

In my letter of June 7, 2019, I suggested the "Watchman" be replace with specific equipment provided on site during construction. I identified the equipment, crew size, and hours of operation.

I also suggested that IPC partner with counties and cities to develop traffic evacuation plan.

I did not receive any comment from the applicant or department.

I am requesting a contested case hearing due to the failure of the proposed order to comply with OAR 345-022-0110.

Issue 4. **Standards Relating to Protected Areas, Scenic Resources, Recreation and Historic, Cultural and Archaeological Resources for the National Historic Oregon Trail and sites**

OAR 345-022-0040 (Protected Areas) requires the Council to find that, taking into account mitigation, the design, construction and operation of a proposed facility are not likely to result in significant adverse impacts from noise, increased traffic, water use, wastewater disposal, visual impacts of facility structures or plumes, and visual impacts from air emissions.

OAR 345-022-0080 (Scenic Resources) requires the Council to determine that the design, construction and operation of the proposed facility, taking into account mitigation, will not be likely to have a "significant adverse impact" to any significant or important scenic resources and values in the analysis area.

OAR 345-022-0100 (Recreational Opportunities) requires the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order.

All three of these regulations have similar methods of analysis and rely upon the definition of significant as defined in OAR 345-001-0010(53). "having an important consequence, either alone or in combination with other factors, based upon the magnitude and likelihood of the impact on the affected human population or natural resources, or on the importance of the natural resources affected, considering the context of the action or impact, its intensity and the degree to which possible impacts are caused by the proposed action. Nothing in this definition is intended to require a statistical analysis of the magnitude or likelihood of a particular impact."

Council rules do not prescribe specific methodology for assessing impacts to protected areas or outline specifically what constitutes a potential significant adverse impact from a proposed facility to a protected area.

I am requesting a contested case hearing as the methods used to determine significant in all three standards were not independently obtained. Numeric values were applied to impacts with the total value determining significant. Key measurement locations or observation points were not satisfactory for useful results, with no public input obtained.

I respectfully maintain that the Staff does not have adequate knowledge of the Oregon Trail, its location, and its historical meaning as a legislated National Historic Trail. Staff when showing Key Observation Point simulation 5-25D, indicated it was from the picture window looking at the Oregon Trail. In fact, the simulation is of Flagstaff Gulch where there is no Oregon Trail and view is from a secondary window in the Interpretive Center. The power line simulation did show a significant visual adverse impact.

The Interpretive Center is very inadequately analyzed for significance in all three standards. Most of the elements were assigned values based upon opinion of a consultant. The effect from the Interpretive Center picture window, Panorama Point, and the Oregon Trail ruts were not shown nor discussed with the Council.

I believe that the proposed design, construction, and operation of the transmission line, considering mitigation, will likely have a "significant adverse impact" to Scenic, Recreational and Protected standards.

I commented at the Public meetings and in my letter of July 5, 2019 on these subjects.

Issue 5 **<u>OAR 345-022-0080 Scenic Resources for the National Historic Oregon Trail Interpretive Center (NHOTIC)</u>**

The Proposed Order did not respond to a Special Advisory Group (Baker County) and multiple public comments including mine of June 19, 2019 Public Meeting and May 26,2019 letter, for Underground mitigation.

What is the value of the BLM ACEC protected area and its scenic resource at Flagstaff Hill? Idaho Power was asked to provide an evaluation of undergrounding 1.5 miles of the transmission line. Power Engineers provided a Desk Top Class 5 estimate of costs and included opinion of their results. Power Engineers has not indicated that they have set foot on the ground at the site.

Staff has made several comments that have no basis in fact:

1. underground technology and infrastructure would themselves create visual impacts
2. underground would impact other resources protected and not evaluated in the ASC

Power Engineers has not indicated that undergrounding was not feasible or that it could not be done, only that their estimate of cost was very high and ground disturbance would be substantially greater than overhead lines.

The route is the same for both overhead and underground lines, and do not cross cultivated land. Power Engineers has experience with undergrounding as they were part of the Southern California Edison underground 500-kV project, finished in 2019.

Staff has written that; Undergrounding could be considered as "minimizing" impacts of the action if it was found that undergrounding did, in fact, minimize the visual impact of the proposed facility to the extent that the mitigation reduced a potentially significant adverse impact to a level that was less than significant, in compliance with an applicable Council standard.

I am requesting a contested case as no analysis was done on how undergrounding could mitigate scenic views. All cost amounts are estimates with the potential for 100% adjustment as per Class 5 American Association of Civil Engineers.

Issue 6 **Department Recommended Mitigation for NRHP-Eligible Oregon Trail/NHT Segments**

The proposed mitigation fails to consider the BLM Programmatic Agreement while adding additional restrictive requirements that require approval by Council as outlined in OAR 345-001-0010(33)

The Staff has modified this OAR to require the benefit of mitigation to the **county** of the resource effected. Department Recommended Mitigation for NRHP-Eligible Oregon Trail/NHT Segments…. with a demonstrated direct benefit to affected area (county of resource site), in order of priority:

Item "e" in the regulation (OAR 345-001-0010(33)) has no requirement of county or resource site which states: (e) Partially or completely compensating for the impact by replacing or providing comparable substitute resources or environments.

As previously stated, Oregon Trail segments that are likely to be eligible for National Register is estimated at a total of 50 miles in Oregon. Ownership is split nearly half between private and public ownership. Scenic Resources being significantly affected at the NOTIC, and possible unwillingness to consider undergrounding, the purchase of comparable property is the most likely mitigation. In this case purchase of property, with Oregon Trail ruts/swales may need to extend to Idaho or Washington.

However, after all this time with lots of meetings and multiple pages of material, for staff to include now a new requirement never discussed, lacks transparency, cooperation, and possible applicant influence.

I am requesting a contested case hearing due to the proposed order entering new requirements for mitigation beyond the applicable OAR while not providing for public comment.

TARDAEWETHER Kellen * ODOE

From: Joe Horst <joehorst@eoni.com>
Sent: Thursday, August 27, 2020 11:29 AM
To: OED_OAH_Referral@oregon.gov
Cc: kellen.tardaewether@oregon.gov; fuji@stopb2h.org
Subject: [Fortimail Spam Detected] Contested case Horst/Cavinato
Attachments: Contested Case Letter to ODOE 8-25-2020.docx

Please read attached contested case letter.
Thank you,
Joe

Joe Horst
La Grande Auto Repair
1505 26th St. La Grande, OR. 97850
Phone: 541.975.2000
Fax: 541.975.2222

August 25, 2020

From: Joe Horst
Anna Cavinato
86 Hawthorne Dr.
La Grande, OR. 97850

To: Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. N.E., Salem, OR 97301
email: OED_OAH_Referral@oregon.gov
copy: kellen.tardaewether@oregon.gov

Dear Ms. Greene-Webster and Kellen Tardaewether:

We are requesting to file as a full party to the Boardman to Hemingway Contested Case process. If anyone else has the same or similar issues as ours, they may not represent us and our issues. There is no assurance they will address the issues in the same manner and may not represent us and our issues the way we would given our experiences, interests, and impacts. We are also not represented by an attorney at this time but reserve the right in future proceedings.

We are intending to protect a personal interest in the outcome of this contested case. The outcome may result in the construction of a transmission line within 500 to 1000 feet of our home. This will reduce the value of our home, create noise impacts, irreparably damage the Oregon Trail on our property, potentially damage my well, destroy our views, and result in stress lasting for a minimum of several years due to not knowing if the line will pass by our home until it is actually built.

We had sent in a letter to the EFSC on August 5th 2019 regarding the Draft Proposed Order and we addressed our concerns at the hearing on June 20th 2019 in La Grande. Idaho Power has not addressed many of our concerns nor has the Oregon Department of Energy (ODOE) in the recently issued Proposed Order for the B2H site certificate. The following is a summary of the issues we would like to address.

Issue #1 Notification to affected property owners.

On May 5th, 2016, we received a letter from Idaho Power about the B2H line. This was the very first time we ever heard anything about the B2H project. The letter was short and in bold letters it said: "Permission to enter your property for survey and information gathering does not in any constitute your consent to grant a future easement." We were told by Idaho Power at this time that there would be nothing done at or around our property and no surveys were ever done. The very next letter we received was on May 12th, 2017. (Very near the completion of building our new house). This letter said it was contacting landowners whose property "May" be impacted by this project. I contacted Idaho Power and had a sit-down meeting with a representative that did not work for Idaho Power but was contracted by

Idaho Power to meet with me. This was the first time I was made aware that there may be significant construction that may have an impact on us.

We would also like to note that three times, after initial contact in 2017, right after the meeting in La Grande in October of 2018, and after the meeting in June of 2019, Idaho Power contacted us and told us that the route that passes by our house was not going to be used. After the 2019 meeting, they specifically said there were too many obstacles using that route and if the project continued, the Morgan Lake route would be the route that would be used.

Then, in early 2020, I received a phone call from Idaho Power telling me (again) that they were not going to use the Mill Creek route in front of our house, and that we "didn't need to take any further action." Since then, we have been under the impression that the route through my property was no longer going to be used until we just received this last notice. After reading the public notice and a little research we found that Idaho Power shows the route through my property as one of two possible routes and the Oregon energy facilities website still shows this route as the **primary/preferred route**. In fact, the draft site certificate, in the Proposed Order, states it is approving the preferred (Mill Creek) route as well as the (alternative) Morgan Lake route.

Idaho Power misled us, and we would guess others by telling us we no longer needed to participate in this transmission corridor site certificate process. It is clear that Idaho Power manipulated us and the public to the extent that no one was sure what they should be reacting to. They interfered with the public being able to comment on impacts to their property, get a contested case, and went around giving property owners false advice. No matter what route they actually do plan to use, they manipulated the public behind the scenes. No site certificate issued to Idaho Power can be legal given the following:

a. The application did not accurately show the location of the development.
b. The developer told people they did not need to participate in the process while they moved it forward.
c. They failed to meet the requirements of the Project Order.
d. Appeared to purposefully confuse the public by submitting an application they knew was not accurate. We believe the term is "bait and switch".
e. Included unnecessary information in the application they already had decided they would not use resulting in increasing the amount of material the public had to review.
f. The developer started working on this transmission line in 2010. We started building our home in 2015 having received no notice of what they were planning. We will suffer extreme financial and are experiencing physical damage due to the actions of this developer (stress).

We are requesting a contested case due to the actions of the Idaho Power to discourage public participation in the site certificate process and the fact that we have not received proper notice. This contested case request is supported by ORS 183.415 (1) Notice of right to hearing "[T]he Legislative Assembly finds that persons affected by actions taken by state agencies have a right to be informed of their rights and remedies with respect to the actions." This statute goes on to state specifically what must be communicated and how it is to be communicated. The Oregon Department of Energy failed to provide this information to us and others impacted by such things as potential damages our my well, impacts to

the streets we use to get to our home, the noise of the transmission lines, and as a result of that failure, have left the impacted public and us vulnerable to the malfeasance of Idaho Power. The Council is responsible for the procedures used in contested cases and this request does meet the requirement of being under council jurisdiction.

Issue #2 Public Safety and Traffic Plan.

The information required to be submitted with our contested case is the same as that included in Contested Case Number One. We commented on this concern in my verbal comments made on June 20, 2019.

We are asking for a contested case due to the fact that the developer did not include in their site certificate as part of the development the use and changes required to use Hawthorne Dr. to access the road past my house. Modelaire Dr. and Hawthorne Dr. forms a bottle neck as it leaves Sunset. According to the developer's application, a 20 foot area is required by the state to make a turn with the large equipment they will be using. There is not 20 feet of clearance at the intersection.

The traffic to our housing project entrance (Sunset Dr. to Modelaire Dr. and Hawthorne Dr.) is a single entrance with absolutely no sidewalks, high bushes, two blind 90 degree corners with significant bike and foot traffic. This includes many kids going and coming from school. A count done in 2017 has 24 school kids that live in this area that must use this road entrance to and from school. This entrance is also at the base of a steep road as you turn either 90-degree corner. Sidewalks would be critical for safety due to the blind corners and steepness of the road. There is no other way in and out of this area. There are also elderly and other people that walk this hill for exercise on a regular basis. Major street improvements and sidewalks would be 100% necessary for safety. Because of the steep terrain and the design of the yards and landscapes, sidewalks alone will be very difficult. These issues are not addressed in the updated Proposed Order.

The way they addressed the traffic issue is very generic. No specifics were detailed, and the Traffic Plan is also so general how can anyone comment with "specific specificity" required by ODOE? This proposed route is going to use our road that literally passes within 25 feet in front of our house.

This proposed route is not only going to use-our road that literally passes within 25 feet in front of our house. It will also pass within 10 feet of a very expensive 565 ft. deep well that was drilled in 2002. This is a private road and generally has little traffic. There will be very heavy equipment using this road. The dirt and dust on our house and new wood log siding will be significant. They talk about dust debatement but who polices this when it is no longer effective? We are mostly concerned about potential damage to our well as essentially very heavy equipment will be driving right across the top of it. We are also concerned about nearby blasting damaging the well. The new power lines and the tensioning station would be approximately between 1000 and 1500 feet from our house and we could very well hear the noise from these. We will address noise specifically in Issue #4. Yet all of the issues above pose serious health and safety threats to our family and our neighbors. This industrial line is just too close to residential areas of our community and our home.

We are also requesting a contested case due to the fact that Idaho Power must test the amount and quality of water in wells near their development prior to starting any construction and monitor well quantity and quality post-construction of the transmission line (it will be assumed that the construction impacts were the cause of the well water changes), Idaho Power will pay for whatever actions are required to restore and repair the well including drilling a new well if that is required.

Issue #3 Historic and Cultural Resources.

The Oregon Trail enters our driveway (Hawthorne Dr.) at one of the sharp corners, that would need to be changed for large equipment to get around, at the lower end of the driveway. There are good ruts from the Oregon Trail wagons at this spot. There is a large post with a sign just installed into the ground by the Boy Scouts of America (BSA). The National Historic Oregon Trail leaves the driveway about 900 feet up from that spot at another sharp corner right in front of our house. The road may also need to have some work done here to accommodate large vehicles. There is also another sign, also just installed into the ground by the BSA, at this location.

The Oregon Trail through here is already walked often and has increased substantially over the past 15 years. We expect this traffic to increase even more with the installation of new signs and markings for the trail, as well as cooperation by the landowners allowing permission for people to walk the trail. We are under the understanding that the National Historic Oregon Trail is protected. There can be no mitigation for damages to the trail and the ruts. Once they are gone, they are gone forever.

Issue #4 Noise.

We briefly mentioned noise in my past testimony and letters, however after reviewing the Proposed Order, We have learned that ODOE is planning to have EFSC give a total variance to the State Department of Environmental Quality's Noise Standard. While this is obviously another public health and safety issue, we wanted to make it a stand-alone issue as well in the contested case. In addition, we may not have commented on the issue of noise with "specific specificity" in my DPO comments. However we believe that due to the significant changes in the Proposed Order, i.e.: allowing a variance to the noise standard for everyone living within ½ mile of the transmission line, that ORS 469.370 and OAR345-015-0016(3) allow me to comment now in this request for contested case.

We are specifically requesting a contested case regarding the noise variance due to the fact that Idaho Power's contractor used a sound measurement from a location that is nothing like our home to assign a baseline noise level to my property. We are confident that the noise level at my property is not similar to the "monitoring position - MP 11," near Hilgard State Park. That location is next to the interstate, the railroad, and the Grande Ronde River. I will be severely prejudiced if the developer is allowed to build a transmission line without providing an actual baseline monitoring results at our residence. If the development were built, there would be no way after the fact, to obtain an accurate noise level without the transmission line.

ORS 469.507 requires developers to monitor the environmental and ecological effects of construction and operation of the development. So far there has been no monitoring done, nor any offers to conduct monitoring, at my residence. This is also in violation with the DEQ rules, OARs Chapter 340.

Since the monitoring results from the site used to assign a noise measurement to our home was in no way similar to our location, Idaho Power must provide an actual measurement at our home in order to determine what the increase would be with the transmission line. Modeling is not documentation. It is a guess and the site certificate decisions need to be based on site- specific factual information. Therefore, we contest the fact that the variance cannot be granted until site-specific monitoring is conducted at our home.

Due to significant safety issues and the considerable impact to our health, safety, house, property, domestic well, and the Oregon Trail, this route should not be used. **The site certificate should be denied.**

From what we have learned, new power lines are no longer necessary. With technology and other energy sources available, the existing lines could be easily upgraded and would have far less impact on safety, environment issues, and negative impact on landowners.

Sincerely,

Joe Horst & Anna Cavinato
86 Hawthorne DR.
La Grande, OR. 97850
Phone:
WK. 541-975-2000
Cell 541-975-4500

TARDAEWETHER Kellen * ODOE

From: Norm Cimon <ncimon@oregontrail.net>
Sent: Thursday, August 27, 2020 10:40 AM
To: TARDAEWETHER Kellen * ODOE
Subject: Fwd: EFSC Contested Case Request
Attachments: EFSC Contested Case Request.pdf; 2020AS RFP Locational Capacity Limits.jpg; IPC Growth & Flat periods.pdf; ID Power Growth Charts.pdf; Residential Use (1997-2018).jpg; Commercial Use (1997-2018).png; ncimon.vcf

Good morning. This was sent to the Administrative Law Judge a few minutes ago. I'm forwarding you a copy for your records.

-------- Forwarded Message --------
Subject:EFSC Contested Case Request
Date: Thu, 27 Aug 2020 10:38:20 -0700
From: Norm Cimon <ncimon@oregontrail.net>
To:OED_OAH_Referral@oregon.gov

Thank you for your time with this request. Please find attached, the contested case request, and additional documentation. That documentation expands on my request. It's included should you need additional verification of my points.

Norm Cimon
1208 First Street
La Grande, Oregon
97850

Senior Administrative Law Judge Alison Greene-Webster
Oregon Department of Energy
500 Capitol Street NE, Salem, Oregon
97301

August 26th, 2020

Dear Judge Greene-Webster,

I am the owner of a small business, and I am filing a contested case request as a party to the *Proposed Order on Application for Site Certificate for Boardman to Hemingway Transmission Line*, issued by the Oregon Department of Energy on July 2nd, 2020. My interest in the proposed order is primarily economic and environmental. The cost to ratepayers threatens to remove three-quarters of a billion dollars from circulating in local economies (the high-voltage power line would also menace the fire-driven ecosystems of the Blue Mountains where I make my home).

As detailed in my response below, the possible doubling of the cost to ratepayers is a significant red flag for the public interest. Dramatic changes to the business model of electric utilities are completely reworking the electric power grid. I am a systems analyst and I worked for the US EPA, the US Forest Service, and as a self-employed contractor for private and commercial interests over a period of forty years. I've been tracking the changes brought on by digital technology, and what they portend for electric utilities, for over twenty years.

With that background, I have a clear understanding of the issues involved that extends beyond those of other concerned citizens. To reinforce that point, I am including supplementary documentation and links should you need to expand on why I have made my arguments.

A correction to my comments:

One of the comments I was said to have made to the Energy Facility Siting Council when the EFSC held a hearing here in La Grande, Oregon on June 6th, 2019[1] was recorded as follows:

> *Microgrids essentially contain enough energy resources to meet the demands.*

This is a misstatement: perhaps a reflection of the wide-ranging nature of my remarks and the difficult task of recording those accurately.

1 Attachment 4: Boardman to Hemingway Transmission Line DPO Comment, Applicant Responses, Department Response in Proposed Order Crosswalk Tables

What I did say was that the advent of microgrids and distributed resources will completely change the nature of the power grid, drastically reducing the need for long-distance transmission. That has been predicted for years and now it's happening and very quickly.

Because the transition is proceeding at such a rapid pace, there is significant financial risk to consumers. They will be left to carry the burden of 50+ year financing for an under-utilized and often unused asset should the line be approved.

More to the point, a recent very development, pertinent to that risk, is the on-going negotiations between Idaho Power and the Bonneville Power Administration, something the utility has finally acknowledged. Idaho Power is in discussions to take on the BPA's share of the Boardman-to-Hemingway power line. Such an eventuality would increase the burden to customers by over 100%, with three-quarters of a billion dollars, at a minimum, extracted from local economies. I have reached out to our Senators about this loss since it would affect communities that can least afford it. That would happen even as the grid sees a reduction in the amount of long-distance transmission.

The State of Oregon must take this stark reality into consideration in its decision making. While I acknowledge the difficult situation the EFSC finds itself in given the on-going paradigm shift, that does not absolve the Council from doing the hard staff work necessary to factor in the effects of this transition and the long-term consequences for ratepayers.

What follows is a point-by-point factual rebuttal of Idaho Power's comments to my remarks. First my comments, then the utility's response, and then my response, highlighting the facts that counter the claims.

While the hearing recorder largely paraphrased what I had to say, I will nonetheless leave the words uncorrected in what follows, since the gist of the transcription is close to my original intent.

My comments at the hearing:

> *I am concerned that Oregon siting methods do not look at the needs in terms of cost to the end consumer and whether that cost is really necessary in light of new technologies like microgrids, new battery storage systems, and other internal system changes which can reduce energy requirements.*
>
> *Within 10 to 15 years much of the power on the grid will come from widely distributed generating sources. Many of these sources will be small to moderately sized providers hosted through standalone microgrids.*

Idaho Power's response to my comments:

> *This precise argument was made in Idaho Power's 2017 IRP proceeding—to which Idaho Power responded in written comments, filed on February 16, 2018. Specifically, while Idaho Power acknowledged that tools such as micro-grids, DER and storage will all play a part in the utility of the future,* ***they cannot substitute for a reliable transmission grid****—particularly as renewable generation increases and as regional markets expand.*

My response to Idaho Power:

Storage resources ***are*** substituting for transmission. MIT researchers made that very point:

> *Battery storage helps make better use of electricity system assets, including wind and solar farms, natural gas power plants and transmission lines, and that can defer or eliminate unnecessary investment in these capital-intensive assets[.]*

Their study found that:

> ***[T]he value of storage originated primarily from avoiding investments in additional generation capacity and transmission infrastructure.***

The Federal Energy Regulatory Commission put the exclamation point on this by deciding that storage is just that, a transmission resource. The only question remaining, and it's an important one, is how to properly value the savings brought to the utility. That issue is peripheral to the fact that storage can greatly reduce the capital requirements for utilities and, specifically, the need for additional transmission.

Idaho Power's response to my comments (continued):

Idaho Power's comments pointed out that the Company would be joining the Western Energy Imbalance Market in April of 2018, and that there are significant discussions underway across the West to either establish new or expand existing wholesale power markets. These markets are driven, in part, by ***increased renewable generation which, as a generally variable and nondispatchable resource, is relatively difficult to integrate onto the grid****. (my emphasis)*

My response to Idaho Power:

PacifiCorp, part of Berkshire-Hathaway Energy and a utility that serves the Northwest, has decided that increased renewable generation is quite easy to incorporate into the grid. To do just that, the corporation recently issued a massive Request for Proposals for renewable energy, both wind and solar, with integrated storage components. The placement of those resources shows that PacifiCorp fully expects to rework, manage, and moderate, a major portion of the existing grid across the Northwest using those assets.[2]

The precipitously plummeting price of storage has completely obviated the concern over dispatchability of renewable resource. It's hard to believe that, ten years on, Idaho Power is still stating that as fact when other utilities are planing to dispatch that stored power on an as-needed basis.

Idaho Power's response to my comments (continued):

Markets, by utilizing regional transmission interconnections, spread this variability across an entire region, thereby allowing the least cost generation to balance variable resources. It is widely

2 I've included an image from that RFP that shows the initial placement and capacity limits for those resources, a substantial investment.

understood that, as renewable generation grows, the need for flexible dispatchable resources will also grow, and that regional transmission will be the key to linking these complementary resources together.

The fact that the OPUC acknowledged B2H demonstrates that it found the Company's response persuasive.

My response to Idaho Power:

The development of the imbalance market for the western grid is predicated on the perception that moderately rapid sub-hourly response to imbalances will be needed. The advent of storage brings into question the use of high-voltage lines to provide that service. The response from battery storage mediated by digital controls is, for all practical purposes, instantaneous with no delay at all. Given properly staged and provisioned distributed generation, power will emanate locally and propagate through the existing grid.

PacifiCorp is positioning their planned resource base of renewable energy and storage to provide power that will be distributed strategically across the region. That will have the effect of greatly reducing long-distance transmission. There is no doubt that adding storage to the grid will change the pattern of transmission. It has to. If there are storage assets distributed across a service area, there's less of a need to feed power in. That will mean much less traffic on existing lines. It's simple logic. If more power is produced locally, less will have to be transmitted regionally. That will completely change the dynamics of the power grid.

As for the OPUC, in a recent online session I had with them they were shown proof of the flat demand that Idaho Power has seen over the last thirteen years. There is a growing realization that the Idaho Power's static numbers[3] are in keeping with a nation-wide trend. In Idaho Power's case, an increasing customer base has been perfectly matched by decreasing average consumption[4].

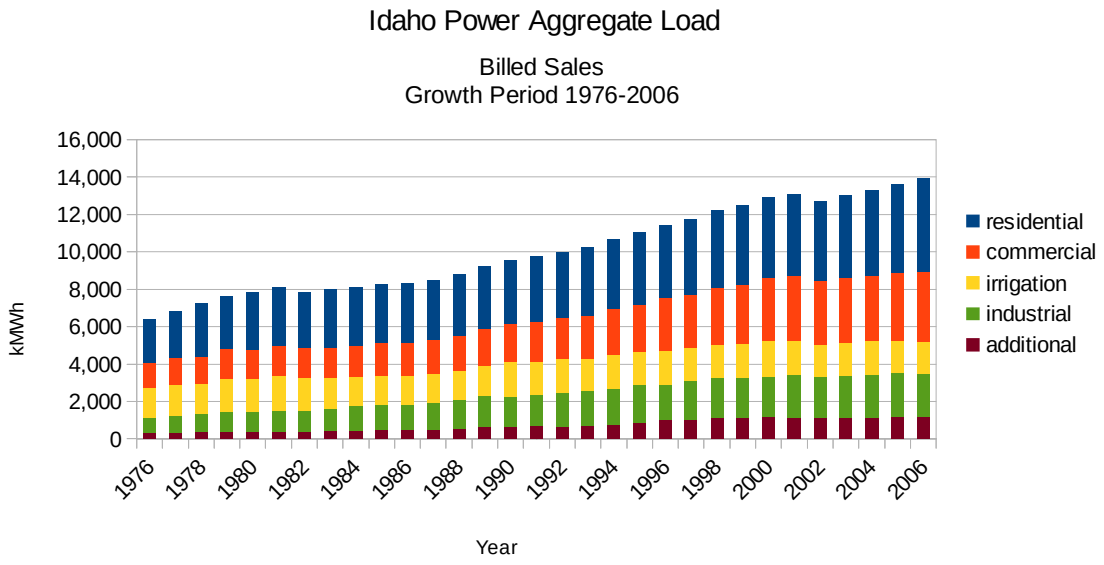
As you examine the included documents detailing Idaho Power's electric demand, consider that those numbers a now subject to further downward revision, given the pandemic and it's significant effect on that demand and how it's being met.

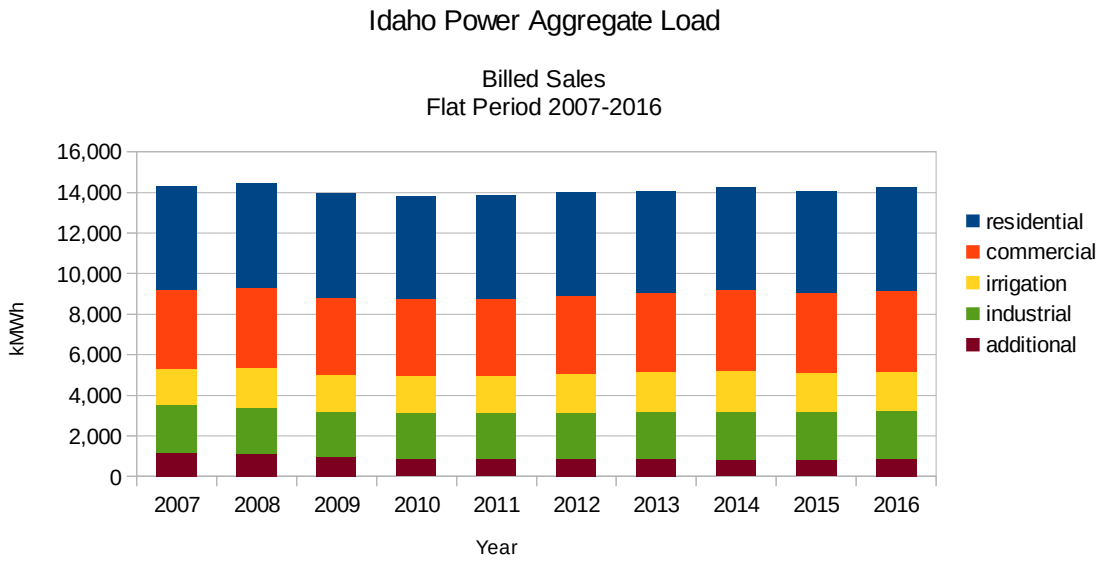
Future participation in what could be a very weak imbalance market should not be the reason for authorizing the power line with it's half-century of financing. That would be grossly unfair to what will in all likelihood be a shrinking base of power consumers. They would find themselves subsidizing Idaho Power as it attempts to satisfy investors through what is, at best, a problematic market strategy. Ratepayers are not piggy-banks.

3 I've included a detailed analysis and charts of the past growth period, and the current flat period, for Idaho Power's electric sales.

4 Charts for residential and commercial consumers are included as an attachment to this document.

Idaho Power: Aggregate Load Before & After 2007





Load Growth

There are two distinct and easily identified periods to the Idaho Power sales data, driven by national trends—factors surfaced through the work of the Energy Information Administration. I've included side-by-side boxplots for each period (Figure 1). The box portion of each is simply where 50% of the data resides and the darker line inside is the median for the period. The extensions below and above the box show the full extent of the data. Those plots visually convey the significant difference in power sales for those two periods over the last forty-eight years, extracted from the company's own sales data.

The sizable spread in electric sales and the large amount of variability in the growth period are both completely absent from the flat period. Moreover, the decline in electric demand caused by the on-going pandemic will likely result in more downward pressure on sales and even less variability.

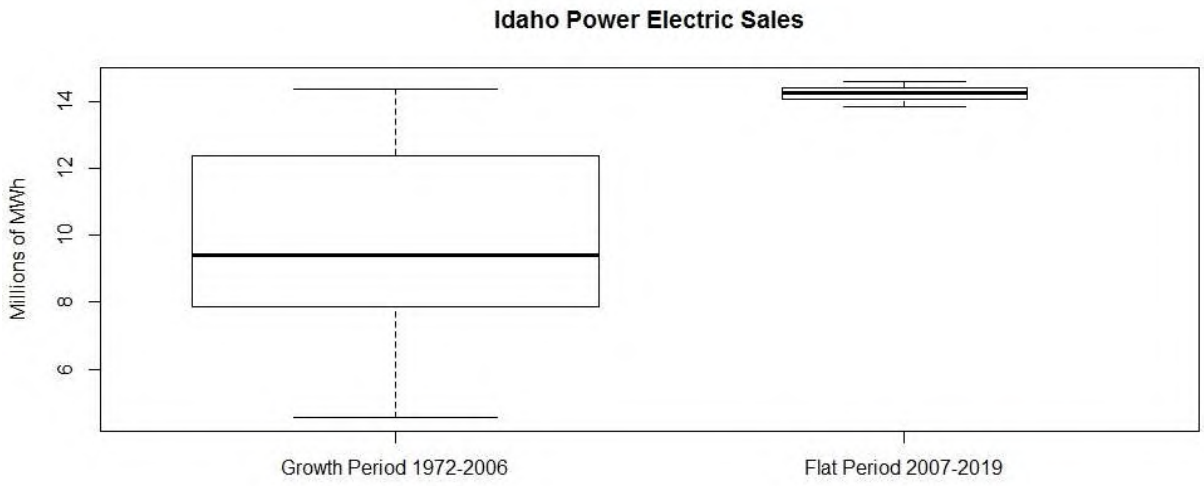
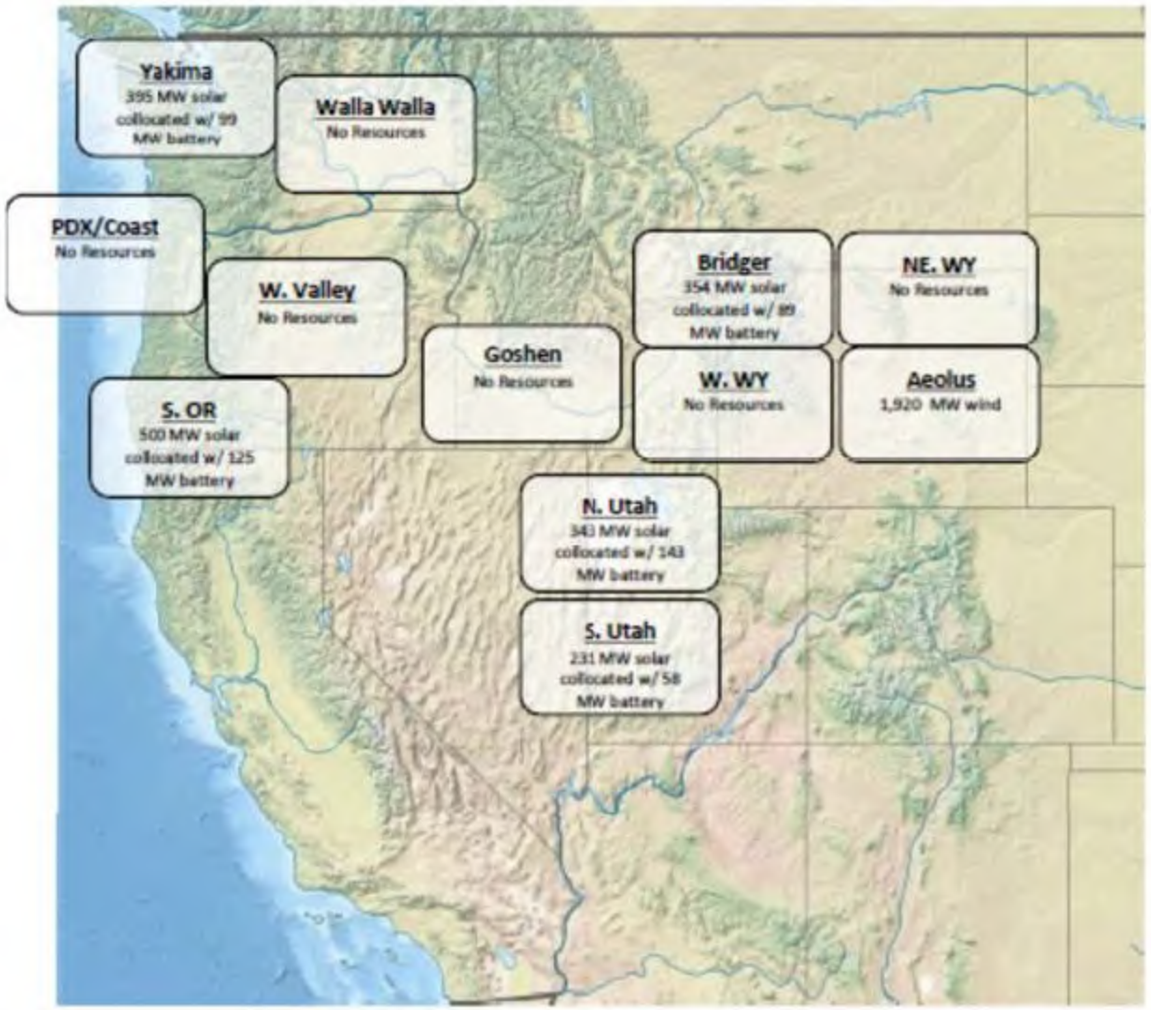


Figure 1: Boxplots for the growth period and the flat period in Idaho Power sales data.

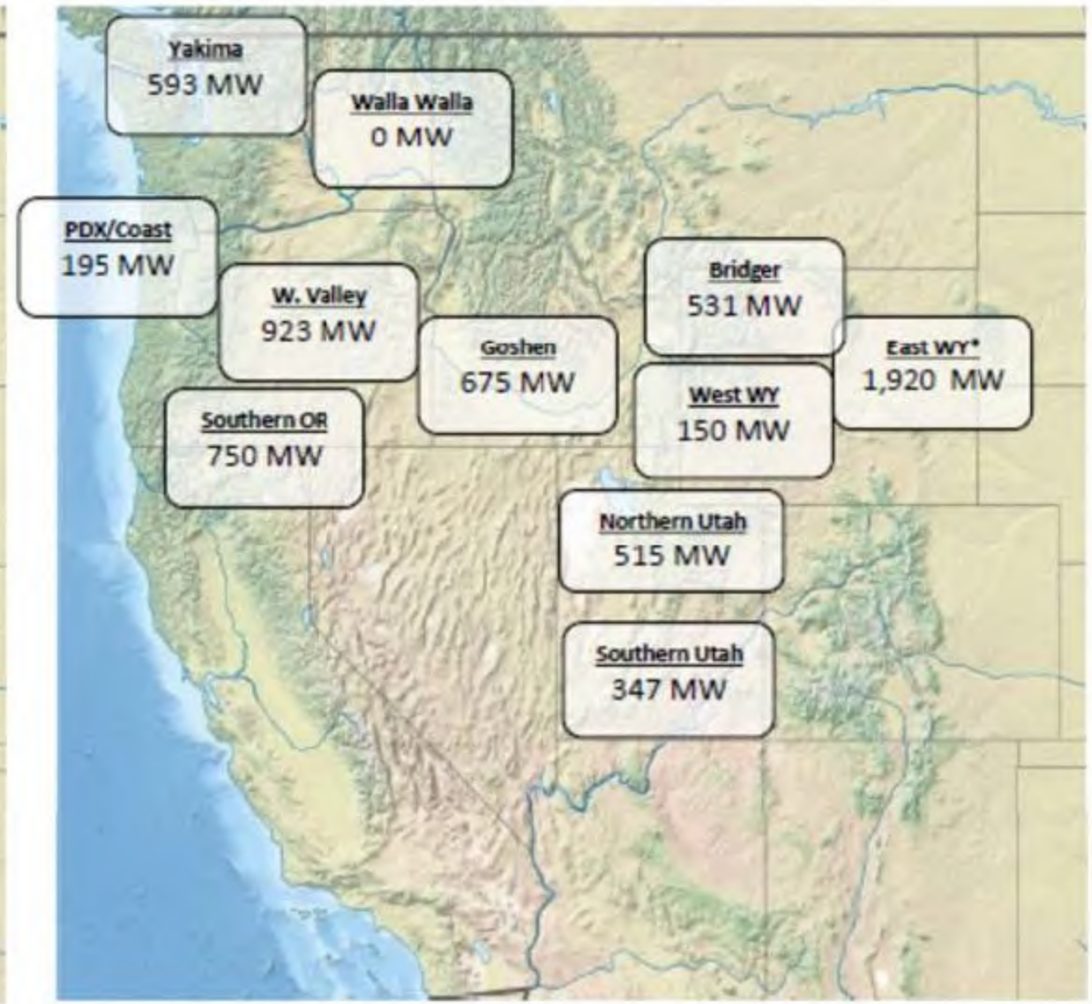
APPENDIX H

2020AS RFP Locational Capacity Limits

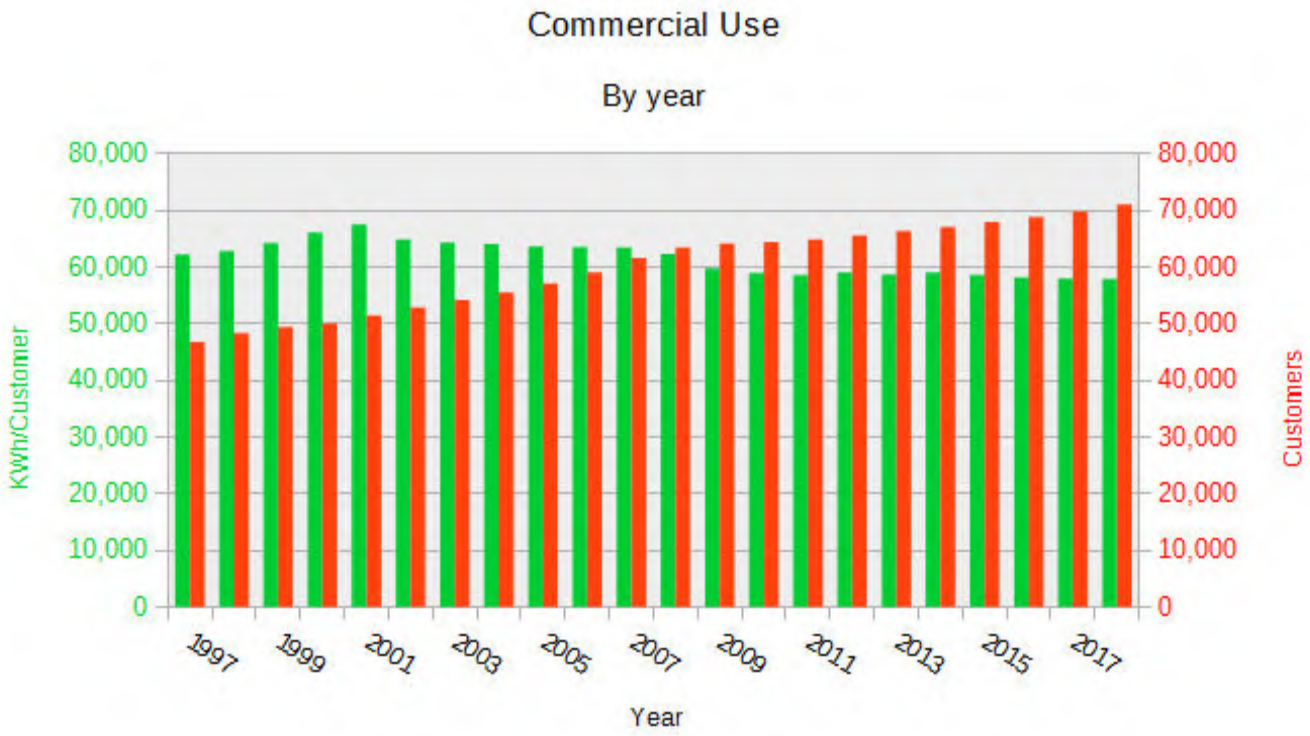
2019 IRP Preferred Portfolio Resources Online by Year-End 2023 (Excludes Customer Preference Resources)

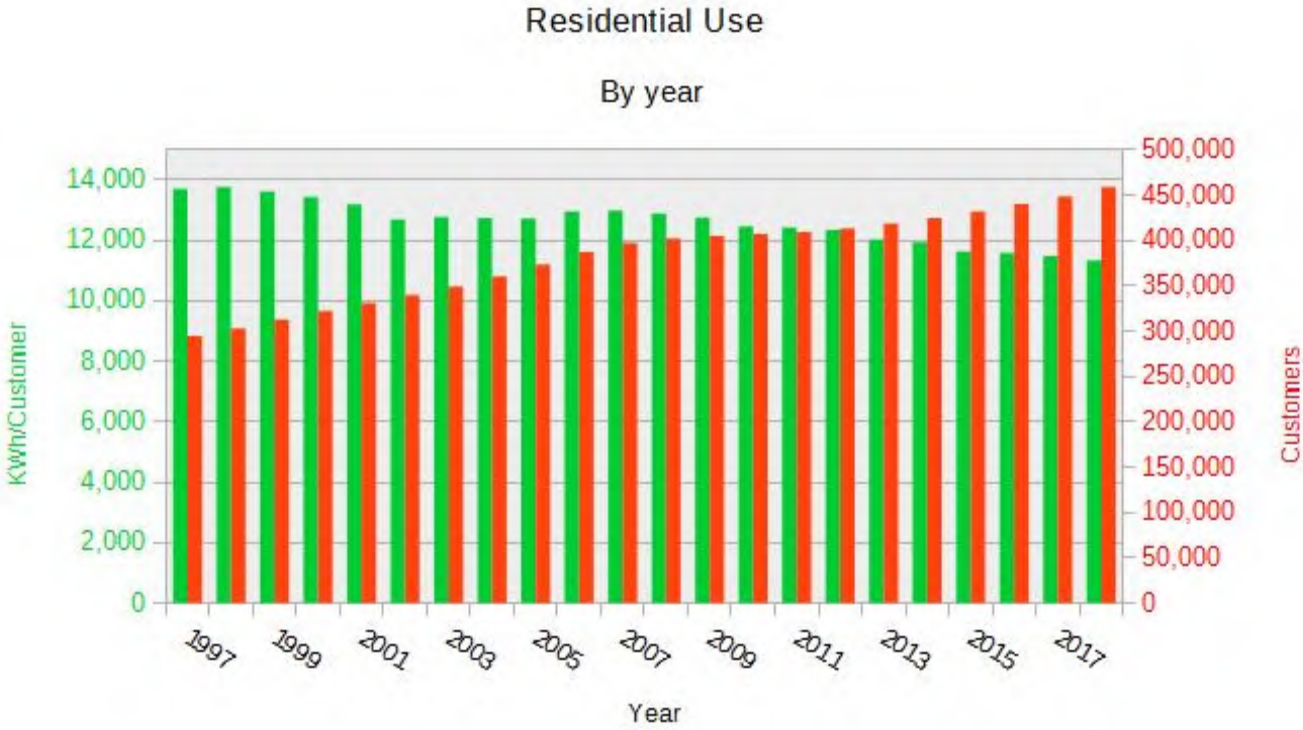


Locational Initial Shortlist Capacity Limits (1.5x Pref. Port. or 1.5x Assumed Interconnection Limit)



*Note, eastern Wyoming includes Aeolus and NE Wyoming, which combined, will be limited to 1,920 MW.


Commercial Use
By year
80,000
70,000
60,000
50,000
40,000
30,000
20,000
10,000
0
KWh/Customer
Customers
1997
1999
2001
2003
2005
2007
2009
2011
2013
2015
2017
Year


Residential Use
By year
KWh/Customer
14,000
12,000
10,000
8,000
6,000
4,000
2,000
0
Customers
500,000
450,000
400,000
350,000
300,000
250,000
200,000
150,000
100,000
50,000
0
1997
1999
2001
2003
2005
2007
2009
2011
2013
2015
2017
Year

TARDAEWETHER Kellen * ODOE

From: Matt Cooper <mcooperpiano@gmail.com>
Sent: Thursday, August 27, 2020 8:43 AM
To: OEH_OAD_Referral@oregon.gov
Cc: TARDAEWETHER Kellen * ODOE
Subject: Contested Case letter re: B2H, wildfire
Attachments: Contested Case Letter- fire.docx

Dear Judge Greene-Webster:

Attached please find my Contested Case letter regarding the risk of wildfire with the proposed B2H transmission line.

Respectfully,

Matt Cooper
302 C Ave.
La Grande, OR
541-786-2052

Date: Aug. 24, 2020

To: Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED-OAH-Referral@oregon.gov
cc: kellen.tardaewether@oregon.gov and Stopb2h.org

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

a. **My name is Matt Cooper and I reside at 302 C Ave., La Grande, OR, 97850.**

b. **I am not represented by an attorney.**

c. **I am requesting to file as a party.**

d. **What is your interest and how will it be affected? (economic, recreation, health, etc.)**
My interest is in the public safety risk from wildfire caused by transmission tower located in the #1 Wildland-Urban Interface in Oregon, two miles directly up-canyon from my home. The recent Camp and Paradise fires in California illustrate the devastating impact of wildfires sparked by power lines in hot, dry conditions.

e. **If it is a public interest, how will it be affected?**
The risk of wildfire will affect everyone living along Morgan Lake road and everyone living in southwest La Grande. This area also contains the hospital, the high school, the middle school, and a brand-new elementary school. The 1973 Rooster Peak fire, in roughly the same area, destroyed several homes and burned within a half-mile of the hospital.

f. **I need to represent myself as I am a homeowner in the Southwest hills of La Grande, immediately down-canyon from Morgan Lake, and thus in an area very vulnerable to wildfire.**

g. **A short statement of my issue and why I am requesting a contested case.**

In Table PS-9, p. 573 of the Proposed Order, the Council has neglected my comments regarding the *implausability of the Estimated Response Time for Union County*. The estimated response time of 4-8 minutes flies in the face of reality. If the transmission line started a fire at Morgan Lake, we are to believe that a crew from the La Grande Rural Fire Protection District, consisting of only two paid members and 23 volunteers, could sprint up to Morgan Lake in eight minutes or less. This is an absurd proposition, for the following reasons:

1. **Fire protection is by a minimally staffed crew of volunteers**
Most likely only one paid member would be on duty at the time of a fire, and all the volunteers would have to be called into duty from around the county. *How long would it take to assemble a volunteer fire crew* before leaving the station?
2. **Response times stated in the PO are wildly inaccurate**
According to the Maps app on my iPhone, the travel time from the La Grande Fire Department at 1806 Cove Avenue. to my house (near the base of Morgan

Lake Road and only one block off the route to Morgan Lake) is *already eight minutes*! That is not to mention the *remaining 2.2 miles and 1200 feet of elevation gain* to get to Morgan Lake on a narrow, winding, unpaved road with blind corners and steep drop-offs.

Based on my numerous trips up and down this road over the past 30 years, I would say a *maximum* safe speed of travel for a passenger vehicle is 20-25 mph. Assuming an average rate of 20 mph, it would take almost seven more minutes for a vehicle to race up Morgan Lake, *totaling 15 minutes* from the fire station to Morgan Lake.

Again, I would stress that even this is an optimistic estimate, assuming a fire truck did not get delayed following a camper, horse trailer, or other slow-moving vehicle (there are probably only about three places on this road wide enough for a vehicle to pull over).

Thus, we are supposed to believe that a) all the volunteers would conveniently be at the fire station when the fire started; and b) the crews could make it to the fire in *one-half to one-third of the time needed* for a passenger car to travel the same route.

3. **Spread of fire is likely to outpace any human response, even in best scenario**

   If a wildfire started at Morgan Lake and traveled through forested land at the commonly accepted rate of 6.7 mph, it would jump a mile in just under 9 minutes, thus coming halfway down the canyon in less time than any fire engine could even make it to the scene.[1] If a fire traveled at 14 mph (the rate given for fires in grasslands), it would travel a mile in 4 ½ minutes; thus it could *burn all the way to the bottom of the canyon in less time than a vehicle could arrive at the scene*. This does not even take into account the effect of wind, which is frequent in this region; average wind speeds on the calmest day of the year are 4.9 mph, and the windiest day of the year are 7.9 mph.[2] Add to this the microclimatic factors of the "up-valley" or "down-valley" winds common to mountain environments during morning and afternoons/evenings, and you have the makings of an inferno particularly during the hot, dry months of summer.[3]

None of these factors are reflected in the unrealistic estimate of response times in Table PS-9. The response times in this table are demonstrably erroneous for Union County, at least. The Council has in fact *completely failed to take into account my comments* on the DPO from Aug. 11, 2019.

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[1] https://en.wikipedia.org/wiki/Wildfire#:~:text=Wildfires%20have%20a%20rapid%20forward,(14%20mph)%20in%20grasslands. Accessed 29 July, 2020.

[2] https://weatherspark.com/y/1778/Average-Weather-in-La-Grande-Oregon-United-States-Year-Round#:~:text=The%20average%20hourly%20wind%20speed,than%206.4%20miles%20per%20hour. Accessed 29 July, 2020.

[3] As an example of how quickly flames can engulf an area, consider this example from the nearby Tower Fire in 1996: "Flames spread through the canopies of trees, some of them older than a century, on about *20,000 acres in a 24-hour period* spanning Aug. 25 and 26. The Tower fire eventually burned over 50,000 acres before an autumn-like storm helped firefighters, who numbered more than 1,000, douse most of the flames in late August." ("Missing Mountains," Jayson Jacoby, *La Grande Observer*, 8-1-2020; italics mine.)

4. Finally, on the subject of utilities and wildfire risk, the following item should have come to the attention of ODOE from Governor Brown's Executive Order 20-04, which reads as follows:

> WHEREAS, all agencies with jurisdiction over natural and working landscapes in O regon will need to prepare and plan for the impacts of climate change and take actions to encourage carbon sequestration and storage; . . . [4]

Furthermore, the GOVERNOR'S COUNCIL ON WILDFIRE RESPONSE November 2019: Report and Recommendations make the following recommendation, which is given priority "HIGHEST": "Oregon legislature pass legislation requiring utilities to prepare risk-based, wildfire standards and procedures inclusive of criteria for initiating power outages. . . "[5]

h. I brought up the issue of wildfire in my letter submitted to EFSC on August 11, 2019.

Locating a high voltage transmission line in the steep, dry, windy country near Morgan Lake results in an unacceptable risk of fire, and any such fire would most likely burn out of control before it could be contained by a rural volunteer fire department. Such a fire would threaten the homes of an entire neighborhood including homes, schools, and the county's only hospital. Idaho Power has included lowball estimates for response times to a fire at this location, times which are demonstrably impossible, and such falsehoods cast doubt on the credibility of their application.

Although I commented in 2019 to this effect, the Proposed Order ignored the information I presented and failed to respond to it in any way. I am contesting this case because of the Proposed Order continues to pretend this problem does not exist, and as proof of this, failed to even bother addressing my concerns. For these reasons, I respectfully request that the Site Certificate for the Morgan Lake Alternative be denied.

Sincerely,

Matthew J. Cooper
302 C Ave.
La Grande, OR 97850
541-786-2052

[4] https://www.oregon.gov/bcd/Documents/eo-energy-20-04.pdf, p. 3.
[5] https://www.oregon.gov/gov/policy/Documents/FullWFCReport_2019.pdf, p. 19.

TARDAEWETHER Kellen * ODOE

From: Matt Cooper <mcooperpiano@gmail.com>
Sent: Thursday, August 27, 2020 9:04 AM
To: TARDAEWETHER Kellen * ODOE; OED_OAH_REFERRAL * OED
Cc: Fuji Kreider ASUS
Subject: Contested Case Letter #2: B2H and flooding
Attachments: B2H Contested Case Flooding.docx

Dear Ms. Greene-Webster:

Please find the attached letter regarding B2H vis a vis flooding risks in west La Grande.

Respectfully,

Matt Cooper
302 C Ave.
La Grande, OR 97850

July 19, 2020

To: Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol Street NE
Salem, OR 97301

From: Matthew J. Cooper
302 C Ave.
La Grande, OR 97850-1137

Re: Contested Case Request, Boardman to Hemingway

I am requesting to file as a party in the contested case for Boardman to Hemingway. Although filing as an individual, it should be noted that I am also a volunteer and on the Board of Directors with STOPB2H Coalition. I previously stated my concerns below, regarding flooding, during the Draft Proposed Order in a letter submitted to the Council on August 11, 2019.

Although the letter I submitted on August 11th concerned the risk of wildfire and flooding, in this letter I would like to focus exclusively on my interest in the risk of flooding and resulting property damage. These risks affect the health and safety not only of me personally, but also of the residents of south and west La Grande. These neighborhoods, lying directly under steep, unstable, and erosion-prone slopes to the west, lie in the City of La Grande Geologic Hazard Zone (as pointed out in StopB2H Coalition's letter dated Aug. 22, 2019).

The reason I am filing a contested case at this time in regard to flooding is that *none of my comments on flooding were addressed by Idaho Power or by the Council in the Proposed Order.* Because of my personal experience with flooding in south and west La Grande neighborhoods in 2011, 2019, and 2020, others can not represent my personal situation and interest. These personal experiences are summarized below.

In my comments during the DPO I detailed the flooding that occurred in March 2019; similar flooding also happened in 2011. These floods *occurred again* on C Avenue in February 2020! This latest flood caused further damage to C (streets cracked, cratered and collapsed). I watched in horror on February 7th as a wall of brown roiling water overflowed its banks above our house, headed directly for our foundation, and wiped out our driveway within seconds (for the second year in a row), and depositing gravel debris for blocks below. As the flooding continued through the night, neighbors helped neighbors fill sandbags, holes, craters and waterspouts formed in the street, and city crews watched nervously through the night, removing load after load of debris with backhoes from Miller Creek. City workers told me that this year's flood was *even worse than that of 2019*.

Other streets besides C were damaged as well; as of this writing, N avenue is only now being reconstructed after much of it washed away due to flooding from Deal Creek. As the La Grande Observer reported at the time:

> The flooding in La Grande damaged C Avenue from Sunset Avenue to the end of the road to the west, L Avenue from Cedar to Second Street, and the intersection of Fourth Street and N Avenue. The city created a trench at L Avenue from Cedar to Second to keep water away from homes and has already scheduled the area for repairs in the spring. The flooding sent a geyser of water 3-feet tall that blew off the manhole cover at Fourth Street and N Avenue, according to Carpenter. (*Flood floors internet,* La Grande Observer, Feb. 11 2020)

In my original comment I pointed out that Idaho Power's maps *don't even show Miller Creek*, which threatens to overflow almost every year now—and is more and more likely to do as a result of climate change. I commented that their road building and blasting to build towers will be directly uphill from us, and there is a significant chance that stream flows will be altered, erosion and sediment could re-route waterways, and flooding risks could be worsened—all the more so since their poor mapping reveals their ignorance of the topography. *Idaho Power completely ignored my comments,* and that is why I am filing a contested case on this issue.

Norm Paullus, retired La Grande Public Works Director who retired after 45 years with the City, expressed his concerns regarding the nearby Hawthorne/Modelaire neighborhood in a letter to Virginia Mammen. During his time in Public Works, he recalls finding a layer of blue clay, about 10 feet below the surface and one foot thick, which can become saturated with water and thus unstable—especially when subjected to extra weight. This layer was found near the hospital (less than ½ mile north of our house) and resulted in the hospital having to drill down deep to anchor it to the hillside. In a subsequent phone call with him, he described the nature of the South and West La Grande hillside as "extremely fragile," including the area I have described in this letter at the top of C and B avenues. He said it is indeed possible that hydrology could be affected, if blasting were to occur upslope, and that it is not uncommon for the location of springs on the mountain to change without warning.[1]

I am glad to see that the Proposed Order includes the following statement: "Extreme precipitation events are also expected to increase, resulting in an increased risk of flooding, runoff, soil erosion, landslides, and mass wasting events" (p. 91). Yet the only flooding that is mentioned elsewhere seems to be that of the Grande Ronde River floodway, which is irrelevant to this discussion. They have not addressed the recurring threat of flooding, property damage, and risk to life and limb that is posed by *flooding in the neighborhoods of south and west La Grande,* directly below the areas where roads will be built and towers constructed.

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[1] Norm Paullus, letter to Virginia Mammen, "Hawthorne Drive Background," Aug. 23, 2020; phone conversation with the author, Aug. 25, 2020.

I respectfully request that ODOE deny the Site Certificate unless and until Idaho Power completes a thorough survey of the hillsides in South and West La Grande to determine the nature and extent of the hydrology, including more detailed and accurate mapping of existing creeks and ditches that drain onto city streets and private property, and core samples of a variety and depth sufficient to determine the extent of any layers which may be unstable, weak, or likely to saturate with water.

Cc: Kellen Tardaewether, Senior Siting Analyst, ODOE
Emailed at Kellen.tardaewether@oregon.gov

302 C Avenue (looking east), day after flooding, Feb. 8, 2020

TARDAEWETHER Kellen * ODOE

From: Matt Cooper <mcooperpiano@gmail.com>
Sent: Thursday, August 27, 2020 9:09 AM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Subject: Contested case letter: B2H and notification of landowners
Attachments: B2H Contested Case Letter- notification.docx

Dear Ms. Greene-Webster:

Attached please find my third and final contested case letter regarding B2H and notification of nearby property owners.

Respectfully,

Matt Cooper
302 C Ave.
La Grande, OR 97850

August 22, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
550 Capitol Street NE, Salem, OR 97301
OED_OAH_Referral@oregon.gov

Cc: kellen.tardaewether@oregon.gov

Re: Contested Case, Notification of Property Owners, B2H line

From: Matt Cooper
302 C Ave.
La Grande, OR 97850

Dear Ms. Greene-Webster:

I originally commented in writing on August 17, 2020 regarding what I believe to be Idaho Power's obfuscation, purposeful deception, poor mapping, and other issues which have negatively affected notification of property owners in West and Southwest La Grande. Since I see nothing in the Proposed Order to suggest that these have been properly addressed, I am making this request to submit a Contested Case. I am not representing any organization, nor do I have an attorney. I request that my case be filed as a party.

As a long-term resident of La Grande, I live on C Avenue, the site of the Oregon Trail. The "alternative route" will pass directly above my house and access to construction will occur within an extremely short distance upslope. For that reason, the lack of notification is of an immediate personal interest and concern to me, as the construction noise (including blasting), dust, and traffic would negatively impact my way of life for a period of approximately two years. I am a professional musician, retired professor, and practice, teach, record and compose at home. This is also a matter of public interest, as hundreds of homes lie in the area immediately adjacent to the construction sites which IPC proposes to access via Hawthorne Lane. My neighbors two doors down are documentary filmmakers, who like me, also do their studio work at home. Of the people on my block alone, three households are retirees; one is retired, widowed and raising her grandchild; one is a college professor who must do all her teaching online from home due to Covid-19. None of these households anticipated the noise and disruption of B2H.

Despite the fact that many others will be negatively affected by B2H, they are not qualified to speak to my unique personal situation. I am best qualified to represent myself as 1) I am a long-term resident of La Grande (since 1991); 2) as a walker, hiker, and biker, I intimately understand the geography of the immediate area, including Deal Canyon, Table Mountain, and Morgan Lake Road; and 3) I have spent much more time than the average person

researching the effects of power lines in terms of issues such as wildfire, noise, degradation of scenic values, etc.

In my letter from 2019, I expressed my concerns that Idaho Power Corporation is not complying with the requirements for notification of nearby property owners and the posting of complete or detailed maps to the public. I will not attempt to revisit all of those here, except to underscore three main points regarding the issue of notification, as follows:

CONTESTED CASE ITEM #1: UNCLEAR AND CONFUSING MAPPING; DIFFICULTY OF HOMEOWNERS TO FIND THEIR PROPERTY IN RELATION TO THE SITE BOUNDARY

As I stated in my original letter dated August 17, 2029, the maps provided by IPC are unclear and lacking in detail. They make it impossible for homeowners in Southwest La Grande to apprise how close they are to the site boundary, or whether they might have been omitted from the list of "Property Owners of Record." This has not been remedied in the Proposed Order.

Maps 50 and 51 (Attachment F): these maps omit many details. According to OAR 345-001-0010(55): "*Maps shall provide enough information for property owners potentially affected by the facility to determine whether their property is within or adjacent to the site boundary. Major roads shall be named.* IPC shall include maps drawn to a scale of 1 inch = 2,000 feet or smaller when necessary to show detail." [Italics mine] The portion of the maps within the City of La Grande are grainy, small, and lacking in any significant detail. Map 50 only shows *one street name*—Cedar Street, a minor residential street which does not even carry through-traffic in this part of town. Main routes such as C Avenue and Sunset, on which are located schools, parks, clinics and the hospital, are not even labeled. Map 51 is only slightly better; Sunset and B are shown in addition to Cedar, but not C (a through street,unlike B), or K (a street which connects the hospital, the high school and the university). IPC's maps, in their seemingly random choices of which streets to label, betray a basic lack of familiarity with the city of La Grande.

Idaho Power says: "Maps shall clearly show the boundaries of the proposed corridor within which the transmission line would be constructed, and *shall include familiar landmarks such as roads* and existing power lines that reviewing agencies and affected landowners may use to identify the proposed route*. Aerial photographs with all roads identified are helpful for public interpretation and review*. The site boundaries of all proposed related or supporting facilities, including but not limited to access roads, temporary lay down areas, switching stations/substations, must also be identified. Maps showing access roads included as related or supporting facilities shall clearly depict where existing roads or road segments are proposed to be in the site boundary." (ASC, Exhibit C, Project Location, p. C-32)

Yet, the maps provided in the application do *not* clearly depict existing roads or road segments. Therefore the B2H application maps lack the detail that is required by the state of Oregon because the maps do not show the names of the streets. Without detailed maps property owners cannot tell how they will be directly affected by this project. Summary: La Grande maps lack the details required by the state of Oregon to meet ordinance OAR 345-001-0010(55).

CONTESTED CASE ITEM #2: OBFUSCATION AND EVASION OF OREGON ADMINISTRATIVE RULES REGARDING NOTICE TO OWNERS OF NOISE SENSITIVE PROPERTY

IPC's statement reads: "Idaho Power disagrees with the commenter's assertion that subsection (1)(x)(E) of OAR 345-021-0010 represents a notice requirement. Subsection (1)(x)(E) provides, "[t]he applicant shall include: . . . A list of the names and addresses of *all owners* of noise sensitive property, as defined in OAR 340- 035-0015, within one mile of the proposed site boundary." By its plain language, subsection (1)(x)(E) requires only that the applicant include in the application a list of *certain landowners* (which Idaho Power provided in Attachment X-7)."[1] [Italics mine]

Idaho Power claims that it need only list "certain landowners," yet the OAR clearly states that "all owners of noise sensitive property" must be listed! They go on to say: "There is no reasonable interpretation of that language that would require an application or ODOE to provide any type of notice to the landowners on the subsection (1)(x)(E) list."[2] This statement flies in the face of all reason. *Other than providing notice to the landowners, what "reasonable interpretation" would there be* for providing a list?

CONTESTED CASE ITEM #3: MANIPULATION OF SITE BOUNDARIES TO EXCLUDE RESIDENTIAL STREETS NEEDED FOR ACCESS, RESULTING IN EXCLUSION OF MANY HOMEOWNERS FROM NOTICE REQUIREMENTS:

On, p. 43 (Sec. IIIC, Proposed Facility), the Proposed Order states: "Typical construction disturbance for existing roads requiring substantial modification would be 7 16 feet wide, but could be up to 30 feet wide when road modification exceeds 70 percent. The 8 operational width would be 14 feet. The site boundary for a substantially modified existing road 9 would be 100 feet wide (50 feet on either side of the centerline.)" However, as the slope angle increases, so does the width of the road cut. Upper Hawthorne is a case in point, as a 200 foot road cut will be

[1] https://www.oregon.gov/energy/facilities-safety/facilities/Facilities%20library/2020-07-02-B2H-PO-ASC.pdf

[2] Ibid.

needed in the several switchbacks that will need to be constructed. Idaho Power has failed to note this.[3]

IPC argues that Hawthorne Loop and Modelaire will not need "substantial modification" (21% or greater) and thus, they were not included in the site boundary; accordingly, property owners in the Modelaire/Hawthorne neighborhood were not notified. (See also footnote 17, p. 8)

I contest IPC's assertion that Hawthorne Loop and Modelaire, residential streets with sharp corners and steep grades—not built to withstand the impact of construction traffic—will not need "substantial modification." The idea that these residential streets will withstand 130 trips per day for a period of several months, with 19 trips a day by vehicles exceeding 10,000 GVW (including 52-foot aerial cranes!) is absurd. (See Exhibit U, Public Services, Tables 4 and 6.)

As evidence of the need for the substantial improvements in Hawthorne Loop that would be needed in order to access the site, I offer the following comments from Norm Paullus, former Public Works Director who retired after 45 years with the City of La Grande. Paullus recalls the "added hardships" that the city experienced when these streets were constructed in the 1970s, including "Hillside slippage because of the documented geological hazard from previous studies"; "Steep gradient of the ground at 17% that required paving with a track paver and rollers only being able to roll down hill"; and "Driveway access with a steep cross slope."[4] Winter posed special hazards, so guardrails had to be installed to prevent cars from sliding off the hill; special sanding trucks had to be acquired that threw the sanding gravel in front of the wheels for traction; and graders had to be used for snow removal. Further improvements had to be made five years later due to flooding, which resulted in washing out the entire length of the road, including catch basins using special grates every 70 feet. During this time, a slippage zone of blue clay was discovered about ten feet below the surface.[5] In a conversation I had with Mr. Paullus, he noted that clay, when saturated with water from runoff and subjected to weight (such as from heavy construction or truck traffic), can become unstable.[6]

Since the improvements to flood control, the street has held up well as a residential street, but the aforementioned history should illustrate the special nature of the street with its unusual steepness and geological instability. Paullus closes his letter with the statement that "construction for the B2H developments is something that should be evaluated with caution," including safety considerations for pedestrians (no sidewalks in this neighborhood!), safety for every day vehicle traffic, and (most alarmingly) safety regarding heavy equipment coming down a mile-long stretch of steep grade. Unlike Cabbage Hill (grade: 6%), there are no runaway truck ramps on this 17% hill. Brake failure on a heavy truck would prove catastrophic, as the guardrail at the

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[3] Phone conversation with Union County road and planning officials, Aug. 3, 2020. The county official who stated this wishes to remain anonymous.
[4] Norm Paullus, letter to Virginia Mammen, "Hawthorne Drive Background," Aug. 23, 2020, p. 1-2.
[5] Ibid., p. 2.
[6] Phone conversation with Norm Paullus, Aug. 25, 2020.

bottom of Hawthorne would not be able to stop such a truck from going right through a house.[7] In terms of damage to the infrastructure itself. Paullus concludes:

> Long-term maintenance needs to be addressed for damage that may be done to the street structure from *use that exceeds what the street was designed for and may not show up for years after construction is complete*.[8]

IPC has purposely manipulated the facts regarding the residential streets needed to access the B2H line. Their omission of these streets from the site boundary, based on the false claim that such streets will *not* need "substantial modification," has meant that they did not notify any of dozens of Modelaire neighbors (all of whom would qualify as NSRs) of the construction of B2H. Since Modelaire and Hawthorne Loop WILL indeed require substantial modification, these streets should have been included within the site boundary. Had they been included in the site boundary as they should have, all the residents of these streets would have been properly notified; none of them were.

I respectfully request that the Site Certificate be withheld until the site boundary is amended to include streets and neighborhoods where substantial improvements will be needed (Hawthorne/Modelaire Loop), and *all* affected landowners have been notified, followed by an appropriate comment period. I further request that IPC amend their maps to show an appropriate level of detail on Maps 50 and 51, to include such detail as discernible street grids and locations of homes. These maps must include clearly labeled street names in the case of thoroughfares such as Sunset, K, and C, or any streets which connect with B2H access routes such as Modelaire, Hawthorne, and Walnut.

Sincerely,

Dr. Matthew J. Cooper
302 C Ave.
La Grande, OR 97850-1137

[7] "Hawthorne Drive Background," p. 2-3.
[8] Ibid., p. 3. Italics added.

TARDAEWETHER Kellen * ODOE

From: Whit Deschner <deschnerwhit@yahoo.com>
Sent: Saturday, August 22, 2020 11:32 AM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Cc: TARDAEWETHER Kellen * ODOE
Subject: B2H DPO CONTESTING
Attachments: July 28.docx; EMF'S (2).docx

ATTACHED ARE MY TWO LETTERS OF CONTENTION

Whit Deschner

July 28, 2020

Alison Greene-Webster. Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE.
Salem, OR 97301

OED_OAH_referral@oregon.gov

Cc: kellen.tardaewether@oregon.gov

Re: Contested Case Proceeding on Proposed Order On Application for Site Certificate for the Boardman to Hemingway Transmission Line

Dear Ms. Greene-Webster:

My name is Whit Deschner and this is my letter contesting the Boardman to Hemingway transmission line. My address is 1640 3rd St., Baker city OR 97814.

I do not represent any organization nor do I have an attorney representing me. I am requesting to file as a party. I am contesting the B2H transmission line because:

My Own Reasons

I moved to Baker in 1982 from the Seattle area to get away from "the rat race." I chose Baker because of its modestly small population and with its strict but well-thought out zoning (unlike Idaho or Montana) it made for a perfect rural living experience. I bought a small ranch that was not wired to the grid and I produced my own electricity. I lived that way until I sold the ranch in 2014. I am not sympathetic to Idaho Power when they claim the B2H line in absolutely needed for growth—their growth maybe but I know, having my off the grid ranch for 32 years there are better alternatives than shuffling around electricity via high voltage power lines while compromising the land B2H would permanently ruin.

I became further against this project when I discovered one the alternate routes were slated to go through my view shed. Idaho Power informed me that I was too far away for it to matter (3 miles) and yet the lines meant a devaluation of my property.

The third reason was a commercial salmon fisherman and Idaho Power reneged on their contract to put fish ladders in and as a result wiped out an entire run of salmon above Hells Canyon dam. The company cannot be trusted. It's hard to believe ODOE has let this process come this far.

Background

Baker County has a population of 16,000 people and the average has hovered near that number for over one-hundred years. Traditionally, Baker's economy has been agriculture (80,000 cattle), timber and mining and mining based. However, over the last 30 years timber and mining have been on the decline, both activities have mostly disappeared. A coalition of far-sighted citizens attempted to fill in some of this financial void creating a highly effective partnership of local, state, and federal government

agencies, six nonprofit organizations, and local residents. At a cost of $16 million, the BLM's National Historic Oregon Trail Interpretive Center (NHOTIC) opened in 1992.

History

The Great Migration was and remains the biggest mass movement of people on earth and it is a major component in the development of America. It is a history of the Native Americans losing their lands and cultures; a history of naivety and greed, but it is a history of innovativeness and determination; and It is a history that cannot be forgotten. The trail is part of us, our heritage and the Interpretive Center has done an excellent job depicting this. Remnants of the trail still exist can be traced and pieced together from Missouri, however, from Baker west, because of the freeway, all traces of the trail vanish. With a commanding panoramic view, the site of the Center is ideal giving an overview of the Trail and an example of the land this mass migration endured. The BLM's Oregon Trail Interpretive Center is the gem of the entire trail.

Idaho Power

Unfortunately, the coalition of citizens and agencies produced no laws or codes limiting or restricting the center's viewscape. It was all planned and built in good faith and no one dreamed or foresaw that Idaho Power would blatantly desecrate what the BLM Center had established.

When Idaho power came forth with their plan the people of the county were not given a vote of whether they wanted the powerlines or not, nor was there much choice of alternative routes. Under Governor Tom McCall, an energy corridor was established for high-voltage power line routes. It was a low-impact route. When Idaho Power proposed B2H, they either ignored or deemed this route too costly. At the same time Idaho Power has ignored the cost to Baker *because* of the impact of bisecting the county with their lines. Their final route choice? Front and center of interpretive center. They have disregarded pleas for it to run elsewhere. They won't bury the line because it too costly nor will they tell you about running the lines behind the center because of Sage grouse nesting sites which the powerlines would disturb and an environmental study would be required. Instead they are proposing to paint their pylons with a 'near invisible paint" (their words) and lower the pylons from 195 feet high to 145 feet. This is not an option. And nothing is said about how they plan to make the wires go unseen. And even if the towers and wires were invisible there is the transmission cackle that would be heard by those who wish to walk and see the historic ruts, or just wish to be outside.

Financial

Baker County is not a rich County and there is little to no money to contest what a large corporation wants to do in or to the county. This is the same Idaho Power who were contractually obligated to build fish ladders as one of the concessions to building the dams. That was 50 years ago and the ladders still have not been installed.

Idaho Power is a for-profit corporation traded on the New York Stock Exchange. This brings up conflicts of interests. What is right for IPC's shareholders is not always in the best interest of the public. Idaho Power Corporation will turn a profit to satisfy shareholders at the expense of Baker County and Eastern Oregon. With sparse population, Idaho Power is dictating what they feel like doing in the county, how and where they choose to run their powerlines. Specifically, why is a large corporation allowed to have their say when the local populous wasn't even allowed to vote whether they wanted the project or not?

Baker was not offered this. When the NHOTIC was built there was a gentlemen's understanding that nothing would be built in its viewshed, nor did anyone foresee that the view would be degraded in such a manner. As stated, nothing was signed but this was Baker and handshakes were valid and honored. Idaho Power is proposing to blatantly run 190-foot tall pylons in front of the BLM's Oregon Trail Interpretive Center simply because it is *their* cheapest option.

Where is the BLM's voice in all of this? When asked to comment on the imposing power lines, I was told that letting Idaho Power place their lines in plain view of the overlook was inconsistent with BLM's policies, however, any comments for on the record were not allowed or else their job or their pension would be endangered. So why would Idaho Power be allowed to build in front of the NHOTIC, ruining the historical presentation of the taxpayers' $16 million NHOTIC? It is the residents of Baker as well as the others in Eastern Oregon, who, will pay the real price, not one of monetary value but as an attrition to the quality of our lives because of these powerlines.

What needs to be addressed

This letter focuses on the discrepancies and incorrect assumptions Idaho Power lines is proposing. Whether purposely or not the language in this draft proposal is confusing, subjective and redundant i.e. the phrase "less than significant" appears 419 times in exhibit T and 138 times exhibit R. Most these instances refer to the visual impact of the Oregon Trail interpretive Center. Just because this phrase is repeated so many times does not make the visual impact of the towers go away.

In exhibit T the DPO states,

> In evaluating various alternatives for Project siting, IPC concluded that potentially significant visual impacts from facility structures in the vicinity of the NHOTIC could result. To address potential impacts, IPC analyzed three design options aimed at reducing adverse impact to less than significant: (1) applying a natina finish to the lattice structure; (2) using an H-frame structure with galvanized finish; or (3) using an H-frame structure with a natina finish. IPC incorporated Option 3 into its revised Project design as planning for the final indicative design for the Project progressed. This design consideration is relevant to OR 86 as the transmission structures considered are those that are visible from OR 86.

Nowhere in this draft proposal order are the wires' visibility mentioned, just the towers. It is implied that the metal finish will make the towers next to invisible. Is this the same magic paint Idaho Power used on the fish ladders they never built in Hells Canyon? *Nowhere in this DPO are the wires' visibility mentioned. They will be seen from the Interpretive Center and they will not have a "less than significant" viewshed.*

The DPO also claims:

> the Project will not result in impacts to scenic resources at a regional scale, the Project is consistent with Baker County's policy to "conserve the natural splendor of the region." Degree to which the possible impacts are caused by the proposed action: The scenic quality of the resource under operational conditions is the result of the combined influence of the Project and other past or present actions. As described above, due to past actions including construction of the interstate, transmission lines, and rural developments, the pre-Project landscape character is cultural. Although the Project will lower the scenic quality, it will not alter the character of the landscape from that currently influenced by past or present actions.

Idaho power is saying that just because Baker Valley already has I–84 and ranches that are in the view shed of the Interpretive Center is okay to add powerlines. With that same logic, why not build an oil refinery and had a military base as well to add to the view shed?

Height of the towers

> NHOTIC may be significant. However, taking into account mitigation, impacts at the NHOTIC are less than significant. Specifically, Idaho Power will implement the mitigation described in the DPO as Recommended Scenic Resources Condition 2: Recommended Scenic Resources Condition 2: During construction, to avoid significant adverse impacts to the scenic resources at the National Historic Oregon Trail Interpretative Center, the certificate holder shall construct the facility using tower structures that meet the following criteria between approximately Milepost 145.1 and Milepost 146.6: a. H-frames; b. Tower height no greater than 130 feet; and c. Weathered steel (or an equivalent coating). Additionally, the certificate holder shall construct the facility using tower structures that meet the following criteria between approximately Milepost 146.6 and Milepost 146.7: a. H-frames; b. Tower height no greater than 154 feet; and c. Weathered steel (or an equivalent coating) Commenter did not explain why Idaho Power's proposed mitigation is inadequate. The structure widths are based on standard industry designs and practices. The structures will be taller than the existing 230-kV line because of the higher voltage and related minimum ground clearances.

According to Idaho Power towers made of a different design and/or are smaller will make them unseen. If I were to throw a 4-foot rattlesnake into Idaho power's boardroom, but then removed it and replaced it with a 3-foot rattler, doesn't mean the snake is not there and can't be seen.

Conclusion

Idaho Power is a large, powerful corporation running roughshod through a small rural community just because it can. I realize what defines the aesthetics of a powerline is difficult to judge but what Idaho Power is trying to do sets a new standard of low. Decency and common sense are being thrown out the window. If approved, Idaho Power is guaranteed an $80 million for itself and their partners' shareholders. What does Baker get? Absolutely nothing from this project, not even a substation and yet Baker County carries the most miles of the power lines—71 miles of the 305 through Oregon. If Idaho Power proceeds with this project and place their pylons and wires in plain view of the NHOTIC it is a slap in the face to the community of Baker especially those who worked so hard to establish the Center, a total disregard for history and real disappointment for visitors who travel from all around the globe to get a sense of this important piece of American History. Why should the ODOE approve this boondoggle when Baker gets no benefit from it? Idaho Power is using arbitrary and subjective measures and tests to try and justify this project.

Sincerely, Whit Deschner

1640 3rd St
Baker City OR 97814

541 519 2736

July 28, 2020

Alison Greene-Webster. Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE.
Salem, OR 97301

OED_OAH_referral@oregon.gov

Cc: kellen.tardaewether@oregon.gov

Re: Contested Case Proceeding on Proposed Order On Application for Site Certificate for the Boardman to Hemingway Transmission Line

Dear Ms. Greene-Webster:

My name is Whit Deschner and this is my letter contesting the Boardman to Hemingway transmission line. My address is 1640 3rd St., Baker city OR 97814.

I do not represent any organization nor do I have an attorney representing me. I am requesting to file as a party.

Please note: in the current DPO I could not find my letter contesting this project regarding EMF concerns. I am including it here so as to be on record of submitting it because I feel it is a very important issue.

I do not represent any organization nor do I have an attorney representing me. I am requesting to file as a party. I am contesting the B2H transmission line also for this reason:

At a January 2015 B2H meeting in Baker City I asked about this project's EMF's and what affect they would have on gas or oil pipelines where they would bottleneck and pass over, near or cross them. I was informed by the BLM's Tamera or Pamela Gertsch that in such places such as in Durkee those pipelines would have to be lined with a sacrificial zinc to stave off accelerated corrosion. Without these precautions there is a serious environmental hazard and/or disaster looming. I have searched extensively through this DPO and nowhere do I see anything about any such precautions being taken.

Although this is one small item in this DPO it is reflective of the lackadaisical attitude Idaho Power has shown this entire project. If they are in the habit of ignoring such detail then they certainly don't deserve their site certificate.

Thank you for taking the time and for considering this point of contention.

Sincerely,

Whit Deschner
1640 3rd St
Baker City, OR 97814

July 28, 2020

Alison Greene-Webster. Senior Administrative Law Judge
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500 Capitol St. NE.
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Re: Contested Case Proceeding on Proposed Order On Application for Site Certificate for the Boardman to Hemingway Transmission Line

Dear Ms. Greene-Webster:

My name is Whit Deschner and this is my letter contesting the Boardman to Hemingway transmission line. My address is 1640 3rd St., Baker city OR 97814.

I do not represent any organization nor do I have an attorney representing me. I am requesting to file as a party. I am contesting the B2H transmission line because:

My Own Reasons

I moved to Baker in 1982 from the Seattle area to get away from "the rat race." I chose Baker because of its modestly small population and with its strict but well-thought out zoning (unlike Idaho or Montana) it made for a perfect rural living experience. I bought a small ranch that was not wired to the grid and I produced my own electricity. I lived that way until I sold the ranch in 2014. I am not sympathetic to Idaho Power when they claim the B2H line in absolutely needed for growth—their growth maybe but I know, having my off the grid ranch for 32 years there are better alternatives than shuffling around electricity via high voltage power lines while compromising the land B2H would permanently ruin.

I became further against this project when I discovered one the alternate routes were slated to go through my view shed. Idaho Power informed me that I was too far away for it to matter (3 miles) and yet the lines meant a devaluation of my property.

The third reason was a commercial salmon fisherman and Idaho Power reneged on their contract to put fish ladders in and as a result wiped out an entire run of salmon above Hells Canyon dam. The company cannot be trusted. It's hard to believe ODOE has let this process come this far.

Background

Baker County has a population of 16,000 people and the average has hovered near that number for over one-hundred years. Traditionally, Baker's economy has been agriculture (80,000 cattle), timber and mining and mining based. However, over the last 30 years timber and mining have been on the decline, both activities have mostly disappeared. A coalition of far-sighted citizens attempted to fill in some of this financial void creating a highly effective partnership of local, state, and federal government

agencies, six nonprofit organizations, and local residents. At a cost of $16 million, the BLM's National Historic Oregon Trail Interpretive Center (NHOTIC) opened in 1992.

History

The Great Migration was and remains the biggest mass movement of people on earth and it is a major component in the development of America. It is a history of the Native Americans losing their lands and cultures; a history of naivety and greed, but it is a history of innovativeness and determination; and It is a history that cannot be forgotten. The trail is part of us, our heritage and the Interpretive Center has done an excellent job depicting this. Remnants of the trail still exist can be traced and pieced together from Missouri, however, from Baker west, because of the freeway, all traces of the trail vanish. With a commanding panoramic view, the site of the Center is ideal giving an overview of the Trail and an example of the land this mass migration endured. The BLM's Oregon Trail Interpretive Center is the gem of the entire trail.

Idaho Power

Unfortunately, the coalition of citizens and agencies produced no laws or codes limiting or restricting the center's viewscape. It was all planned and built in good faith and no one dreamed or foresaw that Idaho Power would blatantly desecrate what the BLM Center had established.

When Idaho power came forth with their plan the people of the county were not given a vote of whether they wanted the powerlines or not, nor was there much choice of alternative routes. Under Governor Tom McCall, an energy corridor was established for high-voltage power line routes. It was a low-impact route. When Idaho Power proposed B2H, they either ignored or deemed this route too costly. At the same time Idaho Power has ignored the cost to Baker *because* of the impact of bisecting the county with their lines. Their final route choice? Front and center of interpretive center. They have disregarded pleas for it to run elsewhere. They won't bury the line because it too costly nor will they tell you about running the lines behind the center because of Sage grouse nesting sites which the powerlines would disturb and an environmental study would be required. Instead they are proposing to paint their pylons with a 'near invisible paint" (their words) and lower the pylons from 195 feet high to 145 feet. This is not an option. And nothing is said about how they plan to make the wires go unseen. And even if the towers and wires were invisible there is the transmission cackle that would be heard by those who wish to walk and see the historic ruts, or just wish to be outside.

Financial

Baker County is not a rich County and there is little to no money to contest what a large corporation wants to do in or to the county. This is the same Idaho Power who were contractually obligated to build fish ladders as one of the concessions to building the dams. That was 50 years ago and the ladders still have not been installed.

Idaho Power is a for-profit corporation traded on the New York Stock Exchange. This brings up conflicts of interests. What is right for IPC's shareholders is not always in the best interest of the public. Idaho Power Corporation will turn a profit to satisfy shareholders at the expense of Baker County and Eastern Oregon. With sparse population, Idaho Power is dictating what they feel like doing in the county, how and where they choose to run their powerlines. Specifically, why is a large corporation allowed to have their say when the local populous wasn't even allowed to vote whether they wanted the project or not?

Baker was not offered this. When the NHOTIC was built there was a gentlemen's understanding that nothing would be built in its viewshed, nor did anyone foresee that the view would be degraded in such a manner. As stated, nothing was signed but this was Baker and handshakes were valid and honored. Idaho Power is proposing to blatantly run 190-foot tall pylons in front of the BLM's Oregon Trail Interpretive Center simply because it is *their* cheapest option.

Where is the BLM's voice in all of this? When asked to comment on the imposing power lines, I was told that letting Idaho Power place their lines in plain view of the overlook was inconsistent with BLM's policies, however, any comments for on the record were not allowed or else their job or their pension would be endangered. So why would Idaho Power be allowed to build in front of the NHOTIC, ruining the historical presentation of the taxpayers' $16 million NHOTIC? It is the residents of Baker as well as the others in Eastern Oregon, who, will pay the real price, not one of monetary value but as an attrition to the quality of our lives because of these powerlines.

What needs to be addressed

This letter focuses on the discrepancies and incorrect assumptions Idaho Power lines is proposing. Whether purposely or not the language in this draft proposal is confusing, subjective and redundant i.e. the phrase "less than significant" appears 419 times in exhibit T and 138 times exhibit R. Most these instances refer to the visual impact of the Oregon Trail interpretive Center. Just because this phrase is repeated so many times does not make the visual impact of the towers go away.

In exhibit T the DPO states,

> In evaluating various alternatives for Project siting, IPC concluded that potentially significant visual impacts from facility structures in the vicinity of the NHOTIC could result. To address potential impacts, IPC analyzed three design options aimed at reducing adverse impact to less than significant: (1) applying a natina finish to the lattice structure; (2) using an H-frame structure with galvanized finish; or (3) using an H-frame structure with a natina finish. IPC incorporated Option 3 into its revised Project design as planning for the final indicative design for the Project progressed. This design consideration is relevant to OR 86 as the transmission structures considered are those that are visible from OR 86.

Nowhere in this draft proposal order are the wires' visibility mentioned, just the towers. It is implied that the metal finish will make the towers next to invisible. Is this the same magic paint Idaho Power used on the fish ladders they never built in Hells Canyon? *Nowhere in this DPO are the wires' visibility mentioned. They will be seen from the Interpretive Center and they will not have a "less than significant" viewshed.*

The DPO also claims:

> the Project will not result in impacts to scenic resources at a regional scale, the Project is consistent with Baker County's policy to "conserve the natural splendor of the region." Degree to which the possible impacts are caused by the proposed action: The scenic quality of the resource under operational conditions is the result of the combined influence of the Project and other past or present actions. As described above, due to past actions including construction of the interstate, transmission lines, and rural developments, the pre-Project landscape character is cultural. Although the Project will lower the scenic quality, it will not alter the character of the landscape from that currently influenced by past or present actions.

Idaho power is saying that just because Baker Valley already has I–84 and ranches that are in the view shed of the Interpretive Center is okay to add powerlines. With that same logic, why not build an oil refinery and had a military base as well to add to the view shed?

Height of the towers

> NHOTIC may be significant. However, taking into account mitigation, impacts at the NHOTIC are less than significant. Specifically, Idaho Power will implement the mitigation described in the DPO as Recommended Scenic Resources Condition 2: Recommended Scenic Resources Condition 2: During construction, to avoid significant adverse impacts to the scenic resources at the National Historic Oregon Trail Interpretative Center, the certificate holder shall construct the facility using tower structures that meet the following criteria between approximately Milepost 145.1 and Milepost 146.6: a. H-frames; b. Tower height no greater than 130 feet; and c. Weathered steel (or an equivalent coating). Additionally, the certificate holder shall construct the facility using tower structures that meet the following criteria between approximately Milepost 146.6 and Milepost 146.7: a. H-frames; b. Tower height no greater than 154 feet; and c. Weathered steel (or an equivalent coating) Commenter did not explain why Idaho Power's proposed mitigation is inadequate. The structure widths are based on standard industry designs and practices. The structures will be taller than the existing 230-kV line because of the higher voltage and related minimum ground clearances.

According to Idaho Power towers made of a different design and/or are smaller will make them unseen. If I were to throw a 4-foot rattlesnake into Idaho power's boardroom, but then removed it and replaced it with a 3-foot rattler, doesn't mean the snake is not there and can't be seen.

Conclusion

Idaho Power is a large, powerful corporation running roughshod through a small rural community just because it can. I realize what defines the aesthetics of a powerline is difficult to judge but what Idaho Power is trying to do sets a new standard of low. Decency and common sense are being thrown out the window. If approved, Idaho Power is guaranteed an $80 million for itself and their partners' shareholders. What does Baker get? Absolutely nothing from this project, not even a substation and yet Baker County carries the most miles of the power lines—71 miles of the 305 through Oregon. If Idaho Power proceeds with this project and place their pylons and wires in plain view of the NHOTIC it is a slap in the face to the community of Baker especially those who worked so hard to establish the Center, a total disregard for history and real disappointment for visitors who travel from all around the globe to get a sense of this important piece of American History. Why should the ODOE approve this boondoggle when Baker gets no benefit from it? Idaho Power is using arbitrary and subjective measures and tests to try and justify this project.

Sincerely, Whit Deschner

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541 519 2736

July 28, 2020

Alison Greene-Webster. Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE.
Salem, OR 97301

OED OAH referral@oregon.gov

Cc: kellen.tardaewether@oregon.gov

Re: Contested Case Proceeding on Proposed Order On Application for Site Certificate for the Boardman to Hemingway Transmission Line

Dear Ms. Greene-Webster:

My name is Whit Deschner and this is my letter contesting the Boardman to Hemingway transmission line. My address is 1640 3rd St., Baker city OR 97814.

I do not represent any organization nor do I have an attorney representing me. I am requesting to file as a party. I am contesting the B2H transmission line.

Please note: in the current DPO I could not find my letter contesting this project due to EMF concerns. I am including it here so as to be on record of submitting it because I feel it is a very important issue. I do not represent any organization nor do I have an attorney representing me. I am requesting to file as a party. I am contesting the B2H transmission line also for this reason:

At a January 2015 B2H meeting in Baker City I asked about this project's EMF's and what affect they would have on gas or oil pipelines where they would bottleneck and pass over, near or cross them. I was informed by the BLM's Tamera or Pamela Gertsch that in such places such as in Durkee those pipelines would have to be lined with a sacrificial zinc to stave off accelerated corrosion. Without these precautions there is a serious environmental hazard and/or disaster looming. I have searched extensively through this DPO and nowhere do I see anything about any such precautions being taken.

Although this is one small item in this DPO it is reflective of the lackadaisical attitude Idaho Power has shown this entire project. If they are in the habit of ignoring such detail then they certainly don't deserve their site certificate.

Thank you for taking the time and for considering this point of contention.

Sincerely,

Whit Deschner
1640 3rd St
Baker City, OR 97814

TARDAEWETHER Kellen * ODOE

From: Brian Doherty <bpdoherty@hughes.net>
Sent: Thursday, August 27, 2020 10:27 AM
To: "OED OAH Referral"@oregon.gov; TARDAEWETHER Kellen * ODOE
Subject: Request Party Status: Brian Doherty

Hello,

I am Brian Doherty. My address is : 70516 Hwy 207 Echo

Lexington, OR 97839

My home phone is 541-989-8443

I am representing myself and my father , William J. Doherty, whose land the B2H project will run through. I am requested to file as a party. I currently farm this ground. My land and homestead lie within a 1/2 mile of the route. I commented on the B2H project on 6/27/2019 in Boardman, OR. As far as I can tell, my comments and concerns were never directly addressed.

I would like to see Idaho Power specifically address how they propose to compensate family farms, who have been targeted as easy marks, for the loss of their livelihood, and the devaluation of their land. In our case, this land has been in our family for more than 135 years. I, like the Luciani family , have had contractors from this project trespass on my land after we specifically told them they did not have permission. I oppose this project stronger than ever, as it has become clear to me that Idaho Power intends to doze through us with no regard for the environment or the safety, well being, or livelihood of those near the line. I believe I speak best for my concerns. Frankly, I was probably too cordial at the public hearing. I didn't realize that many of my neighbors were being treated with the same disrespect that we have been.

On a larger note, I would like to see the Energy siting council, and the various government agencies stand up for Oregon and it's citizens. The negative affects of installing this line are unrecoverable. Endorsing a 305 mile gash across Eastern Oregon, primarily for the benefit of a co-op in another state, is dereliction of duty.

Sincerely,

Brian Doherty

TARDAEWETHER Kellen * ODOE

From: Dutto <dutto@eoni.com>
Sent: Sunday, August 9, 2020 7:34 PM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE
Subject: [Fortimail Spam Detected] Boardman to Hemingway proposed project

I am requesting to be a party of the contested case for the "Proposed Order on B2H".
My name is Corrine Dutto, and I reside at 107 Penn Avenue, La Grande, Oregon 97850
I am employed as a physical therapist at Grande Ronde Hospital. The address of my clinic is 610 Sunset Blvd, La Grande, Oregon.
I do not have an attorney.
I am requesting to file as a "party."

B2H would negatively impact my life in several different ways:

1. Real danger of landslide both at my residence and my place of employment. These giant towers are being placed on the top of a ridge that is deemed high risk of sliding. The work associated with clearing an area for transmission lines, boring and erecting the transmission lines will place our community in great danger. In addition to the residential area below the proposed towers, in which I reside, there is also risk to our hospital which serves as a critical access hospital, several schools (Central Elementary, La Grande High School and La Grande Middle School) and some small businesses run from homes in the area.
2. Wildfire hazard

Others who may be requesting a contested case on the above issues will not be able to represent my personal situation and interest on this issue.
I provided previous comments to you via email on May 23, 2019 sent to Kellen Tardaewether.
Below is my response to the "Boardman to Hemingway Transmission Line Application for Site Certificate-Proposed Order July 2, 2020."

REGARDING LANDSLIDE RISK:
Idaho Power acknowledges the high risk of slides in Union County on pages 75-76 of the document.

20 *Landslides* 21

22.

5 6

7. 7 Based on a review of the above-described information, Shannon & Wilson mapped landslides
8. 8 within one mile of the proposed transmission line route, alternative transmission segments,
9. 9 and of multi-use areas located outside one mile of the proposed transmission line route (see

10. 10 ASC Exhibit H, Attachment H-1, Appendix E). Based on mapping conducted to inform ASC
11. 11 Exhibit H, more than 40 potential landslides were identified with a potential to affect proposed
12. 12 facility components (see ASC Exhibit H, Attachment H-1, Appendix E).

Mass-wasting and Landslides 8

9. 9 Mass wasting is a generic term for landslides, rockslides, rockfall, debris flows, soil creep, and
10. 10 other processes that include the downslope movement of masses of soil and rock. Mass
11. 11 wasting can be initiated by precipitation events, sometimes in conjunction with land use. Slope
12. 12 stability is a function of moisture content, slope gradient, rock and soil type, slope aspect,
13. 13 vegetation, seismic conditions and ground-disturbing activities. The proposed facility, including
14. 14 alternative route segments, would cross multiple landslide hazard areas, as identified in ASC
15. 15 Exhibit H Attachment H-1 Appendix E. ASC Exhibit H Attachment H-1 contains a detailed
16. 16 reconnaissance of the site boundary showing the locations of known landslides and soil
17. 17 instabilities. -from page 78

And on page 78, there is CLEAR ADMISSION that the lines "would cross multiple landslide hazard areas" (see below from page 78). Therefore THEY SHOULD NOT PUT THE TRANSMISSION LINE IN THIS AREA, WHICH COULD CAUSE A SLIDE ONTO MY HOME AND ONTO MY PLACE OF EMPLOYMENT. This line would place me in physical danger night and day!

REGARDING WILDFIRE RISK

This proposal states that the transmission line is within 4-8 minutes of La Grande Rural Fire Protection District, which ONLY HAS 2 paid firefighters. The line is a 15-30 minute response time away from the Oregon Department of Forestry crew, which has access to more firefighters and equipment. A wildfire starting at the transmission line in a high wind day could reach my home or Grande Ronde Hospital in 10 minutes. La grande is in the boundary of the USFS and "Forest" district, as shown on Figure 12 ("Fire Protection Districts within Analysis Area." This proposal addresses fires starting during construction, which would likely be spotted early. Even so, the paragraph from page 577 states.

2. In those areas not covered by a fire response organization and not located on federal land,
3. 7 the certificate holder would attempt to negotiate an agreement with nearby fire response
4. 8 organizations or the federal agencies to provide fire response. If no such agreements can be
5. 9 reached, the certificate holder would propose alternatives such as contracting with a private
6. 10 fire response company or providing additional firefighting equipment at those sites.

This offers no guarantee that there will be a real fire response agreement. Idaho Power only needs to "attempt" to negotiate an agreement and "propose" alternatives. This offers no solid fire plan to protect my home, my place of employment or my community.

In addition, his proposal does NOT address fires started once the project is complete. B2H will have no way of monitoring for fires. This is similar to the situation in California where PG&E has been found liable for hundreds of deaths and billions of dollars in damages because their lines started fires and they had no effective way to alert fire agencies of a fire started by their lines. Idaho Power has a vegetation plan, but if this is managed as poorly as PG&E managed their lines and vegetation, La Grande is going to be at high risk for a devastating fire. The "American National Standards Institute Pruning Standards Best Management Practices for Utilities" apparently is not rigorous enough to prevent hundreds of deaths and billions of damage. Furthermore, there is no mention of how often said vegetation will be pruned and trimmed. So no guarantee that they will address the vegetation before it becomes a problem.

Operational Fire Protection Management 37

38. 38 In the ASC, the applicant describes and provides practices, protocols and management plans to
39. 39 manage wildfire risk, all of which would apply to the proposed facility. For instance, the
40. 40 applicant provides a draft Vegetation Management Plan (Attachment P1-4 of this order; see
41. 41 recommended Fish and Wildlife Condition 1) that focuses on tree trimming to ensure poles and

[586] B2HAPPDoc3-56 ASC Exhibit U - Errata Info 2019-03-28.

1. 1 lines are clear of vegetation. As identified in the draft Vegetation Management Plan,
2. 2 Attachment P1-4 of this order, vegetation that would require management would be conducted
3. 3 in compliance with the American National Standards Institute (ANSI) Pruning Standards Best
4. 4 Management Practices for Utilities, Oregon Forest Products Act, the U.S. Department of Labor
5. 5 Occupational Safety and Health Administration (OSHA), and the North American Electric
6. 6 Reliability Council's (NERC) Standard FAC-003-3 Transmission Vegetation Management Program
7. 7 (TVMP).[587] As such, following the guidelines of the draft Vegetation Management Plan would
8. 8 reduce the potential for an increase in wildfire as a result of proposed facility operation. The
9. 9 draft Vegetation Management Plan is discussed further in section IV.H., *Fish and Wildlife*
10. 10 *Habitat*.

It appears that the firefighters need to reach the fire at the transmission line THEN contact Idaho Power, which can shut down the line "within a few minutes." With the proposed line above Grande Ronde Hospital, we could get a fire response team in 4-30 minutes, who would then need to contact Idaho Power and then wait an additional "few minutes" for the line to be shut down. The proposed route places lines about 2000 feet or less than half a mile from the La Grande City limits, including Grande Ronde Hospital. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in grasslands. A fast-moving fire started at the B2H lines could move to residential areas of La Grande (including my home) and the hospital in 10 minutes. Our firefighters could not react fast enough to save hundreds of homes and our county's critical access hospital, should a fire start from a transmission line in high winds.

2.
    1.
        5. 5 Upon being notified of a fire within the vicinity of the proposed transmission line, the applicant
        6. 6 would dispatch and send personnel on site. Once onsite, and if requested, applicant
        7. 7 representatives would confirm facilities to be removed from service, the applicant's control

8. 8 center and dispatch then removes the proposed transmission line from service (de-energizes
9. 9 the transmission line). Once onsite, applicant representatives requesting a line outage from
10. 10 dispatch for safety concerns can expect a line outage within a few minutes. The proposed
11. 11 transmission line would then be considered unavailable to return to service until onsite
12. 12 applicant personnel are able to verify with onsite emergency agencies that all personnel and
13. 13 equipment are no longer in danger of electrical contact.[586]

This transmission line is a bad idea based on outdated energy distribution ideas and it is DANGEROUS for me and my community in La Grande, Oregon.

Respectfully,

Corrine Dutto

TARDAEWETHER Kellen * ODOE

From: Print & Marketing Services 804 <print.marketing0804@Staples.com>
Sent: Thursday, August 27, 2020 11:10 AM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE; info@Stopb2h.org
Subject: [Fortimail Spam Detected] Idaho Power B2H Powerlines
Attachments: Foss_Kaye_Files.pdf

Staples Print & Marketing Services #0804

125 SE 13th St.

Ontario, OR 97914

T: 541-889-0880

F: 541-889-0473

print.marketing0804@staples.com

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...

Alison Greene-Webster, Senior Administrative Law Judge

: OED_OAH_Referral Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email @oreg

on.gov
also send copies to: kellen.tardaewether@oregon.gov **and** info@Stopb2h.org

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

a. **My name and address: Jim and Kaye Foss**

774 Pheasant rd.
Adrian, Oregon 97901

b. **Attorney name and address (if you have one--otherwise state you are not represented by an attorney)**

Not represented

c. **Requesting to file as a "party" or "limited party" [Stop B2H recommends filing as "party"]**

Landowners

d. **What is your interest and how will it be affected? (economic, recreation, health, etc.)**
We farm on parcel (150 Acres on Owyhee Ave/Rock Springs Rd . Idaho Power proposes towers over our EFU property. We are concerned about loss of use of our Pivots for irrigation , property devaluation, and injury or reduced production of our beef operation.....This property would, in the future , be part of our retirement income and have planned accordingly.

e. **If it is a public interest, how will it be affected? Noise, unsightliness, a utilities corridor was already planned for in different site, so tax dollars have been previously spent on this issue.**

f. **Can others represent your issue(s) or do you need to represent them yourself? [StopB2H recommends you state that you need to represent them yourself]**
We can represent our concerns ourselves.

g. **A short statement of your issue and why you are requesting a contested case.**
I am requesting standing and a contested case regarding the failure of the new procedure used to develop and finalize the Farm Assessment and Mitigation Plans to provide mandatory conditions or a draft plan that contains enough information to allow the public the full right of participation in the siting process. This plans currently only provides general information on topics which cannot be identified with where it applies and which provides no mandatory details. The plans will not be completed until after the

site certificate is issued and there is no plan to provide the public this opportunity as required by the appeals court decision in Gould v Deschutes County, 216 Or Ap 150 (2007).

h. State *when* in your written or verbal comments you brought up this concern (date of letter or testimony at hearing)
The new procedure which required minimal information, made the information in the draft mainly optional and deferred the inclusion of enough detail to allow public the right to participate in the process is missing.

ANY OTHER INFORMATION YOU WANT TO ADD:

Early on in this process, it appeared the route would be somewhere else. We were only privy to the new route after being informed by a private contractor that they, Idaho Power, was planning a tower in the middle of our full circle pivot.Then we were back on board. Idaho Power reassessed that problem and chose an alternate route to place towers on edge of our property. Then we became concerned about our pivots even running with the interference from electrical lines and radio frequency..Bonneville Power addressed the probability of loss of function and danger in statement 2-15-2002. An eastern Idaho dairy farmer was awarded money for loss of production in cattle under power lines. We in written and verbal approach declared our concerns previously in 2018,2019 at public meetings in Ontario, Or. Kaye and Jim Foss

Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (*mandatory*) Jim Foss (Kay)

Mailing Address (*mandatory*) 774 Pheasant Rd
Adrian Or 97901

Phone Number (*optional*) (208) 739-3976 **Email Address (*optional*)** onthehoof1@gmail.com

Today's Date: 6-18-2019

Do you wish to make oral public testimony at this Hearing: Yes ✓ No_____

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony
(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

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1 because you don't get to respond to the decisions of the
2 Council directly. And the Department of Energy has made
3 it increasingly difficult for the public to access the
4 Energy Facility Siting Council members.
5 So you add to that the fact that there's no
6 reasonable time to review these proposed orders, and
7 you're talking about 600 pages in the draft proposed
8 order. These issues, and it's not the complete list,
9 came from 25 pages. I guess it was actually 24 pages of
10 that draft proposed order. So go figure.
11 Do I have any more time left?
12 HEARING OFFICER WEBSTER: You have 23 seconds.
13 MS. IRENE GILBERT: I was going to add a bunch
14 of other things. The developer has ignored things like
15 protected lands. There are three federal mitigation
16 sites at Ladd Marsh; they choose not to even mention
17 them. They ignore federal threatened and endangered
18 species protections. They will not provide any
19 protection of them. They don't honor the tribes and the
20 treaty agreements.
21 You've approved things as far as where the
22 views amount to someone floating on Wild and Scenic
23 River and looking up to energy development that's a mile
24 away, and seeing a bunch of turbines while you're on the
25 Wild and Scenic River.

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1 As far as the placement of these, in Union
2 County, we have 80 percent on private land, we have
3 55 percent, federal land. So I could go on. I will go
4 on but not in this format.
5 So thank you for the time. You will get all
6 of the statutory references.
7 HEARING OFFICER WEBSTER: Thank you,
8 Ms. Gilbert.
9 MS. IRENE GILBERT: Thank you.
10 HEARING OFFICER WEBSTER: Before we hear from
11 Mr. Horton, the next one is Frank Jordan.
12 SECRETARY CORNETT: For the record, Council
13 Member Betty Roppe joined, so we do have a quorum at
14 this point in time.
15 HEARING OFFICER WEBSTER: Thank you.
16 Mr. Horton, if you want to start with your
17 name and address.
18 MR. MICHAEL HORTON: I'm Michael W. Horton.
19 My address is 106 Main Street, P.O. Box 1565, Nyssa,
20 Oregon 97913. I want to welcome Council to eastern
21 Oregon.
22 I'm secretary of the Joint Committee of the
23 Owyhee Project. The Joint Committee consists of
24 representatives from Owyhee Irrigation District,
25 Ridgeview Irrigation District, and Gem Irrigation

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1 District. The Joint Committee manages the Owyhee Dam on
2 the Owyhee River along with two hydroelectric power
3 plants. One of the power plants is located at the base
4 of the Owyhee Dam and the other plant is located at the
5 head of the irrigation tunnel near the Owyhee Dam.
6 The Joint Committee operates and maintains a
7 69-kV transmission line which transmits power from the
8 Owyhee hydroelectric facilities to Idaho Power's power
9 grid system. The hydroelectric power plants were
10 partially funded by loans through the Department of
11 Energy. The 69-kV transmission line will be crossed by
12 the proposed 500-kV line somewhere to the east of
13 proposed milepost 256.
14 The Joint Committee requests additional
15 language be added to the draft proposed order to require
16 Department of Energy staff and irrigation districts'
17 staff be consulted on tower and line placements near the
18 intersections of the power lines and canals, tunnels,
19 and access roads.
20 The Joint Committee members share the same
21 concerns expressed tonight, that you've heard tonight on
22 the proposed placement on EFU lands.
23 Thank you.
24 HEARING OFFICER WEBSTER: Thank you.
25 Following Mr. Jordan we will have Jim Foss.

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1 Mr. Jordan, if you'd state your name and
2 address, please.
3 MR. FRANK JORDAN: My name is Frank Jordan. I
4 live at 3370 Old Stage Road in Westfall.
5 I own property west of Vale that the power
6 line will be crossing. And my main concern is the power
7 line is basically using our driveways as their access
8 roads. We have a home within one-eighth of a mile of
9 the power line. We have fields that it's crossing. An
10 irrigation pond within feet of where they propose to
11 cross.
12 And I have not been contacted at all by Idaho
13 Power to come out and look at where they are putting the
14 line. No one from Idaho Power has come out. No one
15 from Oregon Department of Energy has been on my property
16 to look where the line is going. I find this kind of
17 disturbing that Idaho Power or the Oregon Department of
18 Energy would basically put a line somewhere without
19 actually going out and talking to the landowners and
20 seeing exactly where the line is proposed. That's my
21 only comment.
22 Thank you.
23 HEARING OFFICER WEBSTER: Thank you.
24 After we hear from Mr. Foss, will be followed
25 by Arnold Tropf.

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1 Mr. Foss, your name and address, please.
2 MR. JIM FOSS: My name is Jim Foss. My
3 residence is at 774 Pheasant Road, Adrian, Oregon. Is
4 that it?
5 HEARING OFFICER WEBSTER: You're good to go.
6 MR. JIM FOSS: Good afternoon, ladies and
7 gentlemen.
8 The place in question isn't my home place. We
9 have another -- we have other property just off the
10 Owyhee River, off of Owyhee Avenue and Rock Springs
11 Road. And the power, the transmission line started out
12 above us, and then they changed it to come directly
13 across us, and put a tower in the middle of our center
14 pivot irrigation system. And they finally came out and
15 realized the irrigation system went around there and
16 they couldn't put the tower.
17 We've been told they were not going to put the
18 tower there, that's just verbal, and that they would put
19 a tower above us on private ground. And in talking to
20 the neighbors, they put another tower across the Owyhee
21 Avenue Road and stretched the lines down across our
22 irrigation system of our property. And the irrigation
23 system is a T-L Grand irrigation system, GPS-navigated,
24 state-of-the-art -- we run it with our phones or can --
25 system. And it has a rover arm on it that will go out

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1 and catch the corners and then come back in. Again,
2 it's GPS navigated.
3 So the concern is that the pivot, the
4 irrigation system crosses in two places underneath this
5 transmission line. And I have documentation from T-L
6 engineers, and I'll read part of the statement, that
7 they're concerned about losing the RTK fix, which is
8 they have to have a fix to navigate the system, and it's
9 self-steering. Again, it's off of GPS.
10 And so they state that if the pivot system has
11 unshielded span cable, which is typical for T-L
12 Irrigation pivot control such as point control or
13 precision point control, which is what we have, the
14 magnetic field-induced voltage on the span cable could
15 interfere with control signals, especially the end tower
16 speed center signal or Garmin GPS serial lines. This
17 would be true especially if the pivot spans are parallel
18 to overhead lines directly above the pivot. That goes
19 on to unshielded buried cable, which we do not have.
20 So it will virtually stop the pivot, it will
21 veer off track. And then its safety shuts off and it
22 will stop the irrigation system. I'm talking this one
23 pivot that the line is going over. So that's a big
24 concern of mine.
25 I'd like to touch on this one page, it's

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1 Guidelines For the Installation and Operation of
2 Irrigation Systems Near High Voltage Transmission Lines,
3 Bonneville Power Administration, Transmission
4 Maintenance & Electrical Effects, February 15, 2002. Of
5 course, I won't read it all to you; we'd be here all
6 night.
7 Safe Working Practices. If the pivot point of
8 a circular irrigation system is near or under a
9 transmission line, the irrigation system could acquire
10 an electrostatic charge during operation. To prevent
11 this electrostatic charge buildup, the pivot point
12 should provide a good electrical ground" -- which we
13 have -- "for the sprinkler system. This will eliminate
14 electrostatic shock nuisances during operation.
15 "This electrical ground, however, does not
16 eliminate hazards due to inductive coupling between the
17 transmission line and the sprinkler pipe. With the
18 irrigation system near or under the transmission lines,
19 the pipe could rotate to two locations parallel or
20 nearly parallel to the transmission line." Similar with
21 wheel lines, they talk about wheel lines in here, too.
22 "It is recommended that personnel not touch
23 the sprinkler pipe or its supporting structures when the
24 system is operating under or parallel to...the
25 transmission line."

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1 Okay. "With the sprinkler pipe parallel and
2 close or under the transmission line, the inductive
3 coupling between the transmission line and the sprinkler
4 boom can result in hazardous shock currents if a person
5 touches the system while the boom is connected to the
6 pivot point."
7 So when we put the system in, we were by law
8 mandated to have a licensed electrician do this, and
9 then we were inspected so that this would not be
10 happening, my understanding of it. And now, they're
11 wanting to drape this transmission line over the top of
12 it and tell me that I can't -- now, the pivot may, it's
13 vulnerable to be stuck, whether water runs to one spot
14 and it gets stuck. So if it does get stuck under the
15 transmission line, I can't touch the pivot, I can't
16 touch the machine. It virtually puts me out of
17 business. And that's my concern.
18 I've had a concern about the EFU but we've
19 pretty well beat that up, and I believe everybody --
20 there is an alternative route; they just chose to come
21 back over onto the landowners. If this goes across,
22 it's assuming that they're able to get tower sites on
23 private landowners above me and below me. Because, of
24 course, they can't span clear across the valley.
25 And as far as wild and scenic, they're

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1 crossing the Owyhee River going through me. The Owyhee
2 River, in my eyes and pretty much anybody that lives
3 around there in that area, is wild and scenic, ladies
4 and gentlemen. We have deer and we have turkeys, wild
5 turkeys and pheasants, quail, all of that, just like
6 they do up the river. But we have people making their
7 livings and taking care of their -- pay their taxes and
8 things as well.
9 And so that's my concern of crossing over our
10 ground on the Owyhee.
11 VICE CHAIRMAN JENKINS: Ms. Webster, may I ask
12 a question of Mr. Foss?
13 HEARING OFFICER WEBSTER: You may.
14 VICE CHAIRMAN JENKINS: The first three
15 speakers that we had, Roger Findley, Gary Pearson, and
16 Jay Chamberlin, talked about crossing agricultural land
17 in the Adrian area. Is this your land that they were
18 referring to?
19 MR. JIM FOSS: This is a Nyssa address, but it
20 is, I'm assuming -- and that's all I can do -- I believe
21 it's coming across over the hill, and we live on the
22 Idaho side of the Snake River but we're in Oregon. So
23 it's not there in Adrian; it's a Nyssa address. It's
24 Rock Springs Road and Owyhee Avenue, which goes to the
25 dam, right up the Owyhee River.

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1 VICE CHAIRMAN JENKINS: But where this pivot
2 is?
3 MR. JIM FOSS: Where the pivot is, yes. It's
4 crossing quite a bit of private ground or different
5 private ground owners there, two, maybe three. I'm not
6 real sure. I'm one of them where they've dog-legged the
7 thing down in here and then come across this versus the
8 alternate route that they have to go stay out on the
9 BLM. If I'm understanding the maps right.
10 VICE CHAIRMAN JENKINS: Thank you.
11 HEARING OFFICER WEBSTER: Thank you.
12 MR. JIM FOSS: You're welcome.
13 HEARING OFFICER WEBSTER: Just a reminder, if
14 there's anybody who hasn't filled out a green form that
15 does want to give public comment tonight, please fill it
16 out.
17 Following Mr. Tropf we will hear from Timothy,
18 I think is it Froesch or Froesch?
19 MR. TIMOTHY FROESCH: Yes.
20 HEARING OFFICER WEBSTER: Mr. Tropf, if you
21 could, provide your name and address, please.
22 MR. ARNOLD TROPF: Yes. I'm Arnold Tropf. I
23 live at 404 Main Street, Adrian, Oregon.
24 I would like to thank you for including me in
25 this oral discussion. I just heard about this meeting

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1 today, and I've heard quite a bit about it, and there's
2 been quite of bit of friction about it.
3 And looking at this map where the line is
4 supposedly going to cross, it looks to me like on
5 Cline's Hill, around Cline's Hill there east of Harper;
6 am I right? Am I correct?
7 HEARING OFFICER WEBSTER: I can't answer the
8 question.
9 MR. ARNOLD TROPF: Well, anyway, where it
10 crosses 20/26 there between Vale and Harper.
11 I've been wondering why they can't just
12 completely eliminate going into farm ground. Going
13 south with the line, going pretty close to the mouth of
14 the Owyhee Canyon, cross the canyon, go over toward,
15 what, Blackjack Mountain and go over and hit that Glen
16 Bridger transmission line and use the right of way right
17 there and follow that transmission line right toward
18 Murphy, and then drop down into Murphy. Why can't they
19 do that rather than even to come close to this farm
20 ground?
21 And I heard that they had restrictions there.
22 They've got restrictions for ATVs and stuff. What's
23 more important? We've got to get what's most important
24 here figured out.
25 And it looks to me like they can bring that

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1 line down through there west of Mitchell Butte and Chalk
2 Butte and go across the mouth of the canyon there where
3 the siphon goes across and go south and hit the Glen
4 Bridger transmission line, follow that Glen Bridger line
5 right over into Idaho and drop right down into Murphy.
6 Now, it sounds to me like that's a no-brainer.
7 So I think we better get our maps out and
8 study things because this doesn't make sense to even
9 have to come into farm ground and have a problem with
10 litigation.
11 HEARING OFFICER WEBSTER: And I will just
12 refer us back to what Ms. Tardaewether said at the
13 outset, which is that the EFSC is not talking about
14 reconfiguring at this point; it was the application came
15 forward with the sites for the transmission lines. And
16 the EFSC's job is pretty much a thumbs up/thumbs down on
17 the route that has been provided.
18 MR. ARNOLD TROPF: So it's all cut and dried
19 then on where you're going to put this line?
20 HEARING OFFICER WEBSTER: There is a proposal
21 for a line that the EFSC will either approve or not
22 approve.
23 MR. ARNOLD TROPF: So that's all I got to say,
24 but it sounds to me like they done the figuring wrong
25 when they lined this thing out.

AUGUST 19,2019

ENERGY FACILITIES SITING COUNCIL

%KELLEN TARDAEWETHER, SENIOR SITING ANALYST

OREGON DEPT OF ENERGY

550 CAPTIOL ST. N.E.

SALEM,OR 97301

Subject: Idaho power application for a site certificate for the Boardman to Hemingway Transmission project 9/28/2018:Draft Proposed Order 5/23/2019

Dear Chair Beyeler and Members of the Council:

We are writing this letter to challenge the proposed route by Idaho power that crosses EFU ground on/near the Owyhee River. We own 150 Acres there of EFU that we have farmed since 2001: We both work full time jobs, farm two places and run cattle. Point; we have given a lot of ourselves to make it all happen, and are distressed to see the loss to our neighbors and selves in the potential income of our investments.

The BLM HAS ALREADY SPENT TAXPAYER MONEY ESTABLISHING A UTILITIES CORRIDOR WHICH WAS TO PROTECT OUR ENVIRONMENT AND PUBLIC LANDS BY MINIMIZING FUTURE ENCROACHMENT ON OTHER PUBLIC GROUND. We met with Idaho power and were told the BLM WOULDN'T LET THEM USE OTHER SITES. IDAHO POWER DID NOT DO DUE DILIGENCE IN RESEARCHING, PURSUING OTHER POSSIBILITIES. (ORS 215.275, d. availability of existing rights of way) THE BLM OFFICE RELAYED TO US,THAT THE LISTING STATUS OF THE "SUITABLE FOR WILD AND SCENIC RIVER " STATUS COULD BE AMENDED.IDAHO POWER SHOULD HAVE LOOKED INTO THIS,NOT A BUNCH OF FARMERS TRYING TO FIGURE IT OUT.

We are concerned for the future capabilities of our pivots to run with GPS.WE PUT IN 2 PIVOTS IN 2015 PAID FOR THEM OURSELVES. THE ENGINEERS FROM T-L PIVOTS FEEL IT WOULD BE CONTRAINDICATED TO HAVE POWER LINES OVER THE TOP OF THEM. THIS IS ALSO SUPPORTED BY A PAPER FROM BONNEVILLE POWER ADMINISTRATION FEB 2002.(BPA TRANSMISSION MAINTENANCE AND ELECTRICAL EFFECTS TNLD)

WE FEEL THE EFSC SHOULD DENY THE SITE CERTICIATE APPLICATION TO MOVE ROUTE ON EFU GROUND, TO THE ESTABLISHED UTILITIES CORRIDOR.

SINCERELY,

Kaye Bishop for
Lein Ross

KAYE BISHOP FOSS

JIM FOSS

774 PHEASANT RD.

ADRIAN, OR 97901

*AFFECTED PROPERTY, 2181 ROCK SPRINGS RD, NYSSA,OR 97913

TARDAEWETHER Kellen * ODOE

From: Suzanne Fouty <suzannefouty2004@gmail.com>
Sent: Thursday, August 27, 2020 3:12 PM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Cc: Suzanne Fouty
Subject: B2H Contested Case
Attachments: Fouty_B2H_Contested Case status_08272020.pdf

Dear Ms. Greene-Webster --

Please accept the attached letter and my request to be a "party" to the contested case.

Thank you.

Sincerely,

Suzanne Fouty

August 27, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED_OAH_Referral@oregon.gov
also send copies to: kellen.tardaewether@oregon.gov and info@Stopb2h.org

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

My name is Suzanne Fouty and I reside at 2518 Valley Avenue, Baker City, OR 97814. I am not represented by an attorney and am requesting to file as a "party". I am a retired Forest Service hydrologist/soils specialist with a Ph.D. from the University of Oregon. My research, work, public presentations, and professional interests have focused on impacts to water and soil resources of various land use activities, climate change and its effects on water and soil resources, and climate change and its effect on human and wild communities. I have attached my resume (Appendix A) to present my qualifications for filing as a "party" rather than having my comments represented by others.

As presented in my August 20, 2019 letter to the Energy Facilities Siting Council (EFSC) my concerns are related to the public interest in the following ways:

1. The long-term negative impact of the project on soil productivity by removing vegetation and compacting the soil,

2. The long-term negative impact of the project on soils by removing sequestered carbon and preventing future carbon sequestration and the impacts of those changes on soil productivity and climate change,

3. The long-term negative impact of the project on soils and climate change by placing transmission lines through vegetative landscapes that experiencing the effects of increased frequency of drought due to climate change (Appendix B). The negative impact, in addition to those mentioned in 1 and 2, is the result of increased risk of wildfires started or exacerbated by the project's transmission lines and thus extensive impacts to soils.

I have reviewed a number of Idaho Power (IP) comments related to soils and carbon sequestration and strongly disagree with their conclusions. These points of disagreement concern IP's repeated statements that there are no EFSC standards that require IP to analyze or address carbon sequestration, carbon storage or carbon loss in the EFSC process. These

statements are incorrect. EFSC 345-022-0000 (General Standard of Review) and EFSC 345-022-0022 (Soil Protection) make it clear that these aspects of soils must be considered. I have listed several IP comments that I will address (Table 1).

Table 1. IP Responses that are addressed in this letter.

Comment ID: Stop B2H-Geology, Soils, Carbon	
Comment	IP response
C. IP did not address or quantify the amount of existing and potential future carbon sequestered above and below ground lost as a result of this project (p. 187)	Similar to the immediately preceding response, neither the 2018 Biennial Report nor any EFSC standard requires EFSC or Idaho Power to analyze or address carbon sequestration, carbon storage, or carbon loss in the EFSC process
D. Restoring soil productivity (p.189)	Any potential carbon sequestration impacts associated with a change in soil productivity are not relevant to the Council's consideration of the general standards for siting facilities contained in OAR Chapter 345, Division 22, including the land use and soil protection standards.
	Notably, the commenter appears to acknowledge that Idaho Power's proposed erosion and sediment control measures in fact meet local, county, state, and federal guidelines. While the commenter may desire something different, it is the local, county, state, and federal guidelines that represent the standards that the project must meet, and because those standards are met, the Council should find that those measures are sufficient. (NOTE—I said may, not having read all – I did not say they did)
E. Carbon sequestration as a land use (p. 189)	None of the EFSC standards or applicable substantive criteria require EFSC or Idaho Power to analyze or address carbon sequestration, and the commenter has not identified any specific applicable substantive criteria providing otherwise

For ease of discussion, I have included relevant sections of 345-022-0000 and address them as they apply to soils and carbon sequestration.

Energy Facility Siting Council - Chapter 345
Division 22
GENERAL STANDARDS FOR SITING FACILITIES
345-022-0000
General Standard of Review
(1) To issue a site certificate for a proposed facility or to amend a site certificate, **the Council shall determine that the preponderance of evidence on the record supports the following conclusions**:

(1)(a) The **facility complies with the requirements of the Oregon Energy Facility Siting statutes**, ORS 469.300 to 469.570 and 469.590 to 469.619, and the standards adopted by the Council pursuant to 469.501 or

the overall public benefits of the facility outweigh any adverse effects on a resource or interest protected by the applicable standards the facility does not meet as described in section (2);

(2) The Council may issue or amend a site certificate for a facility that does not meet one or more of the applicable standards adopted under ORS 469.501 if the Council determines that the overall public benefits of the facility outweigh any adverse effects on a resource or interest protected by the applicable standards the facility does not meet. The Council shall make this balancing determination only when the applicant has shown that the proposed facility cannot meet applicable Council standards or has shown, to the satisfaction of the Council, that there is no reasonable way to meet the applicable Council standards through mitigation or avoidance of any adverse effects on a protected resource or interest. **The applicant has the burden to show that the overall public benefits outweigh any adverse effects on a resource** or interest, **and the burden increases proportionately with the degree of adverse effects on a resource** or interest. The **Council shall weigh overall public benefits and any adverse effects on a resource** or interest as follows:

(2)(a) The Council shall evaluate any adverse effects on a resource or interest by considering factors including, but not limited to, the following:

FOUTY: Key phrase in this section is "shall evaluate **any adverse effects** on a resource…. by considering factors **including, but not limited**". This phrase makes clear that the EFSC standards are not static but expected to evolve over time with greater understanding of how various resources can be impacted by a project. Therefore, the impact of the project on carbon sequestration in the soil via direct or indirect effects must be considered because the impacts are long-term and highly adverse on current and future soil productivity.

(2)(a)(A) The uniqueness and significance of the resource or interest that would be affected;

FOUTY: Soils meet this criteria. They are a unique and significant resource in that they have the ability to capture and store large volumes of carbon, vital as a climate change response strategy, and essential for the creation of food and quality habitat. In turn, increased carbon in the soil improves its productivity and its water holding capacity. Greater organic carbon and water holding capacity are critical elements in maintaining soil productivity. The improved water holding capability is especially important given that eastern Oregon is prone to drought (see Appendix B). As noted in the preface of van Breemen and Buurman's (2002) book titled *Soil Formation*[1], soils serve as a substrate for plant growth, play a dominant role in the biogeochemical cycling of water, carbon, nitrogen and other elements. In the process soils influence the chemical composition and turnover rate of these chemicals in the atmosphere and hydrosphere. This critical resource also takes decades to millennia to form and past and current land uses are destroying soils more rapidly than they can form. Thus, soil should be considered largely a non-renewable resource and steps taken to maintain and enhance its quality.

(2)(a)(C) Proposed measures to reduce any adverse effects on a resource or interest by avoidance of impacts;

[1] Van Breemen and P. Buurman (2002). Soil Formation. Kluwer Academic Publishers.

FOUTY: The transmission line project results directly in extensive soil compaction, a loss of carbon stored above and below ground, and increases the risk of wildfires as the line moves through forested and dry landscapes by being an ignition source. High intensity wildfires can have adverse effects on soil by removing vegetation and exposing it to the erosive power of wind and water, and by cooking the soil if it is hot enough and sterilizing it. Several fires in Baker County lead to large soil erosion events (debris flows, gully development) as a result of post-fire storms interacting with newly exposed soils. These fires include the Monument Fire 1989, Dooley Mountain Fire 1989, Cornet Windy fire 2015 and the Rail Fire 2016.

(2)(a)(D) The magnitude of any anticipated adverse effects on a resource or interest, taking into account any proposed mitigation.

FOUTY: The magnitude of any anticipated adverse effects on soil resources is expected to increase as drought increases the importance of stored carbon as a means of increasing the water holding capacity of the soil. Drought will also increase the dryness of the vegetation in the landscape that the transmission lines will pass through thereby increasing the potential for a wildfire to be started or exacerbated by the transmission lines which will in turn expose the soils. No mitigations have been identified that can address these concerns and it is possible that none exist. During my time with the Forest Service, I have seen how quickly wildfires can increase in size and outpace available resources. As Appendix B-1, Table B-1 shows, the suppression costs alone are in the 10 to 100s of millions of dollars. This does not include personal property losses, losses to fish and wildlife habitat, or restoration costs.

(2)(b) The Council shall evaluate overall public benefits by considering factors including, but not limited to, the following:

(2)(b)(A) The overall environmental effects of the facility, considering both beneficial and adverse environmental effects;

FOUTY: Again, key to (2)(b) (A) is the phrase "including, but not limited to," which allows 345-022-0000 to stay current to changing knowledge and environmental conditions. As has been noted, soils represent a unique and significant resource. The proposed transmission line will an adverse effect because of the important feedback loops between soils as a carbon sink and climate change. Therefore, the two cannot be separated as Idaho Power maintains. The interplay between soils and climate is captured in the abstract from Rosenzweig and Hillel (2000)[2] titled: Soils and Global Climate Change: Challenges and Opportunities.

> *"In the interplay of the soil and the atmosphere, the soil can be both a contributor to and a recipient of the impacts of climate change. In the past, land management has generally resulted in considerable depletion of soil organic matter and the release into the atmosphere of such radiatively active gases as carbon dioxide, methane, and nitrous oxide. Global climate change, to the extent that it occurs, will strongly*

[2] Rosenzweig, C. and D. Hillel (2000). Soils And Global Climate Change: Challenges and Opportunities. Soil Science: January 2000 - Volume 165 - Issue 1 - p 47-56

impact all soil processes. At this time, the task of soil management should be to restore soil organic carbon in order to enhance soil structure and fertility and to help counter the atmospheric greenhouse effect. Widely varying estimates of the soil's organic carbon content and of the potential for soil carbon sequestration point to the need to conduct a comprehensive inventory of this important property."

Next I examine ESFC standard 345-022-0022 as to how it applies to IP's responses related to soils and carbon sequestration. For ease of discussion, I have again included the standard below.

Division 22
GENERAL STANDARDS FOR SITING FACILITIES
345-022-0022
Soil Protection
To issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, **are not likely to result in a significant adverse impact to soils including, but not limited to**, erosion and chemical factors such as salt deposition from cooling towers, land application of liquid effluent, and chemical spills. [emphasis added)

Statutory/Other Authority: ORS 469.470 & 469.501
Statutes/Other Implemented: ORS 469.501
History:
EFSC 1-2007, f. & cert. ef. 5-15-07
EFSC 1-2003, f. & cert. ef. 9-3-03
EFSC 1-2002, f. & cert. ef. 4-3-02
EFSC 2-1999, f. & cert. ef. 4-14-99
EFSC 5-1994, f. & cert. ef. 11-30-94

Examination of EFSC 345-022-0022 finds the same phrase as found in 345-022-0000: "are not likely to result in a significant adverse impact to soils **including, but not limited to**, erosion and chemical factors….[emphasis added]. Therefore, there are three key points that Idaho Power has not addressed with respect to EFSC 345-022-0022:

1) The phrase "not likely to result in a significant adverse impact to soils including, **but not limited to**," makes clear that the standard is intended to be flexible to the evolving understanding of soil productivity and interconnections between soils and other natural resources. Therefore, Idaho Power must evaluate soil compaction, loss of soil structure and infiltration and loss of stored carbon, all of which influence soil productivity and the water holding capacity of the soil. They have not done so. The importance of sequestered carbon on soil productivity and its water holding capability is captured in the increased attention the subject is given in the published literature (Figure 1a and 1b). In the last 10 years, over 34,000 articles have been published on the topic. And as mentioned above, soils take decades to millennia to form and are a major influence on the chemical composition and turnover rates of various substances in the atmosphere and hydrosphere.[3]

[3] Van Breemen and P. Buurman (2002)

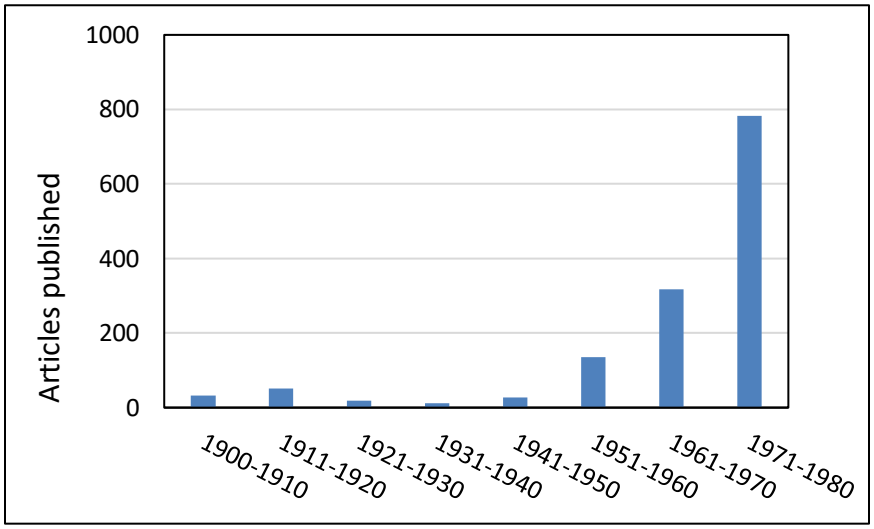


Figure 1a. Articles published by decade between 19000 and 1980 that examined carbon sequestration and soils. (*Source: Google Scholar, 8/26/2020)*

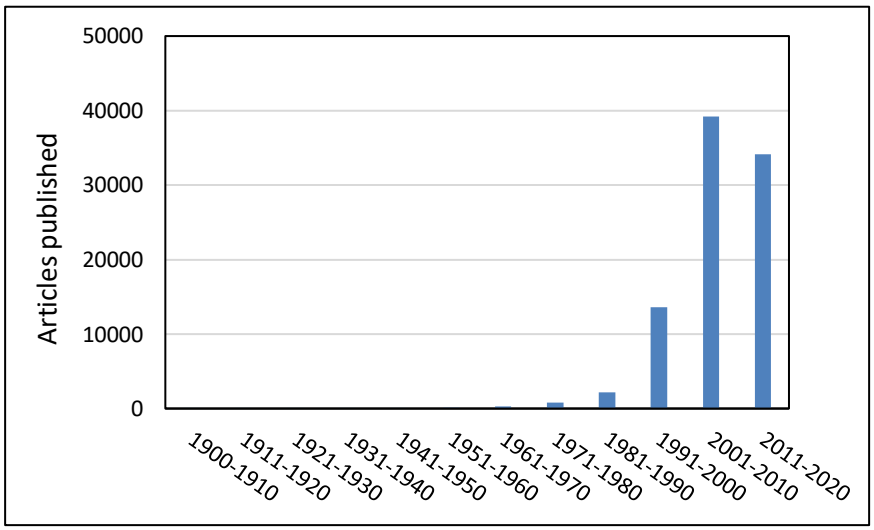


Figure 1b. Articles published by decade that examined carbon sequestration and soils from 1900 to 2020 (*Source: Google Scholar, 8/26/2020)*

The longevity of the impact of compaction is captured in a 2002 study of soils on the Mormon Trail. Brevik et al (2002)[4] found the following:

---

[4] Brevik, E. T. Fenton, and L. Moran (2002). Effect of soil compaction on organic carbon amounts and distribution, South-Central Iowa. Environmental Pollution Volume 116, Supplement 1, March 2002, Pages S137-S141

"Soils on the Mormon Trail have been compacted for over 150 years. Bulk density, carbon, and nitrogen samples were taken in 5-cm increments to 20 cm……Results indicate the compacted layer on the trail alters the soil carbon pool by limiting additions of fresh organic matter to the soil, limiting vegetative production, and by "pooling" carbon additions in the upper 10 cm of the soil ."

2. EFSC 345-022-0022: states "are not likely to result in a significant adverse impact to soils **including,** but not limited to, **erosion** and chemical factors….[emphasis added].

As stated in my letter of August 20, 2019 (p.3), in IP's Tables I-5 and I-9 they note that many of the soils are highly wind erodible and/or have a High K Factor (easily detached soil particles). Therefore, the removal of vegetation due to construction and maintenance, or as a result of a wildfire that is the result of or exacerbated by the transmission lines will have a significant adverse impact on soil erosion. The remoteness of portions of the proposed line, the frequency of drought in eastern Oregon (Appendix B-2), and recent examples where transmission lines have been the source of wildfire ignition underscore the potential for significant adverse soil effects, in the area of the line and beyond. IP has not addressed this erosion concern and as noted in the standard, erosion is specifically called out as a concern.

3. The last time OAR 345-022-0022 was updated was in 2007. Again, the phrase "including but not limited to" indicates that standards were expected to evolve as our understanding of science, climate change and feedback loops evolved. Therefore, IP and the EFSC cannot ignore the impact of the project on carbon sequestration or the recent Governor's Executive Order No. 20-04 "Directing State Agencies to Take Action to Reduce and Regulate Greenhouse Gas Emissions." To state that this is not required is to ignore the language in 345-022-0000 and 345-022-0022 "including but not limited to" that requires a much broader analysis than Idaho Power has done to date.

EXECUTIVE ORDER NO. 20-04
PAGE THREE

WHEREAS, all agencies with jurisdiction over the sources of GHG emissions will need to continue to develop and implement programs that reduce emissions to reach the state's GHG goals; and

WHEREAS, all agencies with jurisdiction over natural and working landscapes in Oregon will need to prepare and plan for the impacts of climate change and take actions to encourage carbon sequestration and storage; and

EXECUTIVE ORDER NO. 20-04
PAGE FIVE

2. **GHG Emissions Reduction Goals.** Consistent with the minimum GHG reduction goals set forth in ORS 468A.205(1)(c), this Executive Order establishes science-based GHG emissions reduction goals, and calls for the State of Oregon to reduce its GHG emissions (1) at least 45 percent below 1990 emissions levels by 2035; and (2) at least 80 percent below 1990 emissions levels by 2050.

3. **General Directives to State Agencies.** From the date of this Executive Order, the state commissions and state agencies listed in paragraph 1 are directed to take the following actions:

   A. GHG Reduction Goals. Agencies shall exercise any and all authority and discretion vested in thein by law to help facilitate Oregon's achievement of the GHG emissions reduction goals set forth in paragraph 2 of this Executive Order.

   B. Expedited Agency Processes. To the full extent allowed by law, agencies shall prioritize and expedite any processes and procedures, including but not limited to rulemaking processes and agency dockets, that could accelerate reductions in GHG emissions.

   C. Agency Decisions. To the full extent allowed by law, agencies shall consider and integrate climate change, climate change impacts, and the state's GHG emissions reduction goals into their planning, budgets, investments, and policy making decisions. While carrying out that directive, agencies are directed to:

      (1) Prioritize actions that reduce GHG emissions in a cost-effective manner;

There is nothing in the above Executive Order that limits state agencies as to how they reduce GHG emissions or excludes consideration of carbon emissions as a result of soil degradation. On page 3 of the EO, it states “take actions to encourage carbon sequestration and storage”. A project that removes existing store carbon above ground and contributes to the degradation of below ground carbon, and creates conditions where wildfire risk and thus soil erosion risk is elevated, leading to carbon released into the atmosphere is not in line with either EFSC 345-022-0000 and 345-022-0022 or the Executive Order.

WHEREAS, all agencies with jurisdiction over natural and working landscapes in Oregon will need to prepare and plan for the impacts of climate change and take actions to encourage carbon sequestration and storage; and

Maintaining the integrity of the soil requires maintaining the existing carbon sequestered and creating conditions where additional carbon can be sequestered. This is an appropriate action and one that will help "reduce GHG emissions in a cost-effective manner (EO 20-40, 3 (C) (1). When talking cost-effective, it is important to note the suppression costs of wildfire alone are in the 10s to 100s of millions of dollars (Appendix B, Table B-1). Additional recovery and restoration costs further increase the economic costs to Oregonians.

Contrary to IP's statements that EFSC standards 345-022-000 and 345-022-0022 do not require IP to consider carbon sequestration or carbon emissions as a result their impacts on soils via construction and maintenance and wildfire, the phrase "including, but not limited to," makes clear that they do. Therefore, the EFSC and IP must evaluate the impacts to soils related to carbon sequestration due to the proposed project from its building and maintaining of the transmission lines and due to the increased risk the project creates by placing a new wildfire ignition source through miles and miles eastern Oregon.

The importance of this topic was again made clear in a search of Google Scholar. 46,700 articles were identified from 2000-2020 that discuss carbon emissions and soil degradation. Therefore, it is clear that carbon sequestration, soil degradation and carbon emissions are considered of great importance. Some of the articles noted were:

1. Lal, R. (2010). Managing soils and ecosystems for mitigating anthropogenic carbon emissions and advancing global food security. BioScience, Vol. 60, Issue 9. pp. 708-721. https://doi.org/10.1525/bio.2010.60.9.8

2. Houghton, R.A., House, J. I., and J. Pongratz (2012). Carbon emissions from land use and land-cover change. Biogeosciences, Vol. 9, No. 12: pp. 5125-5142. https://epub.ub.uni-muenchen.de/68541/

3. Lal, R. (2003). Offsetting global CO_2 emissions by restoration of degraded soils and intensification of world agriculture and forestry. Land Degradation & Development. Vol. 14, Issue 3. pp. 209-322. **https://doi.org/10.1002/ldr.562**

In conclusion, Idaho Power has not sufficiently identified key aspects of soils as required by EFSC standards 345-022-0000 and 345-022-0022. Nor has the Department of Energy via the EFSC sufficiently addressed the Governor's EO 20-04 directing state agencies to take actions to reduce and regulate greenhouse gas emissions when approving actions such as that proposed by Idaho Power. Therefore, I request party status in the contested case.

Sincerely,

s/n Suzanne Fouty, Ph.D.
2518 Valley Avenue
Baker City, OR 97814

APPENDIX A: Resume

Suzanne C. Fouty
2518 Valley Avenue
Baker City, OR 97814
541-523-2541 (landline)
suzannefouty2004@gmail.com

EDUCATION and RESEARCH

Ph.D., March 2003. Department of Geography, University of Oregon, Eugene, Oregon 97403

Research assessed 1) the influence of cattle, elk and beaver on stream channel morphology over a two to five year period in four different mountain ranges, 2) how historic beaver trapping altered how streams look, behave and store water, 3) the role of historic beaver trapping on arroyo formation in the Southwest and 4) methods for accelerating the restoration of riparian and stream habitat.

M.S., March 1989. Department of Geosciences, University of Arizona, Tucson, Arizona 85721

Research assessed the effectiveness of a method for determining long-term groundwater recharge rates in arid and semi-arid regions and the potential for safely storing low-level nuclear waste in alluvial sediments.

B.S., June 1982. Department of Geology, University of Washington, Seattle, Washington 98195

PROFESSIONAL WORK EXPERIENCE

HYDROLOGIST/SOILS SPECIALIST (retired): ***Whitman Ranger District, Wallowa-Whitman National Forest,*** **Baker City, OR** (June 2002 to March 2018)

Interdisciplinary Team member responsible for writing NEPA reports on the current condition of soil and water resource and the potential effect of proposed projects or activities on those resources. Projects involved analysis of mining plans of operation, grazing allotments, aspen enhancement, logging, prescribed burn, road-building activities, stream restoration and fish passage barrier removal. Responded to appeal comments and assist with appeal resolution. Collected, maintained and analyzed a stream temperature database for approximately 110 sites scattered over the district. Established reference stream cross-sections and stream reaches across the District. Represented the Forest Service on the Powder Basin Watershed Council.

Contacted and oversaw summer interns, seasonal personnel and Whitman College students on watershed-related projects. Identified and was project lead in two restoration projects with

multiple partners. One project was designed to expand core beaver habitat though fencing aspen and willow areas to prevent cattle, elk and deer browse after conifer removal. The goal was to assist in their expansion in the watershed and gain various water-related benefits. The other project restored perennial flow to a section of stream that went dry each summer. This improvement in flow restored access to upstream year-round quality habitat for Middle Columbia River steelhead.

SEASONAL HYDROLOGIST/HYDROLOGIC INTERN
Beaverhead-Deerlodge National Forest, Dillon, MT (June – September 1993)
Eldorado National Forest, Placerville, CA (June - September 1992)
Modoc National Forest, Alturas, CA (June - September1991)

Evaluated stream sensitivity to disturbance on proposed timber sales and stream conditions on grazing allotments. Wrote a summary report for the Eldorado National Forest. Prepared field data in map and text form to be used in determining grazing allotment management plans for the Modoc National Forest. Established baseline stream surveys used to determine Rosgen stream type and current conditions on grazing allotments on the Beaverhead-Deerlodge National Forest.

ENVIRONMENTAL EDUCATOR: *Yosemite Institute,* Yosemite National Park, CA (1990, 1991, 1992)
Taught field sciences to groups of students from schools around the state of California. Ages varied from 6th to 12th grade. Focused on field sciences and stewardship. Prepared and regularly presented a slide show on wolves to groups of 24 to 150 people.

WATER RESOURCE SPECIALIST II: *New Mexico Environment Department,* Santa Fe, NM (1989, 1990)
Oversaw cleanup efforts on more than 20 groundwater contamination cases. Interacted with lawyers, consultants, the public and the responsible parties on cases concerning groundwater contamination and threats to public health and the environment. Conducted initial field investigations to determine source of the gasoline release and/or extent of plume migration and when remediation was sufficient. Developed and implemented a state-wide program for gasoline underground storage tank owners on how to use their gasoline inventory records as an early leak detection tool.

HYDROLOGIC INTERN: *Tucson Water -- Hydrology Department*, Tucson, AZ (March 1987 – March 1989)
On-site geologist for water-well construction activities. Collected field data documenting fluctuations of groundwater levels, groundwater quality, and aquifer characteristics. Prepared and analyzed water resources data for interpretive use. Evaluated historical water quality and drill log data for reliability.

PHYSICAL/HYDROLOGIC TECHNICIAN: *U.S. Geological Survey*

Carson City, NV (Summer 1985): Assessed soil moisture content of basin sediments as a function of depth using a Neutron probe at a site near Beatty, Nevada.

Menlo Park, CA (1983 – 1984): Assessed and compiled fault age data to be used in fault hazard assessment of the Nevada Nuclear Waste Repository project. Prepared open-file report.

FIELD ASSISTANT, Department of Geology, University of Washington, **Kenya, East Africa** (July 1982 - September 1982)
Assisted in soil-erosion experiments in the Amboseli Game Reserve, Kenya, East Africa. Collected and prepared samples for statistical analysis. Worked with Kenyan officials.

INDEPENDENT CONSULTANT/CONTRACTOR
Wallowa-Whitman National Forest, Oregon. Summer 2019
Assessed stream temperature data for selected stream sites on the La Grande Ranger District.

Beaverhead-Deerlodge National Forest, Montana. July 1995; July 1997 – June 1998
Bureau of Land Management, Montana. August 1995
Apache-Sitgreaves National Forest, Arizona. July 1997
The Nature Conservancy and Apache-Sitgreaves National Forest, Arizona. September 1994 – January1996
The Nature Conservancy and Bureau of Land Management, Arizona. July 1994 – December 1995
Bureau of Land Management, Arizona. May 1994

For each of these agencies I established study sites and collected, analyzed, and prepared baseline and repeat survey data on selected streams in areas grazed by cattle. Analyzed survey data, and submitted written results. Several projects were joint efforts between two groups.

Environmental Protection Agency, via Arizona State University. August 1994 – January 1995
Subcontractor on an Environmental Protection Agency project for the Department of Justice involving a court case related to recently abandoned pits from a sand and gravel mining operation on a section of the Verde River, Arizona. Worked with other specialists on the project and directed a field crew. Analyzed data and co-authored final report.

RELEVANT PROFESSIONAL DEVELOPMENT

Strategies for Ranching and Conservation on a Landscape with Wolves. Baker City and Halfway, OR. January 2019

Conference examined ways to minimize conflicts with wolves and losses of livestock to wolf depredation by shifting from reactive to proactive approaches with not only wolves but other challenges such as weeds, droughts and wildfire. Conference speaker was Hilary Anderson, a Montana rancher and co-founder of the Tom Miner Basin Range Rider Project.

Multi-Party Negotiations of Environmental Disputes. Portland, Oregon. April 2010

PRESENTATIONS

2017: **Spheres of Influence: Partnerships and Strategies for creating a Water-Rich Future on Public Lands**. State of the Beaver conference.

2015: **Beavers, Wolves, Fire, and Logging: Facing Climate Change with New Partners, New Strategies.** Deschutes Land Trust.

2013: **Decreasing the Impact of Drought and Flooding on Local Communities: Restoring water storage capability to stream ecosystems on Public Lands with the help of Beavers, Wolves, and Fire.** Powder Basin Watershed Council.

2013: **A Strategic Response to Climate Change: Restoring water storage capability to stream ecosystems on Public Lands with the help of Beavers, Wolves, and Fire.** River Restoration NW conference.

2010: **From Water Abundance to Water Scarcity – Can we find our way back? Understanding the power and limits of science.** State of the Beaver conference.

2008: **A Strategic Response to Climate Change: Restoring complexity, stability and water retention capability to stream and riparian ecosystems.** Oregon Watershed Enhancement Board conference: Working for Healthy Watersheds: Climate Change and Watershed Resilience.

2008: **A Strategic Response to Climate Change: Restoring complexity, stability and water retention capability to stream and riparian ecosystems.** The Wildlife Society meeting – Oregon Chapter.

2004: **Beaver: Key Component to Restoring Water back into Our Watersheds.** Grant County Conservationists.

1998: **Stream Channel Morphological Responses to Reductions in Grazing Pressure.** American Water Resources Association.

1998: **Images of Western Rivers: The Internalization of Degraded Systems as Normal and Its Impact on Restoration Attempts.** The River Management Society.

1996: **Beaver trapping in the Southwest in the early 1800s as a cause of arroyo formation in the later 1800s and early 1900s.** The Geological Society of America.

1989: **Paleoclimatic implications of chloride profile shapes: Application for long-term groundwater protection and management, Whisky Flat, Nevada.** American Water Resources Association.

1989**: Paleoclimatic implication of chloride profiles: Application to long-term groundwater protection and toxic waste disposal, Whisky Flat and Beatty, Nevada**. The Geological Society of America.

PUBLICATIONS

Research

Fouty, S.C., 2003. *Current and historic stream channel response to changes in cattle and elk grazing pressure and beaver activity: southwest Montana and east-central Arizona*. Ph.D. dissertation. Department of Geography, University of Oregon.
URI: http://hdl.handle.net/1794/23927

Fouty, S. C., 1989. *Chloride mass balance as a method for determining long-term groundwater recharge rates and geomorphic surface stability in arid and semi-arid regions: Whisky Flat and Beatty, Nevada.* M.S. thesis. Department of Geosciences, University of Arizona.

Publications

Fouty, S.C., 2019. *Tackling the Climate Crisis with the help of Wolves and Beavers.* Short slide show accompanied by text exploring how wolves and beavers help address and mitigate climate change. http://www.pacificwolves.org/water/

Fouty, S.C., 2018. *Euro-American beaver trapping and its long-term impact on drainage network form and function, water abundance, delivery, and systems stability. In* Johnson, R. Roy; Carothers, Steven W.; Finch, Deborah M.; Kingsley, Kenneth J.; Stanley, John T., tech. eds. 2018. Riparian research and management: Past, present, future: Volume 1. Gen. Tech. Rep. RMRS-GTR-377. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. p. 102-133. **DOI:** https://doi.org/10.2737/RMRS-GTR-377-CHAP7

Brown, S. T. and Fouty, S. C., Spring 2011. *Beaver Wetlands.* Lakeline. Pp. 34-38.

Fouty, S. C., 2008. *Climate change and beaver activity: How restoring Nature's engineers can alleviate problems*. Beaversprite, Vol. 23, No. 1, Spring 2008

Fouty, S. C., 2002. "Cattle and Streams: Piecing together a story of change" in Welfare Ranching – The Subsidized Destruction of the American West. (G. Wuethner and M. Matteson eds.). Island Press. pp. 185 – 188

Fouty, S.C., 1996. *Images of Western Rivers: The internalization of degraded streams as normal.* Desert Ramblings: Newletter of Oregon Natural Desert Association (Summer 1996).

Fouty, S.C., 1985. *The thematic mapper and its applications to geomorphology* in Geomorphic Surfaces in the Tucson Basin, Arizona: A Field Guidebook (L.L. Ely and V.R. Baker, compilers), pp. 63 - 79.

Fouty, S.C. (compiler), 1984. *Index to Published Geologic Maps in the Region around the Potential Yucca Mountain Nuclear Waste Repository site, southern Nye County, Nevada*. U.S. Geological Open-File Report 84-524.

Consulting Reports

Fouty, S.C., 1996. *Current condition of selected streams in the Apache-Sitgreaves National Forest -- 1994.* Report for: The Nature Conservancy (Tucson, Arizona) and the U.S. Forest Service (Apache-Sitgreaves National Forest, Springerville, Arizona)

Fouty, S.C., 1994. *Aravaipa Canyon Vegetation and Cross-sections Surveys -- 1994*. Data summaries for: The Nature Conservancy (Tucson, Arizona) and the Bureau of Land Management

Ohmart, R.D., Fouty, S.C., and Tiller, R.L., 1994. *Stream Conditions in the Vicinity of the Valley Concrete Sand and Gravel Operation, Verde River, Arizona*. Report for: U.S. Department of Justice. 51pp.

Conference Abstracts

Fouty, S.C., 1998. *Stream Channel Morphological Responses to Reductions in Grazing Pressure* (abs.): American Water Resources Association -- Specialty Conference on Rangeland Management and Water Resources.

Fouty, S.C., 1998. *Images of Western Rivers: The Internalization of Degraded Systems as Normal and Its Impact on Restoration Attempts* (abs.): River Management Society -- Rivers: The Future Frontier.

Fouty, S.C., 1996. *Beaver trapping in the Southwest in the early 1800s as a cause of arroyo formation in the later 1800s and early 1900s* (abs.): Geological Society of America -- Cordilleran Section, No. 11823, p. 66.

Fouty, S.C., 1989. *Paleoclimatic implication of chloride profiles: Application to long-term groundwater protection and toxic waste disposal, Whisky Flat and Beatty, Nevada* (abs.): Geological Society of America, V. 21, No. 6, p. A343.

Fouty, S.C. and Stone, W.J., 1989. *Paleoclimatic implications of chloride profile shapes: Application for long-term groundwater protection and management, Whisky Flat, Nevada* (abs.): American Water Resources Association -- New Mexico Section: Advances in Management of Southwestern Watersheds Symposium.

APPENDIX B-1

TABLE SHOWING DROUGHT CONDITIONS, WILDFIRE ACRES AND SUPPRESSION COSTS IN OREGON

Table B-1. Percentage of Oregon experiencing Moderate to Extreme Drought in late July (2000 to 2019), and Wildfire Area Burned and Suppression Costs for years 2012 to 2019). SHADED years had ≥50 % of the state in moderate to extreme drought.

Calendar Year	% Moderate to Extreme Drought[1]	Total Wildfire Area Burned (acres)[2]	Wildfire Suppression Costs ($)[3]
2019	11	79,732	*
2018	87	No data found	$514,600,000
2017	0	714,520	$447,000,000
2016	50	219,509	$67,000,000
2015	100	685,809	$266,000,000
2014	76	984,629	*
2013	62	350,789	*
2012	26	1,256,049	*
2011	0		
2010	9		
2009	7		
2008	19		
2007	44		
2006	0		
2005	55		
2004	24		
2003	90		
2002	57		
2001	100		
2000	0		

* No data

(1) US Drought Monitor Maps (https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?OR)
(2) National Interagency Fire Center https://www.nifc.gov/fireInfo/fireInfo_statistics.html
(3) Various newspaper articles

APPENDIX B-2

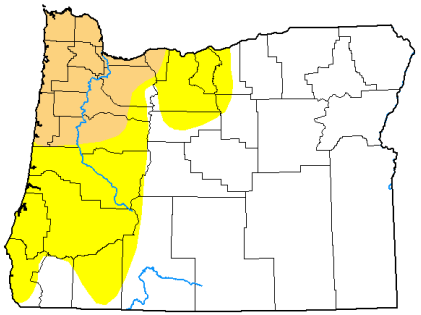
DROUGHT MAPS FOR THE STATE OF OREGON FOR LATE JULY 2000 to 2019

Late July chosen because agriculture irrigation season and beginning of wildfire season.

Maps B1-B20. U.S. Drought Monitor Maps for Oregon (2000 to 2019) in Late July to capture irrigation season and wildfire season.
Note frequency and magnitude of drought in Eastern Oregon where transmission line would go.

U.S. Drought Monitor

Oregon



July 30, 2019

(Released Thursday, Aug. 1, 2019)

Valid 8 a.m. EDT

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	66.08	33.92	10.83	0.00	0.00	0.00
Last Week 07-23-2019	66.08	33.92	10.83	0.00	0.00	0.00
3 Months Ago 04-30-2019	82.70	17.30	0.00	0.00	0.00	0.00
Start of Calendar Year 01-01-2019	0.00	100.00	91.78	78.16	23.39	0.00
Start of Water Year 09-25-2018	0.00	100.00	97.68	87.81	31.62	0.00
One Year Ago 07-31-2018	0.00	100.00	86.66	55.88	0.00	0.00

Intensity:

None
D0 Abnormally Dry
D1 Moderate Drought
D2 Severe Drought
D3 Extreme Drought
D4 Exceptional Drought

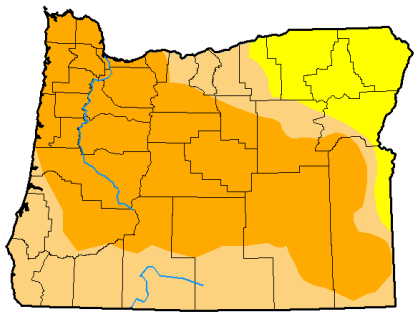
The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.

Author:
Curtis Riganti
National Drought Mitigation Center

droughtmonitor.unl.edu

U.S. Drought Monitor

Oregon



July 31, 2018

(Released Thursday, Aug. 2, 2018)

Valid 8 a.m. EDT

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	0.00	100.00	86.66	55.88	0.00	0.00
Last Week 07-24-2018	5.52	94.48	82.79	55.88	0.00	0.00
3 Months Ago 05-01-2018	32.94	67.06	39.92	0.00	0.00	0.00
Start of Calendar Year 01-02-2018	100.00	0.00	0.00	0.00	0.00	0.00
Start of Water Year 09-26-2017	39.23	60.77	28.57	0.00	0.00	0.00
One Year Ago 08-01-2017	54.52	45.48	0.00	0.00	0.00	0.00

Intensity:

D0 Abnormally Dry
D1 Moderate Drought
D2 Severe Drought
D3 Extreme Drought
D4 Exceptional Drought

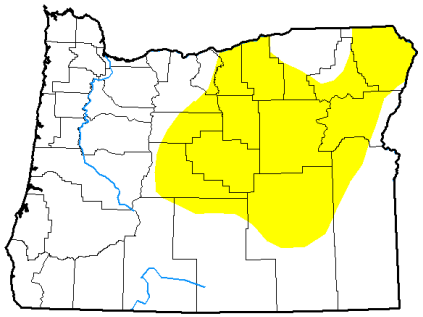
The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.

Author:
Chris Fenimore
NCEI/NESDIS/NOAA

http://droughtmonitor.unl.edu/

U.S. Drought Monitor

Oregon



July 25, 2017

(Released Thursday, Jul. 27, 2017)

Valid 8 a.m. EDT

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	66.40	33.60	0.00	0.00	0.00	0.00
Last Week 07-18-2017	66.97	33.03	0.00	0.00	0.00	0.00
3 Months Ago 04-25-2017	100.00	0.00	0.00	0.00	0.00	0.00
Start of Calendar Year 01-03-2017	65.31	34.69	5.29	0.00	0.00	0.00
Start of Water Year 09-27-2016	0.00	100.00	50.59	12.30	0.00	0.00
One Year Ago 07-26-2016	0.00	100.00	49.75	0.00	0.00	0.00

Intensity:

D0 Abnormally Dry
D1 Moderate Drought
D2 Severe Drought
D3 Extreme Drought
D4 Exceptional Drought

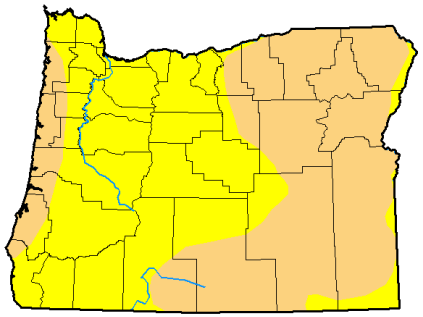
The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.

Author:
Richard Heim
NCEI/NOAA

http://droughtmonitor.unl.edu/

U.S. Drought Monitor

Oregon



July 26, 2016

(Released Thursday, Jul. 28, 2016)

Valid 8 a.m. EDT

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	0.00	100.00	49.75	0.00	0.00	0.00
Last Week 07-19-2016	0.00	100.00	49.75	0.00	0.00	0.00
3 Months Ago 04-26-2016	47.03	52.97	26.12	1.00	0.00	0.00
Start of Calendar Year 12-29-2015	14.52	85.48	80.45	65.33	39.55	0.00
Start of Water Year 09-29-2015	0.00	100.00	100.00	100.00	67.29	0.00
One Year Ago 07-26-2015	0.00	100.00	100.00	100.00	48.31	0.00

Intensity:

D0 Abnormally Dry
D1 Moderate Drought
D2 Severe Drought
D3 Extreme Drought
D4 Exceptional Drought

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.

Author:
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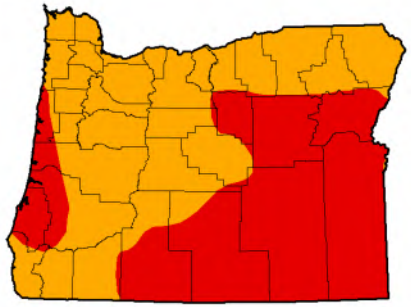
http://droughtmonitor.unl.edu/

U.S. Drought Monitor
Oregon



July 28, 2015
(Released Thursday, Jul. 30, 2015)
Valid 8 a.m. EDT

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	0.00	100.00	100.00	100.00	48.31	0.00
Last Week 7/21/2015	0.00	100.00	100.00	83.71	34.09	0.00
3 Months Ago 4/28/2015	0.11	99.89	86.09	63.17	34.09	0.00
Start of Calendar Year 12/30/2014	13.61	86.39	80.70	49.29	34.11	0.00
Start of Water Year 9/30/2014	1.56	98.44	76.61	56.26	35.30	0.00
One Year Ago 7/29/2014	1.75	98.25	75.50	55.62	19.91	0.00

Intensity:
- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

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Author:
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U.S. Drought Monitor
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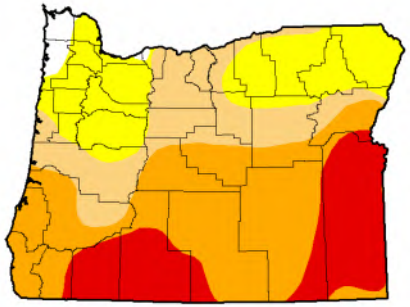

July 29, 2014
(Released Thursday, Jul. 31, 2014)
Valid 8 a.m. EDT

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	1.75	98.25	75.50	55.62	19.91	0.00
Last Week 7/22/2014	0.14	99.86	75.57	54.95	17.11	0.00
3 Months Ago 4/29/2014	5.17	94.83	83.01	51.73	9.31	0.00
Start of Calendar Year 12/31/2013	0.19	99.81	62.59	24.96	1.30	0.00
Start of Water Year 10/1/2013	37.69	62.31	39.79	25.26	1.30	0.00
One Year Ago 7/30/2013	9.76	90.24	62.16	33.72	0.00	0.00

Intensity:
- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

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Author:
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U.S. Drought Monitor
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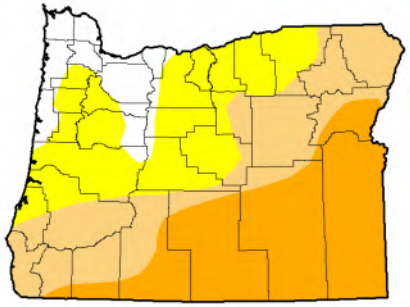

July 30, 2013
(Released Thursday, Aug. 1, 2013)
Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	9.76	90.24	62.16	33.72	0.00	0.00
Last Week 7/23/2013	13.45	86.55	51.29	33.74	0.00	0.00
3 Months Ago 4/30/2013	43.30	56.70	25.30	0.88	0.00	0.00
Start of Calendar Year 1/1/2013	58.19	41.81	26.88	4.82	0.00	0.00
Start of Water Year 9/25/2012	54.04	45.96	28.60	4.20	0.54	0.00
One Year Ago 7/31/2012	63.47	36.53	26.11	1.07	0.00	0.00

Intensity:
- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

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Author:
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U.S. Drought Monitor
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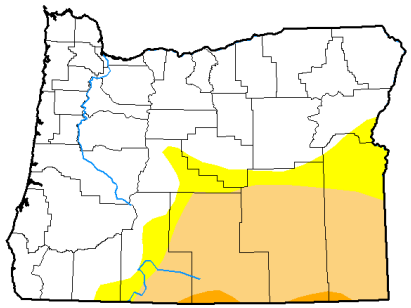

July 31, 2012
(Released Thursday, Aug. 2, 2012)
Valid 8 a.m. EDT

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	63.47	36.53	26.11	1.07	0.00	0.00
Last Week 07-24-2012	63.47	36.53	26.11	1.07	0.00	0.00
3 Months Ago 05-01-2012	55.88	44.12	21.16	1.09	0.00	0.00
Start of Calendar Year 01-03-2012	25.92	74.08	22.05	0.00	0.00	0.00
Start of Water Year 09-27-2011	100.00	0.00	0.00	0.00	0.00	0.00
One Year Ago 08-02-2011	100.00	0.00	0.00	0.00	0.00	0.00

Intensity:
- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

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Author:
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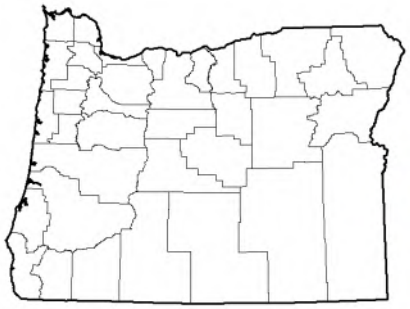

July 26, 2011
(Released Thursday, Jul. 28, 2011)
Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	100.00	0.00	0.00	0.00	0.00	0.00
Last Week 7/19/2011	100.00	0.00	0.00	0.00	0.00	0.00
3 Months Ago 4/26/2011	100.00	0.00	0.00	0.00	0.00	0.00
Start of Calendar Year 1/4/2011	100.00	0.00	0.00	0.00	0.00	0.00
Start of Water Year 9/28/2010	76.68	23.32	8.97	2.61	0.00	0.00
One Year Ago 7/27/2010	76.68	23.32	8.97	2.61	0.00	0.00

Intensity:
- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.

Author:
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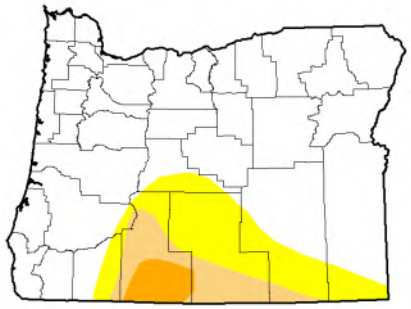

July 27, 2010
(Released Thursday, Jul. 29, 2010)
Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	76.68	23.32	8.97	2.61	0.00	0.00
Last Week 7/20/2010	76.81	23.19	8.97	2.61	0.00	0.00
3 Months Ago 4/27/2010	40.47	59.53	11.88	4.82	0.00	0.00
Start of Calendar Year 12/31/2009	44.90	55.10	6.56	0.00	0.00	0.00
Start of Water Year 9/29/2009	6.81	93.19	18.59	0.00	0.00	0.00
One Year Ago 7/29/2009	55.95	44.05	7.48	0.25	0.00	0.00

Intensity:
- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.

Author:
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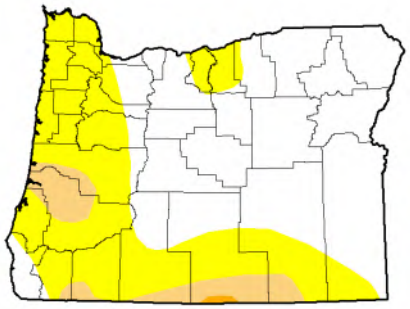

July 28, 2009
(Released Thursday, Jul. 30, 2009)
Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	55.95	44.05	7.48	0.25	0.00	0.00
Last Week 7/21/2009	59.97	40.03	7.48	0.25	0.00	0.00
3 Months Ago 4/28/2009	26.46	73.54	25.75	3.35	0.00	0.00
Start of Calendar Year 12/31/2008	40.48	59.52	19.31	4.86	0.00	0.00
Start of Water Year 9/30/2009	20.65	79.35	17.18	4.22	0.00	0.00
One Year Ago 7/29/2008	31.92	68.08	18.54	3.69	0.00	0.00

Intensity:
- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

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Author:
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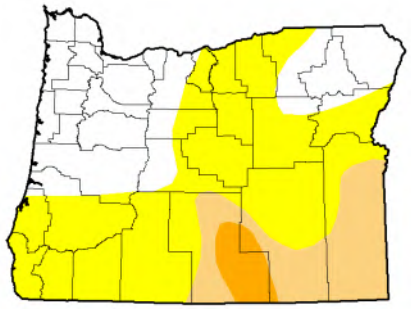
Oregon



July 29, 2008
(Released Thursday, Jul. 31, 2008)
Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	31.92	68.08	18.54	3.69	0.00	0.00
Last Week 7/22/2008	50.66	49.34	18.54	3.69	0.00	0.00
3 Months Ago 4/29/2008	65.04	34.96	14.87	4.67	0.00	0.00
Start of Calendar Year 1/1/2008	51.01	48.99	41.30	4.97	0.00	0.00
Start of Water Year 9/25/2007	19.80	80.20	46.00	33.22	4.84	0.00
One Year Ago 7/31/2007	21.98	78.02	43.89	30.48	0.00	0.00

Intensity:
- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.

Author:
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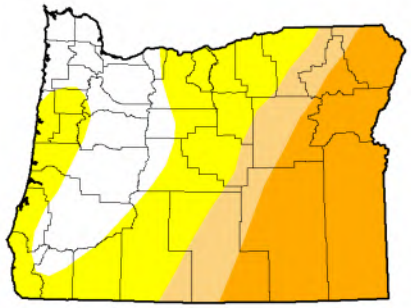
U.S. Drought Monitor

Oregon



July 31, 2007

(Released Thursday, Aug. 2, 2007)

Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	21.98	78.02	43.89	30.48	0.00	0.00
Last Week 7/24/2007	21.98	78.02	43.28	28.75	0.00	0.00
3 Months Ago 5/1/2007	41.32	58.68	26.68	0.00	0.00	0.00
Start of Calendar Year 1/2/2007	100.00	0.00	0.00	0.00	0.00	0.00
Start of Water Year 9/26/2006	92.96	7.04	0.00	0.00	0.00	0.00
One Year Ago 8/1/2006	100.00	0.00	0.00	0.00	0.00	0.00

Intensity:

- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

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Author:
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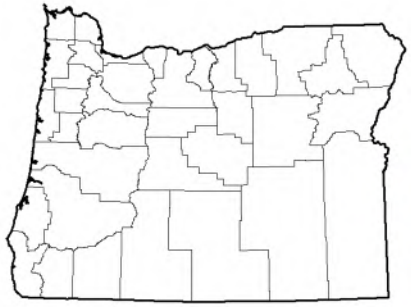
U.S. Drought Monitor

Oregon



July 25, 2006

(Released Thursday, Jul. 27, 2006)

Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	100.00	0.00	0.00	0.00	0.00	0.00
Last Week 7/18/2006	100.00	0.00	0.00	0.00	0.00	0.00
3 Months Ago 4/25/2006	100.00	0.00	0.00	0.00	0.00	0.00
Start of Calendar Year 1/3/2006	99.44	0.56	0.00	0.00	0.00	0.00
Start of Water Year 9/27/2005	16.80	83.20	54.39	28.10	1.75	0.00
One Year Ago 7/26/2005	20.29	79.71	55.27	27.96	0.00	0.00

Intensity:

- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.

Author:
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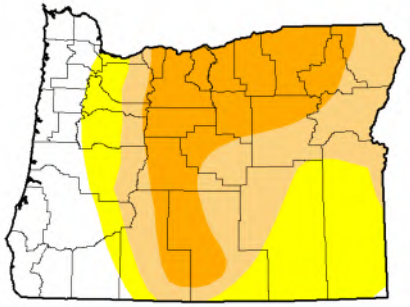
U.S. Drought Monitor

Oregon



July 26, 2005

(Released Thursday, Jul. 28, 2005)

Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	20.29	79.71	55.27	27.96	0.00	0.00
Last Week 7/19/2005	20.29	79.71	55.27	27.96	0.00	0.00
3 Months Ago 4/26/2005	14.55	85.45	77.78	60.70	4.66	0.00
Start of Calendar Year 1/4/2005	55.51	44.49	22.14	14.58	2.58	0.00
Start of Water Year 9/28/2004	61.16	38.84	27.12	17.29	5.09	0.00
One Year Ago 7/27/2004	44.91	55.09	23.94	14.47	4.03	0.00

Intensity:

- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

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Author:
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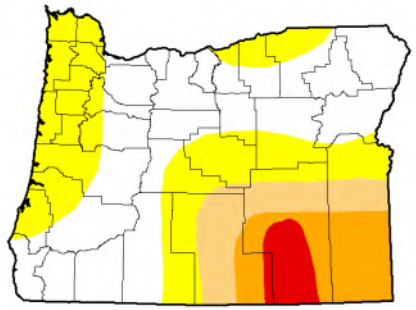
U.S. Drought Monitor

Oregon



July 27, 2004

(Released Thursday, Jul. 29, 2004)

Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	44.91	55.09	23.94	14.47	4.03	0.00
Last Week 7/20/2004	44.91	55.09	23.51	14.47	4.08	0.00
3 Months Ago 4/27/2004	59.53	40.47	24.80	16.76	4.21	0.00
Start of Calendar Year 12/30/2003	30.88	69.12	58.37	36.85	20.18	6.06
Start of Water Year 9/30/2003	2.66	97.34	78.14	30.81	23.12	3.51
One Year Ago 7/29/2003	1.97	98.03	89.68	38.31	23.25	3.16

Intensity:

- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

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Author:
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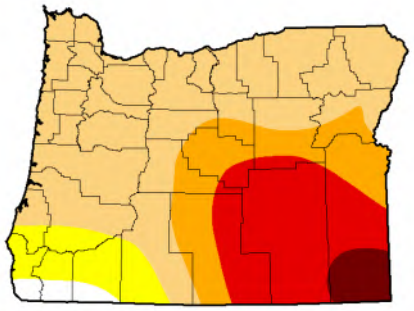
U.S. Drought Monitor

Oregon



July 29, 2003

(Released Thursday, Jul. 31, 2003)

Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	1.97	98.03	89.68	38.31	23.25	3.16
Last Week 7/22/2003	1.85	98.15	40.66	31.16	21.00	3.12
3 Months Ago 4/29/2003	44.66	55.34	35.21	18.92	5.75	0.00
Start of Calendar Year 12/31/2002	37.29	62.71	51.56	30.00	0.00	0.00
Start of Water Year 10/1/2002	21.52	78.48	59.80	32.05	0.00	0.00
One Year Ago 7/30/2002	20.76	79.24	56.80	19.83	0.00	0.00

Intensity:

- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.

Author:
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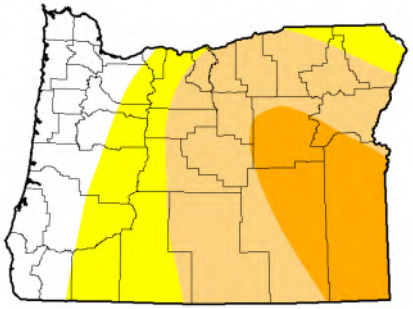
Oregon



July 30, 2002

(Released Thursday, Aug. 1, 2002)

Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	20.76	79.24	56.80	19.83	0.00	0.00
Last Week 7/23/2002	21.14	78.86	56.27	10.19	0.00	0.00
3 Months Ago 4/30/2002	55.52	44.48	6.48	0.00	0.00	0.00
Start of Calendar Year 1/1/2002	15.13	84.87	71.75	60.12	29.41	0.00
Start of Water Year 9/25/2001	0.00	100.00	100.00	97.54	55.54	0.00
One Year Ago 7/31/2001	0.00	100.00	100.00	97.83	26.69	0.00

Intensity:

- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

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Author:
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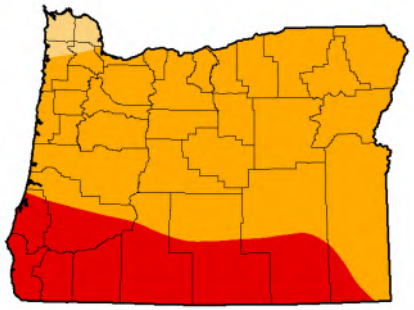
Oregon



July 31, 2001

(Released Thursday, Aug. 2, 2001)

Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	0.00	100.00	100.00	97.83	26.69	0.00
Last Week 7/24/2001	0.00	100.00	100.00	97.83	26.69	0.00
3 Months Ago 5/1/2001	0.00	100.00	100.00	32.96	6.67	0.00
Start of Calendar Year 1/2/2001	100.00	0.00	0.00	0.00	0.00	0.00
Start of Water Year 9/26/2000	93.90	6.10	0.00	0.00	0.00	0.00
One Year Ago 8/1/2000	94.33	5.67	0.00	0.00	0.00	0.00

Intensity:

- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

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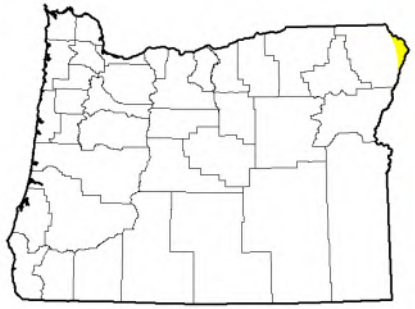
U.S. Drought Monitor

Oregon



July 25, 2000

(Released Thursday, Jul. 27, 2000)

Valid 7 a.m. EST

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	99.70	0.30	0.00	0.00	0.00	0.00
Last Week 7/18/2000	99.70	0.30	0.00	0.00	0.00	0.00
3 Months Ago 4/25/2000	100.00	0.00	0.00	0.00	0.00	0.00
Start of Calendar Year 1/4/2000	98.34	1.66	0.00	0.00	0.00	0.00
Start of Water Year	-	-	-	-	-	-
One Year Ago	-	-	-	-	-	-

Intensity:

- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.

Author:
Staff
National Drought Mitigation Center

http://droughtmonitor.unl.edu/

TARDAEWETHER Kellen * ODOE

From: Susan Geer <susanmgeer@gmail.com>
Sent: Sunday, August 23, 2020 9:14 PM
To: TARDAEWETHER Kellen * ODOE
Subject: Fwd: CONTESTED CASE REQUEST
Attachments: August 23 request contested case sg.docx

---------- Forwarded message ---------
From: **Susan Geer** <susanmgeer@gmail.com>
Date: Sun, Aug 23, 2020 at 9:08 PM
Subject: CONTESTED CASE REQUEST
To: <OED_OAH_Referral@oregon.gov>, <Kellen.taraewether@oregon.gov>, <info@stopb2h.org>

Please see attachment

August 22, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol Street NE, Salem, OR 97301
Fax: 503-373-7806
Email: OED_OAH_Referral@oregon.gov
cc: Kellen.taraewether@oregon.gov and info@Stopb2h.org

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

I am writing to file a contested case. I request to file as a "party". I do not believe others can represent the issues I have with B2H; I would represent them myself.

I am a landowner affected by proposed B2H as well as a professional Botanist/Ecologist with an interest in rare plants, native plant communities, invasion by weeds, and effects of climate change on plants. The proposed B2H would affect our property value and the experience of being at our property, and possibly our health. In addition it would spread invasives to forever alter the integrity of landscape and habitat.

My husband and I have put thousands of hours into controlling invasive species, thinning the forest to promote healthy trees, and restoring native species through seeding and planting. We have also helped our co-owner and neighboring landowner Joel Rice with those activities. I have long recreated and botanized on the Rice property, and I have been so impressed with it that I reached out to the Oregon Natural Areas Program (established by Oregon's Natural Areas Act). Oregon Natural Areas are, "designed to serve educators, researchers, resource managers and the general public with access to Oregon's most natural places far into the future" (OSU Institute for Natural Resources website).

After application and review, Rice Glass Hill Natural Area became the first private Natural Area dedicated by the State Parks and Recreation Commission under OR 273.586. B2H is slated to run through Rice Glass Hill Natural Area under the Proposed Route or Morgan Lake Alternative. Natural Areas should be considered Protected Areas.

A year ago yesterday, August 22, 2019, I submitted 2 written comments via e-mail to ODE, on the DOP and IPC's Amended Application (ASC). They were about rare plants and plant communities and about invasive species. Following summarizes comments which I believe were not addressed or addressed inadequately by the Proposed Order:

State Natural Areas were not addressed in the Proposed Order. No input was sought from the Natural Area program in the review process. Rice Glass Hill Natural Areas should be a Protected Area.

ODA administers the Rare Plant Program. It was excluded because it was unfunded during the IPC Application review. A State Rare Plant program botanist should have reviewed and commented but they did not (DPO Attachment 3, Reviewing Agency Comments). The Proposed Order provides no remedy.

Trifolium douglasii has recently become a USFWS Species of Concern. IPC does not address it and it is not mentioned in the Proposed Order. ODA does not mention it on their website but states that "any federally listed species…will receive protection in the state of Oregon". Species of Concern should merit consideration by ODE.

The State of Oregon provides a hierarchy of categories in listing rare plants. List 1 and 2 as well as Climate Vulnerable plants are not addressed by IPC's Application and the Proposed Order does not address them.

IPC's Noxious Weed Plan does not comply with Chapter 569 of Oregon law. IPC denies responsibility for control of most weed species (all but Class A for County list) and controls weeds only annually- this is extremely irresponsible. The Proposed Order has no remedy.

The Proposed Order says after 5 years and unsuccessful weed control and permanent loss of habitat, IPC can mitigate their way out of weed control. This is not a solution.

In Union County, both the Proposed Route and Morgan Lake Alternative as documented in the ASC were not part of the DEIS. The public was never given the opportunity to comment during the NEPA process on these routes. Therefore, the State hasn't done an adequate review of those routes.

Thank you for your consideration.
Sincerely,

Susan Geer
906 Penn Ave
La Grande, OR 97828

susanmgeer@gmail.com

TARDAEWETHER Kellen * ODOE

From: GARCIA Lucy M * OED on behalf of OED_OAH_REFERRAL * OED
Sent: Friday, August 28, 2020 8:36 AM
To: 'Irene Gilbert'
Cc: TARDAEWETHER Kellen * ODOE
Subject: RE: contestedcase reqjest and request for standing.

The Office of Administrative Hearings is in receipt of your email.

Thank you,

Lucy for
Anesia Valihov | Hearings Coordinator
Office of Administrative Hearings
4600 25th Ave. NE, Suite 140
Salem, OR 97303-4924

Phone: (503) 947-1510
Fax: (503) 947-1923
Email: OED_OAH_REFERRAL@oregon.gov

From: Irene Gilbert <ott.irene@frontier.com>
Sent: Thursday, August 27, 2020 5:24 PM
To: OED_OAH_REFERRAL * OED <REFERRAL.OED_OAH_REFERRAL@oregon.gov>
Subject: Fw: contestedcase reqjest and request for standing.

----- Forwarded Message -----
From: Irene Gilbert <ott.irene@frontier.com>
To: OED-OAH-Referral@Oregon.gov <oed-oah-referral@oregon.gov>
Sent: Thursday, August 27, 2020, 04:54:14 PM PDT
Subject: contestedcase reqjest and request for standing.

TARDAEWETHER Kellen * ODOE

From: Irene Gilbert <ott.irene@frontier.com>
Sent: Thursday, August 27, 2020 5:09 PM
To: TARDAEWETHER Kellen * ODOE
Subject: Fw: contestedcase reqjest and request for standing.
Attachments: IRENE AND STOP B2H REQUESTS FOR STANDING AND CONTESTED CASE REQUESTS.docx

----- Forwarded Message -----
From: Irene Gilbert <ott.irene@frontier.com>
To: OED-OAH-Referral@Oregon.gov <oed-oah-referral@oregon.gov>
Sent: Thursday, August 27, 2020, 04:58:34 PM PDT
Subject: Fw: contestedcase reqjest and request for standing.

----- Forwarded Message -----
From: Irene Gilbert <ott.irene@frontier.com>
To: OED-OAH-Referral@Oregon.gov <oed-oah-referral@oregon.gov>
Sent: Thursday, August 27, 2020, 04:54:14 PM PDT
Subject: contestedcase reqjest and request for standing.

Alison Greene-Webster, Senior Administrative Law Judge

Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED_OAH_Referral@oregon.gov
also send copies to: kellen.tardaewether@oregon.gov and info@Stopb2h.org

Dear M Alison Greene-Webster, Senior Administrative Law Judge

REQUESTS FOR STANDING AND CONTESTED CASE REQUESTS

My name is Irene Gilbert, I live at 2310 Adams Ave./ La Grande, Oregon 97850

I am requesting to be a full party to the contested case process. The timeframes are very short given the amount of material that the public must wade through to develop their contested case issues. I have multiple additional concerns which I was unable to develop prior to the deadline.

I am Co-Chair of the STOP B2H Coallition. My requests are made as a Chair of that Organization with interests based upon a broad base of over 800 individuals spread along the length of the proposed transmission line and nine non-profit groups. This interest is in responding to the concerns and comments of the members of our coalition regarding the negative impacts they have identified they will experience as a result of this transmission line. The members of our coalition have indicated concerns with the decision to find the development in compliance with virtually every standard.

I am also requesting standing as an individual. My interest and impact is due to the fact that I am a La Grande resident living below where the transmission line is projected to be built. I am an active user of the resources in eastern Oregon. I hunt, hike, watch wildlife, pick mushrooms and berries, utilize Ladd Marsh for hunting and watching birds, fish, and spend time at virtually every outdoor recreation site in Eastern Oregon from Suckor Creek and the Owyhee to Ladd Marsh and Oregon Trail sites, to the Deschutes and Columbia Rivers. I am a devoted grandmother who believes I owe it to my child and grandchildren to protect the resources of the state so that they are able to enjoy the quality of life that I have experienced absent destruction imposed on it's resources by those willing to sacrifice them for financial gain.

ISSUE ONE:
I COMMENTED ON THIS ISSUE IN MY June 18, 2019 submission following my verbal comments.

I request standing and a contested case regarding the failure of the Oregon Department of Energy and Energy Facility Siting Council to provide notice to impacted individuals of their pending action to allow a variance and an exception to the DEQ noise standard for all residences within ½ mile of the proposed transmission line as a part of this Proposed Order. ORS 183.415 provides detailed requirements a state agency must follow when their actions will impact citizens and provides for individual notice of the right to a hearing.

ISSUE TWO:

I am requesting standing and a contested case due to the inaccurate information included on Pages 627 and 628 of the Proposed Order supporting the use of methodology for evaluating noise impacts. These methods have not previously been used, and it has not been determined that they meet the same statutory standards that are addressed by the DEQ developed methods.
I did not comment directly about this issue, however, it is new information contained on Page 627, Lines 27 through Line 4 on Page 628 of the Proposed Order describing the council authority to review and approve decisions regarding the Noise rules including alleging the following inaccurate information.:
1.Allowing an exception based on a written authorization from the Oregon Department of Energy
2. Stating the rules do not address lineal facilities
3. Stating that the Sound Measurement Manual is not current and not applicable.
4. Stating that DEQ does not fund or administer rules.

ISSUE THREE:

I commented on this issue in my written submission of June 18, 2019.

I am requesting standing and a contested case due to the failure of the Oregon Department of Energy to approve the methods used to assess noise impacts and the inaccurate methods used to assess the noise impacts of the development resulting in inaccurate determinations of the noise impacts the development will have.

1. There is no written approval of the procedures used that are contrary to the DEQ rules.
2. The Proposed Order interprets the language of the consultant, "Golder" to be an approval of the use of the period from 12:00 midnight till 5:00 a.m. as being the timeframe for establishing the number of exceedances when it only references the timeframe for establishing the ambient noise level and the incorrect interpretation of the noise rules resulted in a significant understatement of the number of noise exceedances.. Using that reduced timeframe fails to establish the actual percentage of days when the standard would be exceeded which would preclude allowing an exception or variance to the noise rules based on an "infrequent" occurrence. It also fails to comply with the definitions included in the Noise Administrative rules. OAR 340-035-0035((i) states that no new industrial or commercial noise source shall cause or permit the operation of the noise source if the noise levels generated or indirectly caused by that noise source increase the ambient statistical noise levels, L10 or L50 by more than 10 dBA in any one hour, or exceed the levels specified in Table 8. The term "any one hour" is defined in OAR 345-035-0015(7) "Any One Hour" means any period of 60 consecutive minutes during the 24-hour day.
3. The use of the noise measurement taken from one location and applied to others without doing measurements at each location will be shown to result in inaccurate baseline noise levels.

The Proposed Order using only the time period from midnight until 5:00 a,m. to establish the number of exceedances of the noise standard is not consistent with the noise rules.

ISSUE FOUR

There is no need to have commented on this as the Proposed Order changed to allow a variance for the entire transmission line.

I am requesting standing and a contested case due to the following issue: ORS 467.060 establishes the Environmental Quality Commission as the only entity with the power to grant variances and this is reflected in OAR 340-035-0100 making it against state law for the Proposed Order to authorize this variance.. Given the language of the statute designating the authority to only the commission, it would constitute a waiver of a state statute for the Oregon Department of Energy and Energy Facility Siting Council Proposed Order to authorize a variance for all noise sensitive properties along the transmission line. While the administrative rules have been placed on hold, the statute still is in effect until the legislature decides to change it.

ISSUE FIVE:

I commented on this issue in the oral comments for 6/18/19, number 14 which was submitted in writing.

The proposed site certificate condition OPR-NC-01(c) fails to comply with state statute ORS 469.507 requiring the certificate holder to perform the testing and sampling necessary for the monitoring program or require the operator of the plant to perform the necessary testing or sampling. In determining the noise level at NSR's, the developer is responsible for showing that the development does comply, not the homeowner having to prove that it does not. The developer needs to perform monitoring at the noise sensitive locations to establish a legitimate baseline noise level for reference. A failure on the part of the developer to establish this baseline will cause irreparable harm to those impacted since in the event the transmission line is constructed, it will not be possible to obtain an accurate monitoring measurement.

On July 30, 2020 a friend and I drove to the site of MP 11. I took several pictures and spoke with the property owner there. What I found was a well traveled paved road literally feet from the residence with a side road going off it at an angle which was being used by ATV riders at the time. Approximately 100 yards back along the paved road there is a dirt road used by atv's and 4 wheel drive vehicles which came down from an existing transmission line. There is a railroad track at the foot of the hill and a train went by while we were there. The property owners stated that they could have as few as 5 or 6 trains a day, or as many as a dozen or more. I asked the property owner if he was familiar with the Morgan Lake area. He said he was. I asked if he thought the noise level at his home was about the same as Morgan Lake. He said his house was "Way noisier". He signed a statement to that effect. I can say with no hesitation that whoever decided to apply the noise measurement at this house to the 63 or so other locations, most of which are in the Morgan Lake area had not visited the locations.. There is no comparison between the two locations. I could take a busload of people out there and they would observe the same thing I did. It can easily be documented that the assignment of the noise level at one location to others has a significant chance of being wrong. In this case, wrong by over 60 NSR's.

INVASIVE WEEDS

ISSUE SIX:

I am requesting standing and a contested case due to the fact the noxious weed plan fails to comply with the state statutes and will negatively impact agriculture, threatened and endangered species, wildlife habitat and the economic stability of all the counties. I commented regarding this in my oral comments document dated 5/19/19, Item 1. And in written comments included in the agency comment list, Page 1580 The Proposed Order includes a complete change in how the plan will be completed making it impossible and unnecessary for me to comment in order to request this contested case.

In order to comply with the state statutes, the Proposed Order must contain conditions which will assure that noxious weeds are not allowed to go to seed for the life of the development. The Proposed Order fails to do this and it fails to include adequate information to assure that the final plan will comply with the statutes. Given the fact that the procedure for completion of the plan fails to incorporate the developer's statements that the weed supervisors would participate in the development of the plan and that it would incorporation the 31 issues they identified, the public has no reason to trust that the final plan will comply with the law or that it will provide for the protection of the livelihood of landowners who depend upon the management of invasive weeds in order to make a living. The plan must be completed to the extent that the public is able to review it and determine if it is sufficient, however that is not the case at present, and the proposed plan provides no access to the public for this review prior to the issuance of a site certificate. This fails to comply with the appeals court determination in Gould v Deschutes County, 216 Or. Ap. 150 (2007) requiring the involvement of the public in the final plan. The plan in it's current form fails to comply with state law contained in ORS 569.390, 569.400 and 569.445. If a developer fails to require compliance with these laws, it can result in landowners having their land quarantined which would not allow them to remove or sell any products produced on their land., The consequences of the proposed order failing to require compliance meeting the state statute requirements with state weed management laws is not a small thing. In fact, in the event of sanctions against them, they could lose their farm business.

OREGON TRAIL

Issue Seven

I am requesting party status and a contested case regarding the fact that the proposed mitigation listed on Page 463 of the proposed order fails to provide mitigation for damages to an irreplaceable public resource that are consistent with the visual damages the plan is supposed to provide mitigation for and the fact that the mitigation plan has not been completed to the extent that the public is able to participate in the plan. The plan fails to identify what mitigation is proposed for what site and where that mitigation activity will be occurring and fails to provide clear and objective methods that will address the actual impacts at the sites.. This contested case is based upon court decisions and interpretations regarding the requirements for mitigation of impacts as noted in Gould v. Deschutes County, 216 Or Ap. 150(2007) requiring that a mitigation proposal must be adequately developed or defer consideration of the plan to allow a full right to public participation in the plan.. The council rules relating to this issue are OAR 345-022-0080

I am not required to have commented on this issue as it is newly presented in the Proposed Order and represents a failure to comply with mitigation requirements.

The extent of damages to the public resources are not identified in relation to the necessary mitigation and most of the mitigation listed fails to apply to visual impacts. The appeals court has determined that mitigation must be consistent with the damages to the resource. There is no indication of the amount or type mitigation that will be required, and most of the indicated mitigation methods fail to address the visual damages they are intended to compensate for. In addition, there is no formal plan to monitor and assure that the mitigation remains in place for the life of the project. The following mitigation methods identified fail to address the visual damages.

1. Item c Historic trails restoration would have to occur within the facility area to meet the requirement to be considered mitigation under criteria (c). The proposed mitigation action

indicating the provision of Public signage, publication/print/media, and/or interpretive plans fails to meet the requirement to be considered mitigation under (c).
For mitigation under (d) the creation of Trail Management Plans is not appropriate as there is no assurance they would remain in place for the life of the project, as has been shown with this project. Literature or archival review, local papers does not meet the criteria of reducing visual impacts, nor does it meet the criteria that the mitigation must remain in place for the life of the development. the transmission line would preclude listing by many sites. Recording again does not meet the requirements of the condition (d) Item (e) requires funding to replace or provide comparable substitute resources or environments. Item e in the table does not fit this criteria.

WILDLIFE

Issue Eight

Contested Case Request:

I am requesting a contested case as a result of the Proposed Order documenting the failure of the Council to protect the habitat for Federally listed Threatened and Endangered wildlife. The Proposed Order, Page 305 documents the intentional nature of this action which leaves the Energy Facility Siting Council and Oregon Department of Energy in the position of breaking Federal Threatened and Endangered Species laws. This action fails to comply with ORS 469.310 stating that Oregon "to the maximum extent permitted by the United States Constitution and to establish in cooperation with the federal government a comprehensive system for the siting, monitoring and regulating of the location, construction and operation of all energy facilities in the state." The council is not required to include federally protected species under the Threatened and Endangered Species standard, however, they must include them in the Habitat Mitigation standard. By definition, if a species is listed as Threatened or Endangered, there is a need to protect critical habitat. My comments submitted on Aug. 22, 2019 includes a copy of that legislative interpretation. In addition, any authorizations provided by the council that will result in death or damages to federal Threatened or Endangered Species places the council in the position of a "person" in terms of that law and allows any private party to initiate legal action based upon their actions It is important to note that the roll backs of the Threatened and Endangered Species Act implemented by President Trump have been rescinded by the courts leaving the prior laws in place. In addition, the definition of critical habitat has been clarified to identify it as habitat that could support the species and this definition is supported by the president. Among multiple examples in the Proposed Order for the Boardman to Hemingway transmission line, it fails to include federally protected fish habitat protection as evidenced by the failure to provide setbacks from riparian areas of an amount greater than 25 feet for construction and roads in most counties. This example also conflicts with the conditions in the Environmental Impact Statement requiring up to a 300 foot setback depending upon the water source. Allowing roads and other construction within 25 feet of water sources, and in the middle of riparian areas is a clear violation of federal law if the area supports protected species. Given the strong public objections to this development, in the event it is constructed, it will likely result in legal action against the developer for failure to follow federal protections as well as the state for approving conditions that clearly are not in compliance with habitat protections for the species. Should any Threatened or Endangered animal be harmed by the actions of the council or the developer. I iwould be happy to have my name on such an action.

FOREST LAND

Issue Nine:

I am requesting a contested case due the failure of the applicant to comply with the state Land Use Goal 4 rules regarding the identification of forest land for establishing compliance with the standards which resulted in understating the impacts of this development on forest land and failing to address the forested area as a conditional use. I commented on this issue on Page 1608 and 161of the compiled public comments done by the Oregon Department of Energy

The applicant relied upon Union County Administrative Rules UCZPSO as stated on Page 148 of the Draft Proposed Order. This resulted in the incorrect identification of forest land using the predominant use rather than the soil class to identify forest land in Union County. The means there is a significantly understating the amount, value and impacts of the damages to forest lands in the county. Approximately 50% of the forested land was treated as agricultural land, and permitted outright in error as opposed to being treated as a conditioinal use.which would be difficult to justify given the amount of land involved.

The Proposed Order fails to comply with ORS 469.504 requiring compliance with statewide land use goals, ORS 527.722 which restricts local government adoption of rules regulating forest operations. This statute states local governments cannot "adopt any rules, regulations or ordinances or take any other actions that prohibit, limit, regulate, subject to approval or in any other way affect forest practices on forestlands located outside of the acknowledged urban growth boundary. The county planner's error in the designation of forest land as only including land currently growing trees cannot be used due to ORS 197.250 which states: " all comprehensive plans and land use regulations adopted by a local government to carry out those comprehensive plans and all plans, programs, rules or regulations affecting land use adopted by a state agency or special district shall be in compliance with the goals within one year after the date those goals are approved by the Land Conservation and Development Commission. Union County failed to update their administrative rules to comply with state statutes which must be applied, however, that does not exempt the county from complying with the state standard. The actions also conflict with the following administrative rules:
OAR 345-021-0010(1)(k) due to a failure to apply the requirements for identifying forest lands consistent with state statutes and OAR 345-022-0030 due to the fact that the council lacks information necessary to assess whether or not the development can be found in compliance with Goal 4 due to the error in identifying impacts of removal of forest lands.

Union County administrative rules cannot be substituted for statewide land use statutes and court decisions.

BOND

Issue Ten:

I am requesting standing and a contested case due to the fact that The Proposed Order fails to provide a bond that is adequate to protect the public, landowners and state agencies from having to assume the costs of site restoration and fails to provide owners of farm or forest land, and any other property type

with mitigation from having to bear the costs of the restoration of the site once the transmission line is removed. OAR 345-022-0050(2) requires the bond to be in an amount satisfactory to the council to restore the site to a useful, non-hazardous condition.

While the rules allow flexibility on the part of the council in determining the amount of the bond, they established the amount of the bond that would restore the site and the standard that the council is to apply is that the amount be consistent with the council determination regarding the necessary amount to restore the site. There appears to be no way to justify the use of $1.00 amount that will assure the public and others that it would be impossible for the funds to not be available, there is no way of assuring that developers will not have to rely upon the bond, and there is no way to quantify the basis of the $1.00 amount, and there is no way to assure with certainty that the development will not be removed prior to it happening if it is as a result of a catastrophic event. The department paid for a consultant on another project who recommended against a similar reduction in the bond amount, and it has been the practice of EFSC to maintain a bond in the amount established by them that would restore the site if the development were removed.

CONTESTED CASE

Issue Eleven:

I am requesting a contested case due to the failure of the Proposed Order to identify the wildlife present at the Ladd Marsh Wildlife Area and the federal mitigation sites included in that wildlife area in order to determine and mitigate for the direct and indirect damages to wildlife. I commented on the issue on

The rules require an evaluation of wildlife in an assessment area extending 5 miles from the site boundary. The developer failed to identify multiple species who utilize the marsh and will be impacted by the transmission line creation of a lineal divide between their use of the marsh and the forested areas above the marsh which are used on a daily basis. ODFW recommended the installation of bird deflectors for the entire length of the transmission line due to the risk to birds based upon the nunbers and use of the marsh. The Proposed Order includes no such requirement. The Forest lands near the Ladd Marsh have been identified by ODFW as containing such a large quantity and number of species that there should be no construction in those areas. This recommendation was provided in writing in the evaluation of a previous project which was planned to impact the same area this project is intended to cross. While there are multiple other examples, the actions of the council regarding allowing indirect damages to Ladd Marsh wildlife and their habitat provides an additional example of the failure to address habitat for federally listed wildlife. In the recommendations from the Oregon Department of Fish and Wildlife regarding the previously proposed Antelope Ridge Wind Development, it was recommended that no construction occur in the forested areas around Ladd Marsh due to the critical nature of this habitat for federally protected migratory birds. Surveys showed a significantly greater number of species of birds using the area than the developer indicates utilize the entire length of the transmission line corridor. Documentation to be provided during the contested case.

An additional example of the failure of the Proposed Order to provide protection for threatened birds is the refusal of the developer to provide bird diverters for the transmission line in Union County in spite of the recommendation from the Oregon Department of Fish and Wildlfie that they do so. This runs contrary to the statement that the council acts on ODFW recommendations regarding Threatened and Endangered wildlife as the Proposed Order does not require them..

I am not required to have spoken specifically to this topic as the Proposed Order has added a new declaration that the council is intentionally ignoring federally listed Threatened and Endangered wildlife under their Habitat Mitigation standard in spite of Legislative Council interpretation that it is required due to removing the evaluation of these species from the T & A evaluation.

CONTESTED CASE

ISSUE TWELVE

This request for standing and a contested case regarding the significant increase in the costs of farming operations and significant changes in farming practices which are likely to force some farm families to cease operation. I commented on this issue

The developer provides broad statements about farm land in the state. The impacts of this development are not impacting the total agricultural producers in the state. They are impacting those who will have the transmission line on their property or near it. They are the ones that will experience impacts which will substantially increase the costs of doing business to such an extent that it is likely that some will no longer be able to continue farming.

Statistics which are meaningful and increase the significance of the impacts which will be catastrophic to many Oregon farm's include such things as:.
--The development will directly impact 104 parcels of irrigated farm land and 889 parcels of non-irrigated farmland.
-- In 2017 Oregon farmers average net income per farm was $19,757 compared to $22,954 in 2012.
--The Oregon farms who showed a net loss in income totaled 25,819 in 2017 (Figures come from the 2017 Oregon Census of Agriculture).

Because most of this section was rewritten in the Proposed Order, it was not possible for me to have commented prior to seeing this order. The problems with the way agricultural impacts are dealt with are almost endless. They include:

1. The developer failed to disclose multiple impacts of the development on farm lands.

2. The proposed order claims mitigation for impacts by methods which do not minimize the risk of agricultural landowners being exposed to financial risks. For example:
    a. The proposed order claims that the required bond for restoration of the site will protect farm families from the costs related to restoring the site when in fact, the bond amount is only going to be $1.00 for 50 years and an amount not adequate to restore the site for the next 50 years. This in no way provides any mitigation for the stress or risk to those currently involved in agriculture and will provide little for the next two generations of farmers utilizing the land. (Page 214 of the proposed order) In addition, the change to require reviews of the amount every 5 years does not adequately address the fact that events causing this company to fail to restore the sight could include catastrophic events such as fire, flood, earthquake, or sabotage or economic collapse. None of these events are going to be predictable, therefore, the condition added on page Page 22 of the Proposed Order does nothing to mitigate for the impacts of being at risk of this occurring.
3. The fire prevention plan fails to provide reliable consistently available fire protection. Reliance on volunteers who can take an hr or more to respond to fires when the wind is blowing and the conditions are dry does not mitigate for the increased fire potential faced by farmers as a result of this transmission line. The developer acts as if the standard that says firefighters need to be on location within 15 minutes 90% of the responses to fires does not exist. The distances indicated are to the nearest boundary of the development and in Malheur County, for example, the nearest RFPD which could provide volunteer firefighters is 9.5 miles and BLM would have to travel 53.3 miles to even reach the site boundary. There is no effort being made for early detection of fires by proven methods such as installation of cameras along the transmission line, providing for paid firefighters during fire season, providing anything beyond the most basic hand equipment rather than the vehicles needed and locating them along the transmission line route in designated facilities. The plan requires no standards indicating the required response times, details regarding the specific resources the developer will provide to meet those standards. The new information on Page 3 is filled with the developer will "attempt" to do things, but ultimately, the only reference is that if it

doesn't work the developer will propose something else. This entire section, and in fact, the entire plan fails to provide the specifics that would be needed to determine if the plan will be effective, and in fact, statements in the plans that indicate the developer believes that there will be little danger of fire during operation leave landowners with an even greater concern. The plan provides no opportunity for public review of a plan with sufficient details to be meaningful and no plan to provide that. Given the real potential of transmission line developments increasing the risk of fire either through the infrastructure or the access they provide to people and vehicles, the developer needs to be required to provide a fire protection policy or a bond to assure the landowners will be compensated for losses due to fires occurring as a result of this development rather than place this financial burden on the property owners. A fire in dryland wheat caused the death of a farmer a couple of years ago. The inadequacy of the fire prevention plan is a life and death matter.

4. The information regarding farm impacts is largely limited to the transmission line corridor, but the impacts to the area outside the right of way and on adjacent farm lands are also significant and are supposed to be evaluated.
5. The proposed order weed management plan is not only lacking in compliance with the state statutes requiring that no invasive weeds be allowed to go to seed, and requirement that equipment be cleaned prior to moving from one landowner's property to another or entering a public roadway.

   It also, fails to provide monitoring for the life of the project, fails to require control of the invasive weeds on the B list for the counties, fails to require approval from the county weed control supervisors in its development, fails to include weed management along roads developed or significantly changed by the developer, fails to address all weed infestations at the site by limiting the origin of the weed seeds in spite of the fact that the development disturbance of the groundcover will cause or at a minimum contribute to the infestations. In addition to all the identified failures of the Weed Management plan as included in the Proposed Order, the plan is almost entirely lacking in any details that would allow the public to evaluate it and there exists no opportunity for the public or impacted landowners to review and identify areas the plan that are lacking whenever it is actually developed. The plan and procedure included in the Proposed Order will

not be developed until after a site certificate is issued and based upon the limited information provided, it will fail to provide any meaningful mitigation for the impacts the development will have on invasive weeds impacting farm lands

6. The costs of applying herbicides, insecticides, and fertilizers will increase due to the fact that most companies doing aerial applications will not risk running into the transmission lines and most farmers are not willing to risk the liability that they will assume if an accident occurs. .

   --Currents from power lines can exacerbate electrolysis and corrode metal pipes, controls and parts prematurely.
   --The review of farm sales prices after transmission lines are developed on their land which was included with my comments shows multiple situations where the value of farm land went down once transmission lines were installed across their land. This has a direct impact on the long-term security if a farmer has to sell his/her land as part of their retirement planning.
   A more immediate consequence of this reduced value is that many farmers use their land as collateral to obtain working capitol for their operation. Reduced value means reduced access to working capitol.
7. Soil compaction effects production along transmission lines for years after they are installed. This impact is apparent in fields with existing transmission lines.
8. Farm land owners received no notice required by ORS 183.415 that the Proposed Order would allow the developer to exceed the noise standard which will have a significant impact on livestock and human ability to live and work on their property.
9. For farm landowners who also have forest land impacted, in the event that an Alternate Practice is approved, it will significantly impact the cost of farm or forest production due to the fact that the landowner will be assessed additional taxes and that increase will continue for as long as the transmission line exists.
10. There is a loss of all crop production at the base of towers as well as the significant area needed to maneuver equipment around the tower bases.
11. Most farmers restrict vehicle use in fields due to the fact that it breaks through the crust on the soil and results in increased weeds and erosion. In areas like Morrow County, one of the reasons for using aerial methods of

taking care of the application of chemicals is the fact that using ground equipment results in large dust clouds and provides for significant amounts of wind eroded soil. The layout of fields can be limited and can result in rows being oriented in ways that increase water and wind erosion.

12. It will create a barrier to the opportunities for purchase of additional land or consolidation of farms to remain economically sound in spite of fluctuating wholesale values of products produced.
13. Allowing this transmission line to impact any water sources is devastating to those living in the high desert area. Water is scarce, ground water is not being restored at a rate to keep pace with use,

This development offers Oregon farm and forest owners nothing but loss of economic well being, and destruction of the life style that brought us to farming in the first place. Farming is not a big money making endeavor. It is a lifestyle that keeps us doing this work and motivates our children to continue caring for the land. This development will cause Oregon farm families untold damage. The farm assessment and mitigation plan is nothing more than a list of potential things that the developer could do to mitigate for the damages that will be caused. The lack of clear and specific mitigation actions, requiring those actions, monitoring to occur for the duration of the project in plans which effect farmers such as the Fire Prevention Plan, the Invasive Weed Plan, the Habitat Restoration, etc. provide no guarantee that this transmission line will not put farmers out of business. The Proposed Order provides no assurance that anything will be done, and it is impossible to mitigate for the destruction of a way of life. t should not be allowed to go forward.

CONTESTED CASE

ISSUE THIRTEEN

I am requesting a contested case due to the fact that Idaho Power has submitted a fraudulent application as evidenced by multiple actions they are involved with areas outside the site boundary.. The Council must deny this application as it fails to accurately represent their intended actions.

Definitions related to this in the Administrative Rules include:

1. A site certificate by definition contained in ORS 469.300(26) means “the binding agreement between the State of Oregon and the applicant, authorizing the applicant to construct and

operate a facility on an approved site, incorporating all conditions imposed by the council on the applicant."

2. ORS 469.300((55) ""Site boundary" means the perimeter of the site of a proposed energy facility, its related or supporting facilities, all temporary laydown and staging areas and all corridors and micrositing corridors proposed by the applicant."

While the developer has the right to exclude these roads and other areas, that exclusion means they cannot be covered by the site certificate or conditions in the site certificate as determined in the Contested Case regarding Wheatridge Wind Development. In this case, the developer submitted a fraudulent application due to the exclusion of roads that they clearly intend to use and have the Energy Facility Siting Council authorize action on. The application documents the significant number and level of impact on roads that the developer was aware of prior to submitting their application. The fact that in the event that the approvals they have requested for actions outside their falsely identified "site boundary" are not allowed. It appears that if they do not obtain these approvals, they intend to request amendments to the site to change the site boundary to include the area they clearly intend it to be. This would result in a process that severely limits the opportunity for any public participation in the process. Given the fact that the developer has sent letters to individuals saying they really don't intend to utilize part of the site they included in the boundary and have asked for actions on the part of the council outside the designated site boundary it is clear that the developer submitted an application that seriously misrepresented their intended actions.. Examples of areas that the developer intends to rely upon the council for approvals include:

1. Roads outside the site boundary. The council has been asked and the Proposed Order includes the intent to require a Transmission Plan for council approval to cover roads outside the site boundary as opposed to completing necessary upgrades to these roads..
2. The file contains documentation that roads the developer plans to use will not meet the requirements for the movement of IP's equipment absent substantial modifications, however, they are not included in the site boundary.
3. The developer has asked for a Goal 4 exception for roads outside the site boundary.
4. The proposed order includes a variance and exception to the noise standard for areas outside the site boundary.
5. The site certificate indicates the developer has requested a Goal 4 exception and approval of an "Alternate Practice" to apply to areas outside the site boundary.

The Proposed Order adds language directing the developer to request an amended site certificate or a request for an amendment that would deny the public access to a contested case as a means to correct the multiple discrepancies on Page 36 of the Draft Site Certificate.

CONTESTED CASE
ISSUE FOURTEEN

Draft Proposed Order fails to provide multiple plans with adequate detail to allow the public review as required by Land Use Goal 14 and the court decision noted previously requiring mitigation plans to be adequately developed to provide for a public process for review. That is not incorporated in the site conditions and it is not occurring prior to the issuance of a Site Certificate. .

Plans failing to meet this requirement include the Wildfire Mitigation Plan which does not require my identification of a comment as the Proposed Order has identified an entirely new procedure for its

approval after the site certificate is issued and the public process is finished as described on Page 38 of the Draft Site Certificate.

CONTESTED CASE

ISSUE FIFTEEN

I AM ASKING FOR STANDING AND A CONTESTED CASE HEARING REGARDING THE FAILURE OF THE APPLICANT TO INCLUDE ALL FARM LAND IN THE ORS 215.275 review . I commented on this issue as shown in the document showing public comments, page 1615. This is important as it forms the basis of the evaluation regarding impacts to surrounding farm lands which needs to include all farm land, notjust high value farm land and the need to provide clear and objective mitigation methods for the impacts. The developer did not include land zoned rangeland/farmland in this review and it appears they limited it to only high value farmland as well as completing surveys with the individuals owning property being crossed by the transmission line rather than those owning surrounding properties.

CONTESTED CASE

ISSUE SIXTEEN

I am requesting standing and a contested case due to the failure of the applicant to identify most economic impacts as a result of the loss of forest lands in Union Coiunty. They indicate only the impacts as a direct loss of forest jobs and then compare that to the perceived benefits the transmission line would have for the entire state and region. These impacts do not benefit Union County, however, the economic losses do and there are multiple additional ones not included. I spoke of this on page 1624 and 1625 of the compiled public comments on the development. In addition, the developer appears to believe that if land is not currently producing trees, but has the appropriate soil classes to do so, that they should not calculate the lost production. The courts require developers to include this amount in the calculations if the utility uses eminent domain to take the property. This future potential also needs to be included in the lost economic benefits to the county.

CONTESTED CASE

ISSUE 17

THE DEVELOPER FAILED TO IDENTIFY MULTIPLE ADVERSE IMPACTS TO OWNERS OF FOREST LANDS AS A RESULT OF THIS TRANSMISSION LINE. It will cause significant changes in the procedures that can be used and the costs of getting things done that are necessary to the management of forest lands. I commented on this issue on pages 1627 and 1628 of the combined public comments on the ODOE website.

The developer intends to run their transmission line through the forested area surrounding the Ladd Marsh Wetland and federal Mitigation Sites. They also intend to remove nests during the time they are not physically in use. Many birds use nests for more than one season. Disruption of the nesting sites can result in the birds moving to a less desirable habitat decreasing their chances of survival. In addition, the clearing of the transmission line path will also increase predation along it’s boarders. These

kinds of impacts and the disruption of the habitat used by federally and state protected birds as well as the game birds which bring economic benefit and recreational opportunities must be mitigated for. In areas of known significant use and resulting impacts including the forest areas in Union County, the mitigation needs to extend for the entire width of the transmission line right of way for the lifetime of the development since the impacts will last that long. The site certificate fails to provide an appropriate amount of mitigation or an appropriate length of time it needs to be provided based upon the impacts. I commented on this on pages1642, and 1643 of the agency compilation of comments.

CONTESTED CASE

Issue 18

The Proposed Order fails to provide mitigation for the extensive impacts this development will have on riparian areas. There are multiple creeks and streams which contain Threatened and Endangered Fish. While the developer may be under the impression that they can ignore these areas, due to changes President Trump made to the Threatened and Endangered Species Law, The President lost that lawsuit and has now embraced the idea of protecting Critical Habitat. The federal register regarding fish present in multiple streams and rivers this project intends to cross identify the riparian areas extending 300 feet from the bank of the water source as critical habitat. This habitat should be rated as Category 1, and certainly Category 2 at a minimum. I fail to understand how the developer can identify water and riparian areas as anything less than category 2. The focus of this contested case request is on the fact that since the site certificate is allowing development structures and roads within 25 feet of water sources, mitigation needs to occur from that point to the outer edges of the riparian areas. That is not reflected in the Proposed Order and needs to be.

CONTESTED CASE,

Issue 19

This is a new item which was not present in the Draft Proposed Order, so it is subject to a contested case request.

The Proposed Order states that the City of La Grande is intending to accept $100,000 as payment for the negative impacts this development will have on the recreational opportunities at Morgan Lake Park. The amount of money being provided is not consistent with the damages that will occur and requires a significant amount of additional mitigation. The addition of a rest room, a new gate and road improvements to be purchased from that funding compared to the damages are insignificant. The problems include:

1. The amount is not significant, however the impacts are.
2. The duration of the impacts is not consistent with the mitigation.
3. The mitigation will not extend for the duration of the impacts which is a requirement.
4. It appears that this amount is intended to mitigate for part of the impacts to the recreational consequences of the development.
5. The planned mitigation fails to be related to the impacts of noise and visual impacts that will occur.
6. Mitigation must be directly related to the impacts that are being mitigated according to the court of appeals for Oregon. There is

nothing in the indicated agreement that will reduce or minimize either noise or visual impacts which still must be mitigated for.

TARDAEWETHER Kellen * ODOE

From: Charlie Gillis <charlie@gillis-law.com>
Sent: Monday, August 10, 2020 11:19 AM
To: TARDAEWETHER Kellen * ODOE
Subject: Petition to appear as party in contested case
Attachments: StopB2H letter to participate in Contested Case 7-17-20.docx

Dear Ms. Tardaewether:

Attached below is my petition to appear as a party in a contested case re B2H.

There have been some email address problems. Would you please let me know if you receive this?

Sincerely,

--
Charles H. Gillis
Attorney at Law
1306 Adams Ave.
La Grande, OR 97850
Ph: 541-963-2700
Fax: 541-963-2711
Cell: 541-910-8949

July 17, 2020

Ms. Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE
Salem, OR 97301

Re: Petition to Request Party Status re Proposed Order on Application for Site Certificate for Boardman to Hemingway Transmission Line

Dear Judge Greene-Webster:

This letter is a request for participation to file as a party in the above referenced matter.

I am requesting party status in this matter as a means of addressing my concern that Idaho Power Corporation (IPC), the organization seeking the Site Certificate for the Boardman to Hemingway (B2H) transmission line project, has not demonstrated that they can adequately comply with the requirements of OAR 345-022-0050 which governs Retirement and Financial Assurance of B2H. Specifically, as I referenced in my oral arguments before the Energy Facility Siting Council on June 20, 2019 in La Grande, OR, IPC has only a 21% interest in B2H. The other 79% interest belongs to Bonneville Power Administration (24%), and PacifiCorp (55%). Therefore, at the present time, the other parties must contribute to the costs of retirement and obtaining financial assurance.

I believe the record shows that IPC is in an unstable financial picture regarding B2H. As I pointed out in my June 20, 2019 oral comments, in October, 2018, the Oregon Public Utilities Commission requested from PacifiCorp an explanation of "the size and status of any B2H transmission service requests that have been submitted to PacifiCorp." The company responded, "PacifiCorp has not determined a need to move forward beyond the permitting phase of the project and as such is only a party to the current permit funding agreement . . . To date PacifiCorp has not received any requests for service on the B2H [transmission] line."

Further evidence of IPC's fragile financial position in B2H leading to an even greater likelihood of their inability to meet the standards of OAR 345-022-0050 was reported in the East Oregonian newspaper. Their article revealed that the Bonneville Power Administration (BPA) is considering withdrawing from B2H:

"BPA has a 24% share in the project, Idaho Power's share is 21% and PacifiCorp's is 55%. Under the proposed arrangement Idaho Power would assume BPA's share, boosting its ownership level to 45%. BPA, under the arrangement now, is expected

to pay 24% of the expense of the B2H project, which could be between $1 billion and $1.2 billion, said Sven Berg, an Idaho Power spokesman. This means should BPA pull out, B2H would lose between $240 million and $288 million in upfront funding."

Given the above, IPC has no firm commitment from either of its partners in B2H that the partners will be liable for their share of the costs associated with compliance of the requirements of OAR 345-022-0050. Nonetheless, a search of the Proposed Order (PO) reveals that there in no discussion regarding the financial reliability of the parties' partnership.

A failure on the part of IPC to assure a solid financial footing prior to initiating construction of B2H may lead to "stranded assets" as I discussed in my remarks. However, despite the threat of Union county being littered with such stranded assets, this is also not addressed in the PO. Such stranded assets, in addition to other negative collateral impacts of the failure of IPC to meet the requirements of OAR 345-022-0050, will have devastating consequences to the economy in Union county due to the county absorbing the cost of the failure of IPC to meet its responsibility to properly retire B2H. Additionally, such a failure would also have devastating consequences on recreation in Union county by the needless destruction and scarring of the lands affected along the B2H right of way. As a resident of Union county such impacts would affect not only the public at large, but me personally as well.

I understand others may be requesting a contested case on the same issues. However, they will not be able to specifically represent my personal situation and interest in these issues. My concerns with B2H are best addressed by me.

Sincerely,

Charles H. Gillis
Attorney at law
1306 Adams Ave.
La Grande, OR 97850
Ph: 541-963-2700
email: charlie@gillis-law.com

cc: Kellen Tardaewether

TARDAEWETHER Kellen * ODOE

From: Dianne Gray <diannebgray@gmail.com>
Sent: Thursday, August 27, 2020 11:54 AM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Subject: CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE
Attachments: B2H Contested Case Request Gray.docx

Attached please find my comments contesting the site certificate for B2H.

Dianne B. Gray
60332 Marvin Rd.
La Grande, OR 97850

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

a. My name and address:

Dianne B. Gray
60332 Marvin Rd
La Grande, OR 97850

b. Attorney name and address

I am not represented by an attorney.

Requesting to file as a "party" or "limited party"

I am requesting to file as a party.

c. What is your interest and how will it be affected? (economic, recreation, health, etc.)

My interests are economic as well as those relate to health and safety, all of which will be negatively impacted by noise issues associated with construction of B2H in the La Grande area.

d. If it is a public interest, how will it be affected?

Public economic and health/safety interests will also be affected by this construction.

e. Can others represent your issue(s) or do you need to represent them yourself?

Because I have lived in the Morgan Lake area for 32 years, I need to represent these issues myself.

f. A short statement of your issue and why you are requesting a contested case.

The Proposed Order does not adequately address my concerns about noise issues relating to the B2H project.

I disagree that the ambient noise measurements made to establish noise baseline levels (as described in the Proposed Order, pp. 635-638) reflect reasonable estimates of noise level baseline for residents in the Morgan Lake area. Further, I am opposed to granting the exception to the Ambient Antidegradation Standard – Entirety of Proposed Transmission Line Route [OAR

345-035-0035(6)(a)] requested in the proposal, especially "given the extent of exceedances predicted to occur in each of the five counties crossed by the 12 proposed facility, including alternative segments," as noted by Idaho Power (p. 643). It appears to most of us that the Proposed Order's responses to our earlier concerns are entirely self-serving attempts to circumvent existing standards.

g. State *when* in your written or verbal comments you brought up this concern (date of letter or testimony at hearing)

I stated these concerns in writing in my August 21, 2019 letter to the Energy Facilities Siting Council.

ANY OTHER INFORMATION YOU WANT TO ADD:

TARDAEWETHER Kellen * ODOE

From: Jerry Hampton <jerryhampton61@gmail.com>
Sent: Monday, August 3, 2020 11:53 AM
To: TARDAEWETHER Kellen * ODOE
Subject: Documents for standing in the Placement of B2H within Baker County
Attachments: B2H Idaho Power 8-3-2020.pdf; EOCERC 8-3-2020.docx

Good morning. I am requesting that you accept these documents that I am attaching, that explain the need for the fire communities to continue to have standing. I am available during normal business hours of 8AM-5PM Pacific time. Please keep me posted with all information that you have going forward.I can be reached by phone at 541-519-4816.

Sincerely, Jerry Hampton
Baker County Fire Defense Chief
Haines Fire Protection District

e-mail@ jerryhampton61@gmail.com

July 30, 2020

Oregon Department of Energy

Energy Facility Siting Council (EFSC)

Comment for the Record pertaining to the proposed “Boardman to Hemingway Transmission Line”

On September 10, 2010 The fire Districts of Baker County Oregon through the Baker County Fire Defense Board made comment for the record in an effort to mitigate the impacts of the proposed 500 KV Boardman to Hemingway Transmission line (B2H). Those comments were in response to public testimony as to the impact to the unprotected areas of Baker County the B2H line was to occupy and to the infrastructure at risk to fire from the locating of a 77 mile long super conductor in Baker County as well as the Oregon Trail Interpretive Center located on federal land east of Baker City Oregon, The impact and risk of fire to the Interpretive Center was the number 1 concern of those commenting at the public comment meetings held in relation to the proposed line. The Baker County Fire Defense board through Fire Defense Chief Jerry Hampton and Assistant Chief Dan Weitz proposed a “Multi Agency Fire and Emergency Response Station “to be located at The Baker City Municipal AirPort. This station was proposed in the comments and the NEPA Study to provide space for apparatus, training, temporary housing for fire crews, and coordinating space for the fire districts, US Forest Service, Bureau of Land Management, Oregon Department of Forestry, Baker County Emergency Management, and those contractors providing helicopter and single engine air tanker (SEAT) services to the region, The proposed multi agency facility would be named the “Eastern Oregon Coordinating and Emergency Response Center” likely a 501c3 organization.

Please find attached the original comment(s) made to the Oregon Department of Energy as to the B2H Transmission line in 2010.

Baker County Fire Defense Board

Jerry Hampton Chief

To Idaho Power Co. September 24, 2010

RE: Comment for the Record on proposed Boardman to Hemingway Transmission Line

The Baker County Fire Defense Board consisting of the 13 fire districts and departments in Baker County along with the Oregon Department of Forestry, Bureau of Land Management (BLM) Vale District, and the US Forest Service wish to go on record as not opposing the proposed transmission line, but require mitigation of the impact upon the districts and agencies who are required to protect the Oregon Trail Interpretive Center and other historical sites. Along with all those affected by the impact of the proposed transmission line. The proposed line represents a clear threat to the ignition of wild land fires along the route whether through mechanical failure or lightning strikes. The agencies cannot afford and should not have to carry the expense on the backs of the patrons to protect this extremely important historical tourist site, and those lands surrounding it. Public testimony has clearly identified this facility as the most important single issue in the debate whether the transmission line should even be located in Baker County. The Fire Defense Board and public agencies ask for your mitigation of the impact of this project in funding an "Multiagency Fire Center" to be located at the Baker City Airport and the firefighting equipment necessary through a bond that would spread the burden of the costs of protecting this valuable community asset on those that benefit from the energy transported to them through this line. We propose that in addition to the funding of the facility that an operational fund for maintenance and replacement costs of equipment as well as staffing be provided to allow those agencies to respond both to fires along the line route and to other emergencies throughout Baker County for as long as the B2H line is in operation.

We would like to take this opportunity to remind you and others of the Oregon Trail fire in Boise Idaho just two years ago that destroyed 19 homes and one life was lost. This tragic event was dealt with by fire agencies whom have a large amount of resources, both personnel and equipment compared to any departments in Baker County. This fire was in a location that had an adequate water supply, even for a fire of this magnitude, something we don't have the luxury of in Baker County. The Oregon Trail Interpretive Center and surrounding lands are protected by Baker Rural Fire District, a small volunteer fire department that operates 3 stations and 12 fire apparatus on less money than 1 paid firefighter receives as a salary from Baker City. The closest station to the Oregon Trail Interpretive Center has 2 bays which house 2 fire engines, 1 a 1968 Dodge pumper that has no off road capabilities and not enough power to carry its load of water up the hill to the Interpretive Center, the other can make it up the hill but only carries 500 gallons of water and has no off road capabilities. The Interpretive Center water pumps only supply 75 gallons of water per minute to a 50,000 gallon holding tank within the center, but the hydrants designed to supply water to fight fires were placed underneath the center rendering them useless. The design of the center itself gave no preference to fire prevention or fire suppression should there be a fire within the center or on the surrounding range land. If the proposed transmission line is built and we have an event along the path of the B2H line of the magnitude of the Oregon Trail fire we have no hope of suppressing it with old fire apparatus and unmanned station before it consumes the Interpretive Center.

Baker Rural Fire District had previously applied for a federal grant to construct a "multi agency station" at the Baker City Municipal Airport on land gifted to it by Baker City, but was not successful in getting the federal funds for the station. This station would house Oregon Department of Forestry, Bureau of Land Management, US Forest Service, Baker County Emergency Management as well as Baker Rural Fire Department apparatus and Rescue vehicles and personnel benefiting all of Baker County. Please find the grant application attached to this comment for the record.

Sincerely,

Dan Weitz, Assistant Chief Baker Rural Fire District

To Idaho Power Co. September 24, 2010

RE: Comment for the Record on proposed Boardman to Hemingway Transmission Line

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Sincerely,

Dan Weitz, Assistant Chief Baker Rural Fire District

July 30, 2020

Oregon Department of Energy

Energy Facility Siting Council (EFSC)

Comment for the Record pertaining to the proposed “Boardman to Hemingway Transmission Line”

On September 10, 2010 The fire Districts of Baker County Oregon through the Baker County Fire Defense Board made comment for the record in an effort to mitigate the impacts of the proposed 500 KV Boardman to Hemingway Transmission line (B2H). Those comments were in response to public testimony as to the impact to the unprotected areas of Baker County the B2H line was to occupy and to the infrastructure at risk to fire from the locating of a 77 mile long super conductor in Baker County as well as the Oregon Trail Interpretive Center located on federal land east of Baker City Oregon, The impact and risk of fire to the Interpretive Center was the number 1 concern of those commenting at the public comment meetings held in relation to the proposed line. The Baker County Fire Defense board through Fire Defense Chief Jerry Hampton and Assistant Chief Dan Weitz proposed a “Multi Agency Fire and Emergency Response Station “to be located at The Baker City Municipal AirPort. This station was proposed in the comments and the NEPA Study to provide space for apparatus, training, temporary housing for fire crews, and coordinating space for the fire districts, US Forest Service, Bureau of Land Management, Oregon Department of Forestry, Baker County Emergency Management, and those contractors providing helicopter and single engine air tanker (SEAT) services to the region, The proposed multi agency facility would be named the “Eastern Oregon Coordinating and Emergency Response Center” likely a 501c3 organization.

Please find attached the original comment(s) made to the Oregon Department of Energy as to the B2H Transmission line in 2010.

Baker County Fire Defense Board

Jerry Hampton Chief

TARDAEWETHER Kellen * ODOE

From: Sam Hartley <samhartley57@gmail.com>
Sent: Wednesday, August 26, 2020 1:39 PM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE
Subject: CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE
Attachments: property values transmission line (1).pdf

Alison Greene-Webster, Senior Administrative Law Judge

Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED_OAH_Referral@oregon.gov
also send copies to: kellen.tardaewether@oregon.gov and info@Stopb2h.org

Dear Ms. Greene-Webster:

My name is Sam Hartley. My farm which consists of 400.1 irrigated acres, located at 2204 Owyhee Lake Road, Nyssa Oregon 97913, will be severely impacted by the proposed power corridor. I am in the processes of moving my family to a house on the property that will be impacted and I am worried that the lifestyle I planned to have in this house for the rest of my life will be intolerable. This farm is my life and I am at a point in my life that I cannot recover from a major setback.

I am not represented by an attorney.

My concerns are the same as others in this valley therefore I have reiterated their concerns as well as added some of my thoughts and concerns.

This request for standing and a contested case regarding the significant increase in the costs of farming operations and significant changes in farming practices which are so substantial that they are likely to force some farm families to cease operation and which will discourage farm children from continuing to farm.

The developer provides broad statements about farm land in the state. The impacts of this development are not impacting the total agricultural producers in the state. They are impacting those who will have the transmission line on their property or near it. They are the ones that will experience impacts which will substantially increase the costs of doing business to such an extent that it is likely that some will no longer be able to continue farming.

Statistics which are meaningful and increase the significance of the impacts which will be catastrophic to many Oregon farm's include such things as:
--The development will directly impact 104 parcels of irrigated farm land and 889 parcels of non-irrigated farmland.
-- In 2017 Oregon farmers average net income per farm was $19,757 compared to $22,954 in 2012.
--The Oregon farms who showed a net loss in income totaled 25,819 in 2017
(Figures come from the 2017 Oregon Census of Agriculture).

Because most of this section was rewritten in the Proposed Order, it was not possible for me to have commented prior to seeing this order. The problems with the way agricultural impacts are dealt with are almost endless. They include:

The developer failed to disclose multiple impacts of the development on farm lands.
The proposed order claims mitigation for impacts by methods which do not minimize the risk of agricultural landowners being exposed to financial risks.

> For example: The proposed order claims that the required bond for restoration of the site will protect farm families from the costs related to restoring the site when in fact; the bond amount is only going to be $1.00 for 50 years and an amount not adequate to restore the site for the next 50 years. This in no way provides any mitigation for the stress or risk to those

currently involved in agriculture and will provide little for the next two generations of farmers utilizing the land. (Page 214 of the proposed order) In addition, the change to require reviews of the amount every 5 years does not adequately address the fact that events causing this company to fail to restore the sight could include catastrophic events such as fire, flood, earthquake, or sabotage or economic collapse. None of these events are going to be predictable, therefore, the condition added on page Page 22 of the Proposed Order does nothing to mitigate for the impacts of being at risk of this occurring.

The fire prevention plan fails to provide reliable consistently available fire protection. Reliance on volunteers who can take an hour or more to respond to fires when the wind is blowing and the conditions are dry does not mitigate for the increased fire potential faced by farmers as a result of this transmission line. The developer acts as if the standard that says firefighters need to be on location within 15 minutes 90% of the responses to fires does not exist. The distances indicated are to the nearest boundary of the development and in Malheur County, for example, the nearest RFPD which could provide volunteer firefighters is 9.5 miles and BLM would have to travel 53.3 miles to even reach the site boundary. There is no effort being made for early detection of fires by proven methods such as installation of cameras along the transmission line, providing for paid firefighters during fire season, providing anything beyond the most basic hand equipment rather than the vehicles needed and locating them along the transmission line route in designated facilities. There are no standards indicating the required response times, details regarding the specific resources the developer will provide to meet those standards. The new information on Page 3 is filled with the developer will "attempt" to do things, but ultimately, the only reference is that if it doesn't work the developer will propose something else. This entire section, and in fact, the entire plan fails to provide the specifics that would be needed to determine if the plan will be effective, and in fact, statements in the plans that indicate the developer believes that there will be little danger of fire during operation leave landowners with an even greater concern. The plan provides no opportunity for public review of a plan with sufficient details to be meaningful and no plan to provide that. Given the real potential of transmission line developments increasing the risk of fire either through the infrastructure or the access they provide to people and vehicles, the developer needs to be required to provide a fire protection policy or a bond to assure the landowners will be compensated for losses due to fires occurring as a result of this development rather than place this financial burden on the property owners.

The information regarding farm impacts is largely limited to the transmission line corridor, but the impacts to the area outside the right of way and on adjacent farm lands are also significant and are supposed to be evaluated.

The proposed order weed management plan is not only lacking in compliance with the state statutes requiring that no invasive weeds be allowed to go to seed, and requirement that equipment be cleaned prior to moving from one landowner's property to another or entering a public roadway.

It also, fails to provide monitoring for the life of the project, fails to require control of the invasive weeds on the B list for the counties, fails to require approval from the county weed control supervisors in its development, fails to include weed management along roads developed or significantly changed by the developer, fails to address all weed infestations at the site by limiting the origin of the weed seeds in spite of the fact that the development disturbance of the groundcover will cause or at a minimum contribute to the infestations. In addition to all the identified failures of the Weed Management plan as included in the Proposed Order, the plan is almost entirely lacking in any details that would allow the public to evaluate it and there exists no opportunity for the public or impacted landowners to review and identify areas the plan that are lacking whenever it is actually developed. The plan and procedure included in the Proposed Order will not be developed until after a site certificate is issued and based upon the limited information provided, it will fail to provide any meaningful mitigation for the impacts the development will have on invasive weeds impacting farm lands

The costs of applying herbicides, insecticides, and fertilizers will increase due to the fact that most companies doing aerial applications will not risk running into the transmission lines and most farmers are not willing to risk the liability that they will assume if an accident occurs.

Irrigation System Impacts

Irrigated farmland is scarce, productive and valuable. It is irreplaceable due to limitations, soil types, and geography. In 2012, irrigated farmland market value was well over $10,000 per acre, and sales near the proposed transmission line reached $17,000 per acre in Morrow County. The impacts along the rest of the line can be expected to be similar.

Transmission line impacts on irrigated farmland are high and cannot be mitigated by tower location. "Even minor losses to existing pivot irrigated fields cause considerable adverse impacts to the balance of the fields due to less effective, efficient, and productive operations to be relocated at significant direct and indirect costs." Placing towers in the corners of pivot irrigated fields fails to acknowledge that such corners are the frequent locations for underground water delivery pipelines. Failing to acknowledge this fact will require towers be located in pivot irrigated fields or underground water delivery systems will have to be relocated at significant costs through crop and other consequential losses.

Field corners also provide one of the few areas where landowners can legally, practically, and affordably expand or develop new irrigated farmland.

Changes required by tower placement may negate licenses, warrantees, etc.

Irrigation systems as well as equipment using wireless systems and controls may not work under high voltage power lines.

Currents from power lines can exacerbate electrolysis and corrode metal pipes, controls and parts prematurely. This equipment is expensive and repairs take away from the farmer's time spent dealing with crops or livestock.

5. Cost impacts to farm landowners include reduced value of farmland (See ` attached review of farm sales prices after transmission lines are developed on their land which means less long term security if the farmer has to sell his/her land as part of their retirement planning.

A more immediate consequence of this reduced value is that many farmers use their land as collateral to obtain working capital for their operation. Reduced value means reduced access to working capital.

Soil compaction effects production along transmission lines for years after they are installed. This impact is apparent in fields with existing transmission lines.

Farm land owners received no notice required by ORS 183.415 that the Proposed Order would allow the developer to exceed the noise standard which will have a significant impact on livestock and human ability to live and work on their property. It will impact all over the air transitions (quality of life for humans and animals, interference with equipment that uses a variety of frequencies) some equipment may not ever work. May prohibit farms from hire good help due to the noise.

For farm landowners who also have forest land impacted, no notice was provided as required by ORS 183.415 regarding the plan to approve an Alternate Practice. This action will significantly impact the cost of farm or forest production due to the fact that the landowner will be assessed additional taxes and that increase will continue for as long as the transmission line exists.

There is a loss of all crop production at the base of towers as well as the significant area needed to maneuver equipment around the tower bases.

The layout of fields can be limited and can result in rows being oriented in ways that increase water and wind erosion.

It will create a barrier to the opportunities for purchase of additional land or consolidation of farms to remain economically sound in spite of fluctuating wholesale values of products produced.

Allowing this transmission line to use and cross water resources on Bureau of Reclamation land will place water resources as well as agricultural lands of the state at risk. No surface-disturbing activities should occur within the Bureau of Reclamations right of way as doing so will result in potential interruption of irrigation resources to farmlands, create a risk to maintenance personnel, result in wind and water erosion due to habitat being disrupted, move eroded soil into the water creating the potential for irrigation equipment failure, and disperse invasive weeds brought on site by construction equipment.

The applicant failed to include all farm land in their review. They state, "Several of the agricultural areas in the project area are zoned a combination of rangeland and farm use. Based on discussions with DLCD, IPC did not consider such hybrid zoned lands to be EFU lands for purposes of the ORS 215.278 analysis." In other words, these areas were not addressed as farm land, nor were they addressed as forest land. Following is documentation taken directly from the LCDC rules that the combination zones are EFU and are required to be included in the ORS 215.278 analysis as well as the dictionary, IRS and FDA definitions of farm use which are consistent with the LCDC definition.

> LCDC defines Exclusive Farm Use Zone in ORS 215.203(2)(a) as "farm use" means the current employment of land for the primary purpose of obtaining a profit in money by raising, harvesting and selling crops or the feeding, breeding, management and sale of, or the produce of, livestock, poultry, fur-bearing animals or honeybees or for dairying and the sale of dairy products or any other agricultural or horticultural use or animal husbandry or any combination thereof.----"

ORS 215.275 applies to the above farm land impacts. Of critical concern are items (4) requiring restoration of agricultural land and associated improvements that are damaged or otherwise disturbed by the siting, maintenance, repair or reconstruction of the facility.

And (5) requiring that there be clear and objective conditions on the application for utility facility siting to mitigate and minimize the impacts of the proposed facility, if any, on surrounding lands devoted to farm use in order to prevent a significant change in accepted farm practices or a significant increase in the cost of farm practices on the surrounding farmlands.

This development offers Oregon farm and forest owners nothing but loss of economic wellbeing, and destruction of the life style that brought us to farming in the first place. Farming is not a big money making endeavor. It is a lifestyle that keeps us doing this work. This development will cause Oregon farm families untold damage. It should not be allowed to go forward.

Valuation Guidelines for Properties with Electric Transmission Lines

By: Kurt C. Kielisch, ASA, IFAS, SR/WA, R/W-AC

Before a discussion can be entered about the perception of electric transmission lines and their effect on property value, it is important to understand what a transmission line is and how it differs from a distribution line.

An electric *transmission* line is an electric line that transports electrical power from one substation to another. These lines are typically 100kV (kilovolts) or larger exceeding one mile in length[1], have large wood or steel support towers over 45ft in height, and often have more than one set of wires (3 wires per circuit plus the static wire). Electric transmission lines do not directly serve electric utility customers: their power is distributed from distribution point to distribution point. Transmission line wires are not insulated and are "bare". Typically, they constructed to have at least 20ft of clearance between the ground elevation and wire at low sag.

An electric *distribution* line is a power line that transports electricity from the substation to the electric utility customers. These lines are of less voltage, typically under 65kV, carried on wood poles of 45ft in height or less and hold one pair of wires. The voltages of these lines are downgraded before the electricity is brought to the customer's residence or commercial building. The focus of this report is on "transmission" lines, not "distribution" lines

Perception = Value

The valuation of properties that have an electric transmission line requires an understanding of the basic principles of Market Value. Market Value is defined, in layman's terms, as the value a property would sell for at a given date considering an open market. (A complete definition of this term is included in the body of the appraisal report.) An open market assumes that the property is available for purchase by the public, being properly marketed for maximum exposure, and that the buyer is well informed, fully knowledgeable and acting in their best interest. Included in this definition is that the buyer has full knowledge of the pros and cons of the property, and then acts with that knowledge in a way that will benefit them. In other words, the value of the property is based on the perception of the buyer. Understanding that perception drives value is the foundation in analyzing the effect that electric transmission lines have on property value.

The key point of the Market Value definition, which gives guidance to answer the "impact" question, is the "willing buyer" part of the equation. In appraising a property the appraiser attempts to reflect the potential buyer of the subject property and estimate their action as to the subject property with all its advantages and disadvantages (knowledgeable buyer). To accurately reflect this buyer, the appraiser must determine the typical profile of such a buyer of the property in question. An example of this

1 Wis. Stat. 196.491(1)(f)

would be a one bedroom condominium along a lake may indicate a typical buyer to be a retired couple who is looking for a recreational retreat for themselves and their guests. Another example would be a parcel with the best use being a dairy farm; the typical buyer would be a person either currently engaged in dairy farming looking to expand or relocate, or one who desires to enter into this field -- in either case a "dairy farmer." Such an analysis should be obvious, yet often overlooked when appraising properties.

For rural properties that are utilized for agricultural purposes, the most likely buyer would be one who: (1) prefers the rural lifestyle over the urban lifestyle; (2) typically generates their income from working in the agricultural field; (3) would be sensitive to environmental issues that affect the uses of the land and the view shed of the land; and (4) would be sensitive to health and safety issues relating to the land and its use.

It is most likely that such a person, when confronted with an electric transmission line traversing the property, would view such an improvement as aesthetically "ugly," potentially hazardous to their health, disruptive to rural lifestyle and potentially harmful to the use of the land for agricultural purposes.

Research Format

Our research into the impact of electric transmission lines followed several stages. The first was a "literature" study. This study involved investigating, collecting, indexing and reading many of the published articles, news stories and published transcripts relating to the topics of EMFs and stray voltage. Stray voltage was included in this research due to the concern dairy farmers have relating to its presence from high voltage power lines. This research resulted in over 2,500 pages of information collected and analyzed. The purpose of this study was to discover "what is the public's perception of high voltage transmission lines." Overall, the majority of the articles indicated a "fear" of these power lines, citing health concerns as the primary factor. Other concerns included stray voltage issues (mainly with rural publications) and aesthetics. It was clear that most of the information the public receives about these matters is negative. The literature study will follow these "guidelines."

The second part of our study involved researching studies completed on the effects on property value due to the presence of electric transmission lines. This included collecting many of the published research studies on this topic found in the public domain. Additionally, the study reviewed trade journals not available to the public, but available only to real estate professionals. Again, to be fair, some of the studies indicated that there was no measurable effect. However, there were a number of studies (mostly recent) that indicated there was a measurable effect and that effect ranged from a loss of 10% to over 30% of the overall property value. These studies included both improved and vacant land.

Empirical Studies

Below is a sampling of some studies we have reviewed regarding the impact that electric transmission lines have on land value and were utilized to formulate our opinion of value when a property is impacted by a high voltage transmission line.

- *Study of the Impact of a 345kV Electric Transmission Line in Clark County, Town of Hendren.*

(Appraisal Group One, Kurt C. Kielisch, 2006, revised 2009) This study was limited to Hendren Township, Clark County, and covered a five year time period from January 1st, 2002 to June 1st, 2006. This study included 22 land sales of agricultural and recreation land, of which 4 were encumbered with a 345kV electric transmission line having wood H-pole design, 60ft height and 150ft wide easement. The other 18 land sales were considered comparable to the power line encumbered sales. The conclusion of this study was that: (a) the land sales with an electric transmission line sold for 23% less than comparable land sales without a transmission line; and, (b) the more severe the location of the power line the greater was the loss of value.

- *An Impact Study of a 345kV Electric Transmission Line on Rural Property Value in Marathon County - Wisconsin.* (Appraisal Group One, Kurt C. Kielisch, 2006) This study focused on the impact a 345kV line, known as the Arrowhead-Weston line, had on property value. This power line was a 345kV electric transmission line, having steel single poles ranging in height from 110ft to 150ft, single and double circuit lines, having a 120ft wide easement. The study compared sales within a 2 year time period (January 1st, 2004 to December 31st, 2005) in Marathon County, Wisconsin, focusing the area to the Townships of Cassel and Mosinee. This study used 14 land sales, of which 5 were encumbered with the power line and 9 were not. A simple regression technique and matched pair analysis was used to extract the value impact. The study concluded with a finding that when the power line traversed the property along the edge, such as a back fence line, the loss was as low as -15%, and when it bisected a large parcel the loss was as high as -34%. The properties were all raw land sales with either agricultural or residential land use.

- *Transmission Lines and Property Values State of the Science* (Electric Power Research Institute [EPRI}, 2003). This study completed by EPRI for the benefit of its electric utility clients reviewed the issue of property values being impacted by electric transmission lines by summarizing research they had on the subject. Essentially they concluded that the results are mixed, some cases showing a loss in value ranging from 7-15% with appraisers who had experience with valuing such properties, to having no effect. Interestingly, it appeared in their survey that appraisers who did not have experience valuing such properties tended to overrate the negative effects.

- *American Transmission Company, Zone 4, Northeast Wisconsin - High Voltage Transmission Line Sales Study* (Rolling & Company, 2005). This study researched the impact that high voltage electrical transmission lines have on property value in the northeast Wisconsin area. They collected information on 682 land sales of which 78 involved lots near a transmission line corridor, but not directly encumbered by the transmission line. Their conclusions were: (a) easement lots sold at about 12% less than lots located over 200ft from the transmission lines; and (b) no clear impact on "proximity" lots those that lie within 200ft from the easement area but are not directly subject to the easement.

- *Properties Near Power Lines and Valuation Issues: Condemnation or Inverse Condemnation* (David Bolton, MAI. Southwestern Legal Foundation. 1993). This study cites a number of studies that prove a loss of property value due to proximity to an electric transmission line and then cites his own study. His own study found that in the Houston area assessed values of properties that adjoined a power line easement had a 12.8% to 30.7% lower assessment than the average homes not on the line, but in the same area. He also found that: (1) many buyers refused to even look at such properties; (2) such properties took at least twice as long to sell; (3) some brokers said such properties can take three times longer and finally sell at a 25% loss of value; and (4) overall homes adjoining transmission line easements took six times longer to sell and experienced a 10% to 30% loss in value.

- *Power Line Perceptions: Their Impact on Value and Market Time* (Cheryl Mitteness and Dr Steve Mooney. ARES Annual Meeting paper. 1998) The authors interviewed homeowners on or near electric transmission lines and found: (1) that in relation to the average impact of overall property value, 33% said 2-3% loss and 50% said a 5% loss or greater; (2) nearly 66% said the power line negatively affected their property value; (3) 83% of real estate appraisers surveyed said the presence of the power lines negatively affected the property values, most saying the loss was 5% or greater.

- *Analysis of Severance Damages (James Sanders, SRA, 2007)* This study completed an analysis of the impact of a transmission line through the middle of the Continental Ranch subdivision outside of the Tucson, Arizona area. This subdivision had a wood H-pole high voltage electric transmission line running through a portion of the subdivision. The author compared the residential lots abutting the easement to ones that were not. All lots abutting the easement were much bigger than the non-easement abutting lots. The author used improved properties for his study and by the use of regression analysis isolated many variables of value for an improved property to remove them from the analysis. In conclusion, through extensive use of the regression technique, the author finds an overall loss to the improved properties abutting the power line easement at -12%. This loss is attributed to both the land and improvements. However, the author notes that the lots are typically twice the size of the non-easement lots. When the size of lots was factored the overall loss to the land only was factored at -40%. It should be noted that the residences were at a distance from the power line.

- *The Peggy Tierney property: A Comparative Study of the Impact of a 69kV Transmission Line v. 345kV/69kV Transmission Line (Kurt C. Kielisch).* This was a brief study on the impact difference, if any, between an existing 69kV transmission line and a new proposed 345kV and 69kV transmission line on the same property. The property was a 3.70 acre residential lake front improved property that had an existing 69kV transmission line crossing the west half of the parcel along the road and required the property owner to cross under the power line to enter the parcel. The 69kV line had an easement width of approximately 100ft, wood H-poles at 50-60ft in height. The new 345kV line was to be placed within the existing easement, more or less, would have 140ft monopoles and carries both a 345kV and 69kV line. The seller attempted to sell the property at its full list price after an experienced lake front home Realtor established the list price from a comparative sales analysis. The home eventually sold for 27% less than the list price and took longer to sell in a relatively strong lake front home market. The buyer cited the pending 345kV line as the principle reason for their low offer.

- A comparative sales analysis to isolate the percentage of loss a residential and/or agricultural

land use property suffers due to the presence of a high voltage electric transmission line (HVTL). This study was found in an appraisal completed by Aari K. Roberts for American Transmission Corporation (ATC) on the Herbert Bolz property located in the Town of Rubicon, Dodge County, Wisconsin. Mr. Roberts compared the sale of a rural agricultural 24 acre land parcel that had an HVTL crossing the property, to three comparable agricultural land sales of comparability that did not have a HVTL. His sales comparison study concluded that the property with a HVTL suffered a 29% loss of value due to the presence of the HVTL. This study was completed in September 2007.

- A sales analysis of the property located at: N8602 CTH D, Town of Deer Creek, Outagamie County, Wisconsin. This is a single family home located on 3.19 acres in the rural area of Outagamie County. The home was a ranch style residence with 1,500sf GLA, attached 2-car garage, 8/3/2 room count, full basement and was in average condition overall. The property also had a 104ft x 52ft pole barn and two other outbuildings. There were two appraisals completed on this property, one by the condemnor (ATC) and one by the property owner. The average Before taking value of the two appraisals was $221,000. The property was then improved with a 345kV & 138kV electric transmission line having 126ft pole height and was placed along the roadside reaching 68ft into the property. The edge of the easement was in less than 20ft to the residence, however the placement of the pole was as close to the roadway right-of-way as possible. The condemnor American Transmission Company (ATC) purchased the property and installed the transmission line. Then they upgraded the property with new paint, doors, sinks, dishwasher and flooring, plus cleaned the premises and outbuildings. ATC put the property on the market asking $179,900 a number established by the appraiser for ATC as the After value. It was sold for $128,500 10 months after ATC purchased it.

  The Before taking average value was $221,000. The property was then improved and upgraded at an expense estimated to be $8,000-$10,000, then resold 10 months later with the transmission lines in place for $92,500 less or 42% less. The only differences between the Before taking market value and After taking sale price were the transmission line and time. A review of the Outagamie County market between November 2008 and September 2009 shows only a small downward trend in rural residential property value, therefore the biggest part of the loss is attributed to the presence and near proximity of the transmission line that being 38%-40%.

- *The Gene Laajala property: A Comparative Study of the Impact of a 161kV Transmission Line v. 345kV/161kV Transmission Line (Kurt C. Kielisch).* This was a brief sales study on the impact difference, between an existing 161kV transmission line and a new 345kV/161kV transmission line on the same property. The property was a 20 acre rural agricultural and residential property that had an existing 161kV transmission line bisecting the parcel along the east side. The 161kV line had an easement width of approximately 120ft, wood H-poles at 50ft± in height. This line was replaced with an upgraded easement comprised of 345kV/161kV line which was to be placed within the existing easement, more or less, and had (2) 110ft and (3) 120ft steel H-poles. The property was appraised in January 2007 with a Before condition value of $204,500 using the Cost approach and $185,500 using the Comparable Sale approach, by Ted Morgan, MAI. (The whole property appraised was 40 acres and the 20 acre parcel was portion out of this whole). The ATC appraiser did not appraise the home in the Before condition, but did conclude the Before taking land value was $44,000 for 20 acres (using his $2,200/acre conclusion for 40 acres) and the assessed value of the improvements were $107,600, indicating a $151,600 Before

value. The property sold and closed in October 2007 for $120,000. The seller attributes the loss to the new power line, it being larger and more lines. The loss indicated was $65,500 (using Morgan's Comparable Sales value) or $31,600 (using ATC's land plus assessed improvement value), indicating a loss range of 35% to 21%.

- *An Impact Study of the Effect of High Voltage Power Lines on Rural Property Value in Southwestern Indiana (Kurt C. Kielisch, Appraisal Group One, 2010).* This study was based in southwest Indiana in Gibson County. It was focused on large agricultural land and the impact of a high voltage transmission lines (HVTL) varying in size from monopole to large steel lattice towers. The study included 32 land sales of which10 were HVTL sales. The time period was January 1st, 2006 to December 31st, 2009. Adjustments were made for time, location and other utility easements (if any) and the results were graphed to compare the non-HVTL land sales to the HVTL land sales. The study concluded that the power lines negatively impacted the property with an impact range from -5% to -36% with the average impact being -20%.

Other Value Issues

Another issue relating to the presence of the transmission line is potential for the creation of an "utility" corridor. Such a corridor is a where several utility transmission lines are placed, such as gas transmission pipelines and communication lines. Indeed, the State of Wisconsin made it a legislative rule that future placement of such utilities are to be given preference to "existing utility corridors."[2] An electric transmission line meets the definition in this statute as an existing corridor. This "corridor" concept continues to grow in the perception of the public as such rules become more commonly known. The reality of such an event happening is the placement of the Arrowhead-Weston Power line, which was often placed within an existing utility corridor such as an oil transmission pipeline, smaller electrical transmission lines or abandoned electric transmission line easements. The very power line that is the focus of this analysis is further proof of the corridor effect for it has been expanded, enlarged and added circuits within the existing easement.

Other factors to consider regarding the valuation of HVTL impacted rural properties are agricultural equipment concerns operating under and near the line, health issues of workers in close proximity of the lines, health concerns of farm animals in close proximity of the lines, stray voltage, the concerns of public in relation to electro-magnetic fields, safety issues regarding bare wires of the transmission line and other concerns addressed in the literature study to follow.

In conclusion, it can be stated with a high degree of certainty that there is a significant negative effect ranging from -10% to -30% of property value due to the presence of the high voltage electric transmission line. The actual loss depends on factors of land use, location of the power line and its size.

2 Wis. Stats 1.12(6)(a).

Literature Study

HVTL Impacts on Rural and Agricultural Properties

Throughout the nation's rural communities, literature research suggests that the presence of an HVTL easement can have a noticeable impact on both the use and appeal of rural properties and farms. Common concerns include stray voltage, health risks to livestock and cattle, diminished livelihoods and heritage, limited land use, and lessened aesthetic appeal. As the following literature survey will show, many different issues play a role in shaping one's perception of the impact of HVTLs on rural property values.

Stray Voltage

To understand the potential impact of HVTLs on rural land, it's important to discuss a key component in many farmers' apprehension about HVTLs: stray voltage.

Stray voltage is the rural equivalent of the high-profile residential Electromagnetic Field (EMF) factor, but instead of fearing leukemia or brain cancer, farmers fear their animals will become unproductive, ill, and even die.

Whenever energy is transferred, some is lost along the way. If metal buildings are near leaking energy, they can act as a conduit for voltage to find its way to feeding systems, milking systems and stalls.

In their 1995 presentation, "Stray Voltage: The Wisconsin Experience," a team of researchers led by Mark Cook and Daniel Dascho stated that farmers most worry that stray voltage will increase somatic cell count in their animals, make cows nervous, reduce milk production, and increase clinical mastitis.[3]

"Few issues are more upsetting to dairymen than fighting case after case of clinical mastitis with more and more cows in the sick pen," writes Dr. Winston Ingalls. "It represents extra time to properly handle such cows, lost production, vet calls, treatment products, concern about contaminated milk and an occasional dead or culled cow."[4]

In Cook & Dascho's presentation, they discuss their findings from a non-random sampling study of farms with stray voltage complaints stemming from a nearby substation. Their research team found no significant relationship between cow contact current and distance from the substation or contact currents. However, they also noted that cow contact current depends on many physical factors from on-farm and off-farm electrical power systems. They say, "There are many confounding factors that may outweigh the impacts of stray voltage which makes it difficult to draw conclusions from field studies about its effects on production and animal health."[5]

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3 **Stray Voltage: The Wisconsin Experience.** Written for presentation at the 1995 International Meeting by Mark A Cook, Daniel M Dascho, Richard Reines and Dr. Douglas J Reinemann.
4 **Clinical Mastitis.** Winston Ingalls, Ph.D. GoatConnection.com. August 2, 2003. http://goatconnection.com/articles/publish/article_173.shtml
5 **Stray Voltage: The Wisconsin Experience.** Written for presentation at the 1995 International Meeting by Mark A Cook, Daniel M Dascho, Richard Reines and Dr. Douglas J Reinemann.

In a 2003 study prepared for the NRAES Stray Voltage and Dairy Farms Conference, a research team conducted by the University of Wisconsin-Madison and led by Dr. Douglas J Reinemann studied the effects of stray voltage on cows at four dairy farms over a two-week time period. He and his team found that after the first few days of exposure, cows quickly acclimated to the presence of stray voltage. They also found that stray voltage of 1mA had little effect on the immune system of a cow.[6]

Concerning EMF levels, they noted that "even though man-made signals were larger than the naturally occurring currents, levels are significantly lower than what is considered sufficient earth current strength to develop step potential anywhere near the Public Service Commission 'level of concern.'"[7]

Stray voltage is usually undetectable by humans, and some researchers believe it occurs when electricity escapes a power line or wiring system and emits a secondary current. The problem intensifies with older barns that add automated electrical equipment, "raising ambient levels of current. Soon the cumulative effect of these secondary currents becomes harmful to cows." Though stray voltage can be measured, experts don't know how and why it happens or what conclusive effect (if any) it has on animals.[8]

Despite little concrete evidence, courts have compensated farmers for their losses due to stray voltage when all other factors are eliminated. In 1999 a jury awarded Peterson Bros. Dairy $700,000 after deciding that stray voltage from an automated feeding system from Maddalena's Dairy Equipment of Petaluma, California slashed the herd's milk output and increased the cow's death rate.[9]

The company's defense attorney called stray voltage "junk science," the Petersons' claim of stray voltage in the milk barn a "harebrained theory" unsupported by electrical engineers, and blamed the herd's health problems on the Petersons' own mismanagement.[10]

In a similar case in Wisconsin in 2004, a dairy operation owned by George and Kathy Muth successfully sued Wisconsin Electric Power Co. (now We Energies) for negligence in the maintenance and operation of a distribution system on their farm. They claimed that the system led to stray voltage that injured and killed several of their dairy cows and damaged their milk production. The utility said that the levels of stray voltage were "extremely low" and were levels you could find anywhere.[11]

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6 **Dairy Cow Response to the Electrical Environment: A Summary of Research conducted at the University of Wisconsin-Madison.** Paper presented at the NRAES Stray Voltage and Dairy Farms Conference. Dr. Douglas J. Reinemann. April 2003.

7 **Results of the University of Wisconsin Stray Voltage Earth-Current Measurement Experiment.** A revised version of a report submitted to the State of Wisconsin Legislature on June 25, 2003. Written by David L Alumbaugh and Dr. Louise Pellerin.

8 **Jury gives $700,000 to dairy farmers for losses blamed on "stray voltage."** Author Unknown. The Associated Press. April 21, 1999.

9 **Ibid.**

10 **Ibid.**

11 **Power company negligent in dairy suit; Jury awards $850,000 to couple over effect of stray voltage on cows.** Lauria Lynch-German. Milwaukee Journal Sentinel. February 27, 2004.

The farmers said that shortly after moving to their new location, they faced low milk production, excessive illnesses, and deaths of cows. [12] The cows didn't walk right or act normal. They didn't want to go into the barn, inside, or into the stalls. The Muths examined everything from the animals' food to their bedding until consultants told them it could be stray voltage. In one year, they lost 15-18 cows and calves. Autopsies were inconclusive.[13]

After reviewing herd management and nutrition, they hired a consultant who detected stray voltage. Later that year the utility found no stray voltage problems. The farmers further consulted with veterinarians and tested and ruled out all the other factors except for stray voltage.[14]

The farmers hired an electrician to upgrade the farm's wiring, but it didn't decrease the stray voltage. After being asked, the utility made some other changes, but this also had no effect. Further consultants still found stray voltage from a conductor on the utility's distribution lines. A couple years later the utility removed a piece of underground electrical equipment and the herd immediately recovered...though the level of stray voltage remained the same.[15]

The utility's attorney stated that being able to measure something doesn't make it harmful. He cited several federal and state studies that say the current must be 2 milliamps or higher to adversely affect cattle and said no reading on their farm reached that level.[16]

The jury awarded the dairy farm $850,000 in damages.[17]

Stray voltage fears aren't limited to dairy or cattle operations. Max Hempt, a horse farm owner in Pennsylvania, tried to oppose a proposed 9-mile 138kV HVTL because he feared that the line's EMFs caused by stray voltage could cause sterility and death among his horses.[18]

Though it's difficult to prove a significant presence of stray voltage, and even more difficult to prove a direct correlation between stray voltage and poor health, courts have awarded farmers sizable judgments to compensate them for damaging stray voltage from nearby power lines.

In 2002, one such case in Iowa made it to the state supreme court where the court upheld a $700,000 judgment to a dairy farmer who argued that stray voltage from nearby power lines injured his herd. A substation sits less than a quarter mile from his farm. He said he often got electric shocks from the metal buildings on the farm. Also, he said his herd acted oddly, appearing frightened and refusing to enter barns. Milk production also suffered.[19]

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12 **Jury must decide in voltage complaint; Farm family says stray power harmed dairy herd.** Lauria Lynch-German. Milwaukee Journal Sentinel. February 5, 2004.

13 **Dairy farm owner testifies that stray voltage killed cows in his herd.** Lauria Lynch-German. Milwaukee Journal Sentinel. February 10, 2004.

14 **Jury must decide in voltage complaint; Farm family says stray power harmed dairy herd.** Lauria Lynch-German. Milwaukee Journal Sentinel. February 5, 2004.

15 **Ibid.**

16 **Ibid.**

17 **Power company negligent in dairy suit; Jury awards $850,000 to couple over effect of stray voltage on cows.** Lauria Lynch-German. Milwaukee Journal Sentinel. February 27, 2004.

18 **Farmer Fears Stray Voltage From PP&L 138 kV Line Could Harm His Horses.** Author Unknown. Northeast Power Report. June 24, 1994.

19 **Court upholds stray voltage judgment.** Mike Glover. The Associated Press. October 10, 2002.

The defendant, Interstate Power Co., said that "there's an inherent risk to transmitting electricity" and it shouldn't be vulnerable to such lawsuits unless they were negligent. The court ruled in favor of the dairy farmer, citing the lack of a statute exempting electric utilities from nuisance claims.[20]

One year later the Wisconsin Supreme Court similarly found "that a utility can be held responsible for harming the health of a dairy herd with stray voltage even though state-recommended voltage tests did not find potentially damaging levels where the animals congregated."[21]

As the preceding case studies show, courts have acknowledged stray voltage and its possible effects. However, to fully understand the apprehension surrounding power lines, one must examine the EMF debate and its fear factor.

EMFs and Fear

In 1990, the EMF debate was so prevalent that members of Congress passed a bill that would limit the public's exposure to EMFs.[22] A couple years later, in response to public concern about EMFs, Congress established the EMF-RAPID program in 1992. Its purpose was to coordinate and execute a limited research program to fill information gaps concerning the potential health effects of exposure to EMFs, to achieve credibility with the public that previous research has not earned, and to coordinate and unify federal agencies' public messages about possible EMF effects.[23] The program originally was to receive $65 million in funding, but total funding is expected to be $46 million.[24]

Several years later in 1999, the National Institute of Environmental Health Sciences studied the health effects of EMF exposure and found conflicting results. Though they concluded that the evidence is weak linking EMFs to health risks, they also found that the most common health risk was leukemia (mostly appearing in children). They also found a fairly consistent pattern of a small, increased risk of childhood leukemia with increasing exposure. The majority of the panel's voting members voted to acknowledge EMFs as a possible human carcinogen. They concluded that ELF-EMF exposure cannot be recognized as entirely safe because of weak scientific evidence.[25]

In 2005, UK scientists conducted a case-control study on childhood cancer in relation to distance from high voltage power lines in England and Wales. They found an association between childhood leukemia and proximity of home address at birth to HVTLs. "The apparent risk extends to a greater distance than

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20 **Ibid.**

21 **Utility liable for stray voltage, high court says.** Don Behm. Milwaukee Journal-Sentinel. June 26, 2003.

22 **Electric Powerlines: Health and Public Policy Implications** – Oversight Hearing before the Subcommittee on General Oversight and Investigations of the Committee on Interior and Insular Affairs House of Representatives, 101st Congress, second session on electric powerlines: health and public policy implications. March 8, 1990.

23 **Electric and Magnetic Fields Research Program** by Mr. Mukowski from the Committee on Energy and Natural Resources. 105th Congress, first session. June 12, 1997.

24 **Ibid.**

25 **NIEHS Report on Health Effects from Exposure to Power-Line Frequency Electric and Magnetic Fields.** Released by the National Institute of Environmental Health Sciences on May 4, 1999.

would have been expected from previous studies" although they have yet to discover an "accepted biological mechanism" to explain their results.[26]

Though an accepted biological mechanism remains elusive, an early nineties case made it possible to link loss of property value to a fear of EMFs. In the 1993 case, *Criscuola v. Power Authority of the State of New York*, the court found that, "there should be no requirement that the claimant must establish the reasonableness of a fear or perception of danger or of health risks from exposure to high voltage power lines" and "Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact."[27]

Utilities say that landowners should not be able to recover damages or injunctive relief "based on myth, superstition or fear about an alleged health risk that is not supported by substantial scientific or medical evidence."[28]

With the EMF debate unresolved, and evidence for both sides of the argument, some communities are reluctant to approve new HVTLs...and may even legally oppose them.

In an effort to preempt public opposition, Public Service Enterprise Group offered hundreds of thousands of dollars to New Jersey towns opposing its proposed HVTL project if the towns dropped all opposition and didn't comment on the payments. Opponents called them "bribes." The utility called them "settlements" to help minimize impacts of the project on towns and residents.[29]

Some towns accepted payment, but the majority did not. Either they said they didn't have enough time to respond to the offer, or they rejected them as payoffs. One of the opposing mayors, Mayor James Sandham of Montville, said it's not about the money; "It's about safety and property values."[30]

HVTLs and Property Values

Fear can impact the public's buying habits. Residential homeowners' resistance to abutting HVTLs is well documented. Though homeowners may fear negative effects on their community and environment,[31] their first point of opposition is usually safety, especially if there are many children in the neighborhood. Though the 1979 Wertheimer study linking EMFs to childhood leukemia has long been contested, supported, and contested again, the very existence of a debate about the safety of EMFs sows enough doubt in residents' minds to justify the fear.[32] And that fear can influence the values of nearby homes.[33 34 35 36]

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26 **Childhood cancer in relation to distance from high voltage power lines in England and Wales: a case-control study.** Gerald Draper, Tim Vincent, Mary E Kroll, John Swanson. British Medical Journal (bmj.com). June 3, 2005.
27 **'Criscuola' – The Sparks Are Still Flying.** Michael Rikon. New York Law Journal. April 24, 1996.
28 **High Court Hears Arguments Today on EMF Claims.** Todd Woody. The Recorder. June 6, 1996.
29 **Opponents of $750M N.J. power line project argue towns were paid to drop opposition.** Lawrence Ragonese. The Star-Ledger. January 31, 2010.
30 **Ibid.**
31 **NY Power Line Opponents Win Court Fight.** Associated Press. New York Post. February 20, 2009.
32 **Lines in Sand and Sky.** B.Z. Khasru. Fairfield County Business Journal. September 3, 2001. Vol. 40 Issue 36, p3, 2p.
33 **Power line plan concerns metro residents.** Melissa Maynarich. News 9 (Oklahoma). July 22, 2008.

When given the choice to purchase two identical homes, one with such health concerns and the other without, most buyers will choose the home without the concern,[37] forcing the homeowner to lower their price. Aesthetic impact can also influence a property's value. Many residents don't want to look at HVTLs,[38] something they consider to be an "eyesore."[39]

One of the hardest properties to sell can be one encumbered by an HVTL. Unlike roadway proximity, its effect isn't readily noticeable or measurable. Though homes near HVTLs typically have larger lots (and that can be a benefit), the biggest disadvantage is the fear factor surrounding EMFs.[40]

In the early nineties, when EMFs were just entering the public consciousness, it was difficult to find a measurable price difference between homes close to an HVTL and those that were not.[41] However, two researchers (Hsiang-te Kung & Charles F Seagle) conducted a case study on the impact of power transmission lines on property values and found that such negligible results depended almost entirely on the public's ignorance of EMFs and their related issues. They also found that the amount of potential property loss increased dramatically the more homeowners were aware of the potential health impacts of EMFs.[42]

The effect of HVTLs on property values has long been a matter of contention with many studies either proving a diminutive effect or none at all. Methodologies differ and different areas of the country register different results. Some markets (ex. high-end homes) are very sensitive to HVTLs whereas others (ex. low-end homes) hardly notice them. The size of the line and the pylons are also a factor. A 69kV power line will have less effect than will a 1,200kV power line. Distance from the easement also matters. Some studies combine homes thousands of feet from HVTLs with those directly encumbered. Research sponsors also may play a factor with many being funded by the utilities themselves.

For example, in a 2007 study funded by a utility, researchers Jennifer Pitts and Thomas Jackson conducted market interviews, literature research and empirical research and reported little (if any) impact of power lines on property values. However, they did note that there is an increasing recent opinion that proximity to power lines has a slight negative effect on property values.[43]

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34 **Power Line Worries Landowners**. Ben Fischer. The Wisconsin State Journal. June 3, 2006.
35 **Lines in Sand and Sky.** B.Z. Khasru. Fairfield County Business Journal. September 3, 2001. Vol. 40 Issue 36, p3, 2p.
36 **Commissioners voice opposition to transmission lines.** David Rupkalvis. The Graham Leader. February 9, 2010.
37 **Real Estate Agents on Property Value Declines.** 4 Realtor opinion letters submitted to residents in the Sunfish, MN area whose properties are being affected by an HVTL.
38 **Ibid**.
39 **Power line plan concerns metro residents.** Melissa Maynarich. News 9 (Oklahoma). July 22, 2008.
40 **High Voltage Transmission Lines, Electric and Magnetic Fields (EMF's) And How They Affect Real Estate Prices.** David Blockhus. January 3rd, 2008. http://siliconvalleyrealestateinfo.com/electric-and-magnetic-fields-emfs-and-how-they-effect-real-estate-prices.html
41 **Impact of power transmission lines on property values: A case study.** Hsiang-te Kung & Charles F Seagle. Appraisal Journal. Vol. 60, Issue 3, p.413, 6p. July 1992.
42 **Ibid**.
43 **Power lines and property values revisited.** Jennifer M. Pitts & Thomas O. Jackson. Appraisal Journal. Fall, 2007.

Two California appraisers, David Harding and Arthur Gimmy, published a rebuttal to the Pitts-Jackson study that disagreed with their methodology, took issue with their sponsor, addressed omitted information, and failure to conduct before-and-after cost comparisons.[44]

Pitts and Jackson responded to the rebuttal and defended their methodology, saying they purposely limited their literature research to only include empirical, peer-reviewed articles from The Appraisal Journal and the American Real Estate Society journals. They acknowledged they conducted the research for "a litigation matter" but did not elaborate on their sponsor.[45]

In a similar case, researchers James A Chalmers and Frank A Voorvaart published a large study spanning nearly 10 years and over 1,200 properties in which they found that an encumbering HVTL had only a small negative effect on the sale price of a residential home. In half of their samples they found consistent negative property values mostly limited to less than 10%, with most between 3%-6%.[46]

They summarized their findings as showing "no evidence of systematic effects of either proximity or visibility of 345-kV (kilovolt) transmission lines on residential real estate values."[47]

They did, however, say that "An opinion supporting HVTLs effects would have to be based on market data particular to the situation in question and could not be presumed or based on casual, anecdotal observation. It is fair to presume that the direction of the effect would in most circumstances be negative, but the existence of a measureable effect and the magnitude of such an effect can only be determined by empirical analysis of actual market transactions."[48]

Appraiser Kerry M. Jorgensen disagreed with the authors' views that paired data analysis and retroactive appraisal were "too unrefined and too subjective to be of much value," and that only through objective statistics could the effect of HVTLs on property value be truly understood. He argued that relying too much on statistics can be dangerous as there could be problems with how the data is compiled and interpreted. For example, he points out that out of their set of 1,286 qualifying sales, only 78 (6%) are directly encumbered by a power line easement, and only 33 (2.6%) more are within 246 feet of a power line easement.[49]

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44 **Comments on "Property Lines and Property Values Revisited."(Letter to the editor)** David M. Harding & Arthur E. Gimmy & Thomas O. Jackson & Jennifer M. Pitts. Appraisal Journal. Winter, 2008. http://www.entrepreneur.com/tradejournals/article/176131510.html

45 **Ibid.**

46 **High-Voltage Transmission Lines: Proximity, Visibility, and Encumbrance Effects.** James A Chalmers and Frank A Voorvaart. The Appraisal Journal via the Appraisal Institute website. Volume 77, Issue 3; Summer, 2009; pages 227-246. Reposted by CostBenefit of the Environmental Valuation and Cost-Benefit News blog - http://www.envirovaluation.org/index.php/2009/11/09/high-voltage-transmission-lines-proximity-visibility-and-encumbrance-effects

47 **Power Lines Don't Affect Property Values. The Appraisal Journal.** July 30, 2009. http://www.appraisalinstitute.org/about/news/2009/073009_TAJ.aspx

48 **High-Voltage Transmission Lines: Proximity, Visibility, and Encumbrance Effects.** James A. Chalmers, PhD and Frank A. Voorvaart, PhD. The Appraisal Journal. Summer 2009. Pgs. 227-245.

49 **Letters to the Editor.** Kerry M. Jorgensen. Appraisal Journal. January 1, 2010. http://www.thefreelibrary.com/Comments+on+"high-voltage+transmission+lines:+proximity,+visibility,...-a0220765052

The Chalmers-Voorvaart study also attracted the interest of Washington Post Real Estate writer Elizabeth Razzi who wrote that the study was paid for by Northeast Utilities and completed before they proposed a high-voltage transmission grid in New England. She also wrote that both Chalmers and Voorvaart are appraisers and expert witnesses for the power industry.[50]

Several studies have found that, over time, property value damages from nearby HVTLs diminish though properties near the pylons stay permanently damaged no matter the elapsed time.[51] In the first case, though the property owner may grow accustomed to HVTLs and thus think less of them, new potential buyers aren't as sensitized and the diminutive impact is fresh to them.

Realtors usually oppose HVTLs. Nearly all surveyed realtors and appraisers in the Roanoke and New River valleys of Virginia said that close proximity to HVTLs would diminish property values by as much as $25,000, but mostly for high-end homes. Lower-end homes see little impact.[52]

Diminished property values can also impact communities. In one case, Delaware residents were worried that a proposed 1,200 megawatt HVTL would depress local property values, thus weakening the local tax base and leading to higher taxes to offset the losses. Kent Sick, author of a 1999 paper on power lines and property values, projects losses from a few percentage points to 53%.[53]

In Atlanta, a local realty group named Bankston Realty ranked power lines as the number one item that damages resale value, followed closely by busy roads and inferior lot topography. They advise buyers to pay 15% less of the asking price if power lines are present, and they advise sellers to accept it as a logical perception of value.[54]

Evidence suggests that HVTLs affect the health of residents in close proximity to lines 345kV and higher. Evidence also suggests that the power lines have little to no impact on property values because encumbered lots are often larger and more private than unencumbered lots, resulting in no diminution of purchase price. However, most studies did observe longer time on the market for encumbered properties.[55]

Rural Impact

Now that the reader is aware of stray voltage, EMFs, and property values, the reader will have a deeper understanding of the potential effects of HVTLs on rural land throughout the United States.

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50 **Do High-Voltage Lines Zap Property Values?** Elizabeth Rassi. Local Address. August 4, 2009. http://voices.washingtonpost.com/local-address/2009/08/do_high-voltage_lines_zap_prop.html

51 **The Effect of Public Perception on Residential Property Values in Close Proximity to Electricity Distribution Equipment.** Sally Sims, B.Sc. Paper presented to the Ph.D. Forum at the Pacific Rim Real Estate Society Conference. January 2002. This is the first part to the study.

52 A Question of Power: Part III – Realtors: High voltage lines lower property values. Leslie Brown. Roanoke Times. 1998. http://www.vapropertyrights.org/articles/98lineslowervalues.html

53 **Expert: Power lines hurt property value, market research shows sellers lose up to 53 percent.** Elizabeth Cooper. Gannett News Service. May 20th, 2006.

54 **Atlanta Homes and Resale Value... Power lines are a definite NO.** The Bankston Group. July 17, 2008. http://atlantaintheknow.com/2008/07/17/atlanta-homes-and-resale-value-power-lines-are-a-definite-no/

55 **High Voltage Power Lines Impact On Nearby Property Values.** Ben Beasley. Right of Way Magazine. February 1991.

In Goodhue County, Minnesota, an area locally known for protecting agriculture, CapX2020 (a utility consortium) is proposing to build a 345kV HVTL through the county that may be doubled to 690kV. Local landowner Linda Grovender voiced her concern in a 2010 letter to the editor of the Cannon Falls Beacon. She worries that the line, proposed to traverse residential and agricultural lands instead of following existing utility right-of-way, will have an adverse effect on her family's health (due to EMFs), jeopardize agricultural interests, result in lost agricultural productivity, and damage property values.[56] She wrote that if the proposed 345kV HVTL is doubled to 690kV (as it legally could be) it could have an adverse effect on her family's health, jeopardize agricultural interests, result in lost agricultural productivity, and damage property values.[57]

Elsewhere n Minnesota, Dairyland Power Cooperative (one of the chief members of CapX2020) surveyed rural landowners for their opinion regarding the proposed HVTL in their area. Whether they were crop or dairy farmers, each had several reasons why the proposed line would impact their business. The unnamed respondents shared Grovender's views and said they prefer to use highway corridors and woodlands to avoid impacts to productive agricultural land; protect livestock; avoid interference with large farm equipment, GPS, and navigation systems used in farm machinery; preserve open channels for crop-dusting; protect farm buildings; protect pasture land, tree farms, and timber production.[58]

The Dairyland survey also found that livestock operations are concerned that the HVTL will generate stray voltage, impacting livestock and feedlots. Cattle, horses, and other livestock will not go near transmission lines due to stray voltage. And stray voltage can impact the health of beef cattle and hogs. Farmers also fear potential impacts on dairy operations, poultry, livestock mortality, horse boarding facilities, and herd reproduction. [59]

HVTLs also pose potential technological obstacles. For example, The GPS equipment used in the farm equipment may not be able to steer around transmission poles, potentially making farming around the towers extremely difficult. [60]

One major concern was the routing the HVTLs through the middle of properties or fields. The surveyed farmers quoted many repercussions for bisecting a property. They include: Interrupted irrigation and tile drainage equipment and practices; decreased food production; fragmented existing cropland and dairy operations; diminished lease value: the addition of transmission lines would make it difficult to lease farm land for the top rental price; compacted soil from construction of the HVTLs and access roads: it would take 3–5 years to restore.[61]

Across the border in Wisconsin, the state's Department of Agriculture validated many of the Minnesota respondents' concerns when it found that HVTL construction could compact soil, making it difficult to

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56 **No CAPX2020.** Letter to the Editor by Linda Grovender. The Cannon Falls Beacon. March 23, 2010.
57 **Ibid**.
58 **SE Twin Cities-Rochester-La Crosse Transmission System Improvement Project Macro-Corridor Study, Appendix A: Summary of Public Comments regarding a proposed HVTL.** Dairyland Farm Cooperative. September 2007.
59 **SE Twin Cities-Rochester-La Crosse Transmission System Improvement Project Macro-Corridor Study, Appendix A: Summary of Public Comments regarding a proposed HVTL.** Dairyland Farm Cooperative. September 2007.
60 **Ibid.**
61 **Ibid**.

plow and plant those areas, naturally resulting in reduced crop yields. The HVTLs force farmers to change planting patterns to avoid support structures. Since farm land is only as valuable as its ability to yield good crops, rural property values suffer from the limitations and effects of HVTLs on their land.[62]

Potential compaction, forced building changes, and lower property values equally threaten dairy operations as much as agricultural farmers. Susan and Robert Herckendorf, dairy farmers in the path of the proposed A-W HVTL, are worried that the line could put local dairies out of business.[63]

In researching the possible negative factors of the then-proposed Arrowhead-Weston HVTL in Wisconsin in 2000, the state's Public Service Commission found that rural property values may decrease from "concern or fear of possible health effects from electric or magnetic fields; The potential noise and visual unattractiveness of the transmission line; Potential interference with farming operations or foreclosure of present or future land uses."[64] They also found that the value of agricultural property will likely decrease if the pylons inhibit farm operations."[65] However, they also found that adverse effects appear to diminish over time.[66]

The impact report further states that, on farmland, HVTL installation can remove land from production, interfere with operation of equipment, create safety hazards, and deprive landowners the opportunity to consolidate farmlands or develop the land for another use. The greatest impact on farm property values is likely to occur on intensively managed agricultural lands.[67]

Nearly a decade later in 2009, the Wisconsin Public Service Commission conducted another study on the environmental impacts of transmission lines and found that "in agricultural areas, the number of poles crossing a field may be the most significant measure of impact," and "agricultural values are likely to decrease if the transmission line poles are in a location that inhibits farm operations."[68] Beyond the impact of pole placement, the PSC found that "the overall aesthetic effect of a transmission line is likely to be negative to most people, especially where proposed lines would cross natural landscapes. The tall steel or wide 'H-frame' structures may seem out of proportion and not compatible with agricultural landscapes or wetlands."[69] They further explained that "Transmission lines can affect farm operations and increase costs for the farm operator. Potential impacts depend on the transmission line design and the type of farming. Transmission lines can affect field operations, irrigation, aerial spraying, wind breaks, and future land development."[70]

The study further examines how rural HVTL pole placements can affect agricultural land values: They can create problems for turning field machinery and maintaining efficient fieldwork patterns; expose

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62 **Line could affect farms, property values.** Author Unknown. Oshkosh Northwestern. June 26, 2000.
63 **Ibid.**
64 **Property Values (pages 212-215) from Final Environmental Impact Statement, Arrowhead-Weston Electric Transmission Line Project, Volume 1.** Public Service Commission of Wisconsin. Docket 05-CE-113. Date issued, October 2000.
65 **Ibid..**
66 **Ibid.**
67 **Property Values (pages 212-215) from Final Environmental Impact Statement, Arrowhead-Weston Electric Transmission Line Project, Volume 1.** Public Service Commission of Wisconsin. Docket 05-CE-113. Date issued, October 2000.
68 **Environmental Impacts of Transmission Lines.** Public Service Commission of Wisconsin. March 2009.
69 **Ibid.**
70 **Ibid.**

properties to weed encroachment; compact soils and damage drain tiles; result in safety hazards due to pole and guy wire placement; hinder or prevent aerial activities by planes or helicopters; interfere with moving irrigation equipment; hinder future consolidation of farm fields or subdividing land for residential development.[71]

To oppose these potentially diminutive effects on their land, landowners sometimes organize against them. In Ohio, a group of concerned citizens formed the group, Citizens Advocating Responsible Energy (CARE), to oppose FirstEnergy's proposed Geauga County power line. On their website they state the reasons for their opposition. They fear the HVTL will devalue the properties it crosses, force affected property owners to continue paying taxes on damaged property, damage natural beauty and local ecology, lessen agricultural productivity of impacted land, thus reducing farm income and local purchasing power, and create a thorough-fare for snowmobiles and off-road vehicles.[72]

Other times, concerned landowners are united in voice, but not in form. In 2010, Idaho property owners in Bonneville County are nervously following the progress of Idaho Falls Power's proposed 161kV HVTL that would pass close to their homes.[73]

Lynn Pack, a Bonneville County dairy farmer, has educated himself on HVTLs and said he's most concerned with stray voltage. "It causes so many problems with cow's production. They won't feed, they won't drink water, they dry up and when they dry up they just don't give any milk." [74] Another property owner, Sharon Nixon, fears the HVTL could harm her husband's health after his recent victory over bone cancer. She also fears the value of her home will fall. "It is not something we want in our backyard. We worked all our lives. This is our dream home." [75]

Idaho Falls Power General Manager Jackie Flowers said the HVTL is a necessary step to meet new federal energy reliability standards and that the utility is open to the public's input. [76]

A year earlier in Idaho, a coalition of Rockland County farmers tried to convince Idaho Power Company to avoid routing a new HVTL through their land, citing environmental and development concerns.[77] Doug Dokter, Idaho Power project leader, said the new lines are required because the existing lines are at their capacity.[78] Because of their concerns, utility representatives say they're looking at other options and hope for a compromise to avoid invoking eminent domain to take the land. [79]

Sometimes opposition to a proposed HVTL route can alter its course. In 1994, Public Service Company of New Mexico abandoned plans to take new right-of-way through the Jemez Mountains for a 50-mile long HVTL extension that Indian groups and environmentalists argued would cut through several miles

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71 **Ibid.**

72 **We oppose FirstEnergy's proposed Geauga County power line.** Website posting by Citizens Advocating Responsible Energy (CARE). Date unknown but website copyright suggests sometime from 2008-2009.

73 **Transmission Lines Worry Property Owners.** Brett Crandall. Local News 8. March 5, 2010.

74 **Ibid.**

75 **Ibid.**

76 **Ibid.**

77 **Headway being made on proposed route for power transmission line.** Author Unknown. The Power County Press and Aberdeen Times. April 8, 2009.

78 **Ibid.**

79 **Ibid.**

of pristine vistas and Native American ruins.[80] The utility instead re-routed the extension to follow an existing utility corridor, bringing the decade-long dispute to a close.[81]

In 2008, California farmers and ranchers found themselves in a similar situation. San Diego Gas & Electric proposed a 150-mile long, 500kV HVTL (in conjunction with several 230kV HVTLs) across San Diego and surrounding counties to meet increasing energy needs and transport required renewable energy.[82]

Affected landowners are worried the line will have "huge" impacts on their properties. Katie Moretti, an affected cattle rancher, and other farmers worry that building construction access roads across untouched land will limit their land's future use. She also worries that the utility won't compensate her for the loss of use.[83]

Another rancher, Glen Drown, also worries about the impact the line will have on land-use and property values since the proposed route bisects several of his parcels subdivided for future development.[84]

Local dairy producer, Richard Van Leeuwen, is worried that stray voltage from the line would damage the health of his calves and milking cows. To protect his herd's health he said he would have to relocate the calf farm to another part of his property, costing millions.[85]

San Diego County Farm Bureau Executive Director Eric Larson acknowledges that the farming community won't be able to stop the project, but he's trying to make it compatible with the area's farming interests by recommending burying the line underground in some areas, going around some areas, and utilizing existing right-of-way.[86]

Elsewhere in the state, the City of Brentwood researched the potential impact of HVTLs on agricultural land values by interviewing several of their local and experienced Real Estate brokers. All the brokers said that "Agricultural land with power lines above ground is worth less than properties with below-ground utilities."[87]

However, in a 2007 report, the California Department of Conservation's Farmland Mapping and Monitoring Program reported that HVTLs installed on agricultural land for a wind farm will result in a temporary disturbance of 10 acres of farmland and permanently affect 1 acre. Since the affected areas are mainly grazing land, the report concluded that the HVTL would not significantly impair productivity. Though the impact to agricultural productivity during construction would be negative, they claimed it would be mostly insignificant.[88]

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80 **PNM Scraps Jemez Power Line Plan.** Keith Easthouse. Sante Fe New Mexican. December 16, 1994.
81 **Ibid.**
82 **Proposed power line would impact farms.** Christine Souza. California Farm Bureau Federation. May 28, 2008.
83 **Proposed power line would impact farms.** Christine Souza. California Farm Bureau Federation. May 28, 2008.
84 **Ibid.**
85 **Ibid.**
86 **Ibid.**
87 **City of Brentwood, California.** Website page explaining their approaches to valuing agricultural land. Date and author unknown.
88 **3.3 Agricultural Resources.** Part of the public draft by The California Department of Conservation's Farmland Mapping and Monitoring Program. July 2007.

Across the country in Leesburg, Virginia, 26 landowners opposed Dominion Energy's proposed 230kV HVTL, saying it will damage their property values, thus decreasing their tax base and thus affect the county as a whole. They also fear its impact on Blue Ridge tourism.[89]

Bill Hatch, owner of a 400-acre farm was upset to learn the line would run through his farm. He said the proposed line would so affect his farm that he could only afford to keep it by direct marketing or agro-tourism, but he admitted that few people would want to visit a farm with power lines.[90]

Landowners want the utility to bury the lines, but the utility says it will cost 10 times more than traditional overhead lines. However, Harry Orton, an underground power line expert, testified that while the initial costs of burying the lines are higher, the lower cost of maintenance over the years evens the cost along the lines' lifecycle.[91]

A year later in 2006, Dominion proposed an additional 500kV HVTL to meet growing demand and routed it through northern Virginia because it was the most efficient route. However, the area is also one of the state's most pristine, and the proposal met with fierce resistance from landowners, environmentalists, Congressman Frank Wolf, and actor Robert Duvall.[92]

In the path of the HVTL are landowners of some of the most valuable land in Virginia, and they were bothered that the utility plans to erect the 40-mile, 15-story HVTL in their back yards.[93]

One landowner, Cameron Eaton, fears the line will bring financial ruin and "sink" her investment into her 100-acre Fauquier County property and horse business. "No one will buy that land if some ugly power line could run right over their house. I'm broken off at the knees."[94]

Real estate agents consider the area's picturesque countryside to be its most valuable quality. Matt Sheedy, a land developer and president of Virginians for Sensible Energy Policy, said that the very proposal that the line will soon dominate the countryside has already "sent land values plummeting." Brokers confirmed that the market froze. People backed out of real estate contracts, unwilling to live anywhere under the line. Sheedy's groups estimated that land immediately affected could lose as much as 75% of its value.[95]

"When you're out in the country and you're selling property, what you're selling is the open space and the bucolic views and the history," Sheedy said. "Running power lines through an area like this is just devastating." To landowners Gene and Deborah Bedell, who were trying to sell their 223-acre farm to pay for their retirement, it was a hard blow. Their agent old them no one would buy their property if they knew "that it could have a power line looming over it."[96]

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89 **Committee Hears Debate Over Underground, Overhead Power Lines.** Megan Kuhn. Leesburg Today. May 20, 2005.
90 **Ibid.**
91 **Committee Hears Debate Over Underground, Overhead Power Lines.** Megan Kuhn. Leesburg Today. May 20, 2005.
92 **Landowners Fear Ruin from Power Line Route.** Sandhya Somashekhar. Washington Post Staff Writer. December 11, 2006.
93 **Ibid.**
94 **Ibid.**
95 **Ibid.**
96 **Ibid.**

Further north in New York, over 50 landowners and local officials spoke before the state's Public Service Commission in opposition to Upstate NY Power Corp's proposed construction of a 230kV HVTL in their community.[97]

Sharon B. Rossiter, co-owner of Doubledale Farms in Ellisburg, said the HVTL will damage their crop cycle, remove 100 acres from use, and make planting difficult by having to navigate around the poles. Also worried is Roberta F. French, owner of Farnham Farms in Sandy Creek. The proposed line will bisect her blueberry farm, eliminating two-thirds of it.[98]

Jay M. Matteson, Jefferson County agricultural coordinator, advocated routing the HVTL through public land to avoid damaging productive, private land. "The burden should be on New York state and the developer to prove to local landowners why their land is less valuable than public land," he said.[99]

The Town of Henderson opposed it because the town's foundation is tourism and agriculture, and the community is "very concerned about the visual impacts of this project."[100]

Robert E. Ashodian, chairman of the Henderson Harbor Area Chamber of Commerce's Economic Development Committee, agreed. "The scenic resources of the community and the natural resources are at the heart of the value of the community."[101]

In an effort to appease worried or angry landowners, agricultural property owners in Montana with HVTLs encumbering their land will be exempt from paying taxes on land within 600 feet on either side of the HVTL Right-of-Way.[102]

In the 2002 study, "The Impact of Transmission Lines on Property Values: Coming to Terms with Stigma," authors Peter Elliott and David Wadley cite a 1978 Canadian study that, according to one commentary, found "the per acre values from more than 1,000 agricultural property sales in Eastern Canada were 16-29% lower for properties with easements for transmission lines than for similar properties without easements." The impact was greater on smaller properties. The 1978 study found little difference in impact from 230kV or 500kV HVTLs. The study also found that the impacts didn't seem influenced by time.[103]

Three more Canadian studies on the impact of HVTLs on agricultural land values found different results.[104] Brown 1976 studied the effect of low-voltage power lines on agricultural land in Saskatchewan and found no measurable impact on property values. The Woods Gordon 1981 study focused on the effects of 230kV to 500kV HVTLs on Ontario farmland and found some areas had an average of a 16.9% negative impact, two areas had a positive effect, and others showed no statistically

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97 **Transmission line gets no support.** Nancy Madsen. Watertown Daily Times. November 17, 2009.
98 **Transmission line gets no support.** Nancy Madsen. Watertown Daily Times. November 17, 2009.
99 **Ibid.**
100 **Ibid.**
101 **Ibid.**
102 **Tax facts on proposed power line.** The Montana Standard Staff. The Montana Standard. July 11, 2009.
103 **The Impact of Transmission Lines on Property Values: Coming to Terms with Stigma.** Peter Elliott & David Wadley. Property Management, pgs.137-152. 2002.
104 **The Effects of Overhead Transmission Lines On Property Values: A Review And Analysis Of The Literature.** Edison Electric Institute Siting & Environmental Planning Task Force. 1992.

significant effect. The third study, a master's thesis referred to as Thompson 1982 found sales prices lower for properties crossed by HVTLs but only where the land has potential for irrigation.(pgs. 56-57)[105]

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105 **Ibid.**

TARDAEWETHER Kellen * ODOE

From: Ken or Marsha <ken_marsha@comcast.net>
Sent: Friday, July 24, 2020 4:55 PM
To: TARDAEWETHER Kellen * ODOE; OED_OAH_REFERRAL * OED
Subject: Letter to be included in the Contested Case of the B2H project

Dear Sirs:

Our name: Ken and Marsha Hildebrandt
9892 Mulberry Dr.
Cedar Hills, Utah 84062

We are to be considered a Party -- (not limited party).

We own timber property in Glass Hill Road area, south of La Grande, Oregon. Our property would be within 500 feet of the proposed power line. This creates a lot of serious worries and challenges for us, as with all of the property owners. We know from the Paradise, CA fire, that big power lines such as this often cause serious fires, which would destroy or desecrate our property, and that of many others. We understand there is often a popping or humming sound, which would be annoying or bothersome to animals, as well as people.

It would also be a terrible eye-sore that would destroy the beauty of the timber property for all of us. It would also devalue our property value. It would be destruction of beautiful property that would never again be the same, even especially if/when Idaho Power in an upcoming time deemed it no longer necessary to them. When that time were to come, it would be impossible to remove the structures and return the timber land to its natural and beautiful state.

La Grande residents often use the road up to Glass Hill or Morgan Lake, and this would be such a negative impact, to see the big towers and drooping lines across the hillside, let along the view from the city of La Grande. So it really is of public interest, let alone to all of us individual property owners.

We are not represented by anyone else. We alone represent ourselves. Our family goes to our timber property several times a year to relax and enjoy the beautiful area. Having the big power lines there would definitely be a great detraction for us.

We are hoping that your company will listen to the concerns of us, as well as so many others, to protect our property and investment, especially since we know there are other ways for you to solve your need for power.

Sincerely,

Ken and Marsha Hildebrandt

TARDAEWETHER Kellen * ODOE

From: Joe Horst <joehorst@eoni.com>
Sent: Thursday, August 27, 2020 11:29 AM
To: OED_OAH_Referral@oregon.gov
Cc: kellen.tardaewether@oregon.gov; fuji@stopb2h.org
Subject: [Fortimail Spam Detected] Contested case Horst/Cavinato
Attachments: Contested Case Letter to ODOE 8-25-2020.docx

Please read attached contested case letter.
Thank you,
Joe

Joe Horst
La Grande Auto Repair
1505 26th St. La Grande, OR. 97850
Phone: 541.975.2000
Fax: 541.975.2222

August 25, 2020

From: Joe Horst
Anna Cavinato
86 Hawthorne Dr.
La Grande, OR. 97850

To: Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. N.E., Salem, OR 97301
email: OED_OAH_Referral@oregon.gov
copy: kellen.tardaewether@oregon.gov

Dear Ms. Greene-Webster and Kellen Tardaewether:

We are requesting to file as a full party to the Boardman to Hemingway Contested Case process. If anyone else has the same or similar issues as ours, they may not represent us and our issues. There is no assurance they will address the issues in the same manner and may not represent us and our issues the way we would given our experiences, interests, and impacts. We are also not represented by an attorney at this time but reserve the right in future proceedings.

We are intending to protect a personal interest in the outcome of this contested case. The outcome may result in the construction of a transmission line within 500 to 1000 feet of our home. This will reduce the value of our home, create noise impacts, irreparably damage the Oregon Trail on our property, potentially damage my well, destroy our views, and result in stress lasting for a minimum of several years due to not knowing if the line will pass by our home until it is actually built.

We had sent in a letter to the EFSC on August 5th 2019 regarding the Draft Proposed Order and we addressed our concerns at the hearing on June 20th 2019 in La Grande. Idaho Power has not addressed many of our concerns nor has the Oregon Department of Energy (ODOE) in the recently issued Proposed Order for the B2H site certificate. The following is a summary of the issues we would like to address.

Issue #1 Notification to affected property owners.

On May 5th, 2016, we received a letter from Idaho Power about the B2H line. This was the very first time we ever heard anything about the B2H project. The letter was short and in bold letters it said: "Permission to enter your property for survey and information gathering does not in any constitute your consent to grant a future easement." We were told by Idaho Power at this time that there would be nothing done at or around our property and no surveys were ever done. The very next letter we received was on May 12th, 2017. (Very near the completion of building our new house). This letter said it was contacting landowners whose property "May" be impacted by this project. I contacted Idaho Power and had a sit-down meeting with a representative that did not work for Idaho Power but was contracted by

Idaho Power to meet with me. This was the first time I was made aware that there may be significant construction that may have an impact on us.

We would also like to note that three times, after initial contact in 2017, right after the meeting in La Grande in October of 2018, and after the meeting in June of 2019, Idaho Power contacted us and told us that the route that passes by our house was not going to be used. After the 2019 meeting, they specifically said there were too many obstacles using that route and if the project continued, the Morgan Lake route would be the route that would be used.

Then, in early 2020, I received a phone call from Idaho Power telling me (again) that they were not going to use the Mill Creek route in front of our house, and that we "didn't need to take any further action." Since then, we have been under the impression that the route through my property was no longer going to be used until we just received this last notice. After reading the public notice and a little research we found that Idaho Power shows the route through my property as one of two possible routes and the Oregon energy facilities website still shows this route as the **primary/preferred route**. In fact, the draft site certificate, in the Proposed Order, states it is approving the preferred (Mill Creek) route as well as the (alternative) Morgan Lake route.

Idaho Power misled us, and we would guess others by telling us we no longer needed to participate in this transmission corridor site certificate process. It is clear that Idaho Power manipulated us and the public to the extent that no one was sure what they should be reacting to. They interfered with the public being able to comment on impacts to their property, get a contested case, and went around giving property owners false advice. No matter what route they actually do plan to use, they manipulated the public behind the scenes. No site certificate issued to Idaho Power can be legal given the following:

a. The application did not accurately show the location of the development.
b. The developer told people they did not need to participate in the process while they moved it forward.
c. They failed to meet the requirements of the Project Order.
d. Appeared to purposefully confuse the public by submitting an application they knew was not accurate. We believe the term is "bait and switch".
e. Included unnecessary information in the application they already had decided they would not use resulting in increasing the amount of material the public had to review.
f. The developer started working on this transmission line in 2010. We started building our home in 2015 having received no notice of what they were planning. We will suffer extreme financial and are experiencing physical damage due to the actions of this developer (stress).

We are requesting a contested case due to the actions of the Idaho Power to discourage public participation in the site certificate process and the fact that we have not received proper notice. This contested case request is supported by ORS 183.415 (1) Notice of right to hearing "[T]he Legislative Assembly finds that persons affected by actions taken by state agencies have a right to be informed of their rights and remedies with respect to the actions." This statute goes on to state specifically what must be communicated and how it is to be communicated. The Oregon Department of Energy failed to provide this information to us and others impacted by such things as potential damages our my well, impacts to

the streets we use to get to our home, the noise of the transmission lines, and as a result of that failure, have left the impacted public and us vulnerable to the malfeasance of Idaho Power. The Council is responsible for the procedures used in contested cases and this request does meet the requirement of being under council jurisdiction.

Issue #2 Public Safety and Traffic Plan.

The information required to be submitted with our contested case is the same as that included in Contested Case Number One. We commented on this concern in my verbal comments made on June 20, 2019.

We are asking for a contested case due to the fact that the developer did not include in their site certificate as part of the development the use and changes required to use Hawthorne Dr. to access the road past my house. Modelaire Dr. and Hawthorne Dr. forms a bottle neck as it leaves Sunset. According to the developer's application, a 20 foot area is required by the state to make a turn with the large equipment they will be using. There is not 20 feet of clearance at the intersection.

The traffic to our housing project entrance (Sunset Dr. to Modelaire Dr. and Hawthorne Dr.) is a single entrance with absolutely no sidewalks, high bushes, two blind 90 degree corners with significant bike and foot traffic. This includes many kids going and coming from school. A count done in 2017 has 24 school kids that live in this area that must use this road entrance to and from school. This entrance is also at the base of a steep road as you turn either 90-degree corner. Sidewalks would be critical for safety due to the blind corners and steepness of the road. There is no other way in and out of this area. There are also elderly and other people that walk this hill for exercise on a regular basis. Major street improvements and sidewalks would be 100% necessary for safety. Because of the steep terrain and the design of the yards and landscapes, sidewalks alone will be very difficult. These issues are not addressed in the updated Proposed Order.

The way they addressed the traffic issue is very generic. No specifics were detailed, and the Traffic Plan is also so general how can anyone comment with "specific specificity" required by ODOE? This proposed route is going to use our road that literally passes within 25 feet in front of our house.

This proposed route is not only going to use-our road that literally passes within 25 feet in front of our house. It will also pass within 10 feet of a very expensive 565 ft. deep well that was drilled in 2002. This is a private road and generally has little traffic. There will be very heavy equipment using this road. The dirt and dust on our house and new wood log siding will be significant. They talk about dust debatement but who polices this when it is no longer effective? We are mostly concerned about potential damage to our well as essentially very heavy equipment will be driving right across the top of it. We are also concerned about nearby blasting damaging the well. The new power lines and the tensioning station would be approximately between 1000 and 1500 feet from our house and we could very well hear the noise from these. We will address noise specifically in Issue #4. Yet all of the issues above pose serious health and safety threats to our family and our neighbors. This industrial line is just too close to residential areas of our community and our home.

We are also requesting a contested case due to the fact that Idaho Power must test the amount and quality of water in wells near their development prior to starting any construction and monitor well quantity and quality post-construction of the transmission line (it will be assumed that the construction impacts were the cause of the well water changes), Idaho Power will pay for whatever actions are required to restore and repair the well including drilling a new well if that is required.

Issue #3 Historic and Cultural Resources.

The Oregon Trail enters our driveway (Hawthorne Dr.) at one of the sharp corners, that would need to be changed for large equipment to get around, at the lower end of the driveway. There are good ruts from the Oregon Trail wagons at this spot. There is a large post with a sign just installed into the ground by the Boy Scouts of America (BSA). The National Historic Oregon Trail leaves the driveway about 900 feet up from that spot at another sharp corner right in front of our house. The road may also need to have some work done here to accommodate large vehicles. There is also another sign, also just installed into the ground by the BSA, at this location.

The Oregon Trail through here is already walked often and has increased substantially over the past 15 years. We expect this traffic to increase even more with the installation of new signs and markings for the trail, as well as cooperation by the landowners allowing permission for people to walk the trail. We are under the understanding that the National Historic Oregon Trail is protected. There can be no mitigation for damages to the trail and the ruts. Once they are gone, they are gone forever.

Issue #4 Noise.

We briefly mentioned noise in my past testimony and letters, however after reviewing the Proposed Order, We have learned that ODOE is planning to have EFSC give a total variance to the State Department of Environmental Quality's Noise Standard. While this is obviously another public health and safety issue, we wanted to make it a stand-alone issue as well in the contested case. In addition, we may not have commented on the issue of noise with "specific specificity" in my DPO comments. However we believe that due to the significant changes in the Proposed Order, i.e.: allowing a variance to the noise standard for everyone living within ½ mile of the transmission line, that ORS 469.370 and OAR345-015-0016(3) allow me to comment now in this request for contested case.

We are specifically requesting a contested case regarding the noise variance due to the fact that Idaho Power's contractor used a sound measurement from a location that is nothing like our home to assign a baseline noise level to my property. We are confident that the noise level at my property is not similar to the "monitoring position - MP 11," near Hilgard State Park. That location is next to the interstate, the railroad, and the Grande Ronde River. I will be severely prejudiced if the developer is allowed to build a transmission line without providing an actual baseline monitoring results at our residence. If the development were built, there would be no way after the fact, to obtain an accurate noise level without the transmission line.

ORS 469.507 requires developers to monitor the environmental and ecological effects of construction and operation of the development. So far there has been no monitoring done, nor any offers to conduct monitoring, at my residence. This is also in violation with the DEQ rules, OARs Chapter 340.

Since the monitoring results from the site used to assign a noise measurement to our home was in no way similar to our location, Idaho Power must provide an actual measurement at our home in order to determine what the increase would be with the transmission line. Modeling is not documentation. It is a guess and the site certificate decisions need to be based on site- specific factual information. Therefore, we contest the fact that the variance cannot be granted until site-specific monitoring is conducted at our home.

Due to significant safety issues and the considerable impact to our health, safety, house, property, domestic well, and the Oregon Trail, this route should not be used. **The site certificate should be denied.**

From what we have learned, new power lines are no longer necessary. With technology and other energy sources available, the existing lines could be easily upgraded and would have far less impact on safety, environment issues, and negative impact on landowners.

Sincerely,

Joe Horst & Anna Cavinato
86 Hawthorne DR.
La Grande, OR. 97850
Phone:
WK. 541-975-2000
Cell 541-975-4500

TARDAEWETHER Kellen * ODOE

From: WHITAKER Monica A * OED
Sent: Thursday, September 3, 2020 11:10 AM
To: TARDAEWETHER Kellen * ODOE
Subject: FW: Regarding: Notice of Proposed Order and Contested Case Proceeding for B2H
Attachments: PHowell B2H PO Objection EDITED.pdf; vertical map of all union county routes.pdf; comments2020-07-01-B2H-PO-Attachment-B5-NoMaps.pdf; C2020-07-01-B2H-PO-Attachment-X5 (1).pdf

Kellen,

Here is the petition and the attachments our office received from the Howells.

Monica

Monica A. Whitaker
Presiding Administrative Law Judge
Office of Administrative Hearings
7995 SW Mohawk St.
Tualatin, OR 97062
Office: (503) 612-4300
Cell: (971) 720-0251
Fax: (503) 612-4340

From: Jane Howell <d.janehowell@gmail.com>
Sent: Wednesday, August 26, 2020 5:28 PM
To: OED_OAH_REFERRAL * OED <REFERRAL.OED_OAH_REFERRAL@oregon.gov>
Subject: Regarding: Notice of Proposed Order and Contested Case Proceeding for B2H

My name is Jane Howell and my husband Jim, and I, are contesting Idaho Power's application for Site Certification for B2H.

We live at 482 Modelaire Drive in La Grande and we are contesting Idaho Power's site certification because they did not address our concerns pertaining to the letter that we wrote on August 18, 2019 concerning mapping. We have attached our objection letter and three other attachments to this email.

Attached files_ phowell B2H PO Objection Edited .pdf map of union county routes pdf Comments 2020-07-01-B2H PO-Attachment-B5..Pdf C 2020-07-01-B2H PO-Attachment-X5 (1).pdf

Please email us at this address and let us know that you have received all of our documents and that you are preparing them for review byAlison Greene-Webster, Senior Administrative Law Judge.

Kindest regards,

Jane and Jim Howell

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St N.E.
Salem, OR. 97301
OED-OAH-Referral@orgon.gov
stopb2h.@gnail.com
Kellen.tardaewether@oregon.gov

August 17, 2020

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Power Line Project

Regarding: Notice of Proposed Order and Contested Case Proceeding

Dear Alison Greene-Webster:

We are Jane and Jim Howell, we are property owners at 482 Modelaire Drive, in La Grande, we have commented nearly many times in writing concerning the Boardman to Hemingway (B2H) power line proposed by Idaho Power. We are filing as a party, and are not represented by any attorney. We live within 500-feet of the proposed Mill Creek access road either listed as Modelaire Drive or Hawthorne Drive or Hawthorne Lane or Modelaire/Hawthorne Loop depending on Idaho Power's document. Unfortunately, we are also within the "noise sensitive" ½ mile radius of the proposed Mill Creek Pulling and Tensioning Site as well. Although others may be filing contested cases on the same issues, they are not able to represent our personal interests.

Idaho Power's proposal to use Modelaire and Hawthorne as their proposed access for the B2H power transmission project would be devastating to our neighborhood. We are very concerned for the safety of our neighborhood and the structural damage that the heavy equipment will do to our homes and roads. Our roads are nearly fifty-years old and they were not built for the logging trucks that Idaho Power wants to use to clear the forest or to carry the industrial size equipment to build and maintain the proposed power transmission lines. Hawthorne is too steep, too narrow and too geologically unstable to be the access road for Idaho Powers' proposed project.

When we moved to our 34 home neighborhood adjacent to Grande Ronde Regional Hospital (GRRH), just off Sunset Drive, seven years ago, we had never heard of the B2H project. Idaho Power's plans to use Modelaire and Hawthorne as the main access road are not safe; Modelaire is the only road in and out of our neighborhood. It is within a block

and a half of Central Elementary, La Grande High School, the community play ground, and sports complex. Not to mention all of the people who work at these facilities and the hospital. Most importantly, it is next to Grande Ronde Regional Hospital. Idaho Power's proposed route threatens the safety of our neighborhood and the people who live in the region because Grande Ronde Regional Hospital is the only regional hospital in Union or Wallowa counties.

We personally are traumatized by the proposed access plan to the B2H power line in La Grande because we regularly need to use the hospital due to Jim's advanced Parkinson's. Jim falls at least five times a week and sometimes five times a day. He has monthly and sometimes weekly swelling in his throat that causes his air passage to block. He also gets dehydrated because he cannot keep enough fluid in his system due to his excess saliva, esophagus closures and regurgitation. In the last three months Jim has been admitted into GRRH's Emergency Room five times. This month Jim was taken to the hospital in an ambulance because I could not get him into the car to take him to the hospital. How are we going to deal with Jim's need for urgent medical care with the expected road closures that Idaho Power is proposing for the only road in and out of our neighborhood? For that matter how will anyone in the neighborhood deal with any emergency situation?

Last winter, our daughter Vangie passed away. At 66 and 72 we are the sole care takers of our Grandson Austin. Austin was diagnosed with Autism when he was three and he has lived with us since he was eight. He is 22 years old now and he recently received his Notice of Eligibility from disability services stating "…Autism that originated in the developmental years, is likely to continue and significantly impact your adaptive behavior as defined in OAR 411-320-0020 and 411-320-0080…" Austin is a very innocent and kind young man who is sensitive to strangers, loud noises and traffic noise. He does not drive so he walks everywhere he goes. He wears headphones and listens to music and dances to block out traffic noise already, turning up the music to drown out B2H's construction noise will put Austin at risk of physical injury. The noise from the blasting of Hawthorne, heavy duty equipment and the Mill Creek Pulling and Tensioning Site will make it difficult for Austin to navigate his small world even in his own home. We do not believe that he will be able to handle all of challenges that Idaho Power proposes for our neighborhood. We believe that the proposed B2H project will jeopardize Austin's safety and his mental health.

When we learned that Idaho Power planned to use our quiet neighborhood as the access road for the B2H power line my own health started to decline. We were forced to educate ourselves by reading hundreds of pages of information from websites and the single copy of B2H's 15+ years' of applications and amendments held at La Grande's public library. As former Arts Administrators and Music Educators we were ill prepared to take on Idaho Power's ability to manipulate the system by neglecting to provide the necessary mapping information we needed to understand their proposed B2H project.

When I realized that Idaho Power, a for profit company, was most likely going to be able to take land without paying for it, ruin people's homes and livelihoods, destroy the environment, and jeopardize the health and well being of everyone in my home and community my body couldn't take it. I felt helpless and developed Rheumatiod Arthritis. I just can't accept the fact that corporate profits trump the well being of people, the land and the millions of species we share this plant with so my body decided to attack itself.

Please forgive any mistakes enclosed in our attempt to provide information that seems valid concerning our perceptions that Idaho Power has not lived up to their legal responsibilities under Oregon law as we understand them. We are attempting to demonstrate that the Proposed Order for Idaho's Power B2H project did not adequately address the comments we originally filed on August 19, 2019 pertaining to OAR 345-021-0010(1)(x)(E)) (notification) and OAR 345-001-0010(55) (mapping).

We live within 294 feet of the site boundary for the Mill Creek Pulling and Tensioning Site. We should have received information from Idaho Power regarding their violation of the ½ mile noise EPA pollution area. We also live within 500-feet of the proposed Mill Creek access road. We have never received any correspondence from Idaho Power as required by the state of Oregon. Our names do not appear on any of the lists that Idaho Power has provided in their applications. We believe that this is a violation of OAR 345-021-0010(1)(x)(E)).

The Proposed Order did not address our questions concern mapping. This is at the core of our contested case that Idaho Powers' proposed B2H power line project violated the following OAR 345-001-0010(55) mapping requirements:

I. "Maps shall provide enough information for property owners potentially affected by the facility to determine whether their property is within or adjacent to the site boundary." Idaho Power did not provide enough information for property owners to determine if their property was adjacent or within the site boundary. We had to spend hours researching documents and websites.
II. "Major roads shall be named. IPC shall include maps drawn to a scale of 1 inch = 2,000 feet or smaller when necessary to show detail." Idaho Power did not name the roads and the maps are not drawn to the required scale.
III. "Maps shall clearly show the boundaries of the proposed corridor within which the transmission line would be constructed, and shall include familiar landmarks such as roads and existing power lines that reviewing agencies and affected

landowners may use to identify the proposed route." Idaho Power's maps do not include landmarks such as roads.

IV. "The site boundaries of all proposed related or supporting facilities, including but not limited to access roads, temporary laydown areas, switching stations/substations, must also be identified." Idaho Power did not identify the boundaries of all the proposed related supporting facilities.

V. "Maps showing access roads included as related or supporting facilities shall clearly depict where existing roads or road segments are proposed to be in the site boundary." Idaho Power did not provide the information above on the access roads maps.

Near La Grande the maps provided by Idaho Power in Attachment B-5 Road Classification Guide and Access Control do not name the roads to or from Multiple Use Areas and Pulling and Tensioning Sites to the Access Roads. The maps provided in the application do not clearly depict existing roads or road segments. Therefore the B2H application maps lack the detail that is required by the state of Oregon because the maps do not show the names of the streets. Without detailed maps property owners and the general public cannot tell how they will be directly affected by the B2H project.

Examples: of incorrect or deceptive information presented by Idaho Power during their application process pertaining to the proposed access road in La Grande.

- "Impacts from temporary road closures and construction activities are not anticipated to affect local communities because project activities involving short-term road closures will occur in remote areas, away from housing and other developments." The Modelaire neighborhood is a housing development. The maps provided by Idaho Power do not have enough detail for property owners to see which roads in their neighborhoods will be used by Idaho Power. Google Maps clearly shows that the proposed B2H construction will be happening on surface roads in multiple neighborhoods in La Grande.
- "Surface streets within the city of La Grande may need to be used during construction to access portions of the project'. Nowhere in the application are the streets listed that will be used in La Grande. Nor does it list the un-named streets that will be used to maintain the power line after the proposed project is completed.
- <u>The only roads listed for La Grande are Foothill Road and city of La Grande surface streets.</u> The proposal omits the names of the surface streets that will be used to get

from the Multiple Use Area (the staging area) where everything for the project will be dropped off, and stored for the project before it is trucked to the B2H access road.

- Idaho Powers maps only provide colored lines with names like "Proposed Route" with no names of the streets. To figure out what streets Idaho Power was planning to use to get from the Multiple Use Area on Foothill Drive to Hawthorn Drive the B2H access road we had to take the time to figure out that the "red line" denoting the route on the map requires a person to drive from Foothill Drive, and then turn left onto Gekeler Lane, you cannot get to Modelaire without driving on Sunset Drive so you must turn right on Sunset Drive, and then turn left onto Modelaire Drive, and then right onto Hawthorne Drive. How many people will take the time to figure that out?
- If Idaho Power chooses Hawthorne as the B2H access road, every piece of equipment needed for Idaho Power's proposed transmission line in the La Grande region will occur in neighborhoods in housing developments in the city of La Grande. Is this not in direct conflict with the opening statement that the project activities involving short-term road closures will occur in remote areas, away from housing and other developments"?

Another detail that is not clearly evident due to Idaho Power's disregard for not naming roads and identifying routes is that the public cannot see that <u>emergency responders use the same route from Gekeler to Sunset to get to the Grande Ronde Regional Hospital.</u>

Additionally, the public and home owners cannot see that you cannot get to the proposed access road on Hawthorne without traveling on Sunset Drive where five integral community buildings and facilities are located. Idaho Power states that "Project traffic generated during construction is not anticipated to cause notable congestion or otherwise impact local communities". This statement is simply not true.

<u>List of Integral Community buildings and facilities on Sunset Drive within a block and a half ot the proposed access road on Hawthorne:</u>

1. Grande Ronde Regional Hospital- Emergency Rooms, Ambulances, Surgery Center, Heliport, and Regional Medical Clinics.

2. La Grande High School- Student and parent drivers, buses, school district sports events, tennis courts, track events, musicals, plays, concerts, summer school and other extra-curricular activities.

3. Central Elementary- Young children, car pools, parent drivers, busses, volunteers and after school programs.

4. Community Sports Complex- After school soccer, T-Ball, track and field, and little league seasonal sports.

5. Community Play Ground- Gathering place from toddlers to teens to play. Play structures and basketball hoops.

Idaho Power's application states that "Construction of the new transmission line is anticipated to last at least 36 months, with multiple construction crews working simultaneously and that construction will generally occur between 7 a.m. and 7 p.m., Monday through Saturday" it is impossible to believe that there will not be "notable congestion" within many La Grande neighborhoods. This "notable congestion" has the potential to take the lives of people who are in emergency vehicles or in personal cars on route to the regional hospital.

Other obvious liability risks that Idaho Power avoided by not identifying the roads they plan to use in La Grande follow:

It is unlikely that elementary children will be able to navigate the traffic and the construction on their way to and from school and the play ground. High school and elderly drivers are NOT known for their ability to drive well under pressure. Due to the lack of detailed maps with names of roads and landmarks you cannot see that the entrance for Grande Ronde Retirement, a 115 unit apartment and assisted living complex, is on Gekeler. The congestion and the traffic of the B2H project will put both teenagers and elderly drivers in dangerous situations. Every piece of equipment stored at the staging facility on Foothill Drive on its way to the proposed B2H access roads will have to navigate the entrance to the retirement complex and high school and elementary traffic.

Both the alternate and the proposed B2H access routes use Gekeler Lane to get to the B2H access roads. The proposed Mill Creek route is; Foothill, to Gekeler, to Sunset, to Modelaire, to Hawthorne AND the alternate Morgan Lake access route is; Foothill, to Gekeler, to Morgan Lake Rd. Idaho Power's proposed access roads are in neighborhoods in La Grande, this fact puts us all at risk because any reasonable person can determine that Idaho Power is creating potentially dangerous situations subject to liability suits for everyone involved.

The biggest potential liability for Idaho Power and the state of Oregon should they approve Idaho's contested B2H power transmission line, are fires. Try to imagine what would happen if La Grande had a fire in the foot hills behind the hospital during the blasting of the 21 to 70% remake of Hawthorne. The proposed blasting on Hawthorne is in the last bit of forest that surrounds all the homes and the hospital in the west hills of La Grande. This forest clearly delineates where the last fire in the foothills of La Grande stopped. If there is another fire on Hawthorne the fuel for this fire will be this small strip of forest, our homes, and the hospital. How will families get out of our neighborhood with all of the emergency vehicles and fire trucks using the only exit in and out of our neighborhood? Can you imagine how Sunset Drive (a 24 ft road) could handle all of the traffic from the evacuation of the hospital, schools and the surrounding neighborhoods?

Idaho Power's application for the Boardman to Hemingway Power Transmission line contains multiple and obvious mapping inaccuracies. Idaho Power did not identify all the roads or provide maps that comply with OAR 345-001-0010(55) near La Grande. Idaho Power omitted the names of the streets that they are planning on using to get to the access roads which made it difficult to discover the potential safety issues that should have been identified long ago by the Oregon Department of Energy.

Rather than answering our concerns about (mapping) issues in the Draft Proposed Order, Idaho Power chose to provide more maps that do not comply with OAR 345-001-0010(55) in their Proposed Order. We are also attaching new maps from the Proposed Order that clearly shows that Idaho Power is still using deceptive mapping strategies. Most importantly, we are submitting examples of maps that show that Idaho Power has moved the Proposed Access Route (red line) from Foothill-Gekeler-Sunset-Modelaire-Hawthorne to a new location near Bushnell Rd. in the maps they provided in the Proposed Order.

On pages 28 and 29 of the Proposed Order (7/2/2020) in the new Proposed Facility Routes and Components, the written descriptions in lines 4-19 do not match the maps provided in Attachment X-1: Noise Sensitive Receptors in Union County. If you study the map *B2H Routes Considered in Union County,* it appears that Idaho Power has switched the names of their proposed access roads to different locations on this map. The previously preferred Mill Creek Route is now named the alternate Morgan Lake Route and the previously named BLM FEIS Preferred Route is now the alternate Morgan Lake Route.

Maps 14, 15 and the map on page 20 in Attachment X-1 in the Proposed Order do not match the proposed power line access routes in Idaho Powers Site Application. The

preferred previously proposed Mill Creek access road no longer goes from Foothill Rd. to Hawthorn Drive. We need to point out that the only way we could draw these conclusions is because we found copies of two maps that identify Foothill and Glass Hill roads. The lack of detailed mapping allowed Idaho Power to switch their proposed access roads leaving all of the property owners and the general public wondering where is Idaho Power really planning to build the B2H access road near La Grande?

Kellen Tardaewether, the Senior Analyst for the Oregon Department of Energy (ODE), gave a power point presentation in the first public meeting in La Grande about how the Idaho Power application to the Department of Energy was going to work. During her power point presentation Kellen discussed with the attendees of the meeting that Idaho Power selected to have ODE approve both the Proposed and Alternate B2H access routes or none of the access routes. Kellen explained that Idaho Power was playing for all or nothing. She said if one of the access routes was not approved that the site certificate would be denied. Idaho Power has continually ignored the mapping requirements defined by the state of Oregon. It is clear that Idaho Power's new B2H access maps in the Proposed Order are blatantly fraudulent and the site certificate should be unquestionably denied.

Idaho Power is clearly in violation of the attached OAR 245-21-0010(1) (c) Site Certificate Application Requirements described in the Boardman to Hemingway Transmission Line Project Application for Site Certificate in Exhibit C. Idaho Power has continually produced maps that did not comply with the conditions and specifications that the Oregon Department of Energy required. They asked for and received an all or nothing agreement concerning the B2H project's access roads and they apparently moved the access road in La Grande to another location which clearly violates their request to approve the alternate and the proposed access roads in Union County. Therefore we believe that Idaho Power's application for the Boardman to Hemingway transmission project should be denied due to the fact that Idaho Power did not meet the requirements of the Oregon Department of Energy site certification.

Thank you for your time, your wisdom and your knowledge,

Kindest regards,

Jane and Jim Howell

Please see comments from Jane on maps 14 and the last two maps on page 19 and 20 of Exhibit X.

ATTACHMENT X-5
AERIAL MAPS SHOWING NOISE SENSITIVE RECEPTORS PREDICTED TO EXCEED AMBIENT DEGRADATION STANDARD

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2	B2HAPP Attachment NSR Map	3
	B2HAPPDoc3-58 ASC Exhibit X - Errata Info 2019-03-28	45
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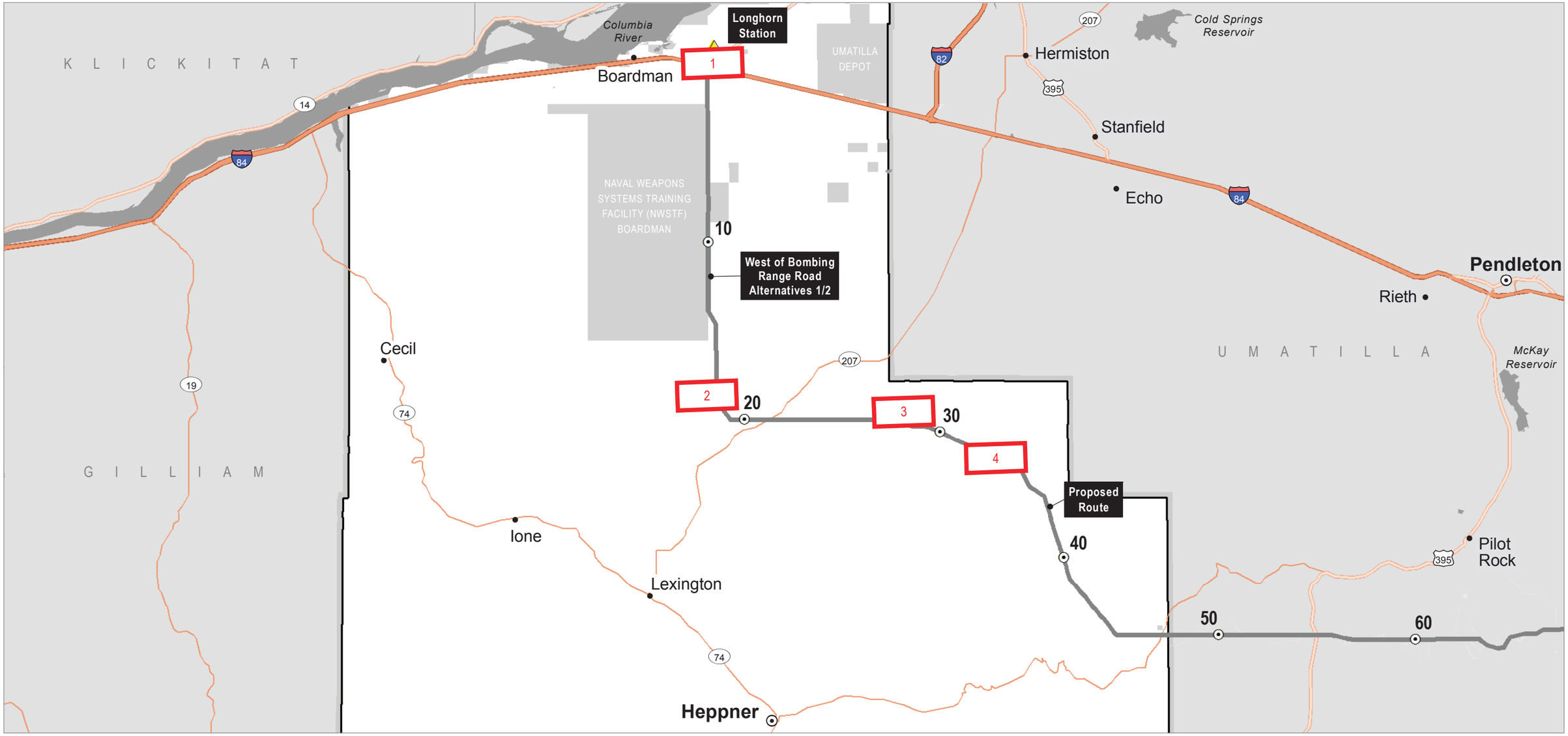

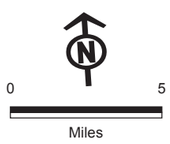

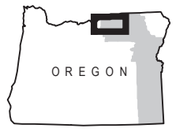

Map Area

Source(s): BLM, IPC, Esri

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Application for Site Certificate

IDAHO POWER
An IDACORP Company

Attachment X-1
Noise Sensitive Receptors

Morrow County

Map Index

0 1,000
Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Bureau of Land Management
- Bureau of Reclamation
- Private

Other Features
- 100-foot Contours
- Existing Transmission Lines
- Interstate
- Highway
- Road
- Railroad
- Stream

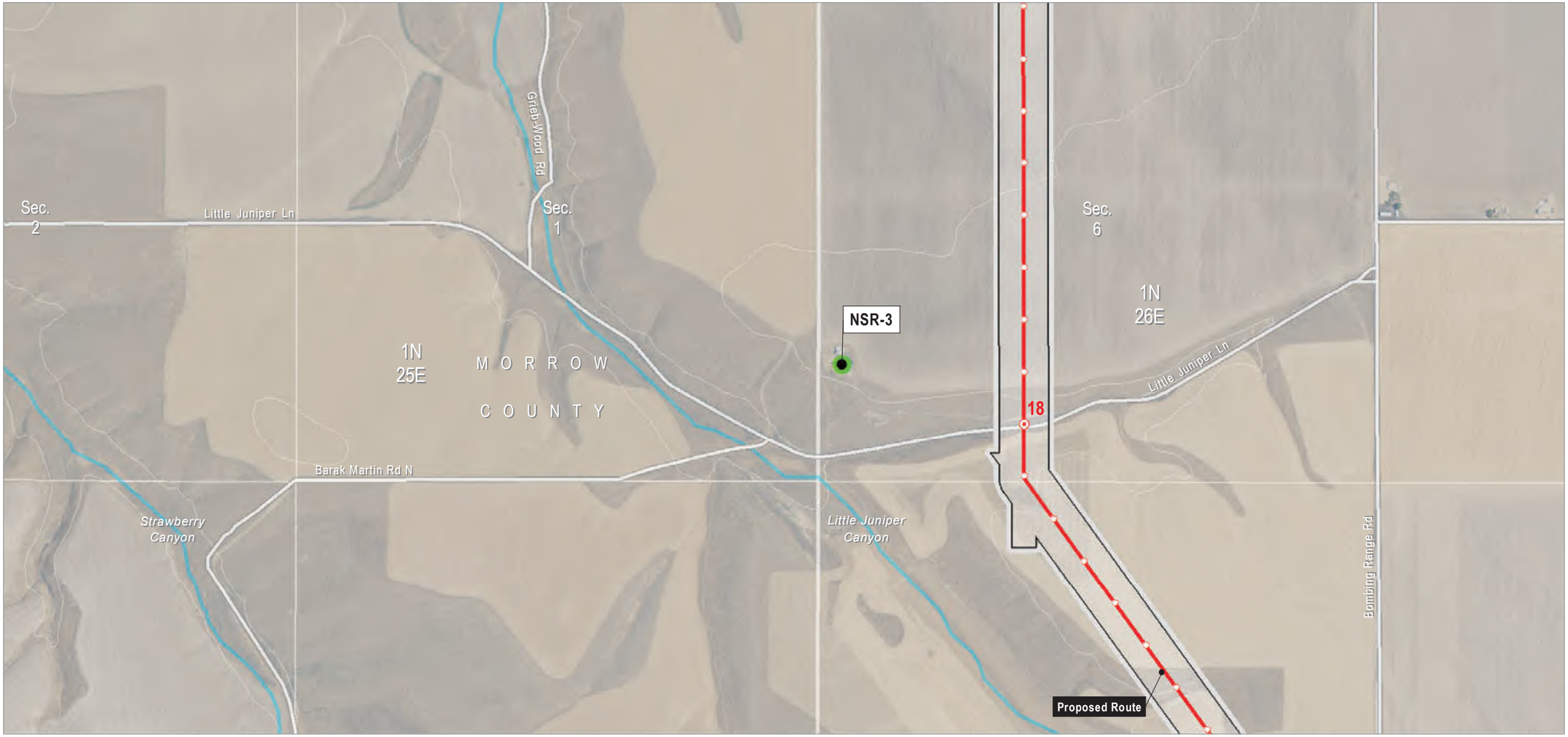
Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
An IDACORP Company

Attachment X-1
Noise Sensitive Receptors

Morrow County

Map 1



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Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Private

Other Features
- 100-foot Contours
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

Attachment X-1
Noise Sensitive Receptors

Morrow County

Map 2

0 1,000
Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Private

Other Features
- 100-foot Contours
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

Attachment X-1
Noise Sensitive Receptors

Morrow County

Map 3

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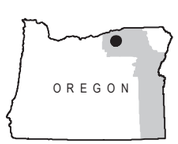
Feet



Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Private

Other Features
- 100-foot Contours
- Road
- Stream

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IDAHO POWER
An IDACORP Company

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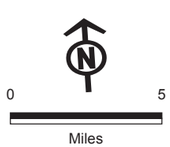
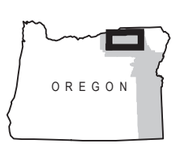
Morrow County

Map 4

Hermiston
Cold Springs Reservoir
Stanfield
Echo
Pendleton
Rieth
McKay Reservoir
UMATILLA RESERVATION
UMATILLA NAT'L FOREST
M O R R O W
U N I O N
Pilot Rock
30
40
70
90
100
5
6
7
8
9
10
Proposed Route
Heppner
Hilgard
Island City
La Grande
84
11
204
207
74
395
82
237
244





Map Area

Source(s): BLM, IPC, Esri

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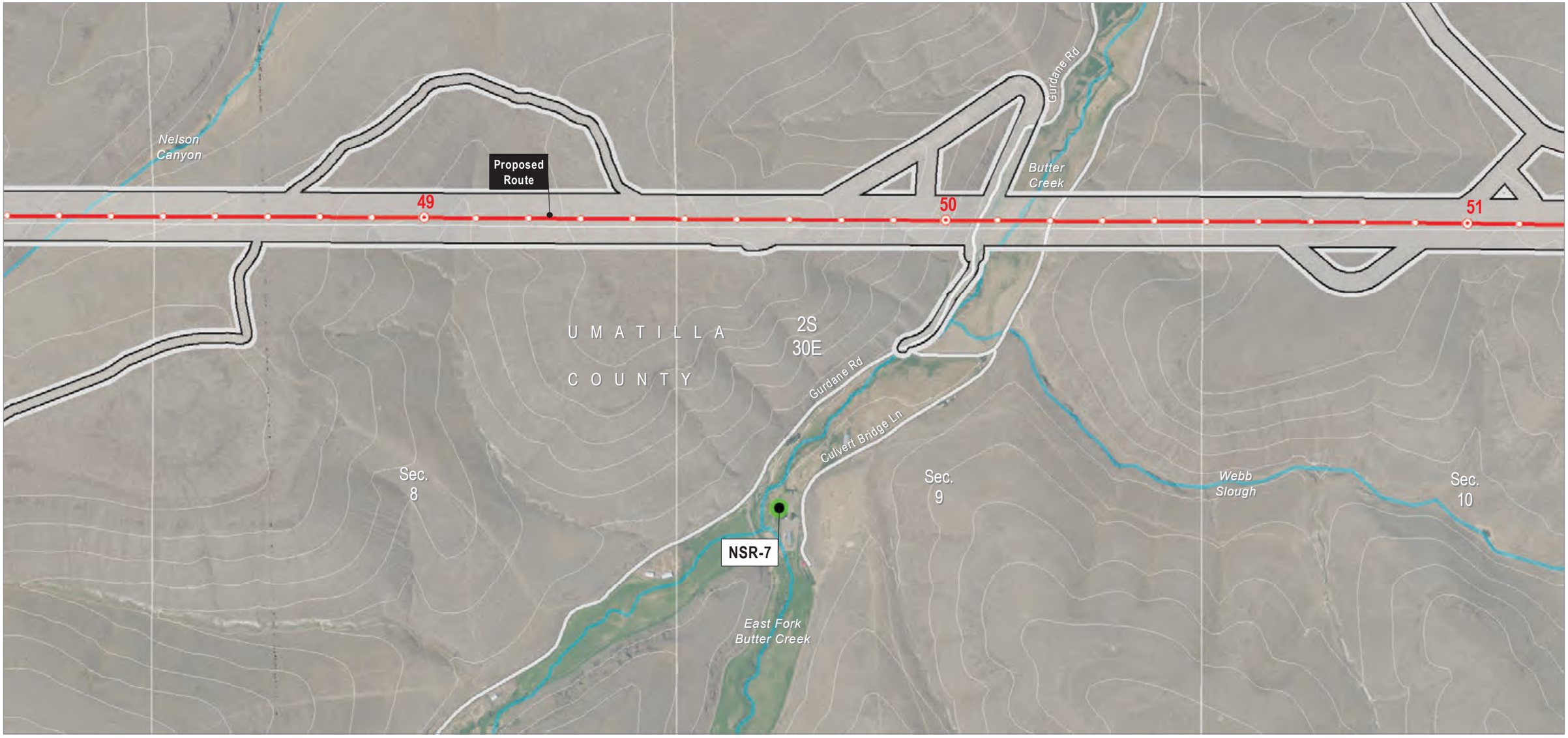

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Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Private

Other Features
- 100-foot Contours
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

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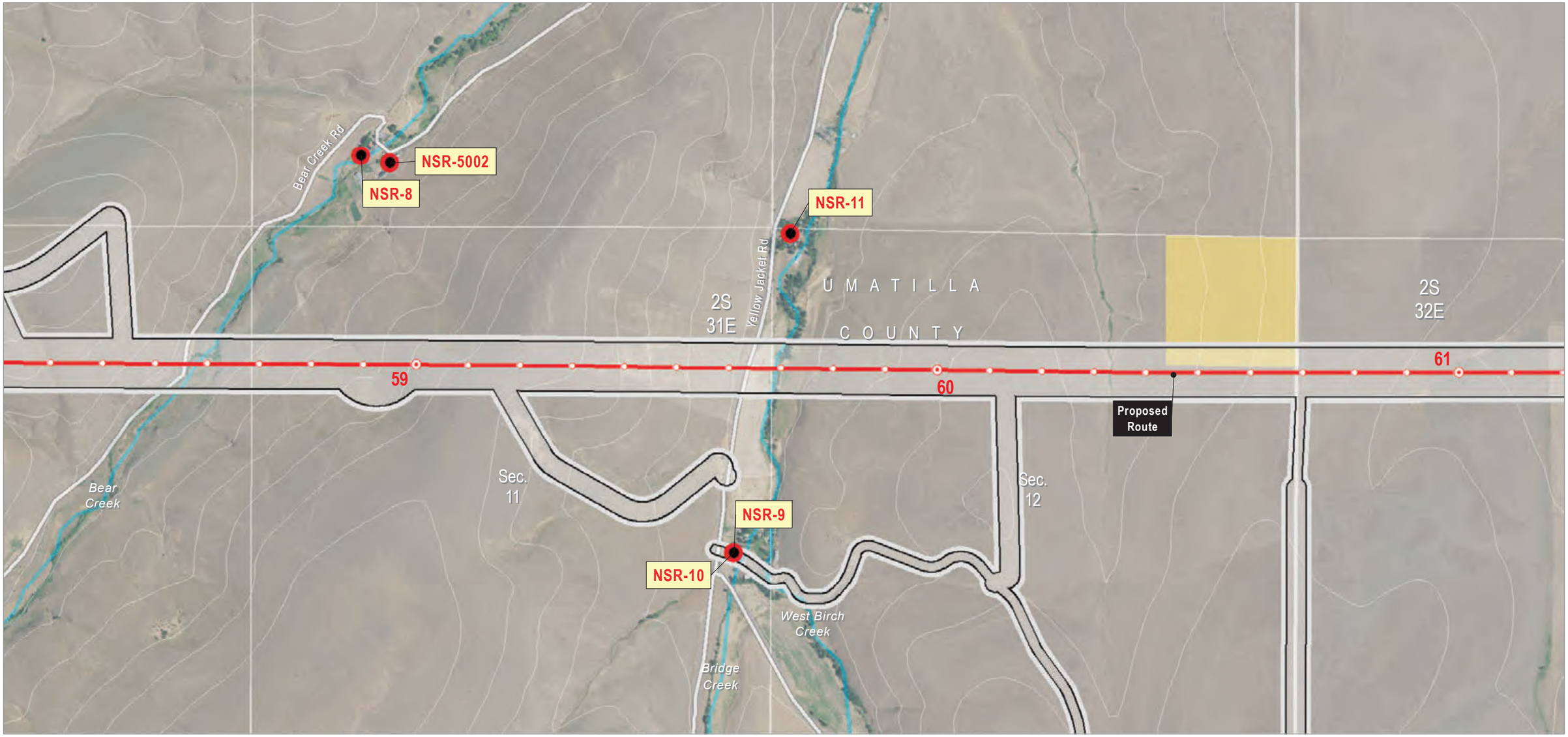
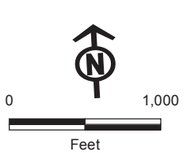
Noise Sensitive Receptors

Umatilla County

Map 5





Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- Predicted Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Bureau of Land Management
- Private

Other Features
- 100-foot Contours
- Road
- Stream

Boardman to Hemingway Transmission Line Project
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Noise Sensitive Receptors

Umatilla County

Map 6

East Birch Creek
NSR-12
NSR-13
E Birch Creek Rd
Sec. 10
NSR-14
64
California Gulch
65
Proposed Route
66
67
2S 32E
Sec. 11
U M A T I L L A
C O U N T Y
Sec. 12
2S 33E
NSR-16
NSR-15
East Birch Creek
E Birch Creek Rd
East Birch Creek

0 1,000
Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Private

Other Features
- 100-foot Contours
- Road
- Stream

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Application for Site Certificate

IDAHO POWER
An IDACORP Company

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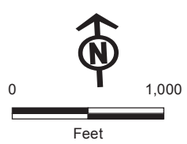
Umatilla County

Map 7



Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Private

Other Features
- 100-foot Contours
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

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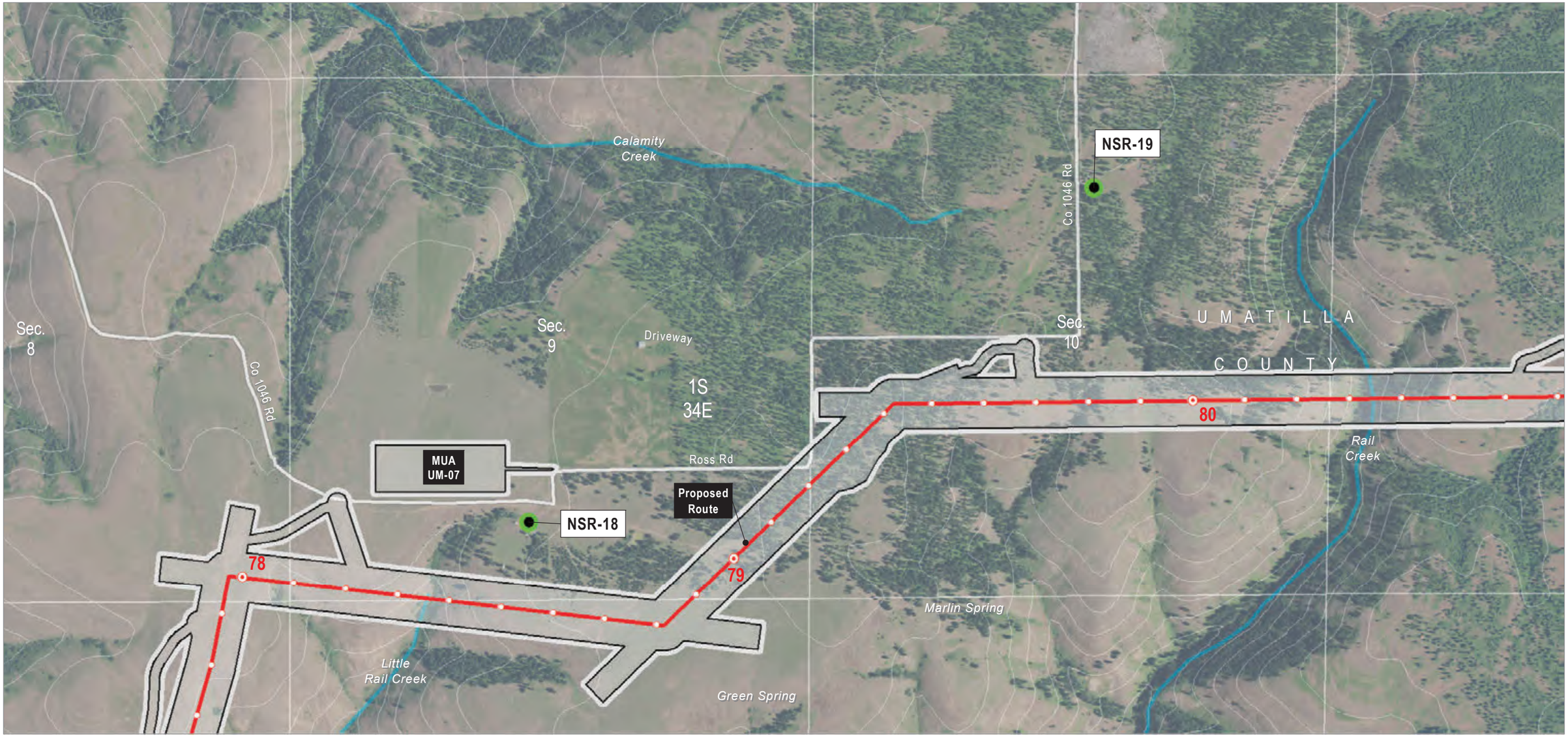
Noise Sensitive Receptors

Umatilla County

Map 8



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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Private

Other Features
- 100-foot Contours
- Road
- Stream

Boardman to Hemingway Transmission Line Project
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Map 9

0 1,000
Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Indian Reservation
- Private

Other Features
- 100-foot Contours
- Road
- Stream

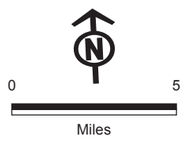
Boardman to Hemingway Transmission Line Project
Application for Site Certificate

Attachment X-1
Noise Sensitive Receptors

Umatilla County

Map 10

70
Proposed Route
U M A T I L L A
11
12
Proposed Route
Hilgard
WALLOWA-WHITMAN NAT'L FOREST
13
100
84
Island City
La Grande
82
Conley Lake
237
W A L L O W A
14
15
110
244
Morgan Lake Alternative
10
16
17
U N I O N
Union
WALLOWA-WHITMAN NAT'L FOREST
18
120
19
203
237
WALLOWA-WHITMAN NAT'L FOREST
Shaw Reservoir
20
Telocaset
North Powder
130
Thief Valley Reservoir
B A K E R
84
Gover Reservoir



Map Area

Source(s): BLM, IPC, Esri

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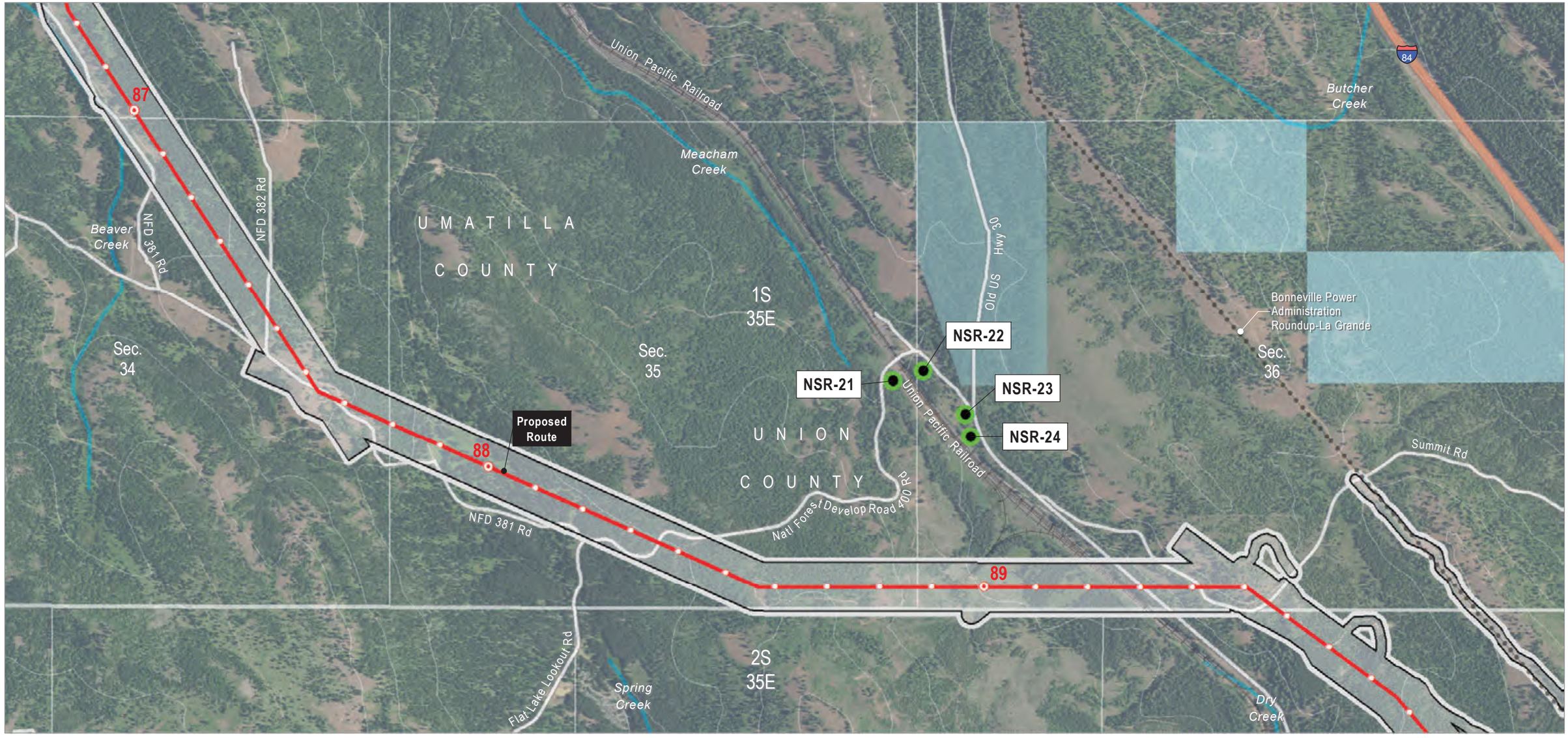
Union County

Map Index



0 1,000
Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Forest Service
- Private
- State or Local
- State or Local Parks and Recreation or Wildlife

Other Features
- 100-foot Contours
- Existing Transmission Lines
- Interstate
- Road
- Railroad
- Stream

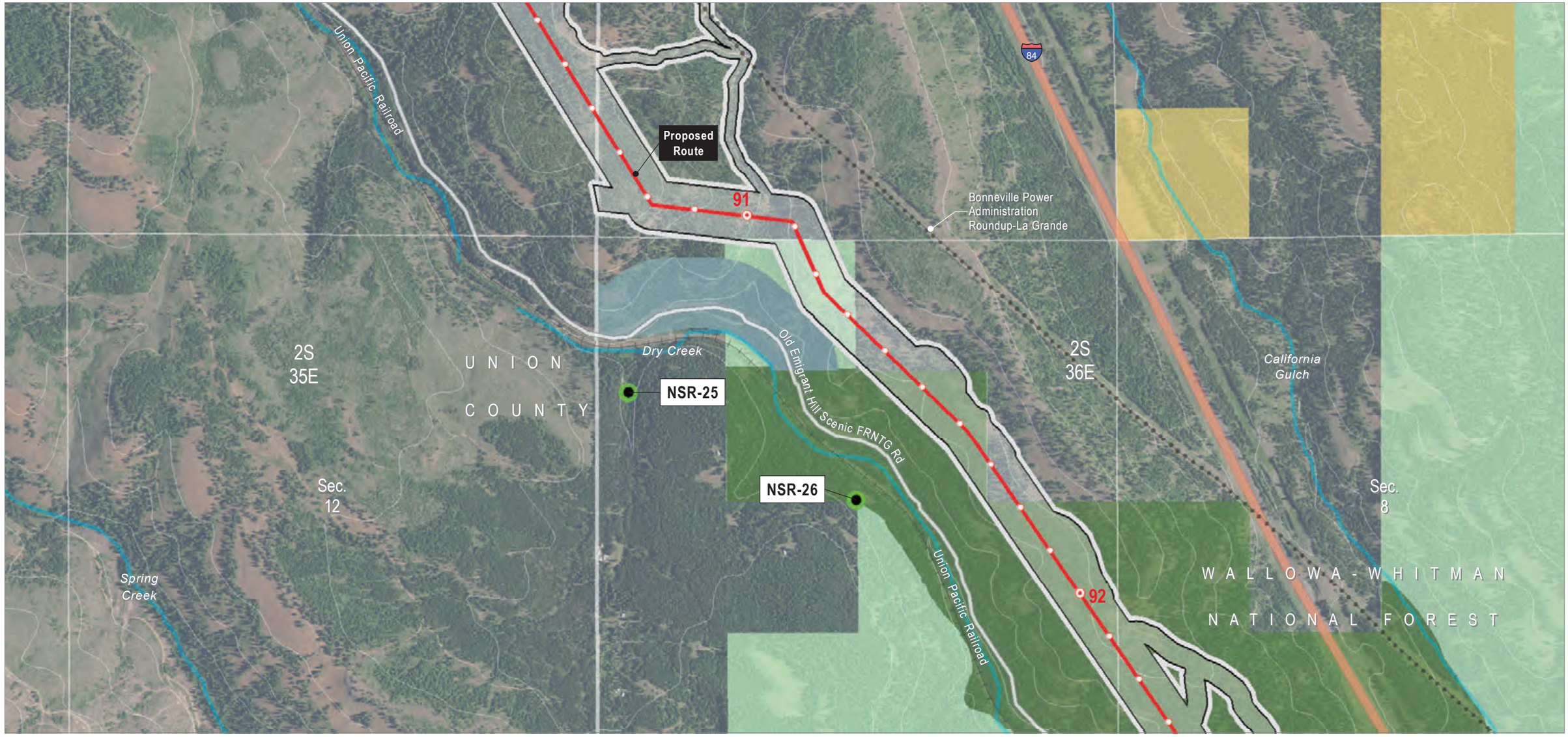
Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
An IDACORP Company

Attachment X-1
Noise Sensitive Receptors

Union County

Map 11



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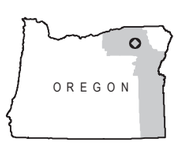

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Bureau of Land Management
- Forest Service
- Private
- State or Local Parks and Recreation or Wildlife

Other Features
- 100-foot Contours
- Existing Transmission Lines
- Interstate
- Road
- Railroad
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
An IDACORP Company

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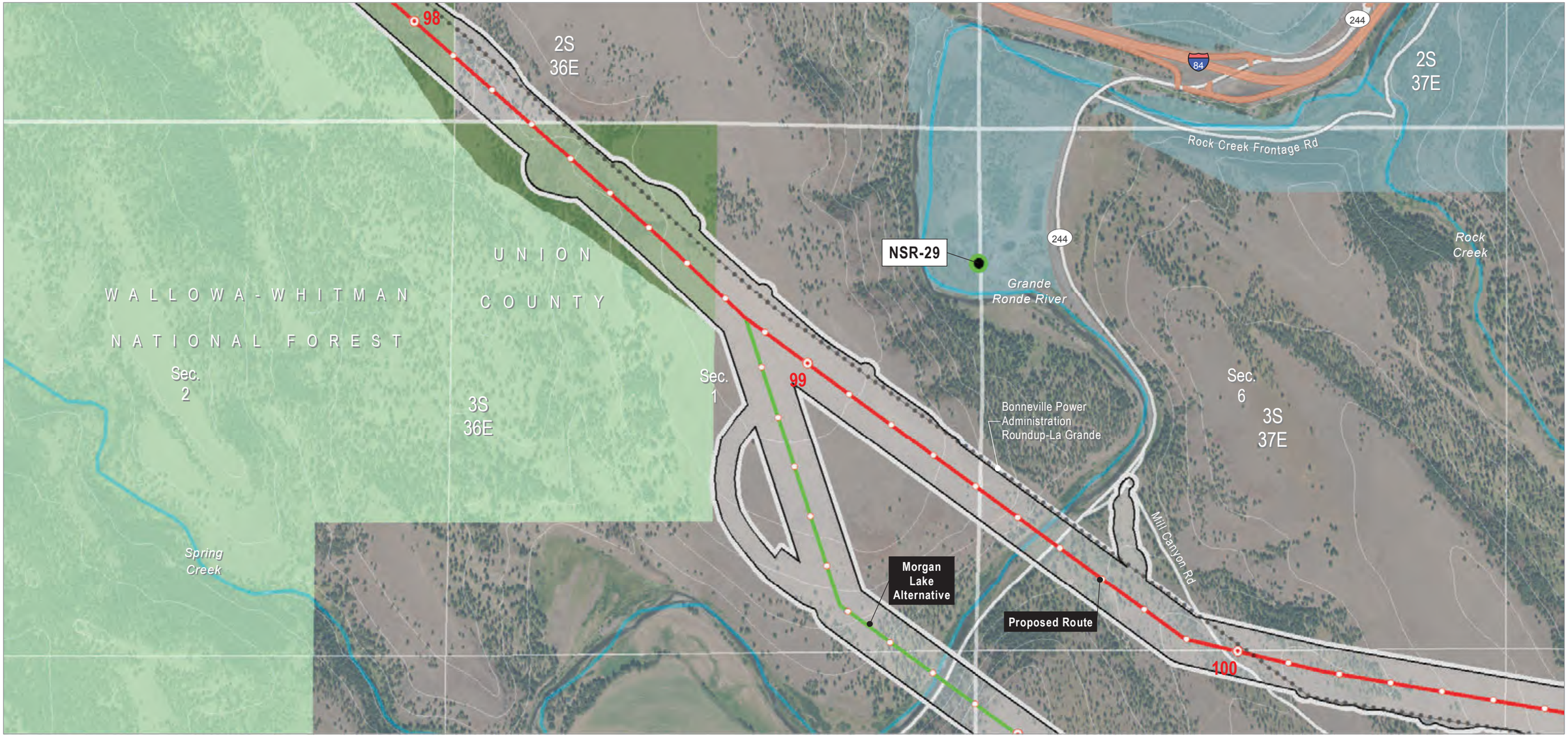
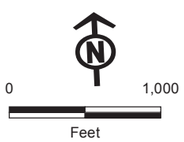
Noise Sensitive Receptors

Union County

Map 12





Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline
- Alternative

Mileposts
- Mile
- Tenth-mile

Land Status
- Forest Service
- Private
- State or Local Parks and Recreation or Wildlife

Other Features
- 100-foot Contours
- Existing Transmission Lines
- Interstate
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

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Union County

Map 13

Please note above that the Proposed Route no longer goes over to the Modelaire/ Hawthorne Loop in La Grande. See the red circle at the top of the screen in La Grande

Map Area

OREGON

0 1,000 Feet

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline
- Alternative

Mileposts
- Mile
- Tenth-mile

Land Status
- Private

Other Features
- 100-foot Contours
- Existing Transmission Lines
- Road
- Stream
- City Limits

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Union County

Map 14

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- Predicted Exceedance
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline
- Alternative

Mileposts
- Mile
- Tenth-mile

Land Status
- Private

Other Features
- 100-foot Contours
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
An IDACORP Company

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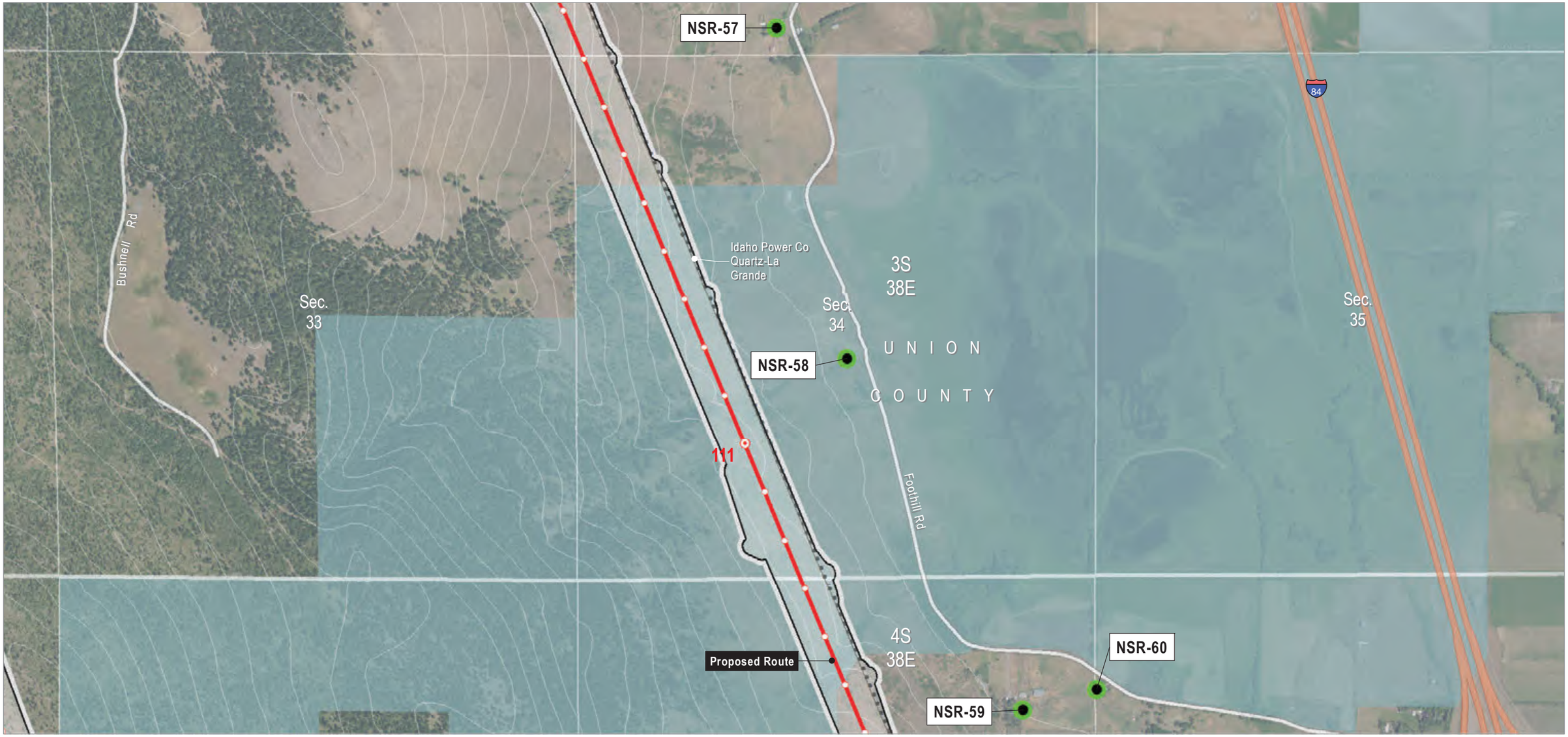
Noise Sensitive Receptors

Union County

Map 15



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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Private
- State or Local Parks and Recreation or Wildlife

Other Features
- 100-foot Contours
- Existing Transmission Lines
- Interstate
- Road

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
An IDACORP Company

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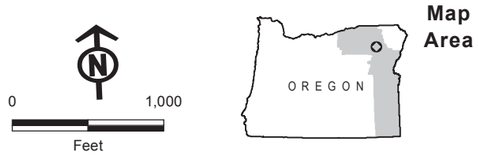
Noise Sensitive Receptors

Union County

Map 16



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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline
- Alternative

Mileposts
- Mile
- Tenth-mile

Land Status
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Other Features
- 100-foot Contours
- Existing Transmission Lines
- Interstate
- Road

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
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Union County

Map 17

0 1,000 Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline
- Alternative

Mileposts
- Mile
- Tenth-mile

Land Status
- Forest Service
- Private

Other Features
- 100-foot Contours
- Existing Transmission Lines
- Interstate
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
An IDACORP Company

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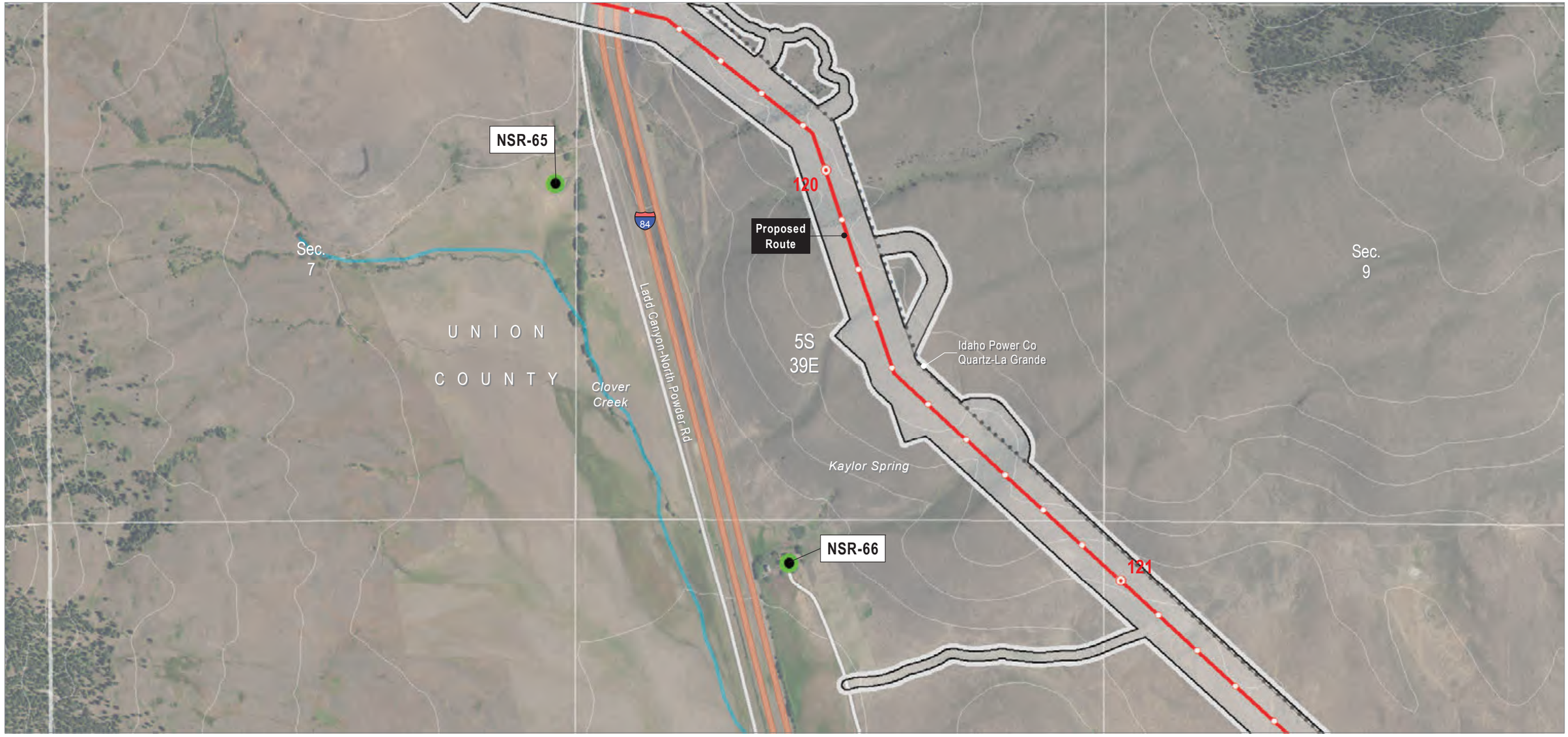
Union County

Map 18



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Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Private

Other Features
- 100-foot Contours
- Existing Transmission Lines
- Interstate
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
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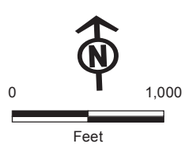
Union County

Map 19



Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Private

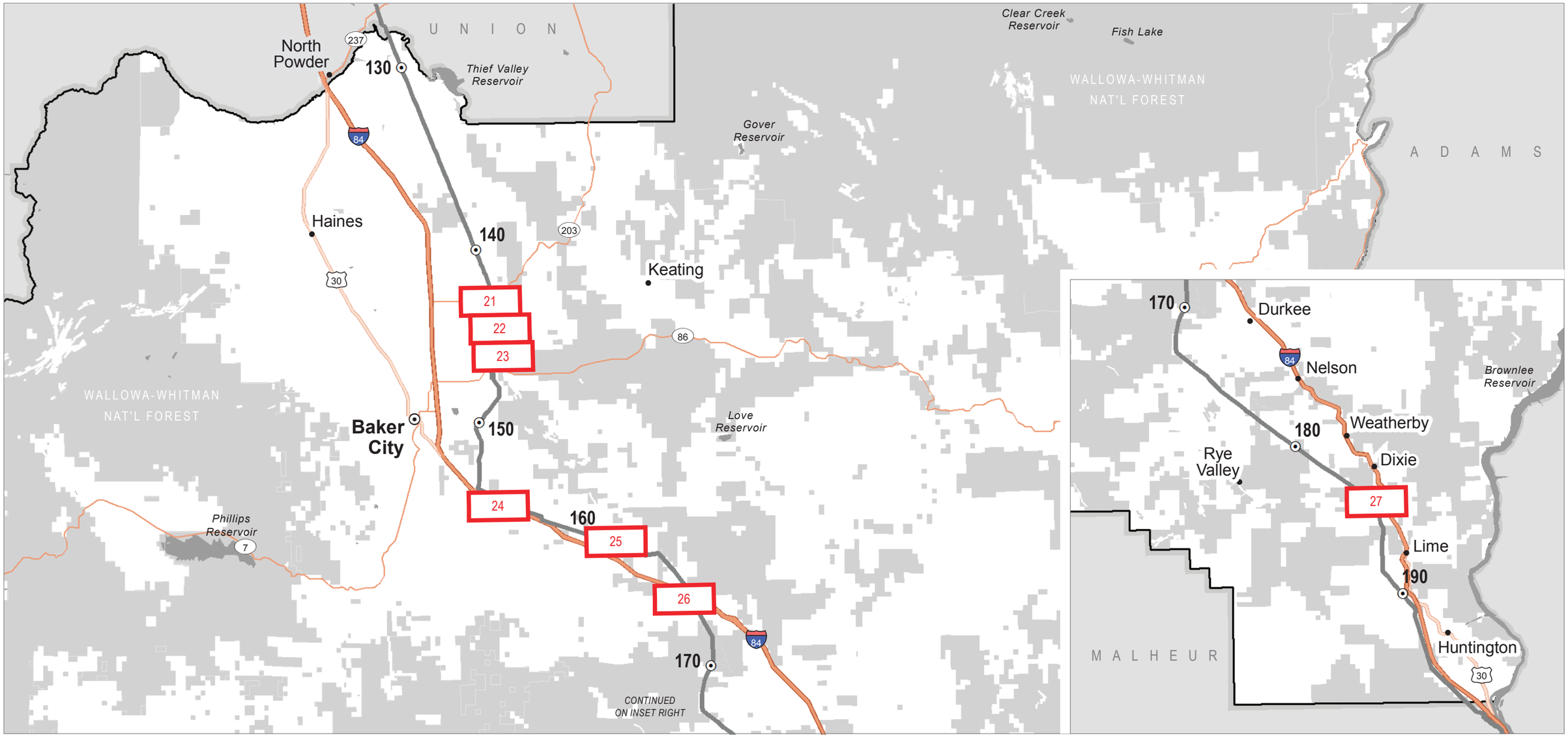
Other Features
- 100-foot Contours
- Existing Transmission Lines
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

Attachment X-1
Noise Sensitive Receptors

Union County

Map 20



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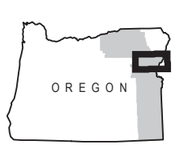
Miles



Map Area

Source(s): BLM, IPC, Esri

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Location Map (Map #)

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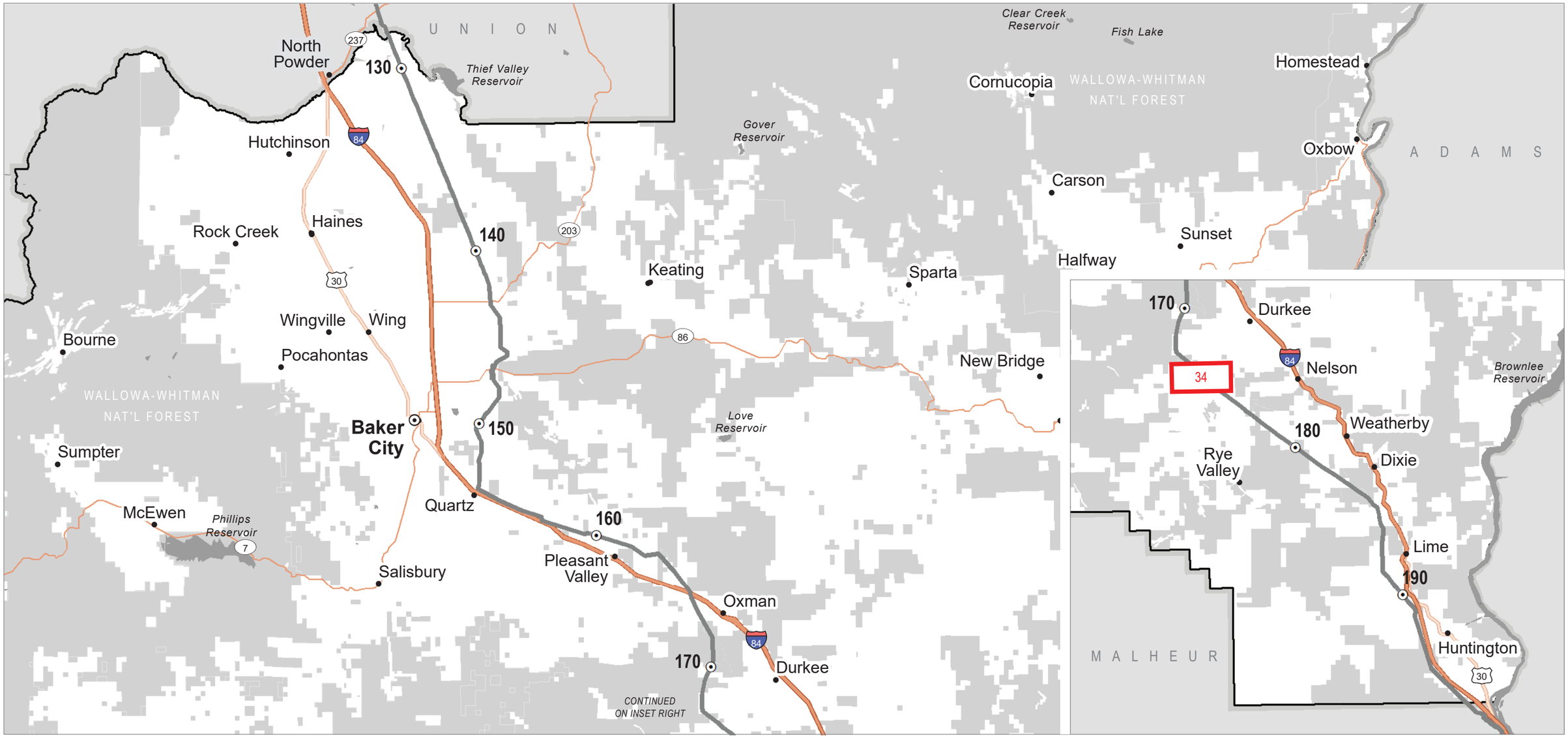
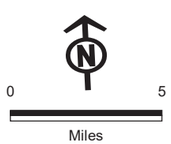
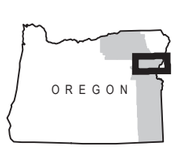
Noise Sensitive Receptors

Baker County

Map Index







Map Area

Source(s): BLM, IPC, Esri

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Map Index

Location Map (Map #)

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
An IDACORP Company

ERRATA

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Noise Sensitive Receptors

Baker County

Map Index

0 1,000
Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- Predicted Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Bureau of Land Management
- Private

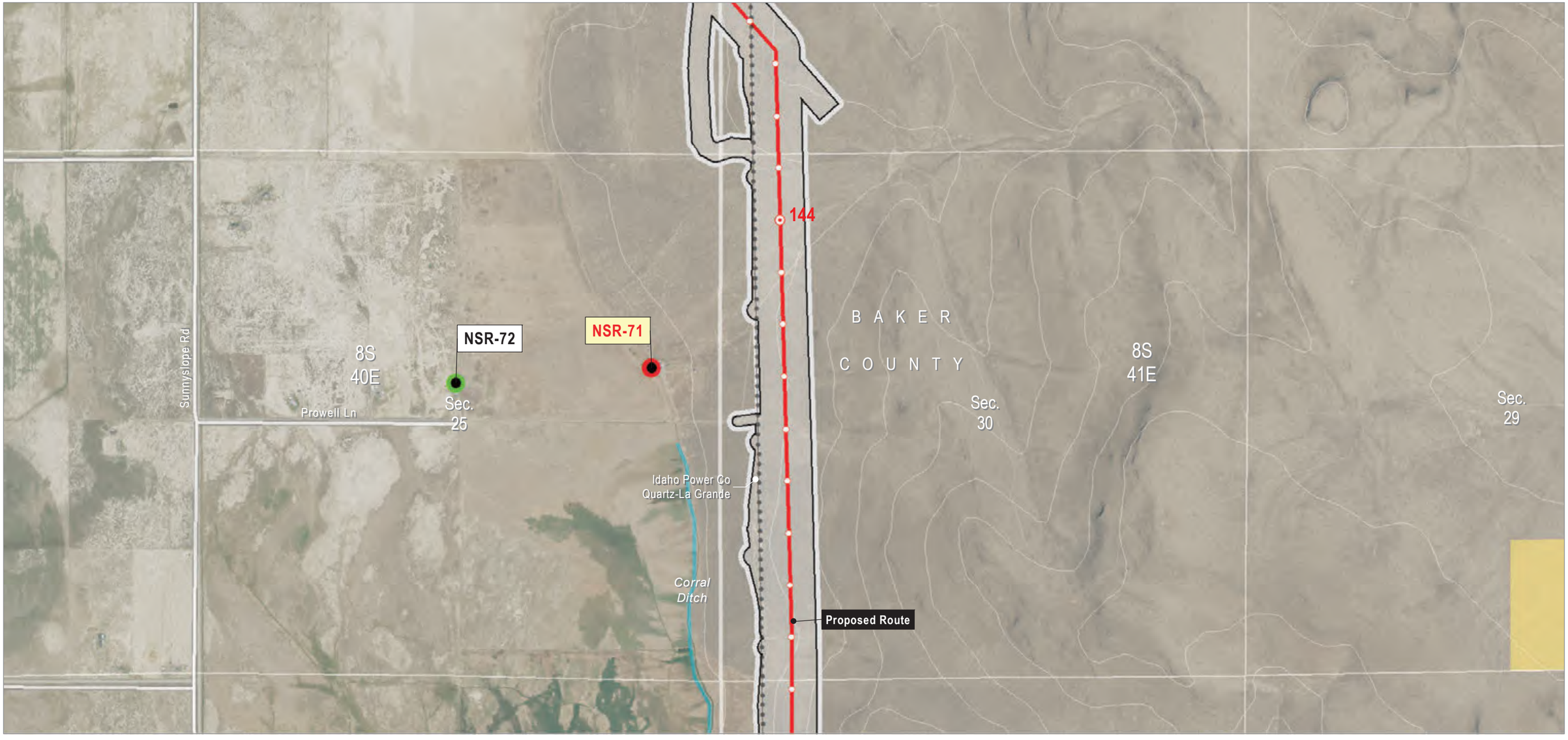
Other Features
- 100-foot Contours
- Existing Transmission Lines
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

Attachment X-1
Noise Sensitive Receptors

Baker County

Map 21



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0 1,000
Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- Predicted Exceedance
- No Exceedance

Project Features
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- Road
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Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
An IDACORP Company

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Noise Sensitive Receptors

Baker County

Map 22

145
Proposed Route
NSR-73
Sec. 36
8S 40E
Sunnyslope Rd
Sec. 31
Flagstaff Gulch
8S 41E
Sec. 32
Idaho Power Co Quartz-La Grande
146
B A K E R
C O U N T Y
Corral Ditch
Proposed Route (230-kV Rebuild)
9S 40E
9S 41E
Flagstaff Hill
86

0 1,000 Feet

Map Area

O R E G O N

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
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Project Features
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- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
An IDACORP Company

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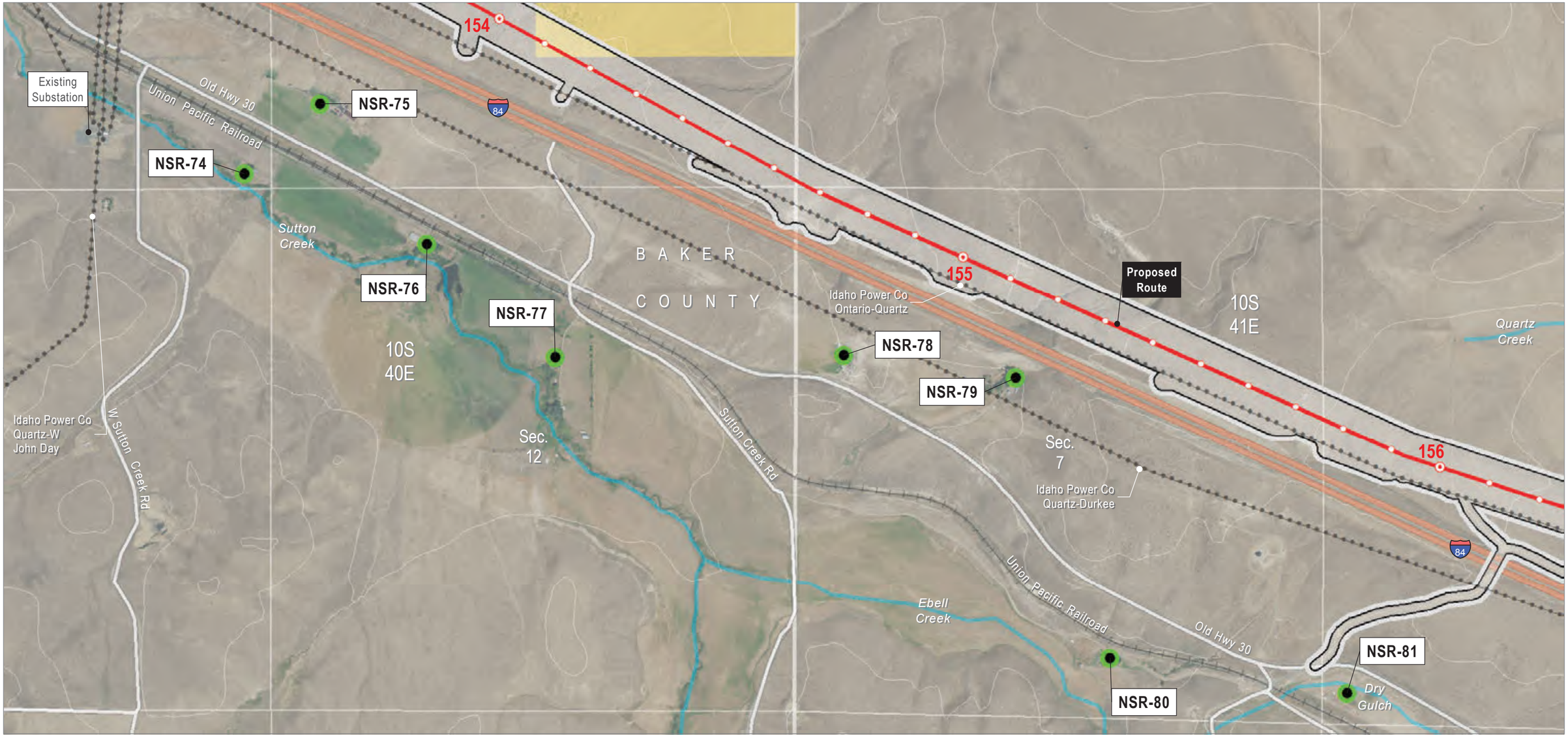
Noise Sensitive Receptors

Baker County

Map 23



N

0 1,000

Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Project Features
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- Railroad
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
An IDACORP Company

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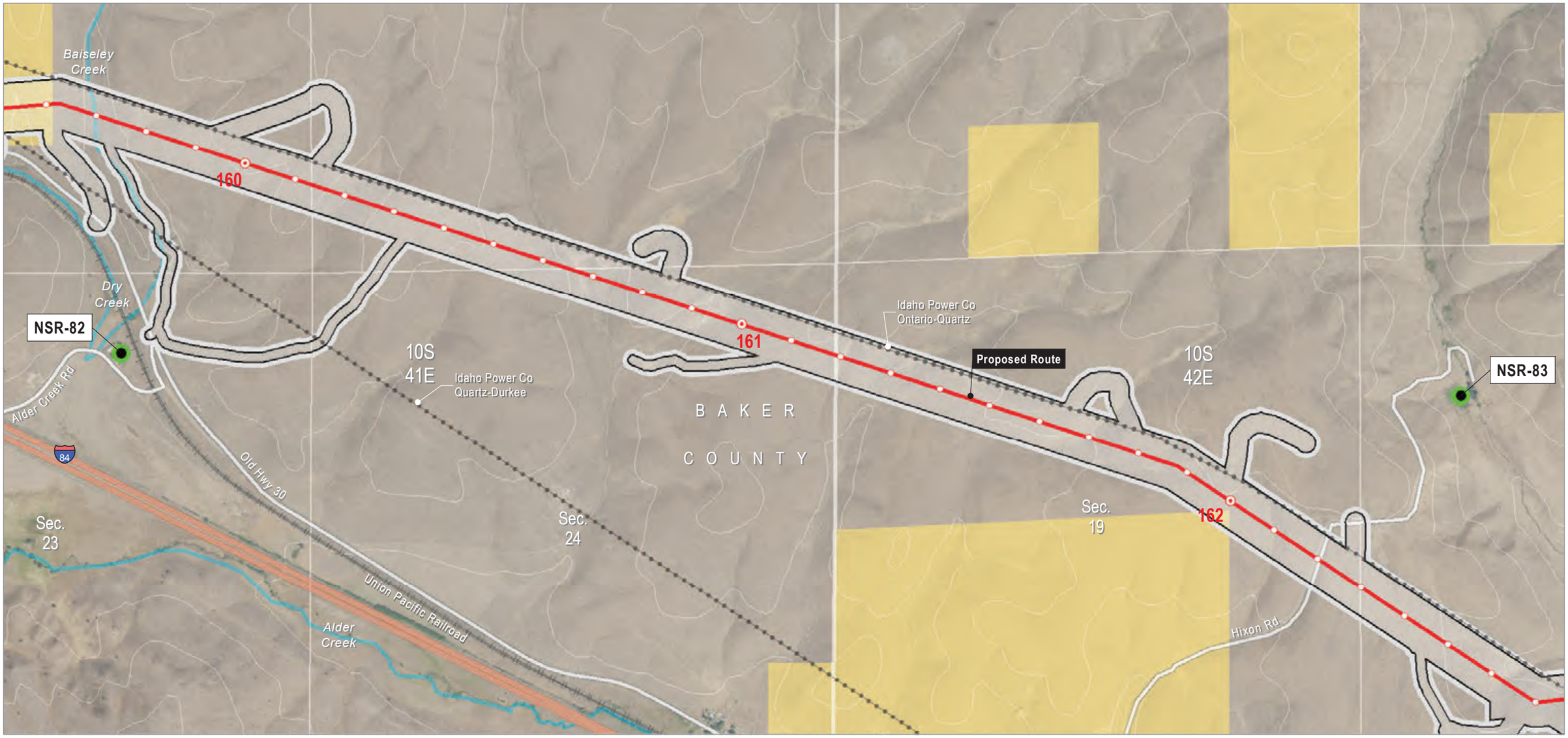
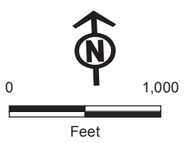
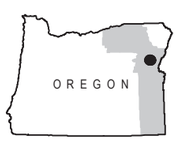
Noise Sensitive Receptors

Baker County

Map 24







Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
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Project Features
- Site Boundary
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Mileposts
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Land Status
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Other Features
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Boardman to Hemingway Transmission Line Project
Application for Site Certificate

IDAHO POWER
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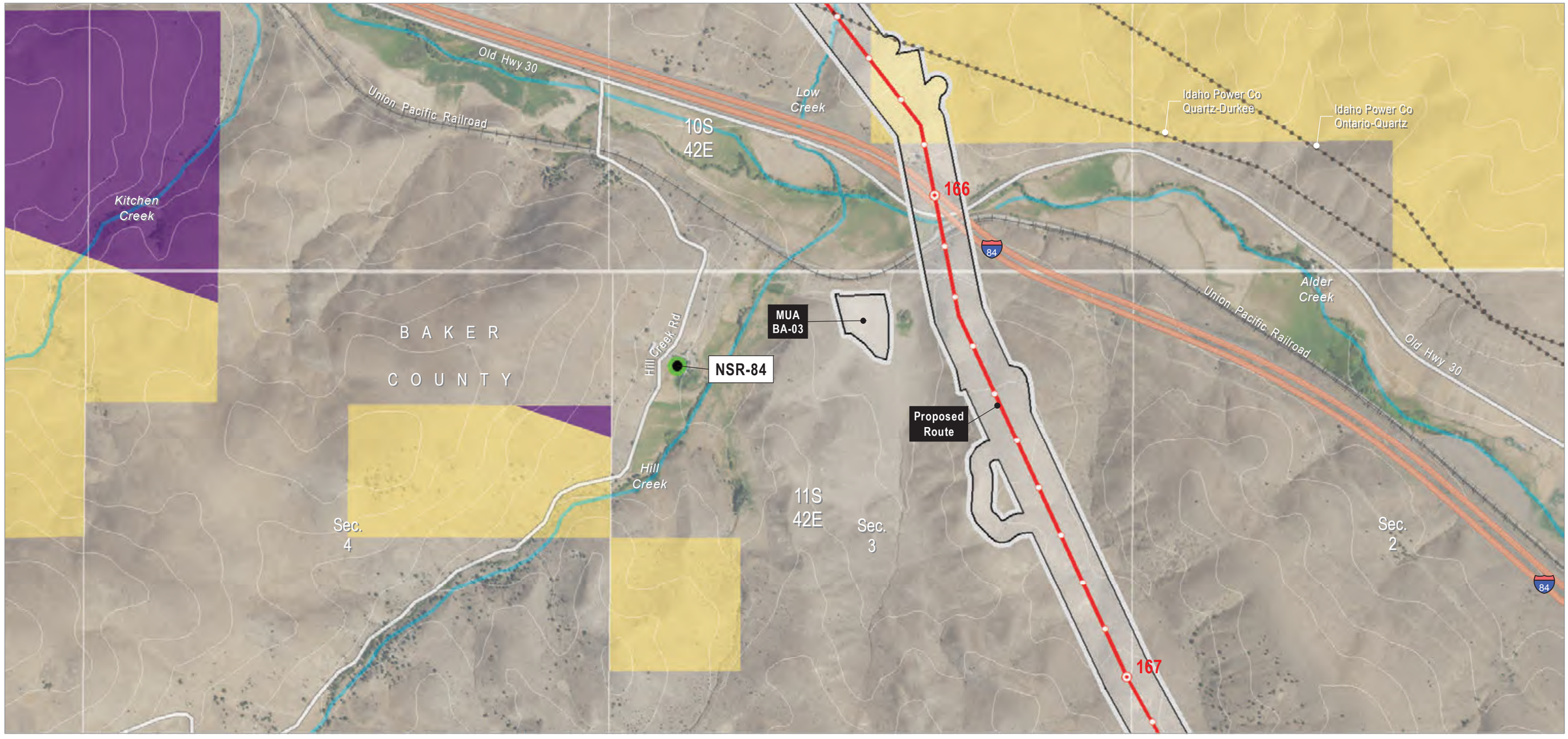
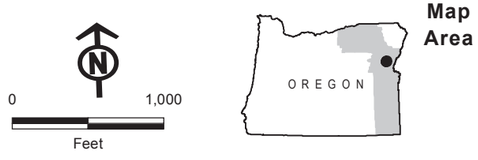
Noise Sensitive Receptors

Baker County

Map 25





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Boardman to Hemingway Transmission Line Project
Application for Site Certificate

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Noise Sensitive Receptors

Baker County

Map 26

0 1,000
Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- Predicted Exceedance

Project Features
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Mileposts
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- Tenth-mile

Land Status
- Bureau of Land Management
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Other Features
- 100-foot Contours
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

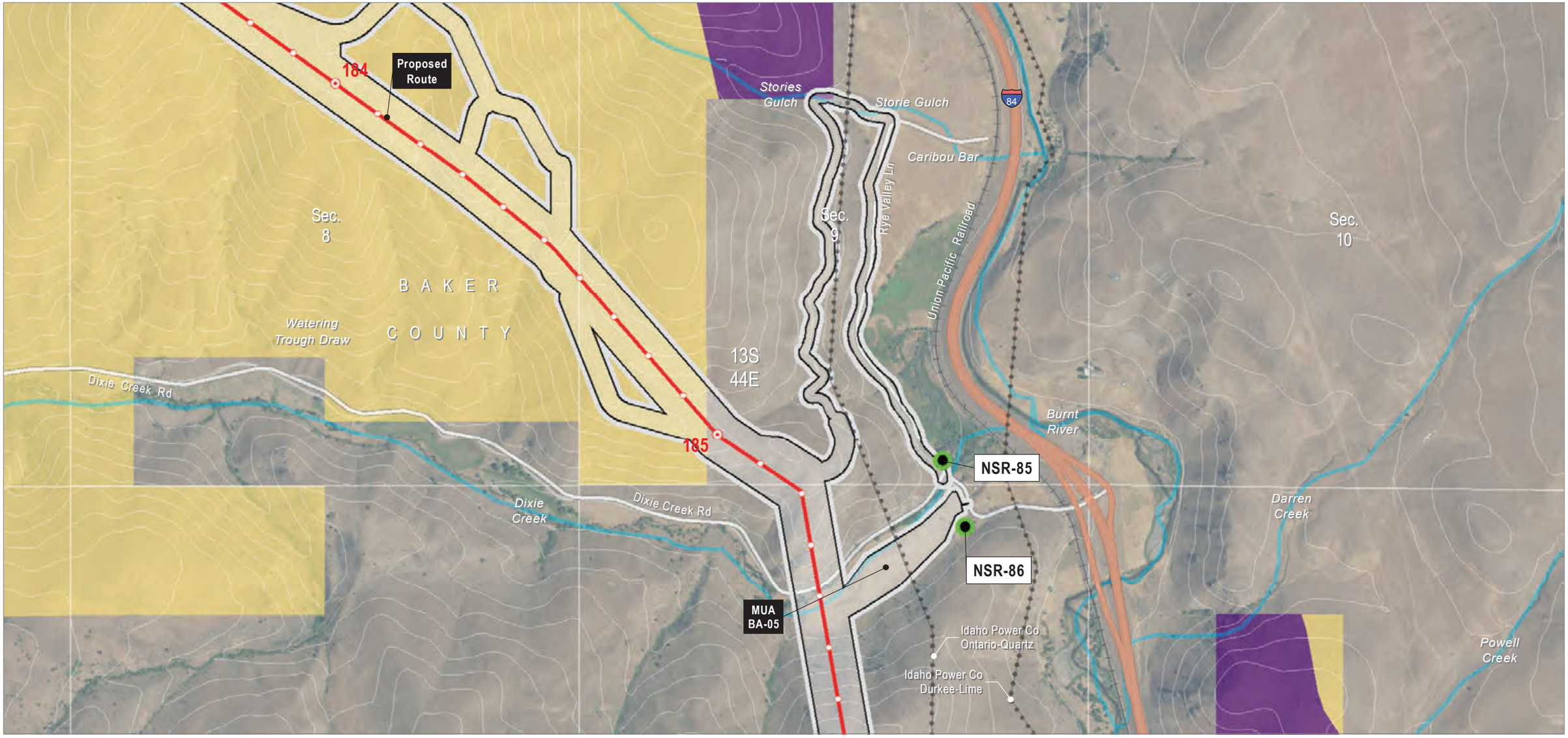
IDAHO POWER
An IDACORP Company

ERRATA

Attachment X-1
Noise Sensitive Receptors

Baker County

Map 34



Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Boardman to Hemingway Transmission Line Project
Application for Site Certificate

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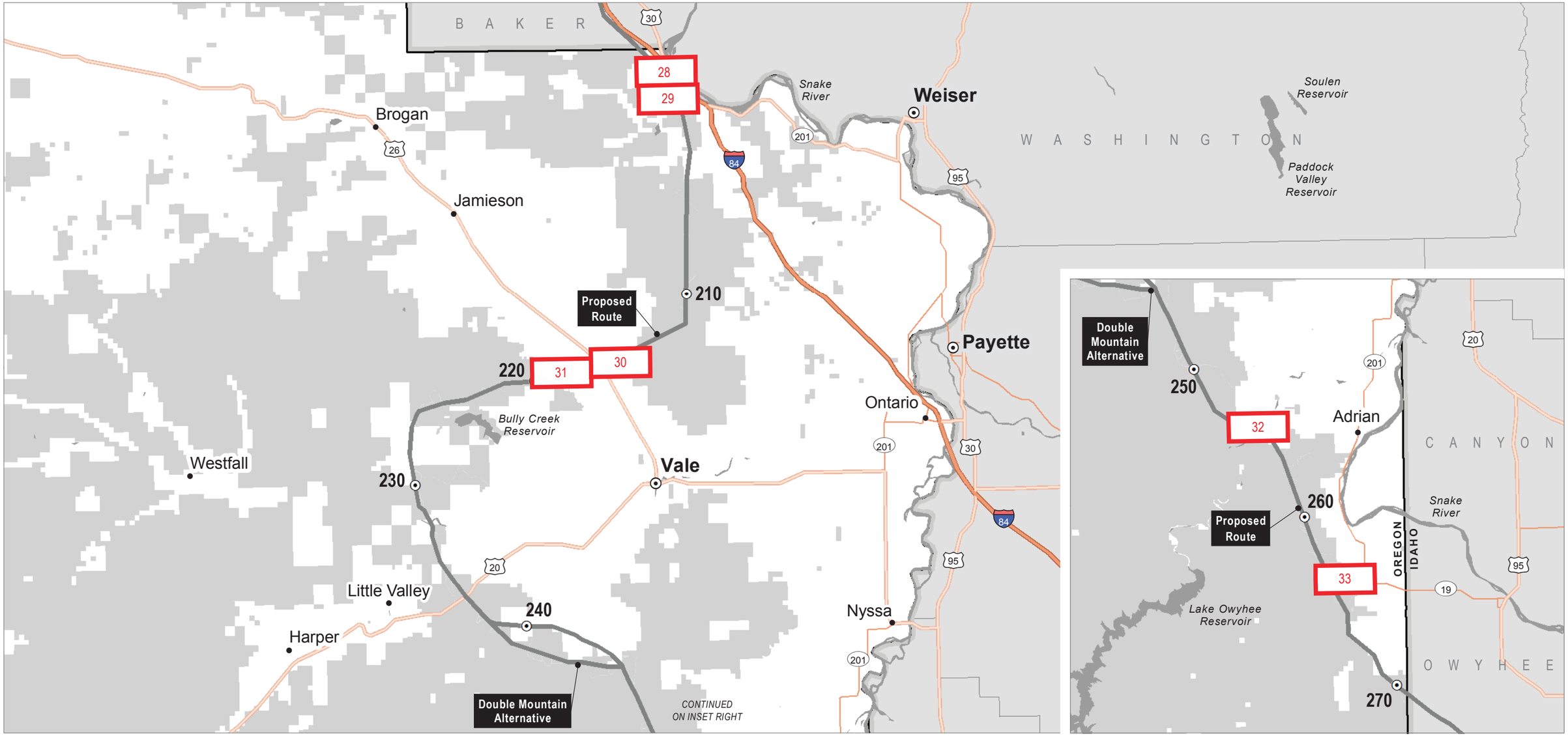
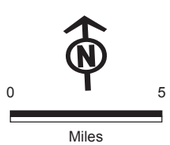
Noise Sensitive Receptors

Baker County

Map 27





Map Area

Source(s): BLM, IPC, Esri

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Map Index

Location Map (Map #)

Boardman to Hemingway Transmission Line Project
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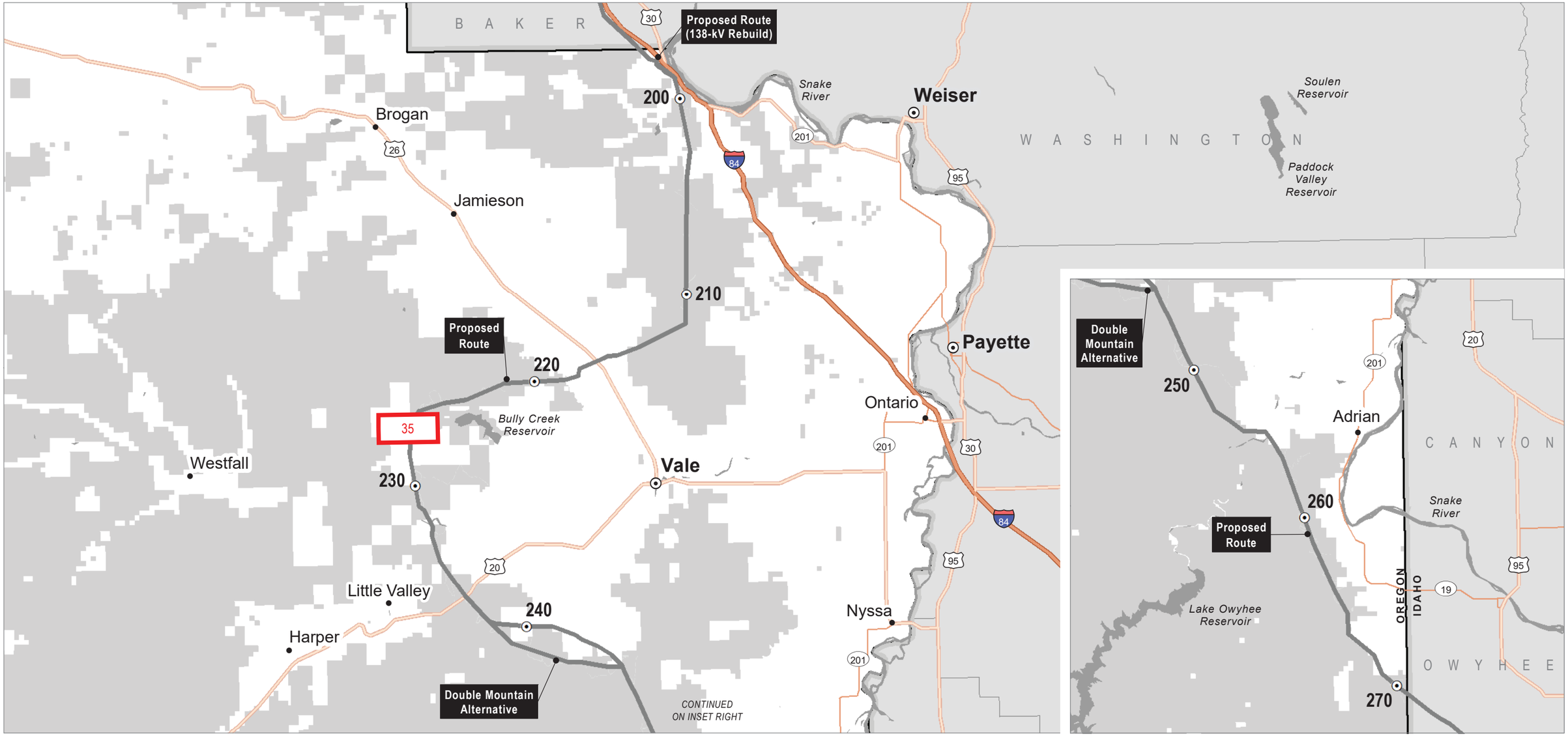
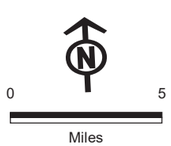
Attachment X-1
Noise Sensitive Receptors

Malheur County

Map Index





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Location Map (Map #)

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

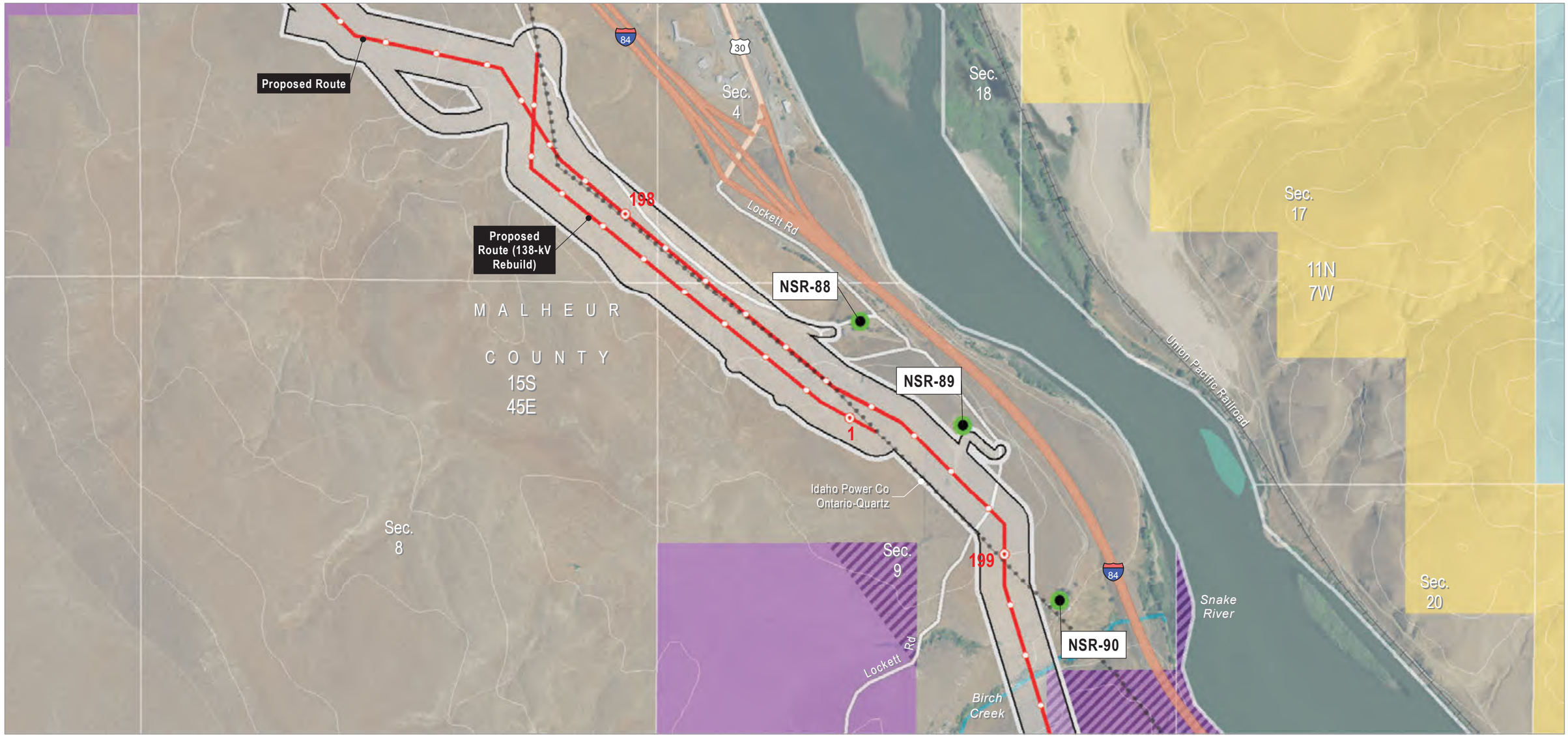
IDAHO POWER
An IDACORP Company

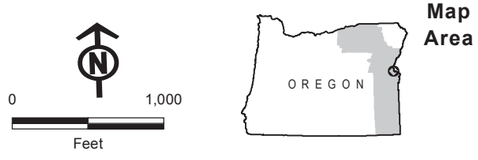
ERRATA

Attachment X-1
Noise Sensitive Receptors

Malheur County

Map Index





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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Bureau of Land Management
- Fish and Wildlife Service
- Private
- State or Local

Other Features
- 100-foot Contours
- Existing Transmission Lines
- Interstate
- Highway
- Road
- Railroad
- Stream

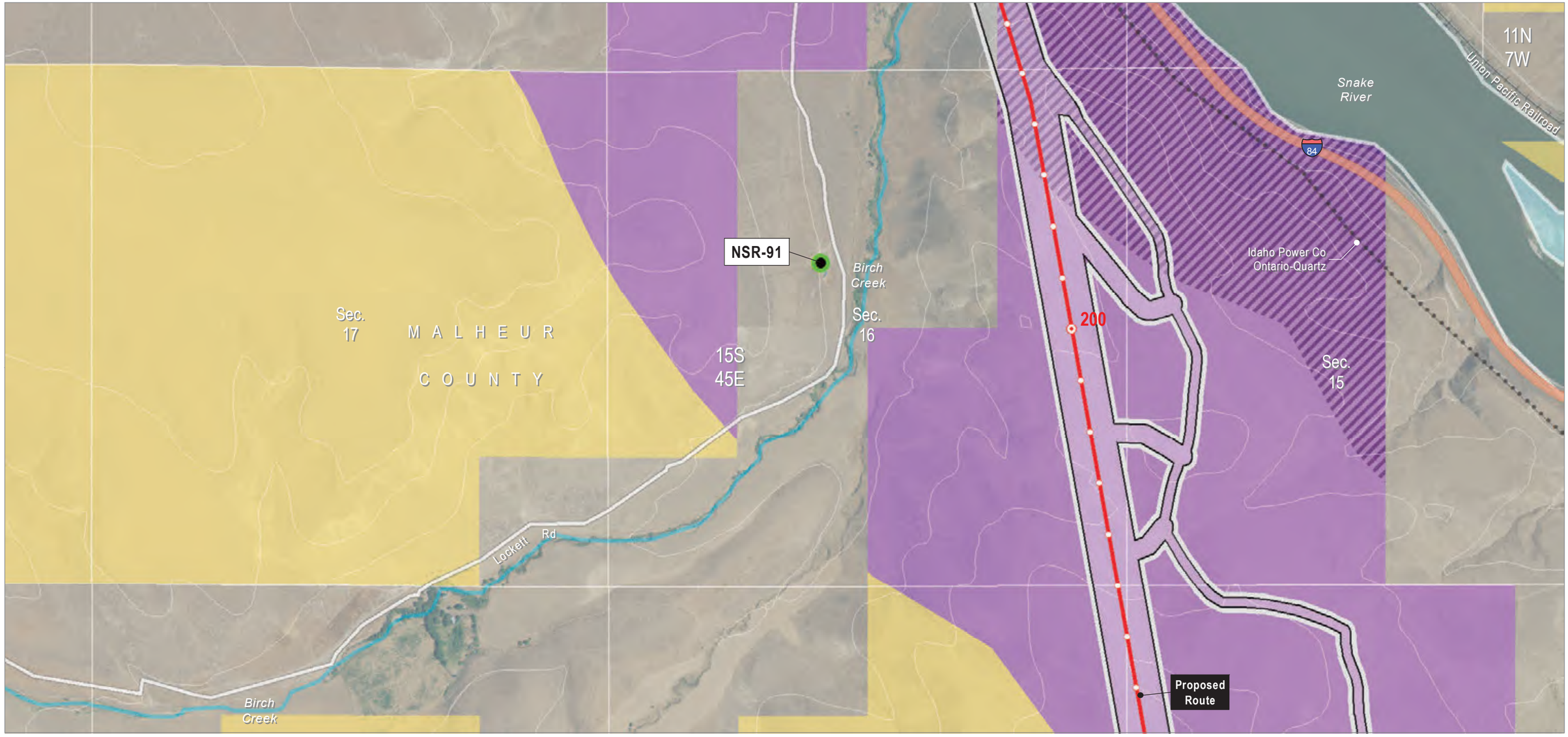
Boardman to Hemingway Transmission Line Project
Application for Site Certificate

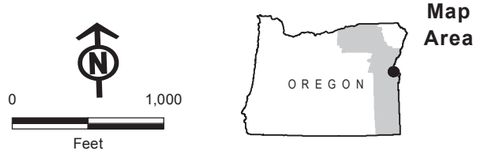
IDAHO POWER
An IDACORP Company

Attachment X-1
Noise Sensitive Receptors

Malheur County

Map 28





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Noise Sensitive Receptors
- No Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Bureau of Land Management
- Private
- State or Local

Other Features
- 100-foot Contours
- Existing Transmission Lines
- Interstate
- Road
- Railroad
- Stream

Boardman to Hemingway Transmission Line Project
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IDAHO POWER
An IDACORP Company

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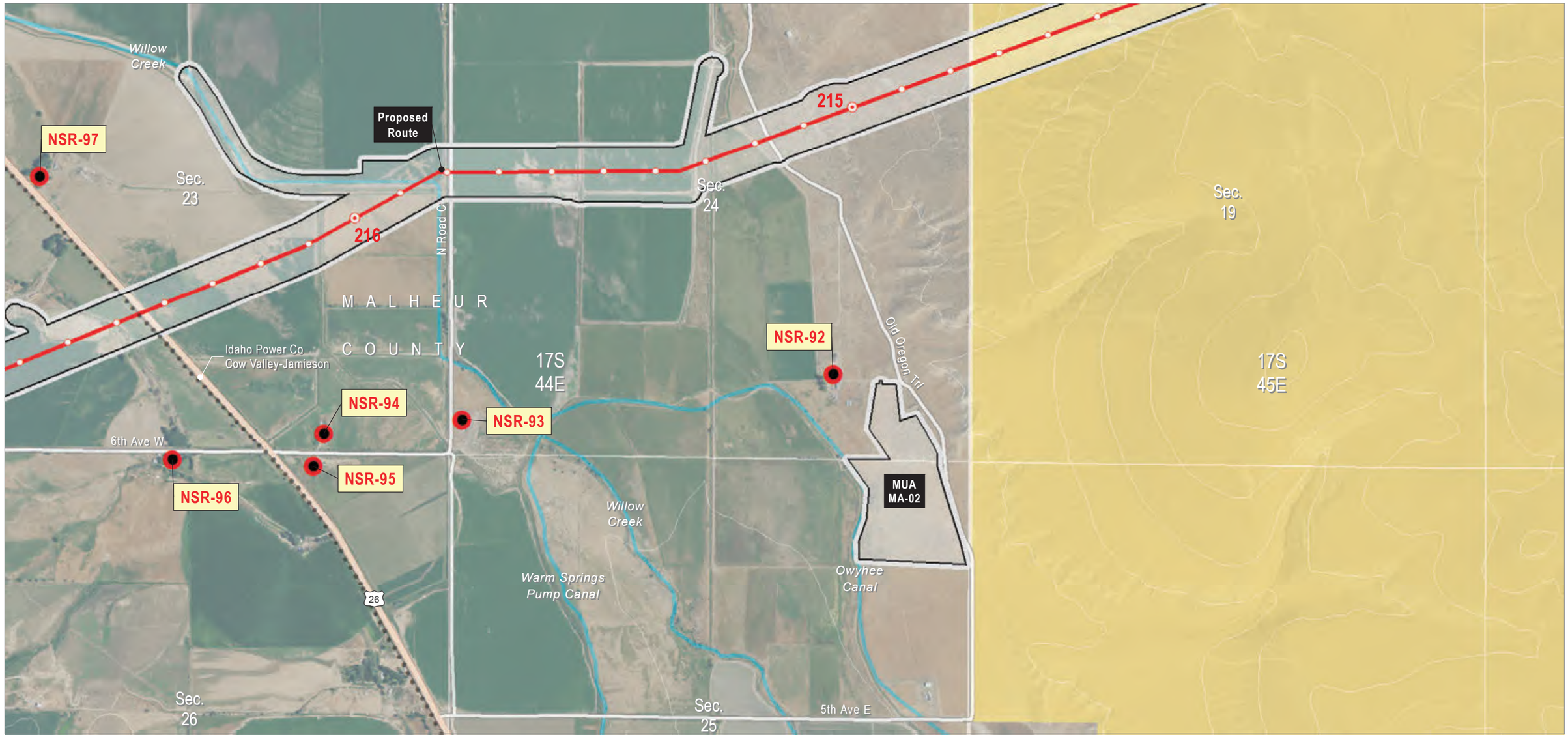
Noise Sensitive Receptors

Malheur County

Map 29



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Noise Sensitive Receptors
- Predicted Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Bureau of Land Management
- Private

Other Features
- 100-foot Contours
- Existing Transmission Lines
- Highway
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

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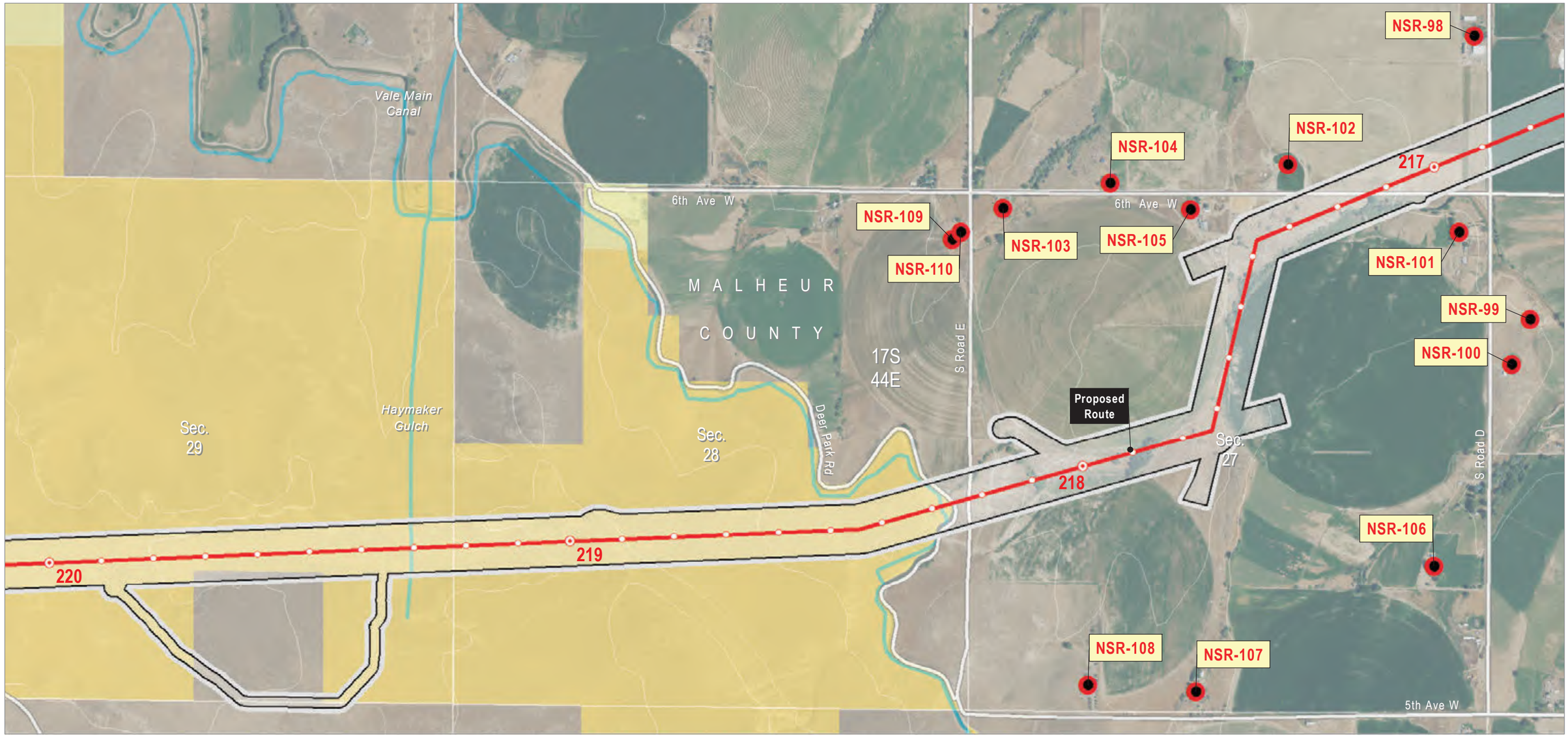
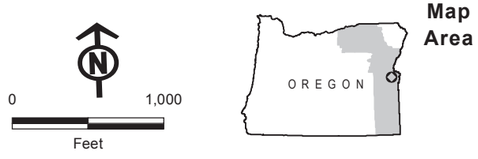
Noise Sensitive Receptors

Malheur County

Map 30





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Noise Sensitive Receptors
- Predicted Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Bureau of Land Management
- Bureau of Reclamation
- Private

Other Features
- 100-foot Contours
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

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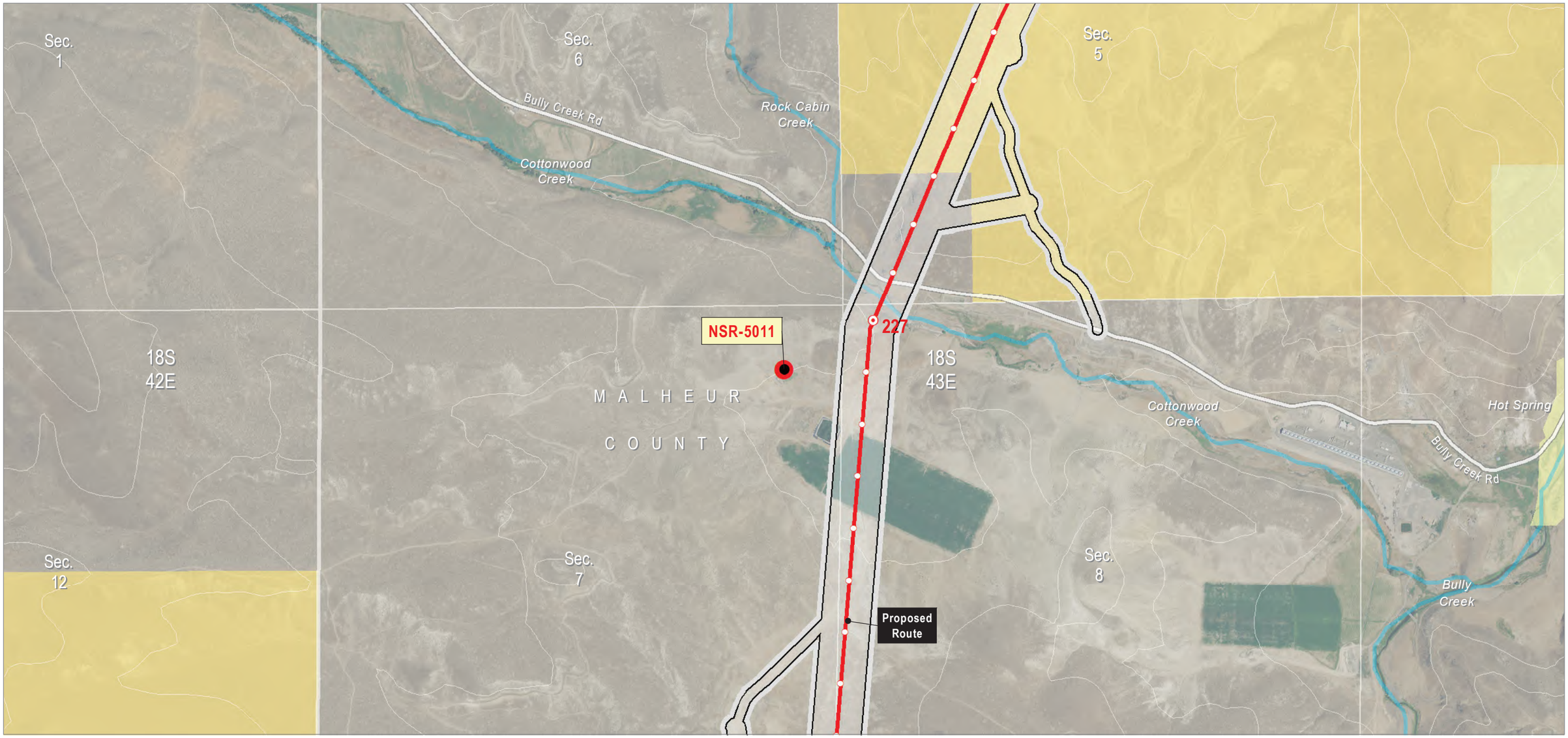
Noise Sensitive Receptors

Malheur County

Map 31



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Noise Sensitive Receptors
- Predicted Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Bureau of Land Management
- Bureau of Reclamation
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Other Features
- 100-foot Contours
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

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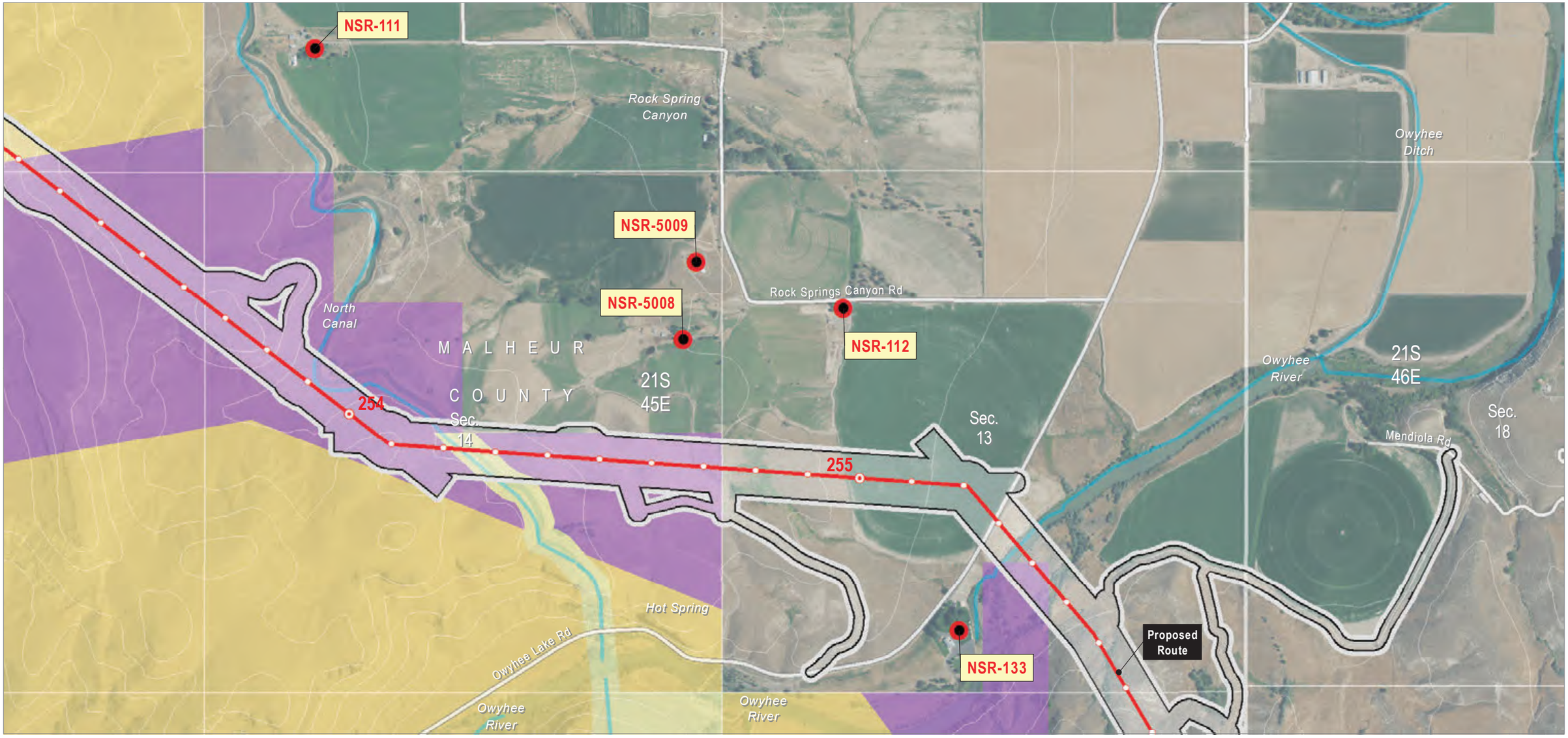
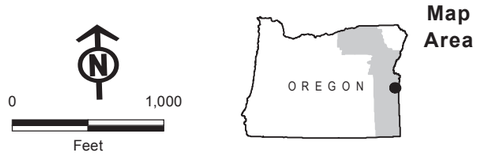
Noise Sensitive Receptors

Malheur County

Map 35





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Noise Sensitive Receptors
- Predicted Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Bureau of Land Management
- Bureau of Reclamation
- Private

Other Features
- 100-foot Contours
- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

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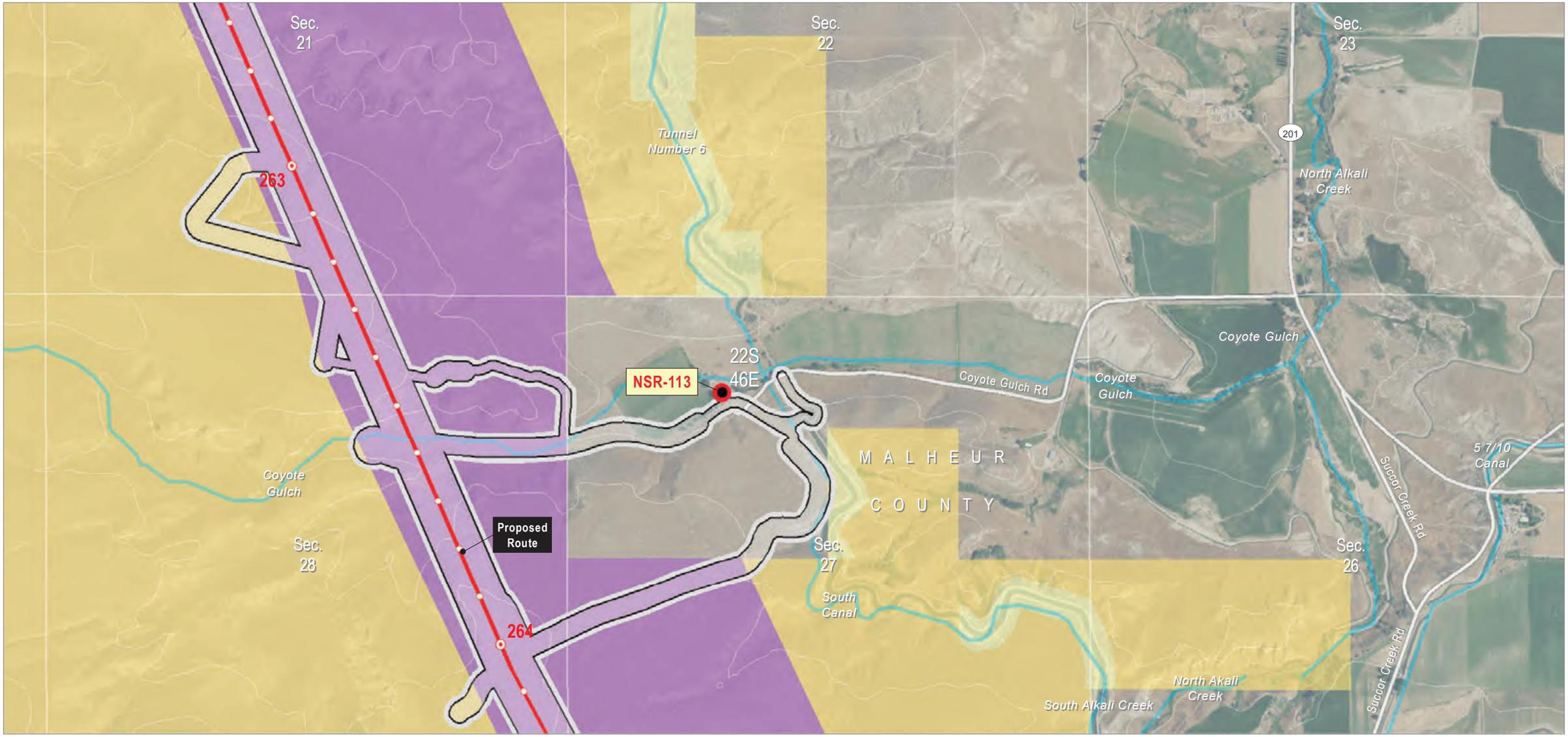
Noise Sensitive Receptors

Malheur County

Map 32



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- Predicted Exceedance

Project Features
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- Tenth-mile

Land Status
- Bureau of Land Management
- Bureau of Reclamation
- Private

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- Road
- Stream

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Noise Sensitive Receptors

Malheur County

Map 33

B2H Exhibit X Errata Sheet

Dear Reader:

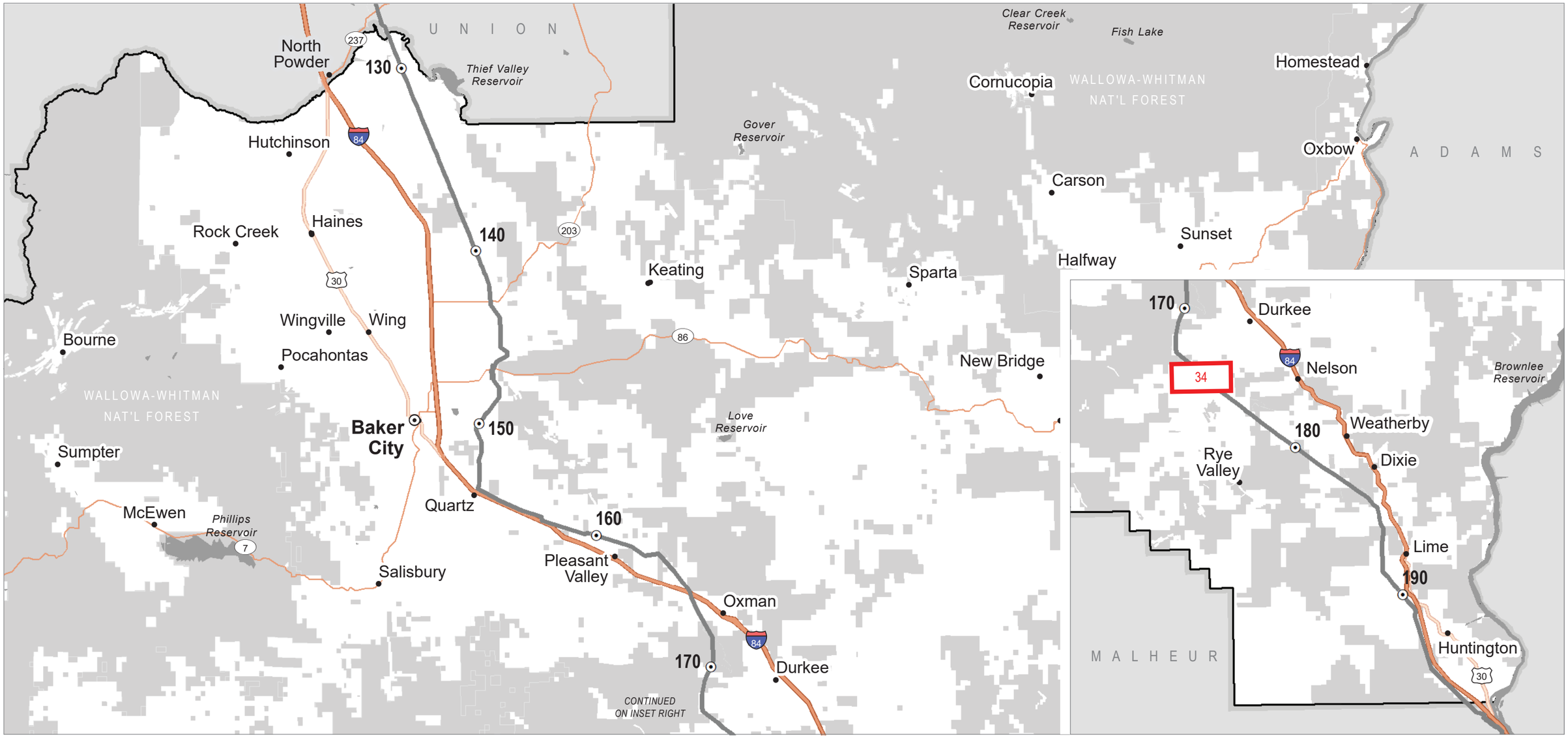
Exhibit X provides analysis of potential noise impacts from the Boardman to Hemingway Transmission Line Project (Project). Exhibit X identifies all noise sensitive receptors (NSRs) within one-half mile of the Site Boundary from noise-generating Project features such as the transmission line, and demonstrates that the relevant Project noise sources will not exceed the Oregon Department of Environmental Quality's (ODEQ) maximum permissible sound level of 50 A-weighted decibels (dBA). Exhibit X also shows, for the majority of NSRs within the analysis area, that the Project will not exceed ODEQ's ambient antidegradation standard, which prohibits new industrial noise sources located on previously unused sites from increasing ambient noise levels by more than 10 dBA. However, Idaho Power Company (IPC) estimates that, at 36 NSRs, the Project may exceed the ambient antidegradation standard during foul weather conditions that occur on average around 2 percent of the calendar year. To address these limited circumstances where an exceedance may occur, IPC requests that the Oregon Energy Facility Siting Council (EFSC or Council) authorize an exception to the Project's compliance with the ambient antidegradation standard on the basis that such exceedances will be infrequent events and that, in all instances where the Project may exceed the ambient antidegradation standard, the noise generated by the Project is below the maximum permissible nighttime sound level (50 dBA). Alternatively, IPC requests that the Council grant a variance on the basis that requiring the Project to strictly comply with the ODEQ Noise Rules is unreasonable and likely to make the Project unpermittable.

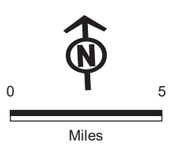
The Applicant submitted its final Application for Site Certification on October 3, 2018. Subsequently, the Oregon Department of Energy requested certain additional information about the Project pursuant to Oregon Administrative Rule (OAR) 345-015-0190(9). This errata sheet provides the requested information—which may include corrections to the exhibit text, tables, figures, and/or proposed conditions—as it relates to Exhibit X.

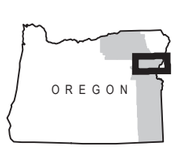
As you read this exhibit, please keep in mind that any additional information identified in this errata sheet shall prevail over the contents of the exhibit document itself.

Additional Information Provided for Exhibit X

Page #	Section #	Description of Change(s) Made
Map 34 and Map 35	Attachment X-5	Map 34 and Map 35 added to Attachment X-5 showing noise sensitive receptors NSR-5010 and NSR-5011.







Map Area

Source(s): BLM, IPC, Esri

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Location Map (Map #)

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Baker County

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0 1,000
Feet

Map Area

Source(s): IPC, ODOT, USDA, USGS, Ventyx, Esri

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Noise Sensitive Receptors
- Predicted Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
- Mile
- Tenth-mile

Land Status
- Bureau of Land Management
- Private

Other Features
- 100-foot Contours
- Stream

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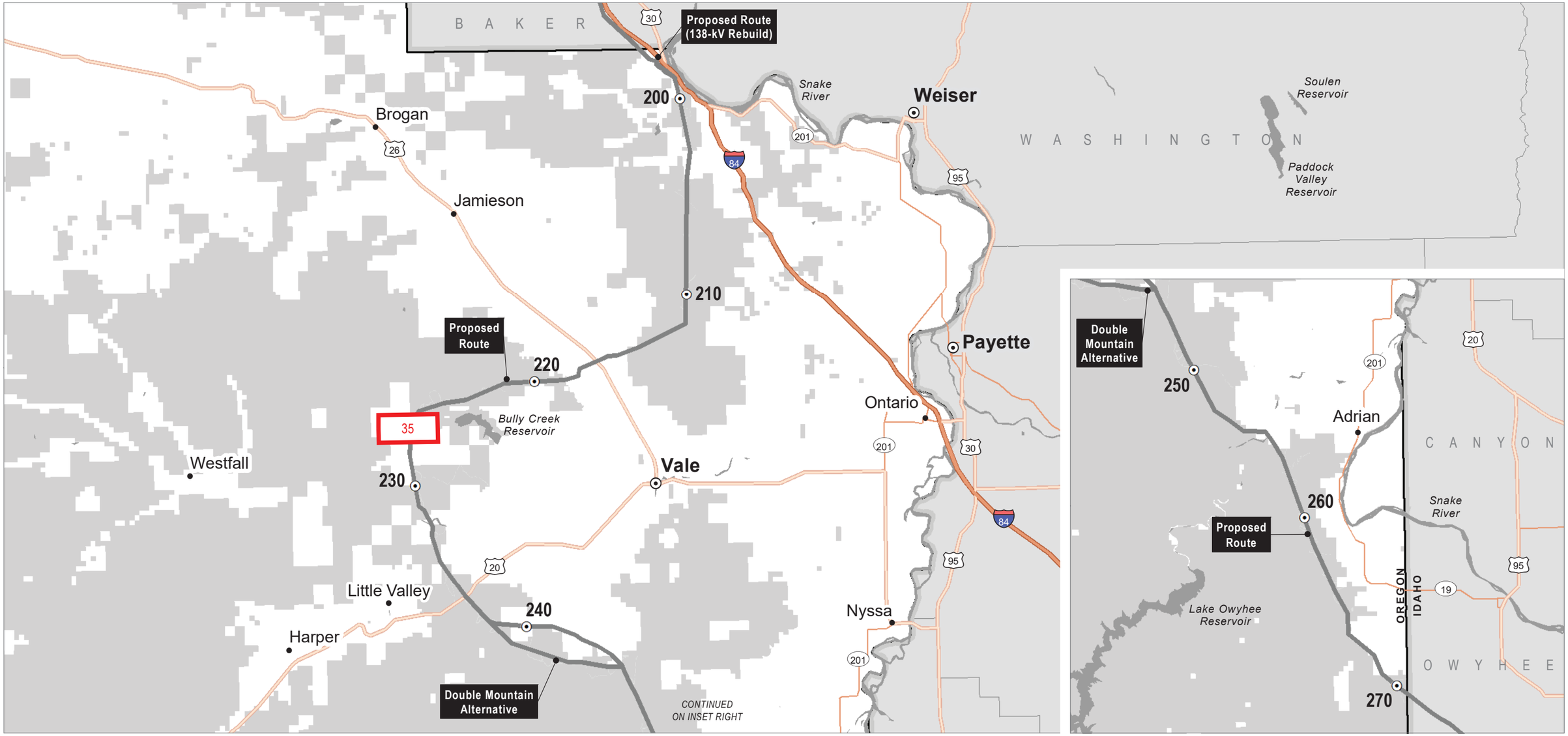
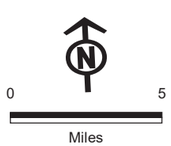
Baker County

Map 34





Map Area

Source(s): BLM, IPC, Esri

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Location Map (Map #)

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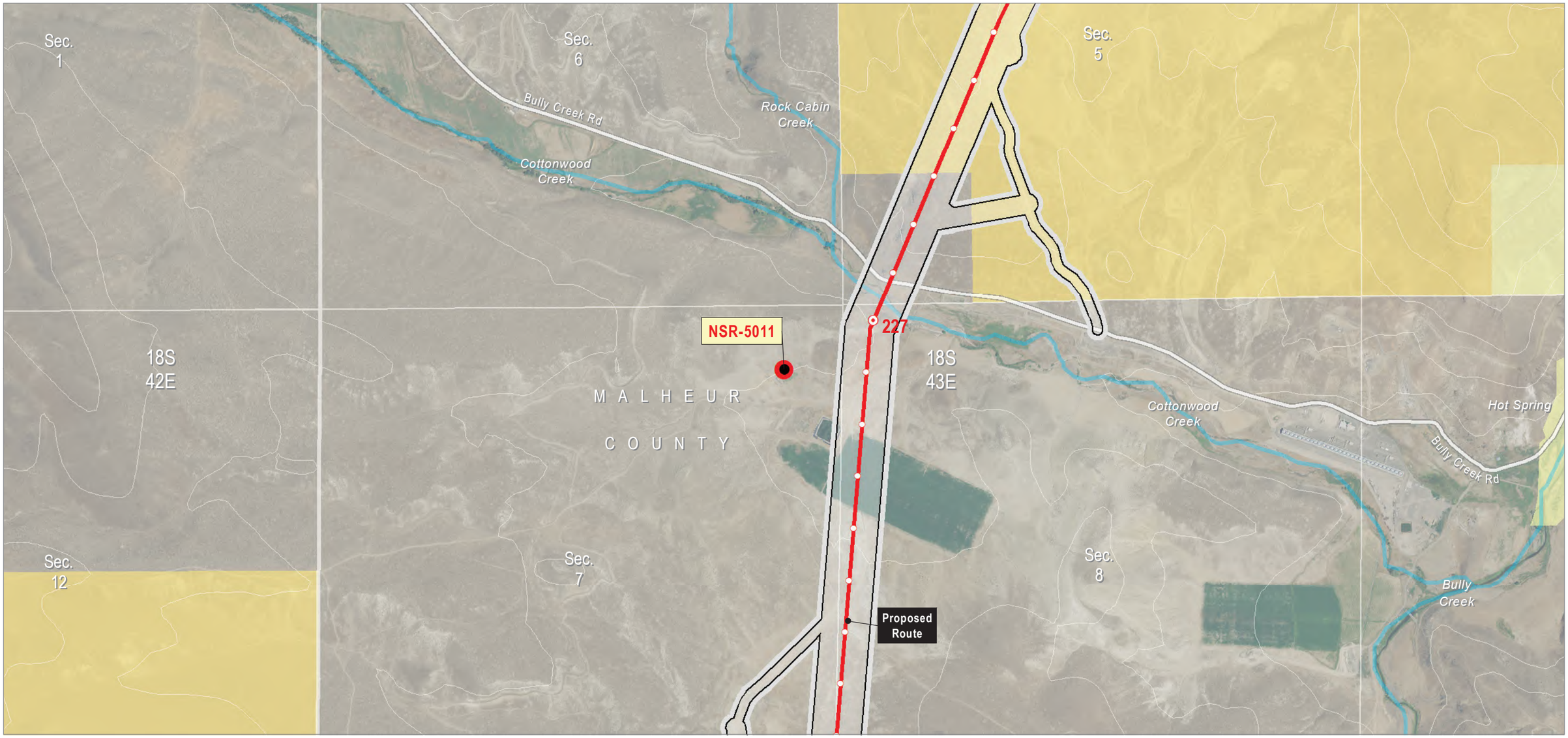
Malheur County

Map Index



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Noise Sensitive Receptors
- Predicted Exceedance

Project Features
- Site Boundary
- Transmission Centerline

Mileposts
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- Tenth-mile

Land Status
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- Bureau of Reclamation
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Other Features
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- Road
- Stream

Boardman to Hemingway Transmission Line Project
Application for Site Certificate

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ERRATA

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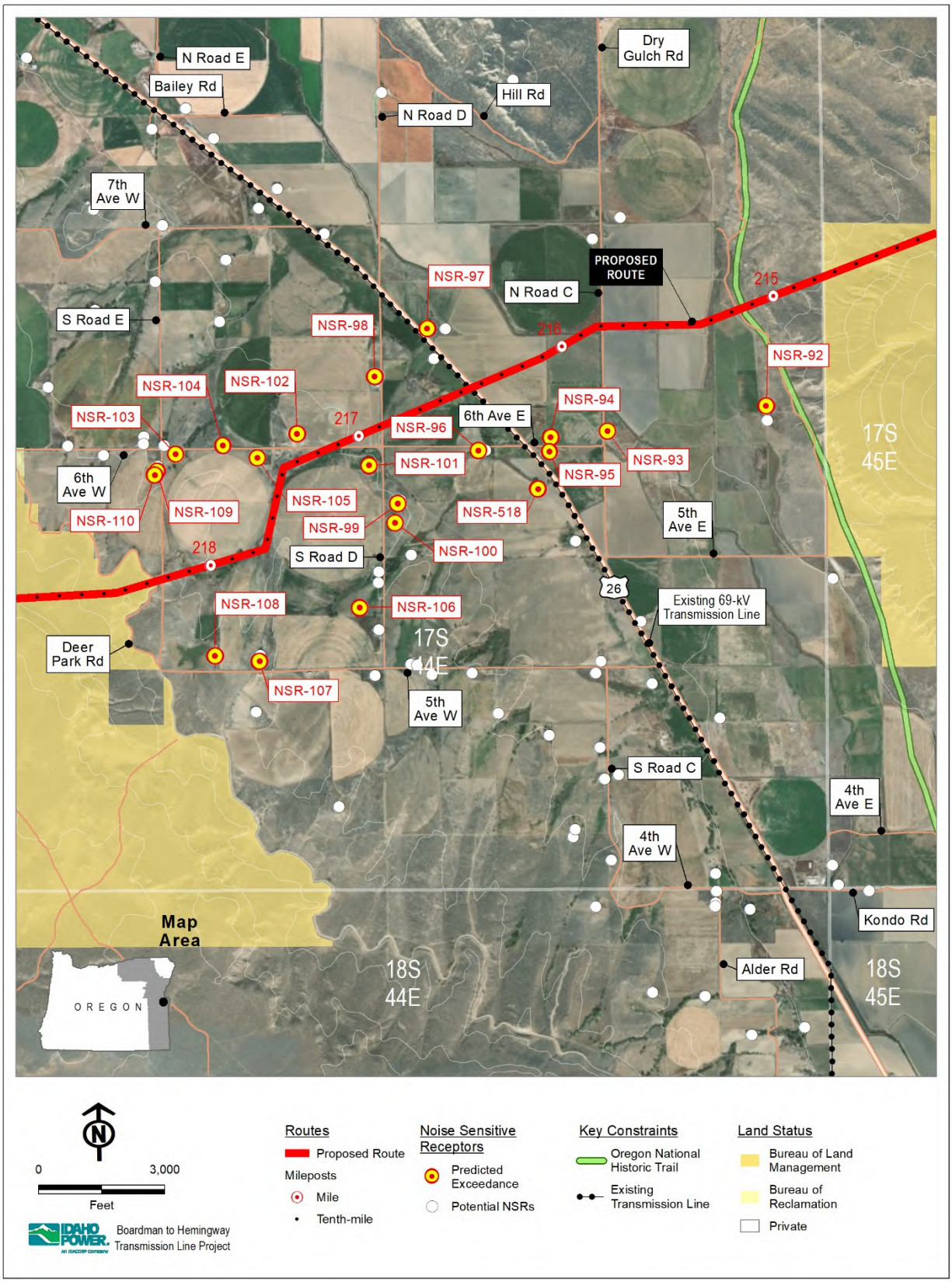
Noise Sensitive Receptors

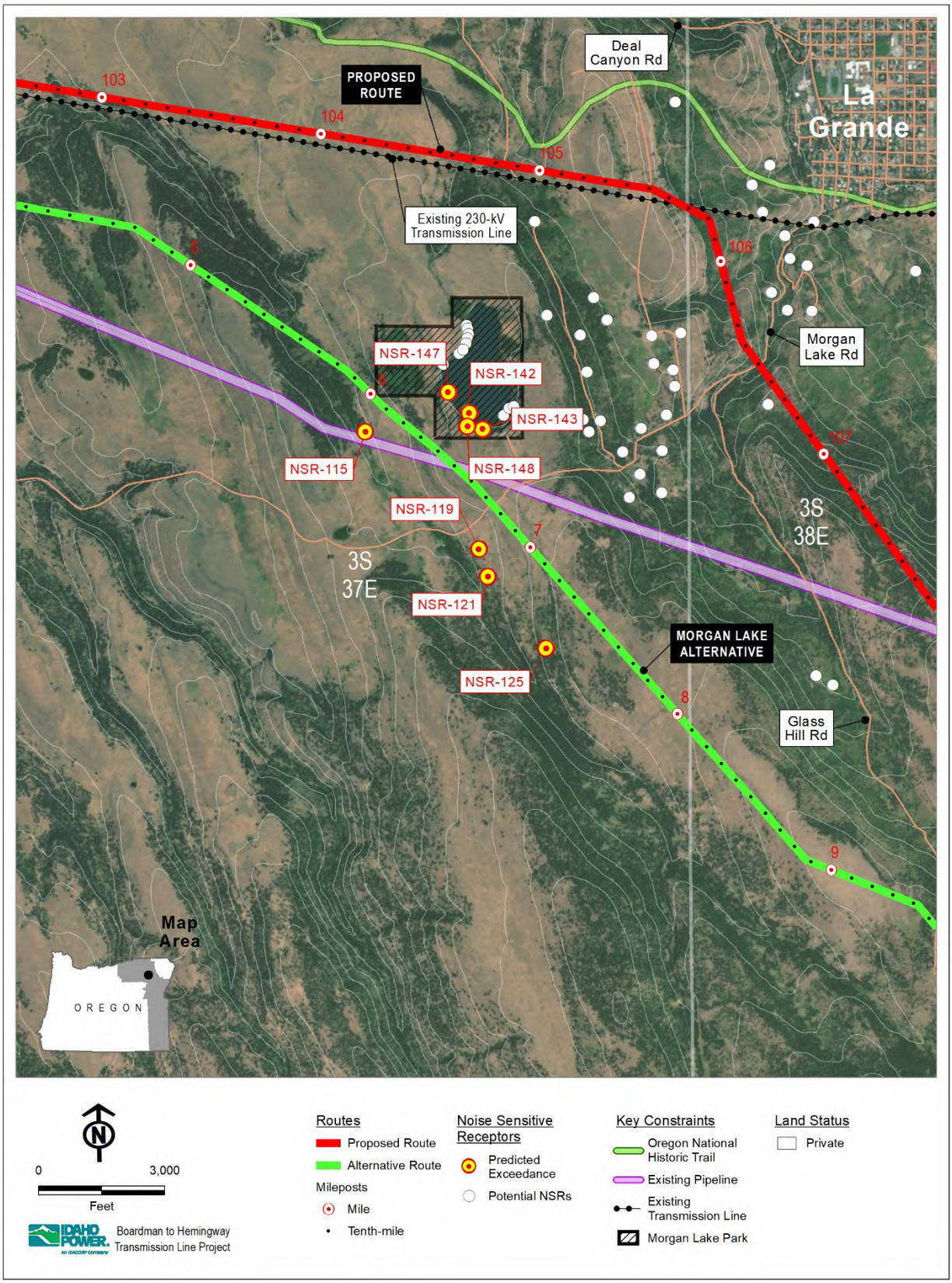
Malheur County

Map 35

B2HAPP Attachment X-5_Attachment 1 Maps - DPO Response Additional NSR Exceedances

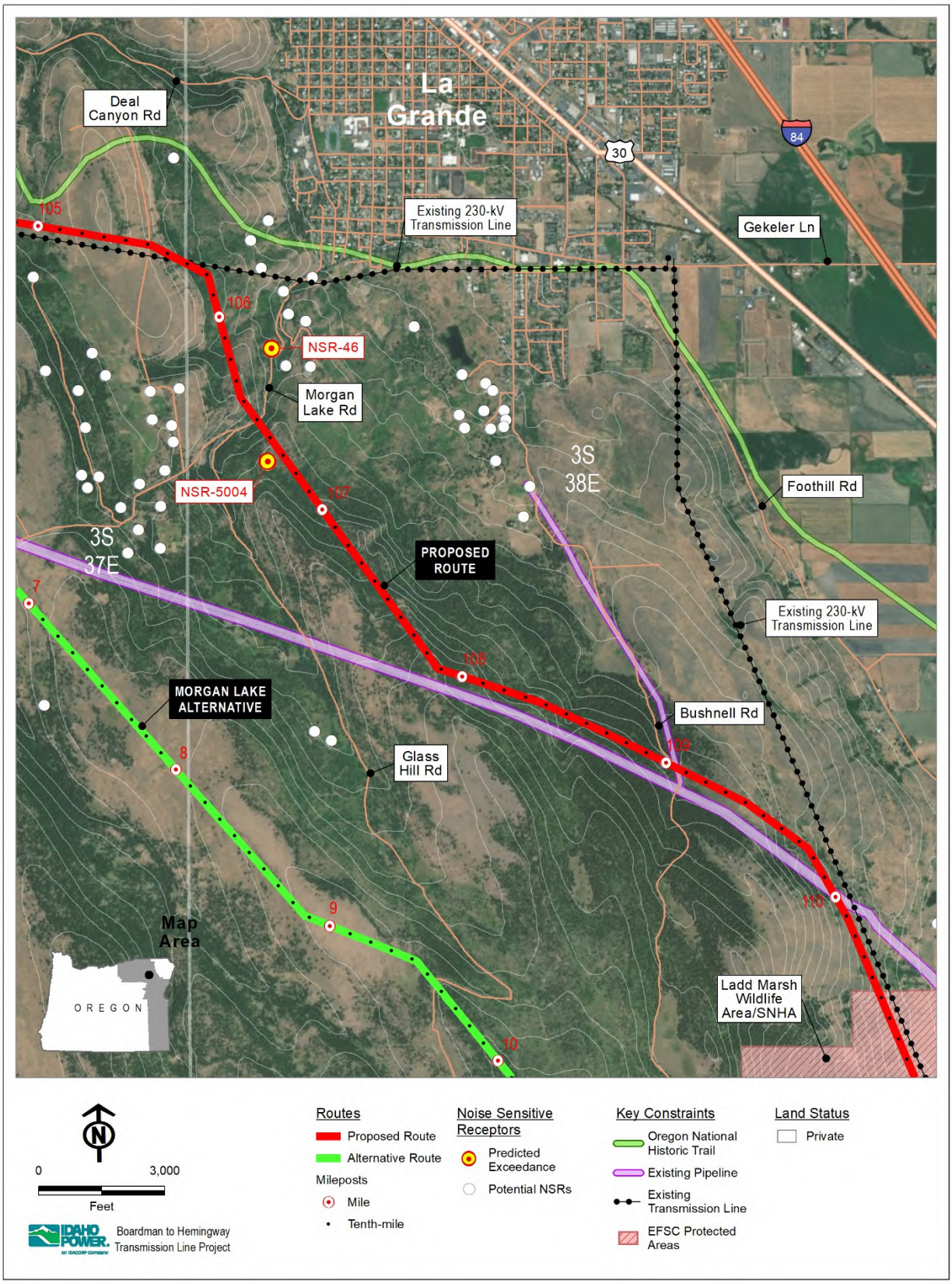
Attachment 1 – Mapset


N Road E
Bailey Rd
Dry Gulch Rd
Hill Rd
N Road D
7th Ave W
PROPOSED ROUTE
N Road C
215
NSR-97
S Road E
NSR-98
216
NSR-92
NSR-104
NSR-102
NSR-94
NSR-103
217
NSR-96
6th Ave E
NSR-93
NSR-101
NSR-95
17S 45E
6th Ave W
NSR-105
NSR-518
NSR-110
NSR-109
NSR-99
5th Ave E
218
S Road D
NSR-100
26
NSR-108
NSR-106
Existing 69-kV Transmission Line
Deer Park Rd
17S 44E
NSR-107
5th Ave W
S Road C
4th Ave E
4th Ave W
Kondo Rd
Map Area
18S 44E
Alder Rd
18S 45E
OREGON
0
3,000
Feet
Boardman to Hemingway Transmission Line Project
Routes
Proposed Route
Mileposts
Mile
Tenth-mile
Noise Sensitive Receptors
Predicted Exceedance
Potential NSRs
Key Constraints
Oregon National Historic Trail
Existing Transmission Line
Land Status
Bureau of Land Management
Bureau of Reclamation
Private



In its supplemental noise evaluation submitted in response to comments on the DPO, the applicant identified noise sensitive receptor (NSRs); 142, 143, 147, and 148 at Morgan Lake Park. However, the Department verified with the City of La Grande that these areas are not campgrounds but are day use areas, and therefore should not be included as a property normally used for sleeping under the DEQ noise rules, as included by the applicant. The Department omitted these day use areas from Table NC-3 in the order and in the evaluation of compliance with the DEQ noise rules. These areas in the above figure are not considered NSRs because the are day use areas. B2HAPPDoc13 DPO IPC Responses to Select DPO Comments Rec'd by 2019-11-07; B2HAPP DPO IPC Responses - StopB2H - 4. Noise - 2nd Supplemental Response 2019-11-06, B2HAPPDoc1 Proposed Order Agency Consultation_City of La Grande_Spence 2020-04-15.

On the last page of this document page 20. Compare where Foothill Rd. and Glass Hill Rd. is on this map and the all union county county roads map to see that the access routes have been switched.



Please see the comments i have made on the side bar

ATTACHMENT B-5
ROAD CLASSIFICATION GUIDE AND ACCESS CONTROL PLAN

Boardman to Hemingway Transmission Line Project

Road Classification Guide and Access Control Plan

Prepared By

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Boise, Idaho 83702

Mark Stokes, Project Leader
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(208) 388-5375
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November 2016

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3.0 ACCESS ROAD DIRECT IMPACT CALCULATIONS AND INDIRECT IMPACT DESIGNATION 11
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Appendix A – Access Road Segments Attribute Table
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ACRONYMS AND ABBREVIATIONS

ASC	Application for Site Certificate
BLM	U.S. Department of the Interior, Bureau of Land Management
EFSC	Energy Facility Siting Council
GIS	Geographical Information System
IPC	Idaho Power Company
OAR	Oregon Administrative Rules
ODFW	Oregon Department of Fish and Wildlife
ORS	Oregon Revised Statute
Plan	Road Classification Guide and Access Control Plan
Project	Boardman to Hemingway Transmission Line Project
ROW	right-of-way
USFS	U.S. Department of Agriculture, Forest Service

1.0 INTRODUCTION

This Road Classification Guide and Access Control Plan (Plan) for the Boardman to Hemingway Transmission Line Project (Project) provides detailed information regarding proposed access roads. This Plan has been prepared as an attachment to Exhibit B of the Application for Site Certificate (ASC). Construction and operation of access roads described in this Plan will adhere to applicable site certificate conditions.

1.1 Plan Purpose

The purpose of this Plan is to define which Project roads are included in the Site Boundary, to classify each access road by the type and amount of disturbance, and to determine which Project roads are included in the indirect impacts calculations performed for Rocky Mountain elk (*Cervus canadensis nelsonii*) and greater sage-grouse (*Centrocercus urophasianus*) to supplement the analysis in Exhibit P2 and Exhibit P3. Neither resource-specific nor Project-wide analyses on the type and amount (acres) of impacts from roads are presented in this Plan. That level of analysis occurs in the Exhibits of the ASC. This Plan focuses instead on how each access road segment is defined in preparation for inclusion in impact analyses.

1.2 Regulatory Framework

A number of agencies have jurisdiction over the access and transportation related components of the Project. These include the U.S. Department of the Interior, Bureau of Land Management (BLM), the U.S. Department of Agriculture Forest Service (USFS), Oregon Department of Transportation, Idaho Transportation Department, Federal Highway Administration, local law enforcement and road departments, and local highway districts in the counties crossed by the Project. The Project will comply with applicable federal, state, and local transportation regulations. IPC will impose on its construction contractor(s) the responsibility to meet all applicable legal requirements. Regulations related to the construction, operation, and maintenance of roads are described in detail in Attachment U-2 to Exhibit U. The following list describes the responsibilities of IPC and its construction contractor for implementing road work:

- *Physical Improvements* – IPC's construction contractor will need to improve some local roads to accommodate oversize truck deliveries. This work will involve improvements to road segments, intersections, and bridges, as needed. Any responsibility for IPC or IPC's construction contractors to rehabilitate or reconstruct roadways and structures during and after use will be stipulated in road-use permits or similar documents;
- *Construction Permits and Property Agreements* – The construction contractor will obtain encroachment permits or similar legal agreements from the public agencies responsible for affected roadways and other applicable rights-of-way. IPC will require its construction contractor(s) to ensure that all suppliers of Project equipment and materials obtain applicable oversize and overweight permits and comply with all permit requirements. Timber harvest during right-of-way (ROW) clearing in forested areas will comply with all Oregon Department of Forestry or USFS standards and policies; and
- *Road Standards and Maintenance* – For new access roads, the design of higher-standard roads will conform to the most current edition of the American Association of State Highway and Transportation Officials' Guidelines for Geometric Design of Very Low-Volume Local Roads, for Access Roads with an Anticipated Average Daily Traffic of Less than 400 Vehicles. Roads will meet USFS and BLM standards for roads that will be added to federal jurisdiction. Existing USFS and BLM roads that cannot be used in their

existing condition will be brought up to these standards. For roads on state forest land, IPC will work with Oregon Department of Transportation, Oregon Department of Forestry, and other agencies to ensure compliance with applicable road standards and to obtain any necessary special approvals. Roads that remain in IPC's jurisdiction may not be designed to all federal standards.

1.2.1 Federal

BLM resource management plans and USFS land and resource management plans provide direction on road management along with other resources that govern road construction and use on federal lands. Both the USFS and BLM have access and travel management plans that designate areas for motorized use, prohibit some uses to protect resources, or limit road use to certain times of the year for resource protection. Off-highway vehicle use is further discussed in ASC Exhibit T.

IPC and its contractor(s) will comply with applicable standards and guidelines described in this section and Attachment U-2 to Exhibit U, except where IPC requests Project-specific amendments to those standards. New roads that do not become BLM or USFS roads and remain under IPC's or private landowner jurisdiction may not be constructed to all BLM and USFS standards.

1.2.2 State

In Idaho, the Idaho Transportation Department Guide for Utility Management will be adhered to for the permit, encroachment, and occupancy requirements for construction and operations activities.

In Oregon, activities on non-federal forest lands must also comply with the Oregon Forest Practices Act rules, Oregon Revised Statute (ORS) 527 and its attendant rules, and Oregon Administrative Rules (OAR) Chapter 629, Divisions 605 through 665. These rules will apply to portions of the Project that cross forest lands.

Where a road must cross a fish-bearing stream, bridges will be engineered to comply with the Oregon Department of Fish and Wildlife's (ODFW) Fish Passage Program to allow fish passage and to pass flood flows without damage. Project crossings are presented in the Fish Passage Plans and Designs (Exhibit BB, Attachment BB-3).

The Site Boundary for an Energy Facility Siting Council (Council or EFSC) project must cover, among other things, certain road access associated with the project (see OAR 345-001-0010(55) and -0010(51)). Not all roads used to access the project must be included in the Site Boundary. Rather, the relevant OARs provide the Site Boundary must include only the new roads constructed for the project and the existing roads that will be substantially modified for access to the project (see ORS 496.300(24); OAR 345-001-0010(51)).

Except under certain circumstances, no facility shall be constructed without a site certificate issued by the Council (see OAR 345-021-0000(1)). In this context, the term "facility" applies to energy facilities together with any "related or supporting facilities" (ORS 496.300(14); see also OAR 345-001-0010(21)). "Related or supporting facilities" means "any structure, proposed by the applicant, to be constructed or substantially modified in connection with the construction of an energy facility, including associated . . . road . . . access . . . ." (ORS 496.300(24)). The Council interprets the terms "proposed to be built in connection with" as meaning "that a structure is a related or supporting facility if it would not be built but for construction or operation of the energy facility" (OAR 345-001-0010(51)). Further, related or supporting facilities "does not include any structure existing prior to construction of the energy facility, unless such structure

must be significantly modified solely to serve the energy facility" (Id.). The Site Boundary for an EFSC project must include the perimeter of the energy facility and its related and supporting facilities (see OAR 345-001-0010(55)).

The information in this Plan provides details on access roads to meet the requirements of Exhibits B, C, and P of this ASC. Access roads are considered a "related or supporting facility" under this ASC. This Plan provides information required to be consistent with the following OARs:

- *OAR 345-021-0010(1)(b)(B)* – provides that Exhibit B to an ASC must include a "description of major components, structures, and systems of each related or supporting facility". This Plan describes each road segment (supporting facility) within the Site Boundary in terms of the road classifications defined in Section 2.
- *OAR 345-021-0010(1)(c)(B)* – provides that Exhibit C must include a "description of the location of the…proposed site of each related or supporting facility and areas of temporary disturbance, including the total land area (in acres) within the proposed site boundary, the total area of permanent disturbance, and the total area of temporary disturbance." This Plan includes: a description of the methods applied to determine if a road segment is included in the site boundary; a detailed set of maps showing the location of each road segment; and a description of each road segment in terms of width, length, and total area within temporary and permanent disturbances.
- *OAR 345-021-0010(1)(p)(F)* – provides that Exhibit P must include a "description of the nature, extent, and duration of potential adverse impacts on the habit…" and (G) a "description of any measures proposed by the application to avoid, reduce or mitigate the potential adverse impacts described in (F) in accordance with the ODFW mitigation goals described in OAR 635-415-0025." Application of the methods in this Plan creates a road disturbance dataset that provides information regarding the nature, extent, and duration of road impacts as well as identifies which roads are included in indirect impact calculations. In addition, the Plan includes proposed locations of access control structures. The Plan defines each road segments' disturbance acreages that inform the impact analysis in multiple exhibits and ultimately are used in development of mitigation. This Plan, along with information provided in Exhibits P1, P2, P3, and Q, provides the Council with adequate information to determine that the Project meets the Fish and Wildlife Habitat Standard (OAR 345-022-0060). The standard requires the Project be consistent with ODFW's fish and wildlife habitat mitigation goals and standards (OAR 635-415-0025).
- *OAR 635-140-0025* – Mitigation Hierarchy of Impacts in Sage-grouse Core, Low Density, and General Habitats. This rule reads "Adverse impacts in sage-grouse core, low density, and general habitat from development actions must be mitigated by the developer for both direct and indirect adverse impacts to sage-grouse and their habitats. When ascertaining direct and indirect adverse impacts from development actions, the Department will use the most current and best available science related to sage-grouse biology and habitat conservation, including the March 20, 2012 *Mitigation Framework for Sage-Grouse Habitats*. Mitigation is comprised, in hierarchal order, of avoidance, minimization, and compensatory mitigation." This Plan defines the amount of direct impacts associated with the Project's road segments and identifies which road segments will be included in the indirect impact analysis in sage-grouse habitat per ODFW guidance.

1.2.3 County and Other Agencies

Counties and other public agencies typically require that the placement of any structures on, over, or under roads require an encroachment permit, road-use permits, or other appropriate license for ROW occupancy.

In addition, an encroachment permit or similar authorization will be required from the applicable jurisdictional agency at locations where construction activities will occur within or above the public-road ROW. The specific requirements of the encroachment permit from the applicable transportation agencies are determined on a project-by-project basis.

2.0 ACCESS ROAD CLASSIFICATION

Construction of the Project will require vehicle, truck, and crane access to all construction areas. Existing roads will be used as the main access road network. IPC assumes that existing paved roads and bridges were designed to meet Oregon Department of Transportation and Idaho Transportation Department and other applicable standards and will therefore not require improvements prior to Project construction. Access to construction sites will require improvements to existing unpaved roads and construction of new access roads. Construction of new access roads will be required only as necessary to access structure sites lacking direct access from existing roads, or where topographic conditions such as steep terrain, rocky outcrops, and drainages prohibit safe overland access to the Project. Most construction areas will be accessed using low-standard roads including those owned by private parties, counties, and state and federal agencies.

County roads are left off Talbe2: Access road ownership on page 12

2.1 Definitions

The following definitions and figures are provided for clarification:

Access Road: A linear travel route designated to support construction, operation, and maintenance of the transmission line.

Bladed Road: Roads constructed using heavy equipment and designed to support vehicular traffic. Bladed road features typically include cuts and/or fills to construct a smooth travel surface and manage surface water drainage and include the manipulation or creation of a road prism and profile. Bladed roads are used where side slope is over 8 percent or over rough and uneven terrain. Typical construction disturbance is 16 feet wide, but can be up to 35 feet wide as dictated by terrain and soil condition. The operational width is 14 feet.

Primitive Road: Commonly called a “two track” or “overland travel” road, a primitive road is a road created by the operator’s direct vehicle use with little or no grading and includes overland routes within a defined travel corridor that leave no defined roadway beyond crushed vegetation. Clearing of woody vegetation and other obstruction will commonly occur along the travel way to allow safe vehicular travel. Drainage must be maintained, where appropriate, to avoid erosion or the creation of a muddy, braided road. Primitive roads or routes necessitate low vehicle speed and are typically limited to four-wheel drive or high clearance vehicles. Primitive roads are not intended for use as all-weather roads.

Road Alignment: The series of horizontal curves and tangents that define the travel path.

Road Prism: The area consisting of the road surface and any cut slope, fill slope and contiguous drainage features (Figures 1, 2, and 3). For primitive roads, the road prism is defined as the travel surface and extent of clearing necessary for horizontal clearance or the extent of modification from the natural condition, whichever is greater (Figure 4).

Road Profile: The trace of a vertical plane intersecting the surface along the longitudinal centerline of the roadbed.

Road Segment: The section of road between nodes of a road network (Figure 5). Nodes occur at one of the following three points:

- Intersections/splits in the road network;
- Points where new roads (bladed or primitive) meet existing roads (substantial modification or no substantial modification); or
- Points where new bladed roads meet new primitive roads.

Road Surface: The surface of the road on which vehicles would travel.

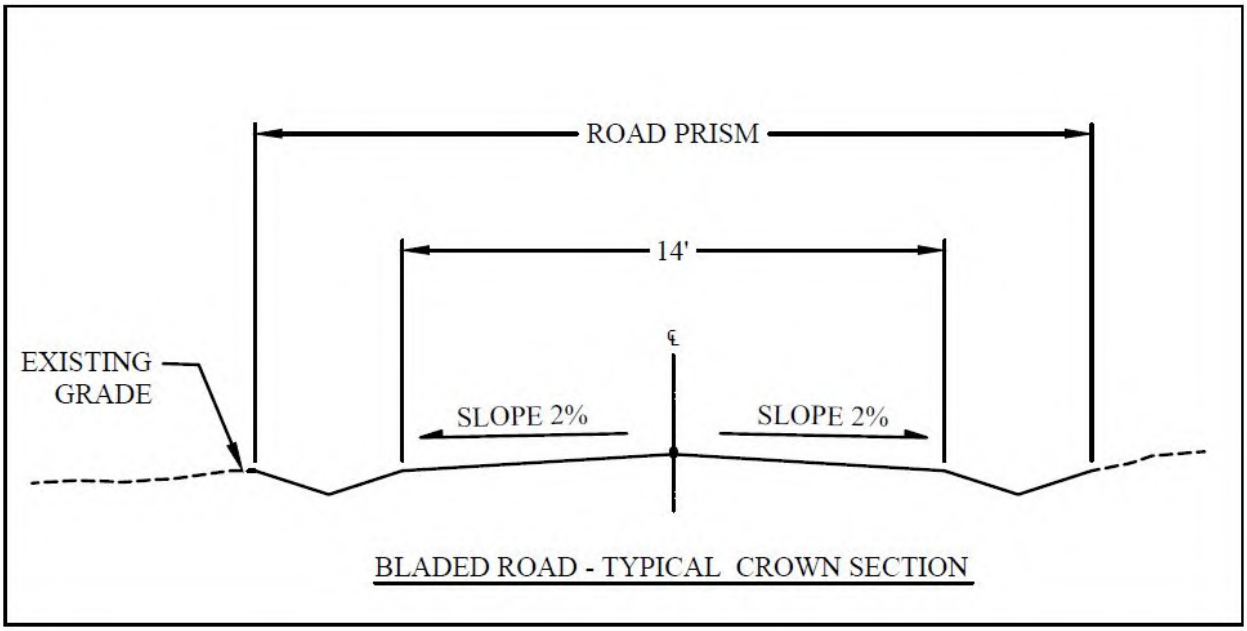

Figure 1. Road Prism Typical Crown Section

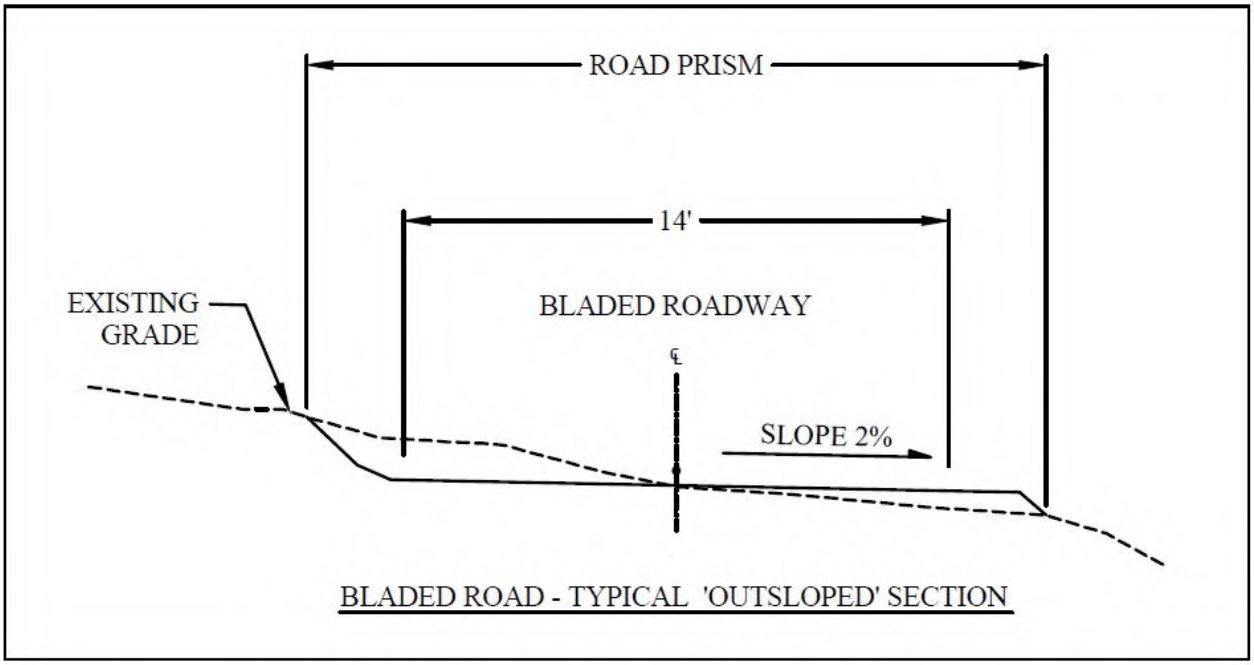

Figure 2. Road Prism Typical Outsloped Section

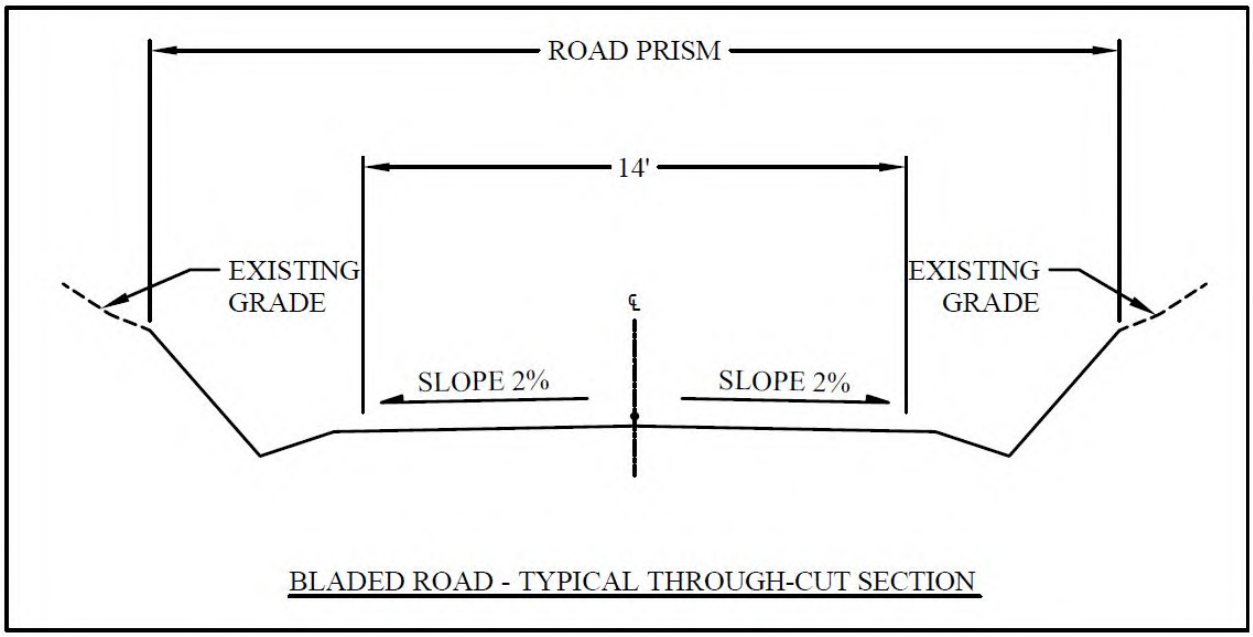

Figure 3. Road Prism Typical Through-Cut Section

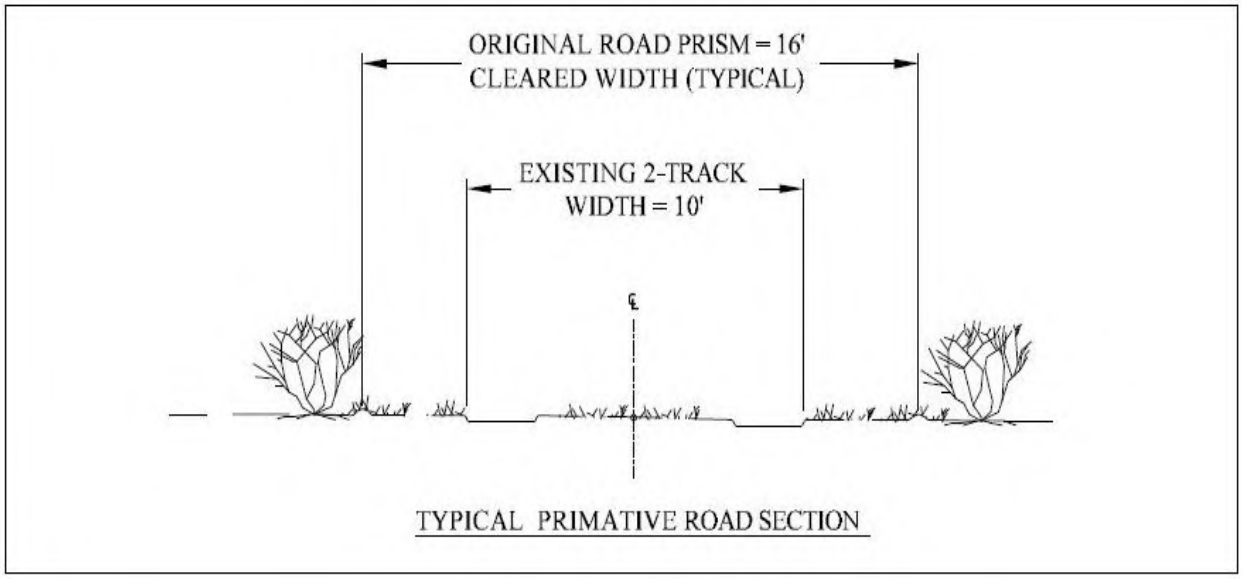

Figure 4. Road Prism Typical Primitive Road Section

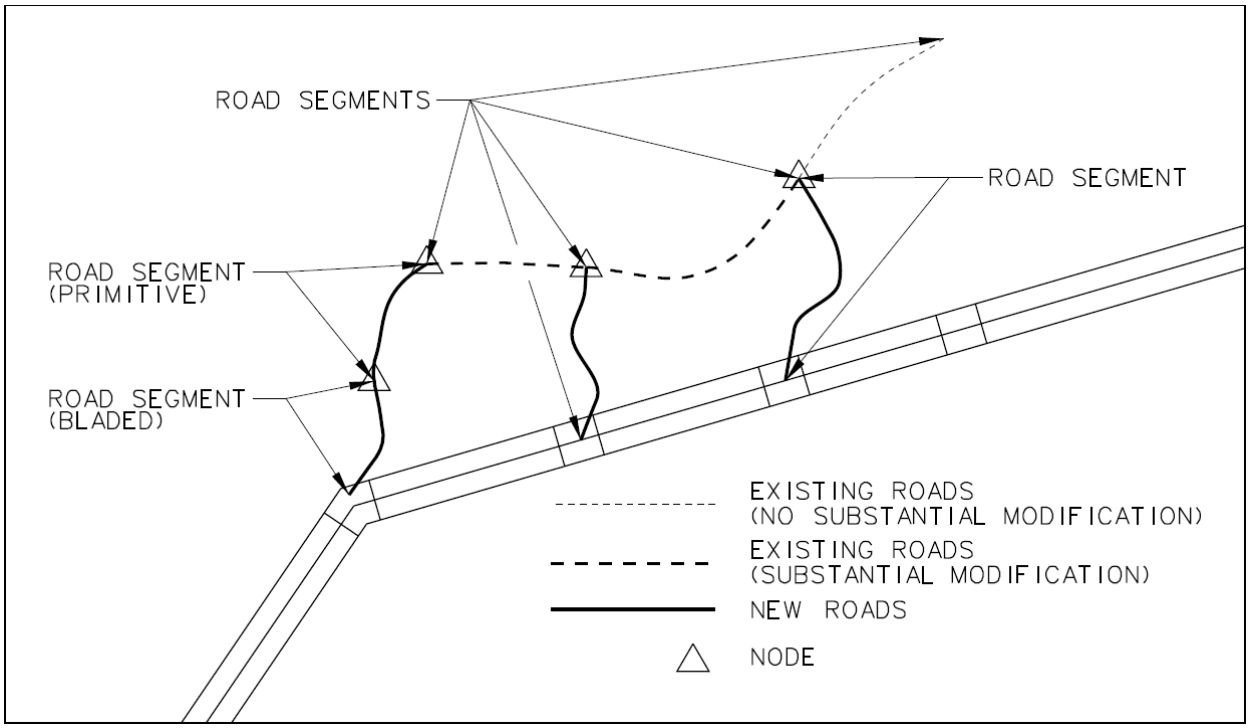

Figure 5. Road Segment Diagram

2.2 Access Road Classification Methodology

2.2.1 Identifying Road Segments

As a first step, IPC identified each of the roads that will be used to access the transmission line and its related and supporting facilities. Next, IPC segmented the roads so that each segment could be classified. The endpoints (also referred to as nodes) of each road segment were located at the following points:

- Intersections/splits in the road network;
- Points where new roads (bladed or primitive) meet existing roads (substantial modification or no substantial modification); or
- Points where new bladed roads meet new primitive roads.

2.2.2 Classifying Road Segments

IPC classified each road segment based upon the type of repair or level of disturbance that will be needed to make the roads usable for construction and operation of the Project. Each road segment was placed into one of the following three classifications: (i) new roads constructed for the Project; (ii) existing roads that will be substantially modified; and (iii) existing roads that will not be substantially modified.[1] The classifications are described in detail in Sections 2.2.2.1 through 2.2.2.3, and summarized in Table 1 below.

Table 1. Summary of Access Road Classifications

Access Road Classification		Site Boundary	Construction Disturbance	Operations Disturbance	Road Prism or Profile Changes	Extent of Work
New Roads	Primitive	200 feet	16 feet	10 feet	Yes	Clearing of vegetation or obstructions. Create roads by direct vehicle travel.
	Bladed	200 feet	16–35 feet	14 feet	Yes	Clearing of vegetation or obstructions. Create roads by cutting/filling existing terrain.
Existing Roads - Substantial Modification	Substantial Modification, 21-70% Improved	100 feet	16 feet	14 feet	Yes	Reconstruct portions of existing road to improve road function. Possible road prism widening, profile adjustments, horizontal curve adjustments, or material placement.

[1] IPC reserves the right to request that ODOE acknowledge the reclassification of the road segments based on the final Project design and construction—for example, if the construction contractor determines that a road segment identified as requiring substantial modification needs no or limited improvements, IPC may request that the road segment be reclassified as “no substantial modification.”

Access Road Classification		Site Boundary	Construction Disturbance	Operations Disturbance	Road Prism or Profile Changes	Extent of Work
	Substantial Modification, 71-100% Improved	100 feet	16–30 feet	14 feet	Yes	Reconstruct portions of existing road to improve road function. Possible road prism widening, profile adjustments, horizontal curve adjustments, or material placement.
Existing Roads – No Substantial Modification	No Substantial Modification, 0-20% Improved	NA[1]	NA[1]	NA[1]	No	Repair of existing road to maintain original road function. No betterment of existing road function or design.

[1] Existing roads with no substantial modifications are not included in the Site Boundary and do not have an operation or construction disturbance width assigned to them.

2.2.2.1 New Roads

New Primitive Roads. New primitive roads are characterized as follows:

- Created by direct vehicle travel over native material and existing vegetation.
- Disturbance may include clearing of large woody vegetation and other obstructions to ensure safe vehicle operation.
- Will generally be present on the landscape as two-track roads leaving no disturbance beyond the edge of the travel surface.
- May require intermittent maintenance work to support continued safe vehicle passage during construction.
- Typical construction disturbance is 16 feet wide. The operational width is 10 feet. The Site Boundary for a new primitive road will be 200 feet wide (100 feet each side of centerline).

New Bladed Roads. New bladed roads are characterized as follows:

- Construction of new road prism across side slope over 8 percent or over rough and uneven terrain.
- Typical construction disturbance is 16 feet wide, but can be up to 35 feet wide as dictated by terrain and soil conditions. The operational width is 14 feet. The Site Boundary for a new bladed road will be 200 feet wide (100 feet each side of centerline).

New roads are identified as being primitive or bladed for purposes of describing the disturbance width. The disturbance width may affect the Project's impact analysis elsewhere in the application, but it does not affect the classification of the roads for purposes of determining whether they are included in the Site Boundary. All new roads—primitive or bladed—are considered related or supporting facilities and are included in the Site Boundary.

2.2.2.2 Existing Roads – Substantial Modification

To determine whether existing roads will require improvements, IPC conducted field reconnaissance and surveyed aerial photos of existing road segments. If IPC determined improvements to an existing road will involve one or more of the following activities, the road segment was classified as requiring substantial improvements: (1) increasing the width of the existing road prism, (2) changing the existing road alignment, (3) using materials inconsistent with the existing road surface, (4) changing the existing road profile, or (5) involving repairs to more than 20 percent of the road surface area defined by road prism width and longitudinal distance over a defined road segment.

Existing roads that will require substantial modification are characterized as follows:

- Typical construction disturbance is 16 feet wide, but can be up to 30 feet wide when road modification exceeds 70 percent. The operational width is 14 feet. The Site Boundary for a substantial modification existing road will be 100 feet wide (50 feet each side of centerline).

Existing roads requiring substantial modification are identified as requiring 21–70 percent improvements or 71–100 percent improvements. The distinction between the two improvement categories may affect the Project's impact analysis in other sections of the application, but it does not affect the classification of the roads for purposes of determining whether they are included in the site boundary. Each existing road requiring improvements to more than 20 percent of the road is considered a related or supporting facility and is included in the site boundary.

2.2.2.3 Existing Roads – No Substantial Modification.

IPC classified existing road segments as requiring no substantial improvements if the road segments will meet each of the following criteria:

1. Road maintenance activities will be limited to repair of the road prism to (i) produce a stable operating surface, (ii) ensure proper drainage and erosion control, and (iii) establish horizontal clearance;
2. Proposed repair and/or construction activities will not (i) increase the width of the existing road prism, (ii) change the existing road alignment, (iii) use materials inconsistent with the existing road surface, and/or (iv) change the existing road profile; and
3. Repairs will be limited to 20 percent or less of the road surface area defined by the road prism width and longitudinal distance over a defined road segment.

2.3 Access Control

Access control will be implemented where agencies and landowners have concern about increased or unauthorized access to lands. Access control will also be implemented to minimize the effects that roads have on wildlife and wildlife habitat. These effects are discussed in Exhibits P1, P2, P3, and Q. This Plan only identifies potential access control locations for road segments within elk and sage-grouse habitat, access control on road segments outside of elk and sage-grouse habitat are yet to be determined. Access control locations have not been reviewed with interested parties and are considered preliminary. Proposed access control locations will be vetted with landowners and agencies and field verifications will need to occur prior to installation.

Many of the proposed locations for access control occur in locations where it is anticipated that some level of access control is already present, such as fence lines, property boundaries, and private driveways. Therefore, some of the proposed access control locations are likely already providing sufficient access control and little to no improvement of those access controls would be required to maintain effectiveness. IPC developed this Plan in consideration of ORS 105.700 regarding prohibiting public access to private land, and ORS 164.245 regarding criminal trespass. This Plan assumes that access control on private property is effective because of these statutes. Placement of access control on private parcels was reviewed for the ingress and egress required to support construction and operation of the Project.

This Plan does not propose any access control for existing roads on public land. Access control for new roads on public lands depends on how those lands are designated within the respective agency's travel management plan. Access control is not proposed for any Project roads on public lands that are designated as open. Access control is proposed for all new roads on public lands that are designated as limited, except where multiple existing roads cross the proposed new road making access control a burden and unlikely to be effective. No Project roads occur within public lands designated as closed.

Specific types of access control are not proposed in this Plan; however, they would typically involve fencing, gates, barriers, and/or signage as preferred by the landowner or agency while maintaining effectiveness. Figure 6 shows a typical gate found on public land that would limit motorized access.

Figure 6. Typical Gate

3.0 ACCESS ROAD DIRECT IMPACT CALCULATIONS AND INDIRECT IMPACT DESIGNATION

The Project layout is maintained within a Geographical Information System (GIS) for analysis during Project permitting. Access roads are maintained within their own dataset within the GIS. Within the access road dataset each road segment has its own entry (row) where attributes (columns) are maintained that provide information on the nature, extent, and duration of impacts.

All ground disturbance associated with road segments within the Site Boundary will have direct impacts on wildlife habitat, and those impacts are part of the analysis discussed in Exhibits P1, P2, P3, and Q. Ground-disturbing activities can also have indirect impacts on wildlife habitat. Indirect impacts are those that are caused by the direct impact but occur later in time or farther removed in distance. Specific examples of indirect impacts on wildlife habitat are presented in Exhibits P2 and P3.

The nature of the impact is defined by the road classification attributed to each road segment (i.e., definition of substantial modification or primitive or bladed roads). The extent of the impact for direct impacts is defined by the construction and operational widths as described in the road classifications and the length of each road segment which is generated by default within the GIS. The duration of the impacts depends on whether the road disturbance is attributed as temporary or permanent. The definition of temporary and permanent impacts and their duration can be found in Exhibit P1. The extent of indirect impacts depends on guidance provided by ODFW and is detailed in Exhibits P1, P2, and P3.

Table 2 defines each attribute found within the access road GIS dataset and included in Appendix A. These attributes describe the amount of direct impacts associated with ground disturbance that is anticipated for each road segment. Attributes are also considered when determining if a road segment will be included in the calculation of indirect impacts. A flowchart was developed (Figure 7) to make the determination whether to include a road in the indirect impact analysis. To justify the determination displayed in Figure 7, IPC proposes the following condition in the site certificate:

> ***Fish and Wildlife Condition X****: To quantify the Project's effects on traffic rates on existing public roads, a traffic study will be conducted. Traffic volume will be measured on a sample of existing public roads that will not have access control for one year in the year prior to construction and for one year in the second year of operation. The timing of the study will best represent traffic conditions immediately prior to construction and after traffic has normalized to represent life-of-Project traffic.*

Table 2. Access Road GIS Attributes

Attribute	Definition
Unique ID	The unique identification for each road segment. The identification contains a two-letter acronym for the county where it occurs (BA=Baker, MA=Malheur, etc.), and a sequential number based on the northing coordinate of the midpoint of the road segment (ordered from north to south). Example: BA-126.
Route	Identifies which route the road segment is accessing (i.e., Proposed Route, Double Mountain Alternative, or Morgan Lake Alternative).
Road Classification	Road classification based on Section 2.2. Example: Existing Road, Substantial Modification, 21-70% Improved.
Ownership	The land owner at the midpoint of the road segment. PV = private; DOD = Department of Defense; BLM = Bureau of Land Management; USFS = U.S. Forest Service; STATE = State of Oregon/Idaho; and BOR = Bureau of Reclamation.
Map Page	Reference to the specific map tile or page number of mapbook located in Appendix B where the road segment can be viewed.

Attribute	Definition
Access Control	Is access control present on the road segment? **Yes** or **No** (or **NA** if outside sage-grouse and/or elk habitat). If access control placed on another road segment is effectively controlling access to this segment then the cell will be populated with **Other**. This directs the reader to the Other column where the location of the effective access control is described.
Other	This cell will identify the Unique ID of the road segment where access control has been placed and is influencing traffic volume on this segment.
Percent Modification	Percent of road modification. Estimated linear feet to be modified/total linear feet in road segment.
Road Length	Total length of road segment in linear feet.
Construction Width	Width of construction disturbance in feet (default value based on Road Classification definition).
Operation Width	Operational width of road segment in feet (default value based on Road Classification definition).
Construction Acres	Acres of construction disturbance; includes both the operational road segment area (permanent impact) and the temporary impact outside of the operational road. (Percent Modification x (Road Length x Construction Width))/43,560 square feet.
Operation Acres	Acres of operation disturbance, aka "permanent impacts" (Percent Modification x (Road Length x Operation Width))/43,560 square feet.
Temporary Acres	Acres of "temporary impacts" (Construction Acres – Operation Acres).
Spur Road	Is the road a “spur road”? **Yes** or **No** (or **NA** if outside sage-grouse and/or elk habitat). A spur road is one that ends at a structure and whose endpoint is visible from the point of departure. This consideration is part of the indirect impact flowchart (Figure 7). A spur road is assumed to have no increase in traffic regardless of access control.
Traffic Volume Increase	Is there an anticipated increase in traffic volume? **Yes** or **No** (or **NA** if outside sage-grouse and/or elk habitat). (Figure 7)
Wildlife	Does the road segment overlap elk winter/summer range or sage-grouse habitat? **Yes** or **No**.
Include in Indirect	Will the road be included in indirect impacts calculation? **Yes** or **No**. (If ‘Traffic Volume Increase’ = Yes and ‘Wildlife’ = Yes, then ‘Include in Indirect Impacts Mitigation’ = Yes; otherwise = No). (Figure 7).

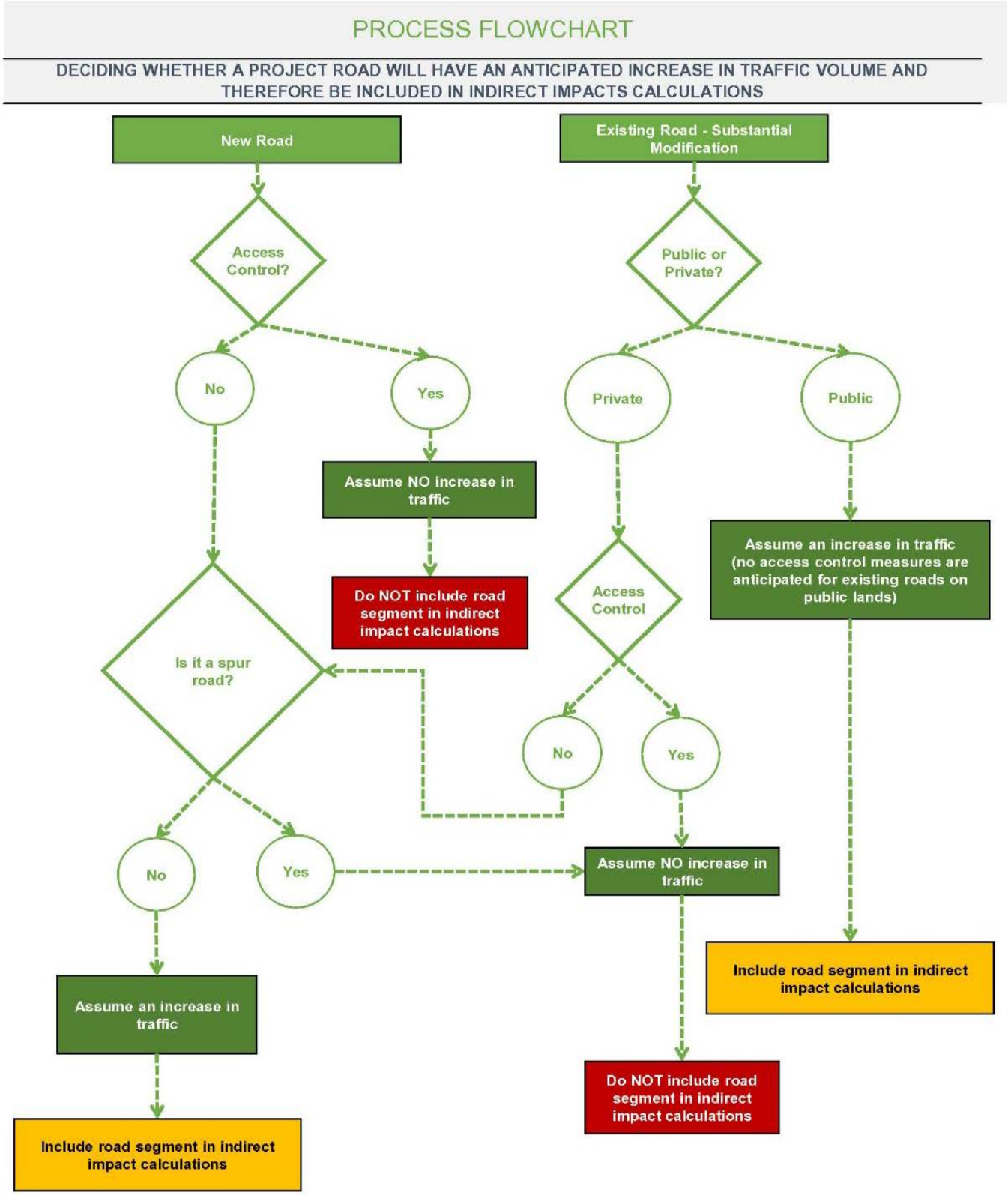

Figure 7. Indirect Impact Flowchart

3.1 Example of Road Segments

Figure 8 shows an example of the Project road segment classification and access control. Table 3 shows the attribute table for the road segments in the example. The table only shows construction impacts attributes for ease of explanation.

Road segment UN-102 is an existing road with substantial modification (21-70 percent improvements) on USFS land within elk winter range. No access control is proposed for this road or any existing roads on USFS- or BLM-managed lands. Modifications would provide improved access; therefore, an increase in traffic volume is assumed. Since the road segment is within elk winter range and an increase in traffic is assumed, UN-102 will be included in indirect impact calculations for elk. It will result in 0.636 acre of direct impact during construction.

Road segment UN-105 is a new, bladed road on USFS land within elk winter range. No access control is proposed for this road segment. This road segment is considered a spur road (Figure 7); therefore, no increase in traffic volume is assumed. UN-105 will not be included in indirect impact calculations for elk. It will result in 0.261 acre of direct impacts during construction.

Road segment UN-106 is an existing road with substantial modification (21-70 percent improvements) on both USFS (0.087 acre of direct impact) and private land (0.173 acre of direct impact) within elk winter range. Access control is proposed for this road segment at the property line shared with the USFS. The portion of UN-106 on USFS land will be included in the indirect impact calculations for elk. The portion of the road segment on private land has access control and will not be included in indirect impact calculations for elk.

Road segments UN-112 (0.338 acre of direct impact) and UN-116 (0.383 acre of direct impact) are existing roads with substantial modification (21-70 percent improvements) on private land within elk winter range. Access control for both road segments occurs on road segment UN-106; therefore, neither road segment is included in the indirect impact calculations for elk.

Road segments Un-111 (0.041 acre), UN-113 (0.250 acre), UN-114 (0.100 acre), UN-115 (0.365 acre), UN-117 (0.527 acre), and UN-128 (1.627 acres) are all new road segments on private land within elk winter range. UN-128 is a new bladed road segment while the others are new primitive road segments. UN-111 and UN-114 are both considered spur roads. All of these road segments are access controlled at road segment UN-106 and not included in the indirect impact calculation for elk.

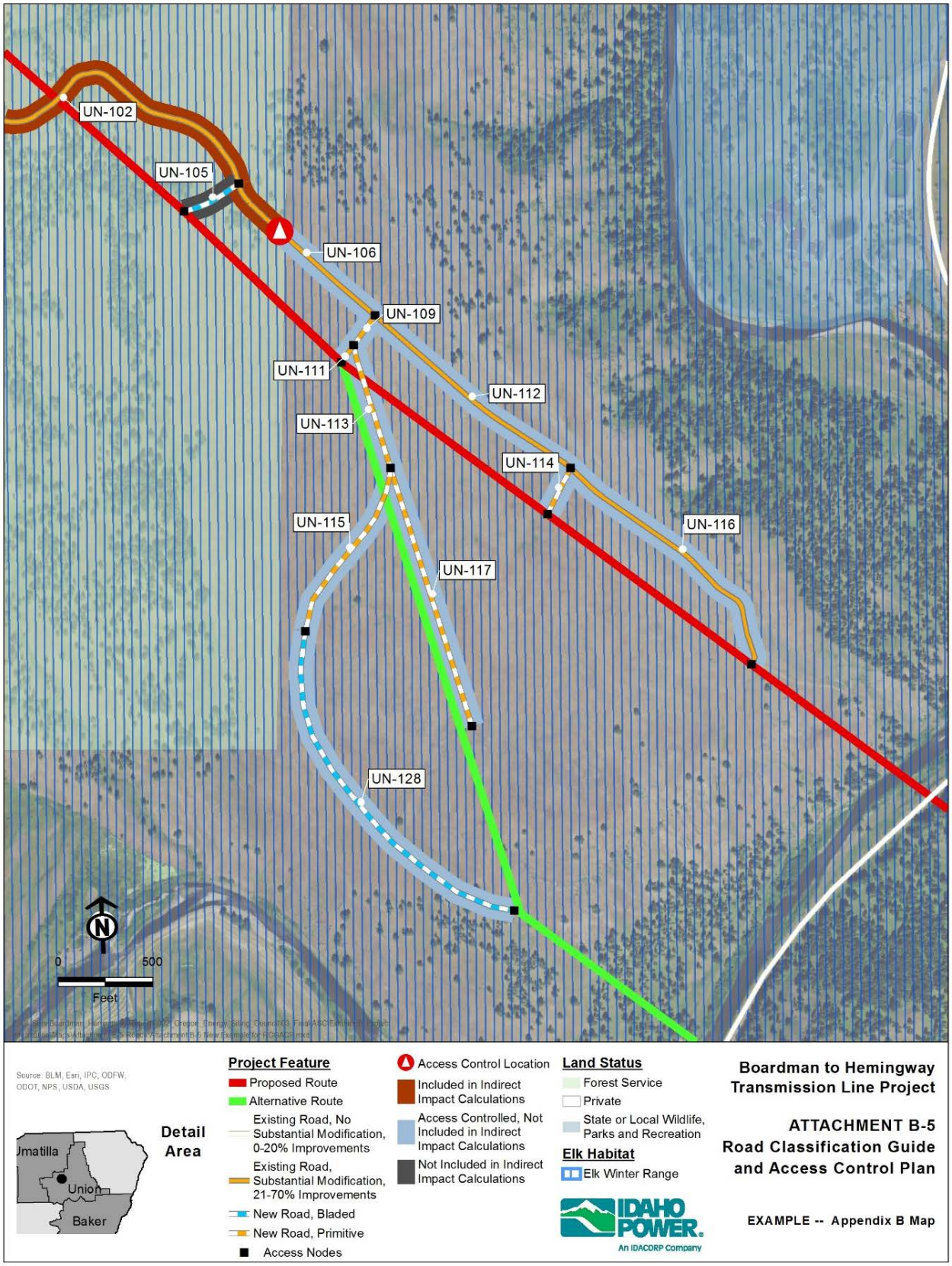

Figure 8. Road Segment Example

Another useless map of Union County

Table 3. Attribute Table for Road Segment Example

							Direct Impact Calculation				Indirect Impact Consideration			
Unique ID	**Map Page**	**Route**	**Road Classification**	**Owner**	**Access Control**	**Other**	**Percent Modification**	**Road Length (ft)**	**Construction Width (ft)**	**Construction Acres**	**Spur Road**	**Traffic Volume Increase**	**Wildlife**	**Include in Indirect**
UN-102	61	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	2474.67	16	0.636	No	Yes	Yes	Yes
UN-105	61	Proposed Route	New Road, Bladed	USFS	No	NA	1.0	325.08	35	0.261	Yes	No	Yes	No
UN-106	61	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	671.70	16	0.173	No	No	Yes	No
UN-106	61	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	338.89	16	0.087	No	Yes	Yes	Yes
UN-109	61	Proposed Route	New Road, Primitive	PV	Other	UN-106	1.0	192.57	16	0.071	No	No	Yes	No
UN-109	61	Morgan Lake Alt.	New Road, Primitive	PV	Other	UN-106	1.0	192.57	16	0.071	No	No	Yes	No
UN-111	61	Proposed Route	New Road, Primitive	PV	Other	UN-106	1.0	111.43	16	0.041	Yes	No	Yes	No
UN-111	61	Morgan Lake Alt.	New Road, Primitive	PV	Other	UN-106	1.0	111.43	16	0.041	Yes	No	Yes	No
UN-112	61	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-106	0.7	1316.03	16	0.338	No	No	Yes	No
UN-113	61	Morgan Lake Alt.	New Road, Primitive	PV	Other	UN-106	1.0	680.01	16	0.250	No	No	Yes	No
UN-114	61	Proposed Route	New Road, Primitive	PV	Other	UN-106	1.0	273.40	16	0.100	Yes	No	Yes	No
UN-115	61	Morgan Lake Alt.	New Road, Primitive	PV	Other	UN-106	1.0	994.42	16	0.365	No	No	Yes	No

Unique ID	Map Page	Route	Road Classification	Owner	Access Control	Other	Direct Impact Calculation				Indirect Impact Consideration			
							Percent Modification	Road Length (ft)	Construction Width (ft)	Construction Acres	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect
UN-116	61	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-106	0.7	1490.65	16	0.383	No	No	Yes	No
UN-117	61	Morgan Lake Alt.	New Road, Primitive	PV	Other	UN-106	1.0	1433.49	16	0.527	No	No	Yes	No
UN-128	61	Morgan Lake Alt.	New Road, Bladed	PV	Other	UN-106	1.0	2025.16	35	1.627	No	No	Yes	No

Un- is Union County
Idaho Power lists the owner of the roads as PV Private and that the traffic Volume will not increase. How could this me true if they are planning to use the proposed Foothill to Hawthorne access road?

4.0 ACCESS ROAD SUMMARY

Classification of Project access roads follows the methods shown in Section 3. A complete list of all Project road segments is provided in Appendix A. The location of each access road segment is displayed on maps in Appendix B. The maps display each road segment, preliminary access control locations, ownership, and elk and sage-grouse habitat. A discussion on the type and amount (acres) of impact associated with roads are not presented in this Plan. The road impacts are part of the analysis performed within other Exhibits throughout the ASC. The following is a summary of miles of road segments according to their road classification and access control status.

Vehicular traffic associated with construction and operation of the Proposed Route in Oregon will require access to 670 miles of new and existing roads including:

- 241 miles of existing roads with no substantial improvements;
- 150 miles of existing roads with 21-70 percent improvement;
- 73 miles of existing roads with 71-100 percent improvement;
- 89 miles of new bladed roads; and
- 117 miles of new primitive roads.

Of the 429 miles of existing roads requiring improvement, and new roads associated with the Proposed Route in Oregon:

- 125 miles occur within elk habitat outside of elk de-emphasis areas (includes the Columbia Basin and East Beulah Wildlife Management Units);
- 91 miles of the 125 miles within elk habitat are access controlled;
- 31 miles are identified for inclusion in the indirect impact analysis for elk (Exhibit P3);
- 89 miles occur within sage-grouse habitat;
- 59 miles of the 89 miles within sage-grouse habitat are access controlled;
- 27 miles are identified for inclusion in the indirect impact analysis for sage-grouse (Exhibit P2).

Vehicular traffic associated with construction and operation of the Double Mountain Alternative in Oregon will require access to 23 miles of new and existing roads including:

- 6 miles of existing roads with no substantial improvements;
- 1 mile of existing roads with 21-70 percent improvement;
- 4 miles of existing roads with 71-100 percent improvement;
- 8 miles of new bladed roads; and
- 4 miles of new primitive roads.

Of the 17 miles of existing roads requiring improvement, and new roads associated with the Double Mountain Alternative:

- 0 miles occur within elk habitat; and
- 0 miles occur within sage-grouse habitat.

Vehicular traffic associated with construction and operation of the Morgan Lake Alternative in Oregon will require access to 62 miles of new and existing roads including:

- 31 miles of existing roads with no substantial improvements;
- 13 miles of existing roads with 21-70 percent improvement;
- 3 miles of existing roads with 71-100 percent improvement;
- 6 miles of new bladed roads; and
- 9 miles of new primitive roads.

Of the 31 miles of existing roads requiring improvement, and new roads associated with the Morgan Lake Alternative:

- All 31 miles occur within elk habitat;
- 22 miles are access controlled;
- 8 miles are identified for inclusion in the indirect impact analysis for elk; and
- 0 miles occur within sage-grouse habitat.

Vehicular traffic associated with construction and operation of the West of Bombing Range Road Alternative 1 in Oregon will require access to 4 miles of new and existing roads including:

- 1 mile of existing roads with no substantial improvements;
- 1 mile of existing roads with 21-70 percent improvement;
- 0 miles of existing roads with 71-100 percent improvement;
- 0 miles of new bladed roads; and
- 2 miles of new primitive roads.

Of the 3 miles of existing roads requiring improvement, and new roads associated with the West of Bombing Range Road Alternative 1:

- 0 miles occur within elk habitat; and
- 0 miles occur within sage-grouse habitat.

Vehicular traffic associated with construction and operation of the West of Bombing Range Road Alternative 2 in Oregon will require access to 6 miles of new and existing roads including:

- 3 miles of existing roads with no substantial improvements;
- 1 mile of existing roads with 21-70 percent improvement;
- 0 miles of existing roads with 71-100 percent improvement;
- 0 miles of new bladed roads; and
- 2 miles of new primitive roads.

Of the 3 miles of existing roads requiring improvement, and new roads associated with the West of Bombing Range Road Alternative 2:

- 0 miles occur within elk habitat; and
- 0 miles occur within sage-grouse habitat.

APPENDIX A
ACCESS ROAD SEGMENTS ATTRIBUTE TABLE

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MO-001	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,726.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-002	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	107.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-003	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,793.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-004	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	159.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-005	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	558.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-006	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	984.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-007	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	223.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-008	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,061.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-009	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	559.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-010	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	180.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-011	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	229.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-012	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,939.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-013	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	506.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-014	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	10,146.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-015	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,093.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-016	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	570.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-017	1	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	287.5	16	10	0.11	0.07	0.04	NA	NA	No	No	No	No
MO-018	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	512.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-019	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,522.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-020	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	239.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-021	1	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	361.3	16	10	0.13	0.08	0.05	NA	NA	No	No	No	No
MO-022	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	695.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-023	1	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	622.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-024	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,267.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-025	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	562.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-026	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	27.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-027	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	25.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-028	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	587.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-029	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	53.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-030	2	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,568.8	16	10	0.58	0.36	0.22	NA	NA	No	No	No	No
MO-031	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	930.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-032	2	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	326.0	16	10	0.12	0.07	0.04	NA	NA	No	No	No	No
MO-033	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,570.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-034	2	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	68.8	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
MO-035	2	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	928.8	16	10	0.34	0.21	0.13	NA	NA	No	No	No	No
MO-036	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,226.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-037	2	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	184.8	16	10	0.07	0.04	0.03	NA	NA	No	No	No	No
MO-038	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	111.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-039	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,189.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-040	2	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	561.2	16	10	0.21	0.13	0.08	NA	NA	No	No	No	No
MO-041	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	875.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-042	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	51.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-043	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	31.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-044	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	396.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-045	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,333.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-046	2	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	997.0	16	10	0.37	0.23	0.14	NA	NA	No	No	No	No
MO-047	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	73.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-048	2	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	51.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-050	3	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	9,552.3	16	14	2.46	2.15	0.31	NA	NA	No	No	No	No
MO-051	3	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	9,539.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-053	3	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	18,943.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-054	3	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	57.6	16	14	0.01	0.01	0.00	NA	NA	No	No	No	No
MO-055	3	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	7,152.8	16	14	1.84	1.61	0.23	NA	NA	No	No	No	No
MO-056	3	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	7,152.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-057	3	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	58.8	16	14	0.02	0.01	0.00	NA	NA	No	No	No	No
MO-058	4	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	2,252.5	16	14	0.58	0.51	0.07	NA	NA	No	No	No	No
MO-059	4	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	2,251.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-060A	4	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	68.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-060B	4	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	39.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-061	4	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	2,457.8	16	14	0.63	0.55	0.08	NA	NA	No	No	No	No
MO-062	4	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	18,174.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-063	4	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	21,938.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-064	4	Proposed Route	New Road, Primitive	DOD	NA	NA	1.0	19,484.2	16	10	7.16	4.47	2.68	NA	NA	No	No	No	No
MO-065	5	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	66.0	16	10	0.02	0.02	0.01	NA	NA	No	No	No	No
MO-067	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	912.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-068	5	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	879.4	16	10	0.32	0.20	0.12	NA	NA	No	No	No	No
MO-069	5	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	77.5	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
MO-070	5	West of Bombing Range Road Alternative 1	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	55.6	16	14	0.01	0.01	0.00	NA	NA	No	No	No	No
MO-071	5	West of Bombing Range Road Alternative 1	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	84.0	16	14	0.02	0.02	0.00	NA	NA	No	No	No	No
MO-072	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	811.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-074	5	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	2,319.1	16	10	0.85	0.53	0.32	NA	NA	No	No	No	No
MO-075	5	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	95.2	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
MO-076	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	933.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-079	5	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	73.9	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
MO-080	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	753.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MO-082	5	West of Bombing Range Road Alternative 1	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	267.5	16	14	0.07	0.06	0.01	NA	NA	No	No	No	No
MO-083	5	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	54.4	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
MO-084	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	727.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-086	5	Proposed Route	New Road, Primitive	DOD	NA	NA	1.0	52.3	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
MO-087	5	West of Bombing Range Road Alternative 1	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	54.4	16	14	0.01	0.01	0.00	NA	NA	No	No	No	No
MO-088	5	West of Bombing Range Road Alternative 1	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	677.7	16	14	0.17	0.15	0.02	NA	NA	No	No	No	No
MO-089	5	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	1,410.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-091	5	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	48.7	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
MO-092	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	582.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-094	5	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	772.2	16	10	0.28	0.18	0.11	NA	NA	No	No	No	No
MO-095	5	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	59.2	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
MO-096	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	655.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-098	5	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	498.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-098	5	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	498.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-098	5	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	34.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-098	5	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	34.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-100	5	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	123.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-102	5	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	340.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-104	5	West of Bombing Range Road Alternative 1	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	59.9	16	14	0.02	0.01	0.00	NA	NA	No	No	No	No
MO-105	5	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	94.7	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
MO-106	5	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	2,649.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-108	5	West of Bombing Range Road Alternative 1	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	741.2	16	14	0.19	0.17	0.02	NA	NA	No	No	No	No
MO-109	5	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	47.7	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
MO-110	5	Proposed Route	New Road, Primitive	DOD	NA	NA	1.0	4,064.2	16	10	1.49	0.93	0.56	NA	NA	No	No	No	No
MO-111	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	687.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-113	5	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	52.5	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
MO-114	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	675.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-116	5	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	57.9	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
MO-117	5	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	940.8	16	10	0.35	0.22	0.13	NA	NA	No	No	No	No
MO-118	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	680.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-120	5	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	70.1	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
MO-121	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	84.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-123	5	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	673.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-123	5	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	127.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-123	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	127.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-126	5	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	546.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-126	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	546.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-129	5	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	243.0	16	14	0.06	0.05	0.01	NA	NA	No	No	No	No
MO-130	5	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	185.2	16	14	0.05	0.04	0.01	NA	NA	No	No	No	No
MO-131	5	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	716.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-133	6	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	1,294.6	16	10	0.48	0.30	0.18	NA	NA	No	No	No	No
MO-133	6	West of Bombing Range Road Alternative 2	New Road, Primitive	PV	NA	NA	1.0	1,294.6	16	10	0.48	0.30	0.18	NA	NA	No	No	No	No
MO-135	6	West of Bombing Range Road Alternative 2	New Road, Primitive	DOD	NA	NA	1.0	63.7	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
MO-136	6	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	3,557.4	16	14	0.91	0.80	0.11	NA	NA	No	No	No	No
MO-137	6	Proposed Route	New Road, Primitive	DOD	NA	NA	1.0	541.4	16	10	0.20	0.12	0.07	NA	NA	No	No	No	No
MO-138	6	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,782.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-140	6	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	1,310.4	16	10	0.48	0.30	0.18	NA	NA	No	No	No	No
MO-140	6	West of Bombing Range Road Alternative 2	New Road, Primitive	PV	NA	NA	1.0	1,310.4	16	10	0.48	0.30	0.18	NA	NA	No	No	No	No
MO-142	6	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	1,126.6	16	14	0.29	0.25	0.04	NA	NA	No	No	No	No
MO-143	6	West of Bombing Range Road Alternative 1	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	649.0	16	14	0.17	0.15	0.02	NA	NA	No	No	No	No
MO-143	6	West of Bombing Range Road Alternative 2	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	649.0	16	14	0.17	0.15	0.02	NA	NA	No	No	No	No
MO-145	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	85.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-146	6	West of Bombing Range Road Alternative 1	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,042.9	16	14	0.27	0.23	0.03	NA	NA	No	No	No	No
MO-146	6	West of Bombing Range Road Alternative 2	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,042.9	16	14	0.27	0.23	0.03	NA	NA	No	No	No	No
MO-148	6	West of Bombing Range Road Alternative 1	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,106.0	16	14	0.54	0.47	0.07	NA	NA	No	No	No	No
MO-148	6	West of Bombing Range Road Alternative 2	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,106.0	16	14	0.54	0.47	0.07	NA	NA	No	No	No	No
MO-150	6	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	DOD	NA	NA	0.7	1,250.6	16	14	0.32	0.28	0.04	NA	NA	No	No	No	No
MO-151	6	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	790.5	16	10	0.29	0.18	0.11	NA	NA	No	No	No	No
MO-151	6	West of Bombing Range Road Alternative 2	New Road, Primitive	PV	NA	NA	1.0	790.5	16	10	0.29	0.18	0.11	NA	NA	No	No	No	No
MO-153	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	15,713.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-154	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	6,803.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-155	6	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	3,344.7	16	10	1.23	0.77	0.46	NA	NA	No	No	No	No
MO-155	6	West of Bombing Range Road Alternative 2	New Road, Primitive	PV	NA	NA	1.0	3,344.7	16	10	1.23	0.77	0.46	NA	NA	No	No	No	No
MO-157	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	DOD	NA	NA	0.0	5,799.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-158	6	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	917.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-158	6	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	917.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-160	6	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	851.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-160	6	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	851.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-162	6	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	153.9	16	10	0.06	0.04	0.02	NA	NA	No	No	No	No
MO-162	6	West of Bombing Range Road Alternative 2	New Road, Primitive	PV	NA	NA	1.0	153.9	16	10	0.06	0.04	0.02	NA	NA	No	No	No	No
MO-164	6	West of Bombing Range Road Alternative 1	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	269.4	16	14	0.07	0.06	0.01	NA	NA	No	No	No	No
MO-164	6	West of Bombing Range Road Alternative 2	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	269.4	16	14	0.07	0.06	0.01	NA	NA	No	No	No	No
MO-166	6	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	825.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-166	6	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	825.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-170	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	732.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MO-170A	6	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	287.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-170A	6	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	287.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-170B	6	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	263.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-170B	6	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	263.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-171	6	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	64.5	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
MO-171	6	West of Bombing Range Road Alternative 2	New Road, Primitive	PV	NA	NA	1.0	64.5	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
MO-173	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	775.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-174	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	440.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-174	6	West of Bombing Range Road Alternative 1	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	440.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-174	6	West of Bombing Range Road Alternative 2	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	440.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-175	6	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	292.9	16	10	0.11	0.07	0.04	NA	NA	No	No	No	No
MO-175	6	West of Bombing Range Road Alternative 1	New Road, Primitive	PV	NA	NA	1.0	292.9	16	10	0.11	0.07	0.04	NA	NA	No	No	No	No
MO-175	6	West of Bombing Range Road Alternative 2	New Road, Primitive	PV	NA	NA	1.0	292.9	16	10	0.11	0.07	0.04	NA	NA	No	No	No	No
MO-178	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,211.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-179	6	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	133.2	16	10	0.05	0.03	0.02	NA	NA	No	No	No	No
MO-180	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	106.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-181	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	573.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-182	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,686.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-183	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,213.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-184	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,255.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-185	6	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	556.9	16	10	0.20	0.13	0.08	NA	NA	No	No	No	No
MO-186	6	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	178.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-187	6	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	328.6	16	14	0.08	0.07	0.01	NA	NA	No	No	No	No
MO-188	7	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,776.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-189	7	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	119.2	16	10	0.04	0.03	0.02	NA	NA	No	No	No	No
MO-190	7	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,543.8	16	14	0.40	0.35	0.05	NA	NA	No	No	No	No
MO-191	7	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	927.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-192	7	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,261.2	16	14	0.58	0.51	0.07	NA	NA	No	No	No	No
MO-193	7	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,736.0	16	14	0.45	0.39	0.06	NA	NA	No	No	No	No
MO-194	7	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	100.1	16	10	0.04	0.02	0.01	NA	NA	No	No	No	No
MO-195	7	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	58.5	16	14	0.02	0.01	0.00	NA	NA	No	No	No	No
MO-196	7	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	4,468.9	16	10	1.64	1.03	0.62	NA	NA	No	No	No	No
MO-197	7	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	903.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-198	7	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	768.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-199	7	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	9,179.7	16	10	3.37	2.11	1.26	NA	NA	No	No	No	No
MO-200	8	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	367.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-201	8	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	468.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-202	10	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,271.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-203	8	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	2,958.5	16	10	1.09	0.68	0.41	NA	NA	No	No	No	No
MO-204	9	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	556.3	16	10	0.20	0.13	0.08	NA	NA	No	No	No	No
MO-205	11	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	6,517.0	16	14	1.68	1.47	0.21	NA	NA	No	No	No	No
MO-206	9	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	957.4	16	14	0.25	0.22	0.03	NA	NA	No	No	No	No
MO-207	9	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	451.1	16	10	0.17	0.10	0.06	NA	NA	No	No	No	No
MO-208	13	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,252.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-209	9	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,504.8	16	14	0.39	0.34	0.05	NA	NA	No	No	No	No
MO-210	9	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	279.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-211	9	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	139.7	16	10	0.05	0.03	0.02	NA	NA	No	No	No	No
MO-212	9	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	26.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-213	9	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	107.0	16	14	0.03	0.02	0.00	NA	NA	No	No	No	No
MO-214	9	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	179.9	16	10	0.07	0.04	0.02	NA	NA	No	No	No	No
MO-215	9	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	7,616.0	16	10	2.80	1.75	1.05	NA	NA	No	No	No	No
MO-216	9	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,316.9	16	14	0.34	0.30	0.04	NA	NA	No	No	No	No
MO-217	9	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	206.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-218	9	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,428.3	16	14	0.37	0.32	0.05	NA	NA	No	No	No	No
MO-219	11	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	285.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-220	13	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,677.1	16	14	0.69	0.60	0.09	NA	NA	No	No	No	No
MO-221	9	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	247.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-222	9	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,791.6	16	10	1.39	0.87	0.52	NA	NA	No	No	No	No
MO-223	9	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	157.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-224	9	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	291.7	16	14	0.08	0.07	0.01	NA	NA	No	No	No	No
MO-225	9	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	391.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-226	11	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,897.8	16	10	0.70	0.44	0.26	NA	NA	No	No	No	No
MO-227	11	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	381.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-228	11	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	5,677.0	16	10	2.09	1.30	0.78	NA	NA	No	No	No	No
MO-229	13	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	5,369.2	16	14	1.38	1.21	0.17	NA	NA	No	No	No	No
MO-230	12	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	12,889.4	16	10	4.73	2.96	1.78	NA	NA	No	No	No	No
MO-231	12	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	148.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-232	12	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	354.3	16	10	0.13	0.08	0.05	NA	NA	No	No	No	No
MO-233	12	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	160.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-234	12	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	2,742.7	16	10	1.01	0.63	0.38	NA	NA	No	No	No	No
MO-235	12	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	910.4	16	10	0.33	0.21	0.13	NA	NA	No	No	No	No
MO-236	12	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,004.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-237	13	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,124.7	16	10	0.41	0.26	0.15	NA	NA	No	No	No	No
MO-238	12	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,408.3	16	10	0.52	0.32	0.19	NA	NA	No	No	No	No
MO-239	13	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,177.4	16	14	0.30	0.26	0.04	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MO-240	13	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,279.6	16	10	1.20	0.75	0.45	NA	NA	No	No	No	No
MO-241	12	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	2,083.1	30	14	1.43	0.67	0.77	NA	NA	No	No	No	No
MO-242	13	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	195.9	16	10	0.07	0.04	0.03	NA	NA	No	No	No	No
MO-243	13	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,100.3	16	14	0.28	0.25	0.04	NA	NA	No	No	No	No
MO-244	13	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	95.7	16	10	0.04	0.02	0.01	NA	NA	No	No	No	No
MO-245	13	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,220.7	16	14	0.31	0.27	0.04	NA	NA	No	No	No	No
MO-246	13	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	108.1	16	10	0.04	0.02	0.01	NA	NA	No	No	No	No
MO-247	13	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,413.3	16	14	0.36	0.32	0.05	NA	NA	No	No	No	No
MO-248	14	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,108.7	16	14	0.54	0.47	0.07	NA	NA	No	No	No	No
MO-249	12	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	249.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-250	14	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	332.5	16	10	0.12	0.08	0.05	NA	NA	No	No	No	No
MO-251	14	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,605.2	16	14	0.67	0.59	0.08	NA	NA	No	No	No	No
MO-252	14	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,132.8	16	10	0.42	0.26	0.16	NA	NA	No	No	No	No
MO-253	14	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,110.5	16	14	0.29	0.25	0.04	NA	NA	No	No	No	No
MO-254	14	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	573.4	16	14	0.15	0.13	0.02	NA	NA	No	No	No	No
MO-255	14	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	143.3	16	10	0.05	0.03	0.02	NA	NA	No	No	No	No
MO-256	14	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	8,013.7	16	14	2.06	1.80	0.26	NA	NA	No	No	No	No
MO-257	14	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	4,491.0	16	10	1.65	1.03	0.62	NA	NA	No	No	No	No
MO-258	15	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,956.9	16	14	0.50	0.44	0.06	NA	NA	No	No	No	No
MO-259	15	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	969.8	16	14	0.25	0.22	0.03	NA	NA	No	No	No	No
MO-260	15	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	2,301.8	16	10	0.85	0.53	0.32	NA	NA	No	No	No	No
MO-261	14	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	648.4	16	10	0.24	0.15	0.09	NA	NA	No	No	No	No
MO-262	15	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,595.2	16	14	0.67	0.58	0.08	NA	NA	No	No	No	No
MO-263	15	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	2,222.7	16	10	0.82	0.51	0.31	NA	NA	No	No	No	No
MO-264	14	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	701.9	16	14	0.18	0.16	0.02	NA	NA	No	No	No	No
MO-265	14	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	455.8	16	10	0.17	0.10	0.06	NA	NA	No	No	No	No
MO-266	14	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,270.4	16	14	0.33	0.29	0.04	NA	NA	No	No	No	No
MO-267	14	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,770.5	16	14	0.46	0.40	0.06	NA	NA	No	No	No	No
MO-268	15	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	779.1	16	10	0.29	0.18	0.11	NA	NA	No	No	No	No
MO-269	14	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	277.5	16	10	0.10	0.06	0.04	NA	NA	No	No	No	No
MO-270	14	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	184.9	16	10	0.07	0.04	0.03	NA	NA	No	No	No	No
MO-271	15	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	209.1	16	10	0.08	0.05	0.03	NA	NA	No	No	No	No
MO-272	15	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,607.9	16	10	0.59	0.37	0.22	NA	NA	No	No	No	No
MO-273	14	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	2,239.3	16	10	0.82	0.51	0.31	NA	NA	No	No	No	No
MO-274	15	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,507.1	16	14	0.64	0.56	0.08	NA	NA	No	No	No	No
MO-275	15	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	356.1	35	14	0.29	0.11	0.17	NA	NA	No	No	No	No
MO-276	15	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,070.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-277	15	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	117.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-278	15	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	6,047.9	30	14	4.17	1.94	2.22	NA	NA	No	No	No	No
MO-279	15	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	421.7	16	10	0.15	0.10	0.06	NA	NA	No	No	No	No
MO-280	15	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	384.7	30	14	0.26	0.12	0.14	NA	NA	No	No	No	No
MO-281	15	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,357.8	16	10	0.50	0.31	0.19	NA	NA	No	No	No	No
MO-282	15	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,697.5	30	14	1.17	0.55	0.62	NA	NA	No	No	No	No
MO-283	15	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,338.5	30	14	0.92	0.43	0.49	NA	NA	No	No	No	No
MO-284	15	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,460.8	16	10	0.54	0.34	0.20	NA	NA	No	No	No	No
MO-285	15	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	843.4	35	14	0.68	0.27	0.41	NA	NA	No	No	No	No
MO-286	16	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,088.0	16	10	0.40	0.25	0.15	NA	NA	No	No	No	No
MO-287	16	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	342.4	35	14	0.28	0.11	0.17	NA	NA	No	No	No	No
MO-288	16	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	7,250.9	16	10	2.66	1.66	1.00	NA	NA	No	No	No	No
MO-289	16	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	227.5	16	10	0.08	0.05	0.03	NA	NA	No	No	No	No
MO-290	16	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,922.4	16	10	0.71	0.44	0.26	NA	NA	No	No	No	No
MO-291	16	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	424.6	16	10	0.16	0.10	0.06	NA	NA	No	No	No	No
MO-292	16	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	868.0	16	10	0.32	0.20	0.12	NA	NA	No	No	No	No
MO-293	16	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	204.6	16	10	0.08	0.05	0.03	NA	NA	No	No	No	No
MO-294	16	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	4,944.4	16	10	1.82	1.14	0.68	NA	NA	No	No	No	No
MO-295	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	114.4	16	10	0.04	0.03	0.02	NA	NA	No	No	No	No
MO-296	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,558.5	16	10	1.31	0.82	0.49	NA	NA	No	No	No	No
MO-297	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	231.2	16	10	0.08	0.05	0.03	NA	NA	No	No	No	No
MO-298	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,272.4	16	10	0.47	0.29	0.18	NA	NA	No	No	No	No
MO-299	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	384.0	16	10	0.14	0.09	0.05	NA	NA	No	No	No	No
MO-300	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,280.8	16	10	0.47	0.29	0.18	NA	NA	No	No	No	No
MO-301	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	360.1	16	10	0.13	0.08	0.05	NA	NA	No	No	No	No
MO-302	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,084.7	16	10	0.40	0.25	0.15	NA	NA	No	No	No	No
MO-303	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	339.8	16	10	0.12	0.08	0.05	NA	NA	No	No	No	No
MO-304	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,175.3	16	10	0.43	0.27	0.16	NA	NA	No	No	No	No
MO-305	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	345.6	16	10	0.13	0.08	0.05	NA	NA	No	No	No	No
MO-306	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	4,828.0	16	10	1.77	1.11	0.67	NA	NA	No	No	No	No
MO-307	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	713.0	16	10	0.26	0.16	0.10	NA	NA	No	No	No	No
MO-308	17	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	663.5	35	14	0.53	0.21	0.32	NA	NA	No	No	No	No
MO-309	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,441.3	16	10	0.53	0.33	0.20	NA	NA	No	No	No	No
MO-310	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,379.9	16	10	0.51	0.32	0.19	NA	NA	No	No	No	No
MO-311	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	475.0	16	10	0.17	0.11	0.07	NA	NA	No	No	No	No
MO-312	17	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	744.0	16	10	0.27	0.17	0.10	NA	NA	No	No	No	No
MO-313	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	618.9	16	10	0.23	0.14	0.09	NA	NA	No	No	No	No
MO-314	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	979.8	16	10	0.36	0.22	0.13	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MO-315	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,235.5	16	10	0.45	0.28	0.17	NA	NA	No	No	No	No
MO-316	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,000.0	16	10	1.10	0.69	0.41	NA	NA	No	No	No	No
MO-317	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	67.6	16	10	0.02	0.02	0.01	NA	NA	No	No	No	No
MO-318	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	748.1	16	10	0.27	0.17	0.10	NA	NA	No	No	No	No
MO-319	18	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	3,583.0	30	14	2.47	1.15	1.32	NA	NA	No	No	No	No
MO-320	18	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	953.7	35	14	0.77	0.31	0.46	NA	NA	No	No	No	No
MO-321	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	931.6	16	10	0.34	0.21	0.13	NA	NA	No	No	No	No
MO-322	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	519.9	16	10	0.19	0.12	0.07	NA	NA	No	No	No	No
MO-323	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	220.3	16	10	0.08	0.05	0.03	NA	NA	No	No	No	No
MO-324	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	337.4	16	10	0.12	0.08	0.05	NA	NA	No	No	No	No
MO-325	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	260.1	16	10	0.10	0.06	0.04	NA	NA	No	No	No	No
MO-326	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,126.5	16	10	0.41	0.26	0.16	NA	NA	No	No	No	No
MO-327	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	550.4	16	10	0.20	0.13	0.08	NA	NA	No	No	No	No
MO-328	18	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	1,264.5	35	14	1.02	0.41	0.61	NA	NA	No	No	No	No
MO-329	18	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	1,346.9	35	14	1.08	0.43	0.65	NA	NA	No	No	No	No
MO-330	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,362.6	16	10	1.24	0.77	0.46	NA	NA	No	No	No	No
MO-331	18	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,427.9	16	14	0.37	0.32	0.05	NA	NA	No	No	No	No
MO-332	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	72.2	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
MO-333	18	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	5,144.0	16	10	1.89	1.18	0.71	NA	NA	No	No	No	No
MO-334	19	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	18,274.8	30	14	12.59	5.87	6.71	NA	NA	No	No	No	No
MO-335	21	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	1,494.0	35	14	1.20	0.48	0.72	NA	NA	No	No	No	No
MO-336	20	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	3,264.3	30	14	2.25	1.05	1.20	NA	NA	No	No	No	No
MO-337	21	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,387.3	16	10	0.51	0.32	0.19	NA	NA	No	No	No	No
MO-338	18	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	2,309.2	30	14	1.59	0.74	0.85	NA	NA	No	No	No	No
MO-339	21	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	262.9	16	10	0.10	0.06	0.04	NA	NA	No	No	No	No
MO-340	21	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,864.7	16	10	0.68	0.43	0.26	NA	NA	No	No	No	No
MO-341	21	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	238.9	16	10	0.09	0.05	0.03	NA	NA	No	No	No	No
MO-342	26	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	878.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-343	21	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,591.3	16	10	1.32	0.82	0.49	NA	NA	No	No	No	No
MO-344	26	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	733.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-345	26	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,700.4	30	14	1.17	0.55	0.62	NA	NA	No	No	No	No
MO-345	26	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,193.9	30	14	0.82	0.38	0.44	NA	NA	No	No	No	No
MO-346	21	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	415.7	30	14	0.29	0.13	0.15	NA	NA	No	No	No	No
MO-347	19	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	279.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-348	21	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,151.6	16	10	0.42	0.26	0.16	NA	NA	No	No	No	No
MO-349	21	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,256.3	16	10	0.46	0.29	0.17	NA	NA	No	No	No	No
MO-350	21	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,269.6	16	10	0.47	0.29	0.17	NA	NA	No	No	No	No
MO-351	19	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	191.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-352	21	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	390.2	30	14	0.27	0.13	0.14	NA	NA	No	No	No	No
MO-353	21	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,231.9	16	10	1.19	0.74	0.45	NA	NA	No	No	No	No
MO-354	26	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,100.1	16	10	0.40	0.25	0.15	NA	NA	No	No	No	No
MO-354	26	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	409.5	16	10	0.15	0.09	0.06	NA	NA	No	No	No	No
MO-355	21	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	3,197.2	30	14	2.20	1.03	1.17	NA	NA	No	No	No	No
MO-356	21	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	3,402.7	30	14	2.34	1.09	1.25	NA	NA	No	No	No	No
MO-357	20	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	14,623.5	16	14	3.76	3.29	0.47	NA	NA	No	No	No	No
MO-358	21	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	4,988.8	30	14	3.44	1.60	1.83	NA	NA	No	No	No	No
MO-359	21	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,140.9	16	10	0.42	0.26	0.16	NA	NA	No	No	No	No
MO-360	22	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	7,250.9	16	10	2.66	1.66	1.00	NA	NA	No	No	No	No
MO-361	23	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	7,147.2	16	14	1.84	1.61	0.23	NA	NA	No	No	No	No
MO-362	20	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	350.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-363	20	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	233.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-364	23	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	4,044.6	30	14	2.79	1.30	1.49	NA	NA	No	No	No	No
MO-365	23	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,035.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-366	23	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,715.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MO-367	23	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,465.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-001	24	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	483.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-002	25	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	716.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-003	41	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	16,579.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-004	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	24,481.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-005	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	842.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-006	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,801.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-007	41	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,980.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-008	42	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	3,867.7	16	14	0.99	0.87	0.12	No	No	Yes	No	No	Yes
UM-009	41	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	26.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-010	41	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	630.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-011	41	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-008	0.7	1,510.7	16	14	0.39	0.34	0.05	No	No	Yes	No	No	Yes
UM-012	41	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-008	0.7	753.2	16	14	0.19	0.17	0.02	No	No	Yes	No	No	Yes
UM-013	42	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-008	0.7	1,858.8	16	14	0.48	0.42	0.06	No	No	Yes	No	No	Yes
UM-014	41	Proposed Route	New Road, Primitive	PV	Other	UM-028	1.0	508.3	16	10	0.19	0.12	0.07	Yes	No	Yes	No	No	Yes
UM-015	41	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	658.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-016	41	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-028	0.7	2,877.5	16	14	0.74	0.65	0.09	No	No	Yes	No	No	Yes
UM-017	41	Proposed Route	New Road, Primitive	PV	Other	UM-008	1.0	368.7	16	10	0.14	0.08	0.05	Yes	No	Yes	No	No	Yes
UM-018	41	Proposed Route	New Road, Primitive	PV	Other	UM-008	1.0	311.0	16	10	0.11	0.07	0.04	Yes	No	Yes	No	No	Yes
UM-019	41	Proposed Route	New Road, Primitive	PV	Other	UM-008	1.0	129.5	16	10	0.05	0.03	0.02	Yes	No	Yes	No	No	Yes
UM-020	42	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-008	1.0	127.5	30	14	0.09	0.04	0.05	No	No	Yes	No	No	Yes

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
UM-021	41	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,373.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-022	42	Proposed Route	New Road, Bladed	PV	Other	UM-008	1.0	2,079.9	35	14	1.67	0.67	1.00	No	No	Yes	No	No	Yes
UM-023	42	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-008	0.7	1,174.8	16	14	0.30	0.26	0.04	No	No	Yes	No	No	Yes
UM-024	43	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	9,051.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-025	41	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	5,101.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-026	42	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-008	0.7	268.8	16	14	0.07	0.06	0.01	No	No	Yes	No	No	Yes
UM-027	42	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-008	1.0	138.6	30	14	0.10	0.04	0.05	No	No	Yes	No	No	Yes
UM-028	41	Proposed Route	New Road, Bladed	PV	Yes	NA	1.0	287.5	35	14	0.23	0.09	0.14	No	No	Yes	No	No	Yes
UM-029	42	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	258.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-030	42	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,085.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-031	42	Proposed Route	New Road, Bladed	PV	Other	UM-008	1.0	987.4	35	14	0.79	0.32	0.48	Yes	No	Yes	No	No	Yes
UM-032	42	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,686.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-033	41	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-028	0.7	1,022.9	16	14	0.26	0.23	0.03	No	No	Yes	No	No	Yes
UM-034		Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,387.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-035	40	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	892.9	16	10	0.33	0.20	0.12	Yes	No	Yes	No	No	Yes
UM-036	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,467.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-037	42	Proposed Route	New Road, Bladed	PV	Other	UM-024	1.0	1,055.0	35	14	0.85	0.34	0.51	No	No	Yes	No	No	Yes
UM-038	42	Proposed Route	New Road, Bladed	PV	Other	UM-024	1.0	101.3	35	14	0.08	0.03	0.05	No	No	Yes	No	No	Yes
UM-039	40	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	2,005.4	16	14	0.52	0.45	0.06	No	No	Yes	No	No	Yes
UM-039	40	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,005.6	16	14	0.52	0.45	0.06	NA	NA	No	No	No	No
UM-040	42	Proposed Route	New Road, Bladed	PV	Other	UM-024	1.0	3,695.3	35	14	2.97	1.19	1.78	No	No	Yes	No	No	Yes
UM-041	41	Proposed Route	New Road, Primitive	PV	Other	UM-028	1.0	2,397.9	16	10	0.88	0.55	0.33	No	No	Yes	No	No	Yes
UM-042	40	Proposed Route	New Road, Primitive	PV	Other	UM-039	1.0	439.7	16	10	0.16	0.10	0.06	Yes	No	Yes	No	No	Yes
UM-043	42	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,765.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-044	40	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-039	0.7	2,333.6	16	14	0.60	0.53	0.08	No	No	Yes	No	No	Yes
UM-045	42	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	694.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-046	42	Proposed Route	New Road, Bladed	PV	Other	UM-024	1.0	1,842.4	35	14	1.48	0.59	0.89	No	No	Yes	No	No	Yes
UM-047	43	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	330.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-048	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,695.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-049	43	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-024	0.7	1,058.1	16	14	0.27	0.24	0.03	No	No	Yes	No	No	Yes
UM-050	42	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,330.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-051	43	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,818.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-052	43	Proposed Route	New Road, Bladed	PV	Other	UM-024	1.0	518.2	35	14	0.42	0.17	0.25	No	No	Yes	No	No	Yes
UM-053	40	Proposed Route	New Road, Primitive	PV	Other	UM-039	1.0	153.2	16	10	0.06	0.04	0.02	Yes	No	Yes	No	No	Yes
UM-054	43	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-024	0.7	3,352.3	16	14	0.86	0.75	0.11	No	No	Yes	No	No	Yes
UM-055	40	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-039	0.7	1,568.7	16	14	0.40	0.35	0.05	No	No	Yes	No	No	Yes
UM-056	34	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	339.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-057	43	Proposed Route	New Road, Primitive	PV	Other	UM-024	1.0	745.7	16	10	0.27	0.17	0.10	No	No	Yes	No	No	Yes
UM-058	34	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	888.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-059	43	Proposed Route	New Road, Bladed	PV	Other	UM-024	1.0	685.2	35	14	0.55	0.22	0.33	No	No	Yes	No	No	Yes
UM-060	43	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-024	0.7	302.0	16	14	0.08	0.07	0.01	No	No	Yes	No	No	Yes
UM-061	43	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,878.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-062	43	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-024	1.0	989.5	30	14	0.68	0.32	0.36	No	No	Yes	No	No	Yes
UM-063	43	Proposed Route	New Road, Bladed	PV	Other	UM-024	1.0	1,028.8	35	14	0.83	0.33	0.50	No	No	Yes	No	No	Yes
UM-064	43	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,706.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-065	43	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-024	1.0	1,106.1	30	14	0.76	0.36	0.41	No	No	Yes	No	No	Yes
UM-066	43	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	5,014.9	16	14	1.29	1.13	0.16	No	Yes	Yes	Yes	No	Yes
UM-067	43	Proposed Route	New Road, Bladed	PV	Yes	NA	1.0	258.5	35	14	0.21	0.08	0.12	No	No	Yes	No	No	Yes
UM-067	43	Proposed Route	New Road, Bladed	PV	No	NA	1.0	186.7	35	14	0.15	0.06	0.09	No	Yes	Yes	Yes	No	Yes
UM-068	40	Proposed Route	New Road, Primitive	PV	Other	UM-039	1.0	5,513.2	16	10	2.03	1.27	0.76	No	No	Yes	No	No	Yes
UM-069	43	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	149.7	16	14	0.04	0.03	0.00	No	Yes	Yes	Yes	No	Yes
UM-070	43	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,224.6	16	14	0.31	0.28	0.04	No	Yes	Yes	Yes	No	Yes
UM-071	43	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	783.8	30	14	0.54	0.25	0.29	Yes	No	Yes	No	No	Yes
UM-072	43	Proposed Route	New Road, Primitive	PV	No	NA	1.0	133.1	16	10	0.05	0.03	0.02	Yes	No	Yes	No	No	Yes
UM-073	43	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	968.1	16	14	0.25	0.22	0.03	No	Yes	Yes	Yes	No	Yes
UM-074	43	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	6,244.3	16	14	1.61	1.40	0.20	No	Yes	Yes	Yes	No	Yes
UM-075	43	Proposed Route	New Road, Primitive	PV	No	NA	1.0	172.7	16	10	0.06	0.04	0.02	Yes	No	Yes	No	No	Yes
UM-076	40	Proposed Route	New Road, Primitive	PV	Other	UM-039	1.0	139.2	16	10	0.05	0.03	0.02	Yes	No	Yes	No	No	Yes
UM-077	40	Proposed Route	New Road, Primitive	PV	Other	UM-039	1.0	1,118.2	16	10	0.41	0.26	0.15	No	No	Yes	No	No	Yes
UM-078	43	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,898.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-079	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,763.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-080	43	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,514.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-081	39	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,257.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-082	43	Proposed Route	New Road, Bladed	PV	No	NA	1.0	662.6	35	14	0.53	0.21	0.32	Yes	No	Yes	No	No	Yes
UM-083	43	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	724.9	30	14	0.50	0.23	0.27	No	Yes	Yes	Yes	No	Yes
UM-084	44	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	2,621.0	30	14	1.81	0.84	0.96	No	Yes	Yes	Yes	No	Yes
UM-085	43	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	455.4	30	14	0.31	0.15	0.17	No	Yes	Yes	Yes	No	Yes
UM-086	44	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	538.2	30	14	0.37	0.17	0.20	No	Yes	Yes	Yes	No	Yes
UM-087	39	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	370.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-088	39	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UM-081	0.7	688.9	16	14	0.18	0.15	0.02	No	No	Yes	No	No	Yes
UM-089	43	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,559.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-090	44	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	386.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-091	44	Proposed Route	New Road, Bladed	PV	No	NA	1.0	2,331.1	35	14	1.87	0.75	1.12	No	Yes	Yes	Yes	No	Yes
UM-092	39	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	7,129.2	16	10	2.62	1.64	0.98	No	No	Yes	No	No	Yes
UM-093	44	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	5,091.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
UM-094	39	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	242.2	16	10	0.09	0.06	0.03	Yes	No	Yes	No	No	Yes
UM-095	32	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	444.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-096	44	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,644.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-097	39	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	2,296.9	16	10	0.84	0.53	0.32	No	No	Yes	No	No	Yes
UM-098	35	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	28,189.6	30	14	19.41	9.06	10.35	No	Yes	Yes	Yes	No	Yes
UM-099	39	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	199.7	16	10	0.07	0.05	0.03	Yes	No	Yes	No	No	Yes
UM-100	39	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	768.9	16	10	0.28	0.18	0.11	No	No	Yes	No	No	Yes
UM-101	39	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	559.8	16	10	0.21	0.13	0.08	Yes	No	Yes	No	No	Yes
UM-102	44	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	358.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-103	44	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	119.2	30	14	0.08	0.04	0.04	Yes	No	Yes	No	No	Yes
UM-104	39	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	2,116.7	16	10	0.78	0.49	0.29	No	No	Yes	No	No	Yes
UM-105	44	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,011.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-106	39	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	1,786.9	16	10	0.66	0.41	0.25	No	No	Yes	No	No	Yes
UM-107	44	Proposed Route	New Road, Primitive	PV	No	NA	1.0	135.0	16	10	0.05	0.03	0.02	Yes	No	Yes	No	No	Yes
UM-108	32	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,580.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-109	39	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	135.3	16	10	0.05	0.03	0.02	Yes	No	Yes	No	No	Yes
UM-110	39	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-081	1.0	638.6	30	14	0.44	0.21	0.23	No	No	Yes	No	No	Yes
UM-111	44	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	770.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-112	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-081	1.0	1,271.8	30	14	0.88	0.41	0.47	No	No	Yes	No	No	Yes
UM-113	39	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-081	1.0	2,906.5	30	14	2.00	0.93	1.07	No	No	Yes	No	No	Yes
UM-114	44	Proposed Route	New Road, Primitive	PV	No	NA	1.0	176.2	16	10	0.06	0.04	0.02	Yes	No	Yes	No	No	Yes
UM-115	38	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	140.1	16	10	0.05	0.03	0.02	Yes	No	Yes	No	No	Yes
UM-116	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-081	1.0	1,087.3	30	14	0.75	0.35	0.40	No	No	Yes	No	No	Yes
UM-117	38	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	50.9	16	10	0.02	0.01	0.01	Yes	No	Yes	No	No	Yes
UM-118	44	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,725.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-119	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-081	1.0	1,193.9	30	14	0.82	0.38	0.44	No	No	Yes	No	No	Yes
UM-120	44	Proposed Route	New Road, Bladed	PV	No	NA	1.0	232.4	35	14	0.19	0.07	0.11	Yes	No	Yes	No	No	Yes
UM-121	27	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	369.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-122	44	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	474.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-123	32	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	13,143.0	16	14	3.38	2.96	0.42	NA	NA	No	No	No	No
UM-124	38	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	218.2	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UM-125	27	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	306.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-126	27	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	2,368.2	30	14	1.63	0.76	0.87	NA	NA	No	No	No	No
UM-127	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-081	1.0	1,176.5	30	14	0.81	0.38	0.43	No	No	Yes	No	No	Yes
UM-128	38	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	291.5	16	10	0.11	0.07	0.04	Yes	No	Yes	No	No	Yes
UM-129	44	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,256.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-130	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-081	1.0	1,377.3	30	14	0.95	0.44	0.51	No	No	Yes	No	No	Yes
UM-131	44	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	237.4	16	14	0.06	0.05	0.01	Yes	No	Yes	No	No	Yes
UM-132	38	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	404.3	16	10	0.15	0.09	0.06	Yes	No	Yes	No	No	Yes
UM-133	38	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	632.6	16	10	0.23	0.15	0.09	No	No	Yes	No	No	Yes
UM-134	38	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	57.9	16	10	0.02	0.01	0.01	Yes	No	Yes	No	No	Yes
UM-135	38	Proposed Route	New Road, Primitive	PV	Other	UM-081	1.0	98.0	16	10	0.04	0.02	0.01	Yes	No	Yes	No	No	Yes
UM-136	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-081	1.0	1,886.7	30	14	1.30	0.61	0.69	No	No	Yes	No	No	Yes
UM-137	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-081	1.0	701.0	30	14	0.48	0.23	0.26	No	No	Yes	No	No	Yes
UM-138	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-081	1.0	1,927.0	30	14	1.33	0.62	0.71	No	No	Yes	No	No	Yes
UM-139	32	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	7,256.3	30	14	5.00	2.33	2.67	NA	NA	No	No	No	No
UM-140	44	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,664.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-141	44	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	144.5	16	14	0.04	0.03	0.00	Yes	No	Yes	No	No	Yes
UM-144	27	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	2,938.8	16	10	1.08	0.67	0.40	NA	NA	No	No	No	No
UM-145	38	Proposed Route	New Road, Primitive	PV	Other	UM-174	1.0	272.3	16	10	0.10	0.06	0.04	Yes	No	Yes	No	No	Yes
UM-146	26	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	5,083.4	30	14	3.50	1.63	1.87	NA	NA	No	No	No	No
UM-147	26	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	563.9	35	14	0.45	0.18	0.27	NA	NA	No	No	No	No
UM-148	26	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	944.6	16	10	0.35	0.22	0.13	NA	NA	No	No	No	No
UM-150	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-174	1.0	1,081.5	30	14	0.74	0.35	0.40	No	No	Yes	No	No	Yes
UM-151	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-174	1.0	888.3	30	14	0.61	0.29	0.33	No	No	Yes	No	No	Yes
UM-152	38	Proposed Route	New Road, Primitive	PV	Other	UM-174	1.0	90.9	16	10	0.03	0.02	0.01	Yes	No	Yes	No	No	Yes
UM-153	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-174	1.0	1,152.1	30	14	0.79	0.37	0.42	No	No	Yes	No	No	Yes
UM-154	38	Proposed Route	New Road, Primitive	PV	Other	UM-174	1.0	108.0	16	10	0.04	0.02	0.01	Yes	No	Yes	No	No	Yes
UM-155	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-174	1.0	998.9	30	14	0.69	0.32	0.37	No	No	Yes	No	No	Yes
UM-156	38	Proposed Route	New Road, Primitive	PV	Other	UM-174	1.0	103.5	16	10	0.04	0.02	0.01	Yes	No	Yes	No	No	Yes
UM-157	38	Proposed Route	New Road, Primitive	PV	Other	UM-174	1.0	271.5	16	10	0.10	0.06	0.04	Yes	No	Yes	No	No	Yes
UM-158	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UM-174	1.0	2,672.5	30	14	1.84	0.86	0.98	No	No	Yes	No	No	Yes
UM-159	38	Proposed Route	New Road, Primitive	PV	Other	UM-174	1.0	100.5	16	10	0.04	0.02	0.01	Yes	No	Yes	No	No	Yes
UM-160	27	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	507.6	16	10	0.19	0.12	0.07	NA	NA	No	No	No	No
UM-161	27	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,362.7	16	10	0.50	0.31	0.19	NA	NA	No	No	No	No
UM-163	26	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	828.9	35	14	0.67	0.27	0.40	NA	NA	No	No	No	No
UM-164	26	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,340.1	16	10	1.23	0.77	0.46	NA	NA	No	No	No	No
UM-165	26	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,504.1	16	10	0.55	0.35	0.21	NA	NA	No	No	No	No
UM-166	26	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	2,070.7	16	10	0.76	0.48	0.29	NA	NA	No	No	No	No
UM-167	26	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,670.2	16	10	0.61	0.38	0.23	NA	NA	No	No	No	No
UM-168	26	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	587.8	16	10	0.22	0.13	0.08	NA	NA	No	No	No	No
UM-169	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	9,969.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-170	26	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,135.2	16	10	0.42	0.26	0.16	NA	NA	No	No	No	No
UM-171	27	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	666.8	16	10	0.24	0.15	0.09	NA	NA	No	No	No	No
UM-172	27	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	965.2	16	10	0.35	0.22	0.13	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
UM-173	27	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	486.7	16	10	0.18	0.11	0.07	NA	NA	No	No	No	No
UM-174	38	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Yes	NA	1.0	1,716.2	30	14	1.18	0.55	0.63	No	No	Yes	No	No	Yes
UM-175	27	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	614.2	35	14	0.49	0.20	0.30	NA	NA	No	No	No	No
UM-176	36	Proposed Route	New Road, Primitive	PV	No	NA	1.0	146.4	16	10	0.05	0.03	0.02	Yes	No	Yes	No	No	Yes
UM-177	26	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	901.5	30	14	0.62	0.29	0.33	NA	NA	No	No	No	No
UM-178	27	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	218.1	16	10	0.08	0.05	0.03	NA	NA	No	No	No	No
UM-179	27	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	254.2	35	14	0.20	0.08	0.12	NA	NA	No	No	No	No
UM-180	28	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,249.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-181	27	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	102.5	16	10	0.04	0.02	0.01	NA	NA	No	No	No	No
UM-182	27	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	5,775.6	16	10	2.12	1.33	0.80	NA	NA	No	No	No	No
UM-183	28	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	5,594.9	16	10	2.06	1.28	0.77	NA	NA	No	No	No	No
UM-184	28	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	834.7	16	14	0.21	0.19	0.03	NA	NA	No	No	No	No
UM-185	28	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,288.5	16	14	0.33	0.29	0.04	NA	NA	No	No	No	No
UM-186	28	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	80.2	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
UM-187	28	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,522.1	16	14	0.39	0.34	0.05	NA	NA	No	No	No	No
UM-188	28	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,377.7	16	14	0.35	0.31	0.04	NA	NA	No	No	No	No
UM-189	27	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,902.2	16	10	0.70	0.44	0.26	NA	NA	No	No	No	No
UM-190	28	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	706.0	16	14	0.18	0.16	0.02	NA	NA	No	No	No	No
UM-191	28	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	79.8	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
UM-192	28	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,701.8	16	14	0.44	0.38	0.05	NA	NA	No	No	No	No
UM-193	28	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	971.5	16	14	0.25	0.22	0.03	NA	NA	No	No	No	No
UM-194	28	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	107.8	16	10	0.04	0.02	0.01	NA	NA	No	No	No	No
UM-195	28	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	922.9	16	14	0.24	0.21	0.03	NA	NA	No	No	No	No
UM-196	28	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	174.9	16	10	0.06	0.04	0.02	NA	NA	No	No	No	No
UM-197	29	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,322.3	16	14	0.34	0.30	0.04	NA	NA	No	No	No	No
UM-198	28	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	211.1	16	10	0.08	0.05	0.03	NA	NA	No	No	No	No
UM-199	26	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,257.4	30	14	0.87	0.40	0.46	NA	NA	No	No	No	No
UM-200	28	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	195.1	16	10	0.07	0.04	0.03	NA	NA	No	No	No	No
UM-201	28	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	658.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-202	36	Proposed Route	New Road, Bladed	PV	Other	UM-223	1.0	169.7	35	14	0.14	0.05	0.08	Yes	No	Yes	No	No	Yes
UM-203	35	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	814.2	16	10	0.30	0.19	0.11	Yes	No	Yes	No	No	Yes
UM-204	35	Proposed Route	New Road, Primitive	PV	Other	UM-203	1.0	2,577.1	16	10	0.95	0.59	0.35	No	No	Yes	No	No	Yes
UM-205	26	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	379.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-206	26	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	393.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-207	35	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	962.7	30	14	0.66	0.31	0.35	No	Yes	Yes	Yes	No	Yes
UM-208	29	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,918.5	16	10	1.44	0.90	0.54	NA	NA	No	No	No	No
UM-209	35	Proposed Route	New Road, Primitive	PV	Other	UM-203	1.0	224.4	16	10	0.08	0.05	0.03	No	No	Yes	No	No	Yes
UM-210	36	Proposed Route	New Road, Bladed	PV	Other	UM-223	1.0	394.9	35	14	0.32	0.13	0.19	Yes	No	Yes	No	No	Yes
UM-211	36	Proposed Route	New Road, Primitive	PV	Other	UM-223	1.0	2,653.9	16	10	0.97	0.61	0.37	No	No	Yes	No	No	Yes
UM-212	29	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,365.0	16	10	0.50	0.31	0.19	NA	NA	No	No	No	No
UM-213	35	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	75.8	16	10	0.03	0.02	0.01	Yes	No	Yes	No	No	Yes
UM-214	36	Proposed Route	New Road, Primitive	PV	Other	UM-223	1.0	88.9	16	10	0.03	0.02	0.01	No	No	Yes	No	No	Yes
UM-215	33	Proposed Route	New Road, Primitive	PV	Other	UM-203	1.0	373.5	16	10	0.14	0.09	0.05	Yes	No	Yes	No	No	Yes
UM-216	29	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,790.0	16	10	0.66	0.41	0.25	NA	NA	No	No	No	No
UM-217	30	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	1,606.8	35	14	1.29	0.52	0.77	NA	NA	No	No	No	No
UM-218	35	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	803.2	16	10	0.30	0.18	0.11	No	No	Yes	No	No	Yes
UM-219	32	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,174.2	16	10	1.17	0.73	0.44	NA	NA	No	No	No	No
UM-220	29	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,252.8	16	10	0.46	0.29	0.17	NA	NA	No	No	No	No
UM-221	36	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	820.8	16	10	0.30	0.19	0.11	No	No	Yes	No	No	Yes
UM-222	26	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	10,431.8	30	14	7.18	3.35	3.83	NA	NA	No	No	No	No
UM-223	36	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	915.3	16	10	0.34	0.21	0.13	No	No	Yes	No	No	Yes
UM-224	33	Proposed Route	New Road, Primitive	PV	Other	UM-203	1.0	662.3	16	10	0.24	0.15	0.09	No	No	Yes	No	No	Yes
UM-225	29	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	886.8	35	14	0.71	0.29	0.43	NA	NA	No	No	No	No
UM-226	28	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	13,144.5	16	14	3.38	2.96	0.42	NA	NA	No	No	No	No
UM-227	36	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	5,971.0	30	14	4.11	1.92	2.19	No	Yes	Yes	Yes	No	Yes
UM-228	35	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	1,861.2	30	14	1.28	0.60	0.68	No	Yes	Yes	Yes	No	Yes
UM-229	29	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	535.3	16	10	0.20	0.12	0.07	NA	NA	No	No	No	No
UM-230	33	Proposed Route	New Road, Bladed	PV	Other	UM-203	1.0	1,162.1	35	14	0.93	0.37	0.56	Yes	No	Yes	No	No	Yes
UM-231	29	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	5,647.1	16	10	2.07	1.30	0.78	NA	NA	No	No	No	No
UM-232	36	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	1,643.2	30	14	1.13	0.53	0.60	No	Yes	Yes	Yes	No	Yes
UM-233	32	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,993.1	16	10	0.73	0.46	0.27	NA	NA	No	No	No	No
UM-234	32	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,054.5	16	14	0.27	0.24	0.03	NA	NA	No	No	No	No
UM-235	36	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	2,045.0	30	14	1.41	0.66	0.75	No	Yes	Yes	Yes	No	Yes
UM-236	30	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,023.5	16	10	0.38	0.23	0.14	NA	NA	No	No	No	No
UM-237	29	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	877.8	16	10	0.32	0.20	0.12	NA	NA	No	No	No	No
UM-238	30	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	323.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-239	30	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	1,842.9	35	14	1.48	0.59	0.89	NA	NA	No	No	No	No
UM-240	30	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	628.6	16	10	0.23	0.14	0.09	NA	NA	No	No	No	No
UM-241	33	Proposed Route	New Road, Primitive	PV	Other	UM-203	1.0	4,488.6	16	10	1.65	1.03	0.62	No	No	Yes	No	No	Yes
UM-242	30	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,401.7	16	10	0.51	0.32	0.19	NA	NA	No	No	No	No
UM-243	31	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	4,709.3	16	10	1.73	1.08	0.65	NA	NA	No	No	No	No
UM-244	33	Proposed Route	New Road, Primitive	PV	Other	UM-203	1.0	215.9	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UM-245	33	Proposed Route	New Road, Primitive	PV	Other	UM-203	1.0	2,498.9	16	10	0.92	0.57	0.34	No	No	Yes	No	No	Yes
UM-246	33	Proposed Route	New Road, Primitive	PV	Other	UM-203	1.0	1,413.9	16	10	0.52	0.32	0.19	Yes	No	Yes	No	No	Yes
UM-247	32	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	240.8	16	10	0.09	0.06	0.03	NA	NA	No	No	No	No

Please see page A-9 to page A16
These pages are supposed to help property owners in La Grande figure out where the proposed access road is located. Note the size of the font and the information given. How would anyone understand where the roads are located? Once again none of the roads are named. The roads have been given numbers that you would need to find on other maps that have no road names on them. Google maps is available to everyone. Their tecnolgy would allow everyone to know where Idaho Power is planning to put the access roads.

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
UM-248	32	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	901.2	16	10	0.33	0.21	0.12	NA	NA	No	No	No	No
UM-249	33	Proposed Route	New Road, Primitive	PV	Other	UM-203	1.0	2,008.3	16	10	0.74	0.46	0.28	No	No	Yes	No	No	Yes
UM-250	31	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	659.4	16	10	0.24	0.15	0.09	NA	NA	No	No	No	No
UM-251	31	Proposed Route	New Road, Primitive	PV	Other	UM-139	1.0	387.6	16	10	0.14	0.09	0.05	Yes	No	Yes	No	No	Yes
UM-252	30	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	1,227.7	35	14	0.99	0.39	0.59	NA	NA	No	No	No	No
UM-253	30	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	949.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UM-254	30	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,381.3	16	10	1.24	0.78	0.47	NA	NA	No	No	No	No
UM-255	29	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,793.4	16	10	1.39	0.87	0.52	NA	NA	No	No	No	No
UM-256	30	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,128.8	30	14	0.78	0.36	0.41	NA	NA	No	No	No	No
UM-257	31	Proposed Route	New Road, Primitive	PV	Other	UM-139	1.0	861.0	16	10	0.32	0.20	0.12	No	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	Bladed	PV	Other	UM-139	1.0	461.9	35	14	0.37	0.15	0.22	Yes	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	Primitive	PV	Other	UM-139	1.0	279.8	16	10	0.10	0.06	0.04	Yes	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	Primitive	PV	Other	UM-203	1.0	3,285.3	16	10	1.21	0.75	0.45	No	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	Primitive	PV	NA	NA	1.0	2,042.1	16	10	0.75	0.47	0.28	NA	NA	No	No	No	No
[illegible]	[illegible]	[illegible]	d, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	749.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
[illegible]	[illegible]	[illegible]	d, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,977.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
[illegible]	[illegible]	[illegible]	Primitive	PV	Other	UM-139	1.0	1,745.0	16	10	0.64	0.40	0.24	No	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	d, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	273.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
[illegible]	[illegible]	[illegible]	d, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	3,475.3	30	14	2.39	1.12	1.28	NA	NA	No	No	No	No
[illegible]	[illegible]	[illegible]	Bladed	PV	Other	UM-139	1.0	859.6	35	14	0.69	0.28	0.41	Yes	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	Primitive	PV	Other	UM-139	1.0	1,878.3	16	10	0.69	0.43	0.26	No	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	Primitive	PV	Other	UM-139	1.0	4,542.7	16	10	1.67	1.04	0.63	No	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	Primitive	PV	Other	UM-273	1.0	1,337.7	16	10	0.49	0.31	0.18	Yes	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	Primitive	PV	Other	UM-273	1.0	289.8	16	10	0.11	0.07	0.04	Yes	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	Primitive	PV	Other	UM-139	1.0	1,105.9	16	10	0.41	0.25	0.15	No	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	d, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	5,838.1	16	14	1.50	1.31	0.19	No	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	Primitive	PV	Other	UM-139	1.0	6,075.2	16	10	2.23	1.39	0.84	No	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	Primitive	PV	NA	NA	1.0	4,040.1	16	10	1.48	0.93	0.56	NA	NA	No	No	No	No
[illegible]	[illegible]	[illegible]	Primitive	PV	Other	UM-273	1.0	811.2	16	10	0.30	0.19	0.11	No	No	Yes	No	No	Yes
[illegible]	[illegible]	[illegible]	d, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	744.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
[illegible]	[illegible]	[illegible]	d, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	4,923.3	30	14	3.39	1.58	1.81	NA	NA	No	No	No	No
[illegible]	[illegible]	[illegible]	d, Substantial Modification, 71-100% Improvements	PV	Other	UM-139	1.0	3,087.4	30	14	2.13	0.99	1.13	No	No	Yes	No	No	Yes
UN-001	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,682.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-002	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,082.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-002	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,950.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-003	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	468.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-004	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	963.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-004	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,876.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-005	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,164.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-006	45	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	844.4	30	14	0.58	0.27	0.31	No	Yes	Yes	Yes	No	Yes
UN-007	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	885.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-008	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,999.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-009	45	Proposed Route	New Road, Bladed	PV	No	NA	1.0	1,300.6	35	14	1.04	0.42	0.63	No	Yes	Yes	Yes	No	Yes
UN-010	45	Proposed Route	New Road, Bladed	PV	No	NA	1.0	182.4	35	14	0.15	0.06	0.09	Yes	No	Yes	No	No	Yes
UN-011	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	138.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-012	45	Proposed Route	New Road, Primitive	PV	No	NA	1.0	108.6	16	10	0.04	0.02	0.01	Yes	No	Yes	No	No	Yes
UN-013	45	Proposed Route	New Road, Primitive	PV	No	NA	1.0	171.5	16	10	0.06	0.04	0.02	Yes	No	Yes	No	No	Yes
UN-014	45	Proposed Route	New Road, Primitive	PV	No	NA	1.0	157.6	16	10	0.06	0.04	0.02	Yes	No	Yes	No	No	Yes
UN-015	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	854.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-016	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,551.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-017	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	170.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-018	45	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,901.0	16	14	0.49	0.43	0.06	No	Yes	Yes	Yes	No	Yes
UN-019	45	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	487.5	16	14	0.13	0.11	0.02	No	Yes	Yes	Yes	No	Yes
UN-020	45	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	6,588.3	16	14	1.69	1.48	0.21	No	Yes	Yes	Yes	No	Yes
UN-021	45	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	2,293.8	16	14	0.59	0.52	0.07	No	Yes	Yes	Yes	No	Yes
UN-022	45	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	1,646.4	35	14	1.32	0.53	0.79	No	Yes	Yes	Yes	No	Yes
UN-023	45	Proposed Route	New Road, Primitive	PV	No	NA	1.0	84.1	16	10	0.03	0.02	0.01	Yes	No	Yes	No	No	Yes
UN-024	45	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	2,007.5	16	14	0.52	0.45	0.06	No	Yes	Yes	Yes	No	Yes
UN-025	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	11,491.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-026	45	Proposed Route	New Road, Bladed	PV	No	NA	1.0	201.3	35	14	0.16	0.06	0.10	Yes	No	Yes	No	No	Yes
UN-027	45	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	454.7	16	14	0.12	0.10	0.01	No	Yes	Yes	Yes	No	Yes
UN-028	45	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,520.0	16	14	0.39	0.34	0.05	No	Yes	Yes	Yes	No	Yes
UN-029	45	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	692.5	16	14	0.18	0.16	0.02	No	Yes	Yes	Yes	No	Yes
UN-030	45	Proposed Route	New Road, Bladed	PV	No	NA	1.0	115.5	35	14	0.09	0.04	0.06	Yes	No	Yes	No	No	Yes
UN-031	45	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	1,755.5	30	14	1.21	0.56	0.64	No	Yes	Yes	Yes	No	Yes
UN-032	45	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,082.0	16	14	0.28	0.24	0.03	No	Yes	Yes	Yes	No	Yes
UN-033	45	Proposed Route	New Road, Bladed	PV	No	NA	1.0	102.6	35	14	0.08	0.03	0.05	Yes	No	Yes	No	No	Yes
UN-034	45	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	USFS	NA	NA	0.0	1,090.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-035	45	Proposed Route	New Road, Bladed	USFS	No	NA	1.0	1,798.8	35	14	1.45	0.58	0.87	No	Yes	Yes	Yes	No	Yes
UN-036	45	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	292.0	16	14	0.08	0.07	0.01	No	Yes	Yes	Yes	No	Yes
UN-037	45	Proposed Route	New Road, Primitive	PV	No	NA	1.0	104.8	16	10	0.04	0.02	0.01	Yes	No	Yes	No	No	Yes
UN-038	46	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,228.8	16	14	0.32	0.28	0.04	No	Yes	Yes	Yes	No	Yes
UN-039	46	Proposed Route	New Road, Primitive	USFS	NA	NA	1.0	138.1	16	10	0.05	0.03	0.02	NA	NA	No	No	No	No
UN-040	46	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	610.0	16	14	0.16	0.14	0.02	NA	NA	No	No	No	No
UN-041	46	Proposed Route	New Road, Bladed	USFS	NA	NA	1.0	2,124.3	35	14	1.71	0.68	1.02	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
UN-042	46	Proposed Route	New Road, Primitive	USFS	NA	NA	1.0	68.5	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
UN-043	46	Proposed Route	New Road, Bladed	USFS	NA	NA	1.0	988.8	35	14	0.79	0.32	0.48	NA	NA	No	No	No	No
UN-044	46	Proposed Route	New Road, Bladed	USFS	NA	NA	1.0	1,035.6	35	14	0.83	0.33	0.50	NA	NA	No	No	No	No
UN-045	46	Proposed Route	New Road, Bladed	USFS	NA	NA	1.0	708.1	35	14	0.57	0.23	0.34	NA	NA	No	No	No	No
UN-046	46	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	USFS	NA	NA	1.0	864.7	30	14	0.60	0.28	0.32	NA	NA	No	No	No	No
UN-047	46	Proposed Route	New Road, Bladed	USFS	NA	NA	1.0	242.8	35	14	0.20	0.08	0.12	NA	NA	No	No	No	No
UN-048	46	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	USFS	NA	NA	1.0	1,060.3	30	14	0.73	0.34	0.39	NA	NA	No	No	No	No
UN-049	46	Proposed Route	New Road, Bladed	USFS	NA	NA	1.0	172.2	35	14	0.14	0.06	0.08	NA	NA	No	No	No	No
UN-050	46	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	USFS	No	NA	1.0	3,813.2	30	14	2.63	1.23	1.40	No	Yes	Yes	Yes	No	Yes
UN-051	46	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	22,072.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-052	46	Proposed Route	New Road, Bladed	USFS	No	NA	1.0	102.4	35	14	0.08	0.03	0.05	Yes	No	Yes	No	No	Yes
UN-053	46	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	USFS	No	NA	1.0	2,745.3	30	14	1.89	0.88	1.01	No	Yes	Yes	Yes	No	Yes
UN-054	46	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	550.1	16	14	0.14	0.12	0.02	Yes	No	Yes	No	No	Yes
UN-055	46	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	USFS	No	NA	1.0	1,395.1	30	14	0.96	0.45	0.51	No	Yes	Yes	Yes	No	Yes
UN-056	46	Proposed Route	New Road, Bladed	USFS	No	NA	1.0	99.3	35	14	0.08	0.03	0.05	Yes	No	Yes	No	No	Yes
UN-057	47	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	USFS	NA	NA	0.0	938.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-058	47	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	USFS	NA	NA	1.0	1,726.8	30	14	1.19	0.55	0.63	NA	NA	No	No	No	No
UN-059	47	Proposed Route	New Road, Bladed	USFS	No	NA	1.0	1,651.8	35	14	1.33	0.53	0.80	No	Yes	Yes	Yes	No	Yes
UN-060	47	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	USFS	No	NA	1.0	1,358.5	30	14	0.94	0.44	0.50	No	Yes	Yes	Yes	No	Yes
UN-061	47	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	USFS	NA	NA	0.0	867.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-062	47	Proposed Route	New Road, Bladed	USFS	NA	NA	1.0	442.2	35	14	0.36	0.14	0.21	NA	NA	No	No	No	No
UN-063	47	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	USFS	NA	NA	0.0	4,489.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-064	47	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	235.2	16	10	0.09	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-065	47	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	USFS	NA	NA	0.0	1,152.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-066	47	Proposed Route	New Road, Bladed	USFS	No	NA	1.0	279.9	35	14	0.22	0.09	0.13	Yes	No	Yes	No	No	Yes
UN-067	47	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	USFS	NA	NA	0.0	1,166.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-068	47	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	219.0	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-069	47	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	USFS	NA	NA	0.0	1,108.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-070	47	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	USFS	NA	NA	0.0	853.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-071	47	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	USFS	NA	NA	0.0	998.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-072	47	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	649.1	16	10	0.24	0.15	0.09	Yes	No	Yes	No	No	Yes
UN-073	47	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	USFS	NA	NA	0.0	2,861.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-074	47	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	USFS	NA	NA	0.0	521.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-075	47	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	193.6	16	10	0.07	0.04	0.03	Yes	No	Yes	No	No	Yes
UN-076	47	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	107.7	16	10	0.04	0.02	0.01	Yes	No	Yes	No	No	Yes
UN-077	47	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	213.3	16	14	0.05	0.05	0.01	No	Yes	Yes	Yes	No	Yes
UN-078	47	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	946.8	16	14	0.24	0.21	0.03	No	Yes	Yes	Yes	No	Yes
UN-079	47	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	371.8	16	10	0.14	0.09	0.05	Yes	No	Yes	No	No	Yes
UN-080	47	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	1,298.4	16	14	0.33	0.29	0.04	No	Yes	Yes	Yes	No	Yes
UN-081	47	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	292.1	16	10	0.11	0.07	0.04	Yes	No	Yes	No	No	Yes
UN-082	47	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	874.3	16	14	0.22	0.20	0.03	No	Yes	Yes	Yes	No	Yes
UN-083	47	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	479.2	16	14	0.12	0.11	0.02	No	Yes	Yes	Yes	No	Yes
UN-084	47	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	322.2	16	10	0.12	0.07	0.04	Yes	No	Yes	No	No	Yes
UN-085	47	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	3,434.9	16	14	0.88	0.77	0.11	No	Yes	Yes	Yes	No	Yes
UN-086	47	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	229.0	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-087	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	1,295.4	16	14	0.33	0.29	0.04	No	Yes	Yes	Yes	No	Yes
UN-088	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	251.4	16	14	0.06	0.06	0.01	No	Yes	Yes	Yes	No	Yes
UN-089	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	306.0	16	14	0.08	0.07	0.01	No	Yes	Yes	Yes	No	Yes
UN-090	48	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	117.5	16	10	0.04	0.03	0.02	Yes	No	Yes	No	No	Yes
UN-091	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	959.3	16	14	0.25	0.22	0.03	No	Yes	Yes	Yes	No	Yes
UN-091	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	523.5	16	14	0.13	0.12	0.02	No	No	Yes	No	No	Yes
UN-092	48	Proposed Route	New Road, Primitive	PV	Other	UN-091	1.0	275.0	16	10	0.10	0.06	0.04	Yes	No	Yes	No	No	Yes
UN-093	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	730.4	16	14	0.19	0.16	0.02	No	Yes	Yes	Yes	No	Yes
UN-093	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	483.1	16	14	0.12	0.11	0.02	No	No	Yes	No	No	Yes
UN-094	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	316.4	16	14	0.08	0.07	0.01	No	Yes	Yes	Yes	No	Yes
UN-095	48	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	93.2	16	10	0.03	0.02	0.01	Yes	No	Yes	No	No	Yes
UN-096	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	1,447.9	16	14	0.37	0.33	0.05	No	Yes	Yes	Yes	No	Yes
UN-097	48	Proposed Route	New Road, Primitive	USFS	No	NA	1.0	229.9	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-098	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	1,369.4	16	14	0.35	0.31	0.04	No	No	Yes	No	No	Yes
UN-098	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	380.9	16	14	0.10	0.09	0.01	No	Yes	Yes	Yes	No	Yes
UN-098	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	124.3	16	14	0.03	0.03	0.00	No	Yes	Yes	Yes	No	Yes
UN-099	48	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	267.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-099	48	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	267.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-101	48	Proposed Route	New Road, Bladed	USFS	No	NA	1.0	70.5	35	14	0.06	0.02	0.03	Yes	No	Yes	No	No	Yes
UN-102	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	2,474.7	16	14	0.64	0.56	0.08	No	Yes	Yes	Yes	No	Yes
UN-103	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	9,259.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-103	NA	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	9,259.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-105	48	Proposed Route	New Road, Bladed	USFS	No	NA	1.0	325.1	35	14	0.26	0.10	0.16	Yes	No	Yes	No	No	Yes
UN-106	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	671.7	16	14	0.17	0.15	0.02	No	No	Yes	No	No	Yes
UN-106	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	USFS	No	NA	0.7	338.9	16	14	0.09	0.08	0.01	No	Yes	Yes	Yes	No	Yes
UN-107	48	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,945.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-107	48	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,945.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-109	48	Proposed Route	New Road, Primitive	PV	Other	UN-106	1.0	192.6	16	10	0.07	0.04	0.03	No	No	Yes	No	No	Yes
UN-109	48	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-106	1.0	192.6	16	10	0.07	0.04	0.03	No	No	Yes	No	No	Yes
UN-111	48	Proposed Route	New Road, Primitive	PV	Other	UN-106	1.0	111.4	16	10	0.04	0.03	0.02	Yes	No	Yes	No	No	Yes

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
UN-111	48	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-106	1.0	111.4	16	10	0.04	0.03	0.02	Yes	No	Yes	No	No	Yes
UN-112	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-106	0.7	1,316.0	16	14	0.34	0.30	0.04	No	No	Yes	No	No	Yes
UN-113	48	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-106	1.0	680.0	16	10	0.25	0.16	0.09	No	No	Yes	No	No	Yes
UN-114	48	Proposed Route	New Road, Primitive	PV	Other	UN-106	1.0	273.4	16	10	0.10	0.06	0.04	Yes	No	Yes	No	No	Yes
UN-115	48	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-106	1.0	994.4	16	10	0.37	0.23	0.14	No	No	Yes	No	No	Yes
UN-116	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-106	0.7	1,490.6	16	14	0.38	0.34	0.05	No	No	Yes	No	No	Yes
UN-117	48	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-106	1.0	1,433.5	16	10	0.53	0.33	0.20	No	No	Yes	No	No	Yes
UN-118	48	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	392.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-118	48	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	392.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-120	48	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	833.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-120	48	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	833.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-122	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	45.2	16	14	0.01	0.01	0.00	No	No	Yes	No	No	Yes
UN-124	48	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-122	0.7	188.6	16	14	0.05	0.04	0.01	No	No	Yes	No	No	Yes
UN-125	48	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	497.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-126	48	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,381.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-128	48	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-106	1.0	2,025.2	35	14	1.63	0.65	0.98	No	No	Yes	No	No	Yes
UN-129	48	Proposed Route	New Road, Primitive	PV	Other	UN-122	1.0	1,597.0	16	10	0.59	0.37	0.22	No	No	Yes	No	No	Yes
UN-130	50	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,872.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-132	50	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,433.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-133	50	Proposed Route	New Road, Primitive	PV	Other	UN-132	1.0	237.4	16	10	0.09	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-134	50	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,020.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-134	50	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,020.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-136	50	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-132	0.7	1,286.1	16	14	0.33	0.29	0.04	No	No	Yes	No	No	Yes
UN-137	50	Proposed Route	New Road, Primitive	PV	Other	UN-132	1.0	331.0	16	10	0.12	0.08	0.05	Yes	No	Yes	No	No	Yes
UN-138	48	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	5,884.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-139	50	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-132	0.7	1,345.2	16	14	0.35	0.30	0.04	No	No	Yes	No	No	Yes
UN-140	50	Proposed Route	New Road, Primitive	PV	Other	UN-132	1.0	233.8	16	10	0.09	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-141	50	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-132	0.7	969.6	16	14	0.25	0.22	0.03	No	No	Yes	No	No	Yes
UN-142	50	Proposed Route	New Road, Bladed	PV	Other	UN-132	1.0	145.0	35	14	0.12	0.05	0.07	Yes	No	Yes	No	No	Yes
UN-143	50	Proposed Route	New Road, Primitive	PV	No	NA	1.0	86.8	16	10	0.03	0.02	0.01	Yes	No	Yes	No	No	Yes
UN-144	50	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	5,961.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-145	50	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-190	1.0	1,077.9	35	14	0.87	0.35	0.52	No	No	Yes	No	No	Yes
UN-146	50	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	348.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-146	50	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	7,424.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-148	50	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-132	0.7	1,031.3	16	14	0.27	0.23	0.03	No	No	Yes	No	No	Yes
UN-149	50	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	78.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-150	50	Proposed Route	New Road, Bladed	PV	Other	UN-103	1.0	172.0	35	14	0.14	0.06	0.08	Yes	No	Yes	No	No	Yes
UN-151	50	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-190	1.0	197.0	35	14	0.16	0.06	0.09	Yes	No	Yes	No	No	Yes
UN-152	50	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-103	0.7	1,918.1	16	14	0.49	0.43	0.06	No	No	Yes	No	No	Yes
UN-154	50	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	908.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-154	50	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	908.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-156	50	Proposed Route	New Road, Bladed	PV	Other	UN-103	1.0	216.6	35	14	0.17	0.07	0.10	Yes	No	Yes	No	No	Yes
UN-157	50	Proposed Route	New Road, Primitive	PV	Other	UN-103	1.0	217.2	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-158	50	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-103	0.7	647.8	16	14	0.17	0.15	0.02	No	No	Yes	No	No	Yes
UN-159	50	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-103	0.7	1,547.8	16	14	0.40	0.35	0.05	No	No	Yes	No	No	Yes
UN-161	51	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	1,796.9	16	14	0.46	0.40	0.06	No	No	Yes	No	No	Yes
UN-162	51	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	340.5	16	10	0.13	0.08	0.05	Yes	No	Yes	No	No	Yes
UN-163	50	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-103	0.7	619.6	16	14	0.16	0.14	0.02	No	No	Yes	No	No	Yes
UN-163	50	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-103	0.7	7,813.4	16	14	2.01	1.76	0.25	No	No	Yes	No	No	Yes
UN-165	51	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-103	0.7	617.0	16	14	0.16	0.14	0.02	No	No	Yes	No	No	Yes
UN-166	51	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	1,737.6	16	14	0.45	0.39	0.06	No	No	Yes	No	No	Yes
UN-167	51	Proposed Route	New Road, Bladed	PV	Other	UN-209	1.0	370.9	35	14	0.30	0.12	0.18	Yes	No	Yes	No	No	Yes
UN-168	50	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-103	0.7	3,561.8	16	14	0.92	0.80	0.11	No	No	Yes	No	No	Yes
UN-170	50	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-190	1.0	2,839.0	35	14	2.28	0.91	1.37	No	No	Yes	No	No	Yes
UN-171	51	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	152.8	16	10	0.06	0.04	0.02	Yes	No	Yes	No	No	Yes
UN-172	51	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	400.4	16	10	0.15	0.09	0.06	Yes	No	Yes	No	No	Yes
UN-173	51	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	989.6	16	14	0.25	0.22	0.03	No	No	Yes	No	No	Yes
UN-174	50	Morgan Lake Alternative	New Road, Bladed	BLM	No	NA	1.0	112.8	35	14	0.09	0.04	0.05	Yes	No	Yes	No	No	Yes
UN-175	50	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-190	0.7	1,891.2	16	14	0.49	0.43	0.06	No	No	Yes	No	No	Yes
UN-176	50	Morgan Lake Alternative	New Road, Primitive	BLM	No	NA	1.0	1,045.1	16	10	0.38	0.24	0.14	No	Yes	Yes	Yes	No	Yes
UN-177	50	Morgan Lake Alternative	New Road, Bladed	BLM	No	NA	1.0	445.7	35	14	0.36	0.14	0.21	No	Yes	Yes	Yes	No	Yes
UN-178	50	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	40.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-179	50	Morgan Lake Alternative	New Road, Primitive	BLM	No	NA	1.0	725.3	16	10	0.27	0.17	0.10	No	Yes	Yes	Yes	No	Yes
UN-180	51	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	2,922.0	16	14	0.75	0.66	0.09	No	No	Yes	No	No	Yes
UN-181	50	Morgan Lake Alternative	New Road, Primitive	BLM	No	NA	1.0	668.0	16	10	0.25	0.15	0.09	No	Yes	Yes	Yes	No	Yes
UN-182	50	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	709.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-184	50	Morgan Lake Alternative	New Road, Primitive	BLM	No	NA	1.0	1,195.2	16	10	0.44	0.27	0.16	No	Yes	Yes	Yes	No	Yes
UN-184	50	Morgan Lake Alternative	New Road, Primitive	PV	Yes	NA	1.0	971.2	16	10	0.36	0.22	0.13	No	No	Yes	No	No	Yes
UN-185	51	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	349.9	16	10	0.13	0.08	0.05	Yes	No	Yes	No	No	Yes
UN-186	51	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	1,566.2	16	14	0.40	0.35	0.05	No	No	Yes	No	No	Yes
UN-187	51	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	240.6	16	10	0.09	0.06	0.03	Yes	No	Yes	No	No	Yes
UN-188	50	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	364.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-189	50	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	2,260.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-190	49	Morgan Lake Alternative	New Road, Bladed	BLM	Yes	NA	1.0	701.1	35	14	0.56	0.23	0.34	No	No	Yes	No	No	Yes
UN-191	51	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	206.8	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
UN-192	50	Morgan Lake Alternative	New Road, Bladed	PV	No	NA	1.0	122.5	35	14	0.10	0.04	0.06	Yes	No	Yes	No	No	Yes
UN-193	51	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	1,610.2	16	14	0.41	0.36	0.05	No	No	Yes	No	No	Yes
UN-194	50	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,690.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-195	50	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-103	1.0	1,226.7	35	14	0.99	0.39	0.59	No	No	Yes	No	No	Yes
UN-196	51	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	1,519.5	16	14	0.39	0.34	0.05	No	No	Yes	No	No	Yes
UN-197	51	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	221.9	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-198	50	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-253	1.0	212.6	35	14	0.17	0.07	0.10	Yes	No	Yes	No	No	Yes
UN-199	51	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	454.2	16	10	0.17	0.10	0.06	Yes	No	Yes	No	No	Yes
UN-200	51	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	997.2	16	14	0.26	0.22	0.03	No	No	Yes	No	No	Yes
UN-201	51	Proposed Route	New Road, Bladed	PV	Other	UN-209	1.0	257.3	35	14	0.21	0.08	0.12	Yes	No	Yes	No	No	Yes
UN-202	51	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	209.0	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-203	51	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	1,136.5	16	14	0.29	0.26	0.04	No	No	Yes	No	No	Yes
UN-204	54	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	568.3	16	14	0.15	0.13	0.02	No	No	Yes	No	No	Yes
UN-205	54	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	656.4	16	10	0.24	0.15	0.09	Yes	No	Yes	No	No	Yes
UN-206	51	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	1,552.6	16	14	0.40	0.35	0.05	No	No	Yes	No	No	Yes
UN-207	51	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-236	1.0	1,273.7	35	14	1.02	0.41	0.61	No	No	Yes	No	No	Yes
UN-208	51	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-103	1.0	990.2	35	14	0.80	0.32	0.48	Yes	No	Yes	No	No	Yes
UN-209	54	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	3,745.7	16	14	0.96	0.84	0.12	No	No	Yes	No	No	Yes
UN-210	54	Proposed Route	New Road, Bladed	PV	Other	UN-209	1.0	471.2	35	14	0.38	0.15	0.23	Yes	No	Yes	No	No	Yes
UN-211	54	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	2,768.8	16	14	0.71	0.62	0.09	No	No	Yes	No	No	Yes
UN-212	49	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	5,443.6	16	14	1.40	1.22	0.17	No	No	Yes	No	No	Yes
UN-212	49	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,081.6	16	14	0.28	0.24	0.03	No	Yes	Yes	Yes	No	Yes
UN-213	54	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	757.7	16	10	0.28	0.17	0.10	Yes	No	Yes	No	No	Yes
UN-214	51	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-236	1.0	434.2	35	14	0.35	0.14	0.21	Yes	No	Yes	No	No	Yes
UN-215	54	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	774.2	16	14	0.20	0.17	0.02	No	No	Yes	No	No	Yes
UN-216	51	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-236	1.0	620.1	35	14	0.50	0.20	0.30	No	No	Yes	No	No	Yes
UN-217	51	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-236	1.0	104.9	35	14	0.08	0.03	0.05	Yes	No	Yes	No	No	Yes
UN-218	54	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-209	0.7	2,079.3	16	14	0.53	0.47	0.07	No	No	Yes	No	No	Yes
UN-219	54	Proposed Route	New Road, Primitive	PV	Other	UN-209	1.0	204.0	16	10	0.07	0.05	0.03	No	No	Yes	No	No	Yes
UN-220	51	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-236	0.7	649.1	16	14	0.17	0.15	0.02	No	No	Yes	No	No	Yes
UN-221	51	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-236	1.0	2,654.6	35	14	2.13	0.85	1.28	No	No	Yes	No	No	Yes
UN-222	51	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-236	1.0	905.6	35	14	0.73	0.29	0.44	No	No	Yes	No	No	Yes
UN-223	54	Proposed Route	New Road, Bladed	PV	Other	UN-209	1.0	1,105.3	35	14	0.89	0.36	0.53	Yes	No	Yes	No	No	Yes
UN-224	52	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-236	1.0	1,430.7	16	10	0.53	0.33	0.20	No	No	Yes	No	No	Yes
UN-225	52	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-236	1.0	294.3	16	10	0.11	0.07	0.04	Yes	No	Yes	No	No	Yes
UN-226	52	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-236	1.0	473.2	16	10	0.17	0.11	0.07	No	No	Yes	No	No	Yes
UN-227	52	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-236	1.0	992.4	35	14	0.80	0.32	0.48	Yes	No	Yes	No	No	Yes
UN-228	52	Morgan Lake Alternative	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UN-253	1.0	10,248.7	30	14	7.06	3.29	3.76	No	No	Yes	No	No	Yes
UN-229	54	Proposed Route	New Road, Primitive	PV	Other	UN-231	1.0	857.8	16	10	0.32	0.20	0.12	No	No	Yes	No	No	Yes
UN-230	54	Proposed Route	New Road, Primitive	PV	Other	UN-231	1.0	290.3	16	10	0.11	0.07	0.04	Yes	No	Yes	No	No	Yes
UN-231	54	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	1,398.1	16	10	0.51	0.32	0.19	No	No	Yes	No	No	Yes
UN-232	53	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	13,117.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-233	54	Proposed Route	New Road, Primitive	PV	Other	UN-261	1.0	525.3	16	10	0.19	0.12	0.07	Yes	No	Yes	No	No	Yes
UN-234	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,182.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-235	54	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,878.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-236	55	Morgan Lake Alternative	New Road, Primitive	PV	Yes	NA	1.0	5,899.4	16	10	2.17	1.35	0.81	No	No	Yes	No	No	Yes
UN-237	55	Morgan Lake Alternative	New Road, Bladed	PV	Yes	NA	1.0	4,751.0	35	14	3.82	1.53	2.29	No	No	Yes	No	No	Yes
UN-238	54	Proposed Route	New Road, Bladed	ST	Other	UN-261	1.0	59.7	35	14	0.05	0.02	0.03	Yes	No	Yes	No	No	Yes
UN-239	56	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	7,649.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-240	54	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	ST	NA	NA	0.0	1,350.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-241	55	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,056.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-242	53	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	11,937.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-243	55	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	579.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-244	54	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	ST	NA	NA	0.0	3,874.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-245	54	Proposed Route	New Road, Primitive	ST	Other	UN-261	1.0	75.6	16	10	0.03	0.02	0.01	Yes	No	Yes	No	No	Yes
UN-246	55	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,100.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-247	54	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	ST	NA	NA	0.0	1,034.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-248	55	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,623.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-249	54	Proposed Route	New Road, Bladed	ST	Other	UN-261	1.0	229.8	35	14	0.18	0.07	0.11	Yes	No	Yes	No	No	Yes
UN-250	55	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-275	1.0	549.7	16	10	0.20	0.13	0.08	Yes	No	Yes	No	No	Yes
UN-251	55	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	805.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-252	54	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	ST	NA	NA	0.0	836.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-253	53	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,388.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-254	54	Proposed Route	New Road, Bladed	ST	Other	UN-261	1.0	676.4	35	14	0.54	0.22	0.33	Yes	No	Yes	No	No	Yes
UN-255	57	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	ST	NA	NA	0.0	1,178.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-256	57	Proposed Route	New Road, Primitive	PV	Other	UN-261	1.0	1,136.4	16	10	0.42	0.26	0.16	Yes	No	Yes	No	No	Yes
UN-257	57	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	ST	NA	NA	0.0	3,139.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-258	57	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	ST	Other	UN-261	0.7	1,751.6	16	14	0.45	0.39	0.06	No	No	Yes	No	No	Yes
UN-259	NA	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,658.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-260	57	Proposed Route	New Road, Bladed	PV	Other	UN-261	1.0	474.8	35	14	0.38	0.15	0.23	Yes	No	Yes	No	No	Yes
UN-261	57	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	ST	NA	NA	0.0	1,814.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-262	57	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-261	0.7	974.0	16	14	0.25	0.22	0.03	No	No	Yes	No	No	Yes
UN-263	57	Proposed Route	New Road, Primitive	PV	Other	UN-261	1.0	72.3	16	10	0.03	0.02	0.01	Yes	No	Yes	No	No	Yes
UN-264	57	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-261	0.7	1,909.1	16	14	0.49	0.43	0.06	No	No	Yes	No	No	Yes
UN-265	57	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-261	0.7	615.9	16	14	0.16	0.14	0.02	Yes	No	Yes	No	No	Yes

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
UN-266	57	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	191.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-267	57	Proposed Route	New Road, Bladed	PV	Other	UN-261	1.0	690.4	35	14	0.55	0.22	0.33	Yes	No	Yes	No	No	Yes
UN-268	57	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-261	0.7	1,537.8	16	14	0.40	0.35	0.05	No	No	Yes	No	No	Yes
UN-269	57	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-261	0.7	2,028.6	16	14	0.52	0.46	0.07	No	No	Yes	No	No	Yes
UN-270	57	Proposed Route	New Road, Bladed	PV	Other	UN-261	1.0	654.0	35	14	0.53	0.21	0.32	Yes	No	Yes	No	No	Yes
UN-271	57	Proposed Route	New Road, Primitive	PV	Other	UN-261	1.0	446.7	16	10	0.16	0.10	0.06	Yes	No	Yes	No	No	Yes
UN-272	57	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-261	0.7	1,528.5	16	14	0.39	0.34	0.05	No	No	Yes	No	No	Yes
UN-273	57	Proposed Route	New Road, Primitive	PV	Other	UN-261	1.0	496.3	16	10	0.18	0.11	0.07	Yes	No	Yes	No	No	Yes
UN-274	57	Proposed Route	New Road, Primitive	PV	Other	UN-261	1.0	444.2	16	10	0.16	0.10	0.06	Yes	No	Yes	No	No	Yes
UN-275	58	Morgan Lake Alternative	New Road, Primitive	PV	Yes	NA	1.0	12,998.7	16	10	4.77	2.98	1.79	No	No	Yes	No	No	Yes
UN-276	57	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-261	0.7	1,534.2	16	14	0.39	0.35	0.05	No	No	Yes	No	No	Yes
UN-277	57	Proposed Route	New Road, Bladed	PV	Other	UN-293	1.0	420.1	35	14	0.34	0.14	0.20	No	No	Yes	No	No	Yes
UN-278	57	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-293	0.7	1,135.3	16	14	0.29	0.26	0.04	No	No	Yes	No	No	Yes
UN-279	57	Proposed Route	New Road, Bladed	PV	Other	UN-293	1.0	516.7	35	14	0.42	0.17	0.25	No	No	Yes	No	No	Yes
UN-280	57	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-293	0.7	2,234.1	16	14	0.57	0.50	0.07	No	No	Yes	No	No	Yes
UN-281	57	Proposed Route	New Road, Bladed	PV	Other	UN-293	1.0	635.0	35	14	0.51	0.20	0.31	No	No	Yes	No	No	Yes
UN-282	58	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	ST	NA	NA	0.0	6,193.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-283	57	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-293	0.7	1,203.2	16	14	0.31	0.27	0.04	No	No	Yes	No	No	Yes
UN-284	58	Morgan Lake Alternative	New Road, Primitive	ST	Yes	NA	1.0	469.9	16	10	0.17	0.11	0.06	No	No	Yes	No	No	Yes
UN-285	57	Proposed Route	New Road, Bladed	PV	Other	UN-293	1.0	449.8	35	14	0.36	0.14	0.22	No	No	Yes	No	No	Yes
UN-286	58	Morgan Lake Alternative	New Road, Bladed	ST	Other	UN-284	1.0	129.0	35	14	0.10	0.04	0.06	Yes	No	Yes	No	No	Yes
UN-287	58	Morgan Lake Alternative	New Road, Primitive	ST	Other	UN-284	1.0	1,112.1	16	10	0.41	0.26	0.15	No	No	Yes	No	No	Yes
UN-288	59	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-293	0.7	1,388.2	16	14	0.36	0.31	0.04	No	No	Yes	No	No	Yes
UN-289	58	Morgan Lake Alternative	New Road, Primitive	ST	Other	UN-284	1.0	141.6	16	10	0.05	0.03	0.02	Yes	No	Yes	No	No	Yes
UN-290	59	Proposed Route	New Road, Bladed	PV	Other	UN-293	1.0	274.4	35	14	0.22	0.09	0.13	No	No	Yes	No	No	Yes
UN-291	58	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	ST	NA	NA	0.0	3,779.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-292	59	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-293	0.7	631.5	16	14	0.16	0.14	0.02	No	No	Yes	No	No	Yes
UN-293	59	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,082.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-294	58	Morgan Lake Alternative	New Road, Primitive	ST	Other	UN-284	1.0	2,783.5	16	10	1.02	0.64	0.38	No	No	Yes	No	No	Yes
UN-295	59	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-293	0.7	1,014.9	16	14	0.26	0.23	0.03	No	No	Yes	No	No	Yes
UN-296	59	Proposed Route	New Road, Primitive	PV	Other	UN-293	1.0	92.6	16	10	0.03	0.02	0.01	No	No	Yes	No	No	Yes
UN-297	58	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	ST	Other	UN-284	0.7	367.8	16	14	0.09	0.08	0.01	Yes	No	Yes	No	No	Yes
UN-298	58	Morgan Lake Alternative	New Road, Primitive	ST	Other	UN-284	1.0	229.9	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-299	58	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	ST	Other	UN-284	0.7	1,927.5	16	14	0.50	0.43	0.06	No	No	Yes	No	No	Yes
UN-300	58	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	ST	Other	UN-284	0.7	1,651.6	16	14	0.42	0.37	0.05	No	No	Yes	No	No	Yes
UN-301	59	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-293	0.7	2,054.1	16	14	0.53	0.46	0.07	No	No	Yes	No	No	Yes
UN-302	59	Proposed Route	New Road, Primitive	PV	Other	UN-293	1.0	254.2	16	10	0.09	0.06	0.04	No	No	Yes	No	No	Yes
UN-303	58	Morgan Lake Alternative	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UN-319	1.0	1,163.4	30	14	0.80	0.37	0.43	No	No	Yes	No	No	Yes
UN-304	59	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-293	0.7	1,219.4	16	14	0.31	0.27	0.04	No	No	Yes	No	No	Yes
UN-305	58	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-319	0.7	1,994.1	16	14	0.51	0.45	0.06	No	No	Yes	No	No	Yes
UN-306	58	Morgan Lake Alternative	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UN-319	1.0	515.9	30	14	0.36	0.17	0.19	Yes	No	Yes	No	No	Yes
UN-307	59	Proposed Route	New Road, Primitive	PV	Other	UN-293	1.0	309.8	16	10	0.11	0.07	0.04	No	No	Yes	No	No	Yes
UN-308	58	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-319	1.0	149.3	16	10	0.05	0.03	0.02	Yes	No	Yes	No	No	Yes
UN-309	59	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-293	0.7	827.7	16	14	0.21	0.19	0.03	No	No	Yes	No	No	Yes
UN-310	58	Morgan Lake Alternative	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UN-319	1.0	652.2	30	14	0.45	0.21	0.24	No	No	Yes	No	No	Yes
UN-311	59	Proposed Route	New Road, Bladed	PV	Other	UN-293	1.0	291.2	35	14	0.23	0.09	0.14	No	No	Yes	No	No	Yes
UN-312	58	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-319	0.7	738.7	16	14	0.19	0.17	0.02	No	No	Yes	No	No	Yes
UN-313	59	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-293	0.7	830.6	16	14	0.21	0.19	0.03	No	No	Yes	No	No	Yes
UN-314	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UN-319	1.0	799.7	30	14	0.55	0.26	0.29	Yes	No	Yes	No	No	Yes
UN-315	59	Proposed Route	New Road, Bladed	PV	Other	UN-293	1.0	220.3	35	14	0.18	0.07	0.11	No	No	Yes	No	No	Yes
UN-316	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-319	0.7	1,428.1	16	14	0.37	0.32	0.05	No	No	Yes	No	No	Yes
UN-317	60	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-319	1.0	269.0	16	10	0.10	0.06	0.04	Yes	No	Yes	No	No	Yes
UN-318	59	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,672.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-319	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,012.0	16	14	0.26	0.23	0.03	No	Yes	Yes	Yes	No	Yes
UN-319	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	322.6	16	14	0.08	0.07	0.01	No	No	Yes	No	No	Yes
UN-320	60	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	434.6	16	10	0.16	0.10	0.06	Yes	No	Yes	No	No	Yes
UN-321	59	Proposed Route	New Road, Bladed	PV	Other	UN-328	1.0	296.2	35	14	0.24	0.10	0.14	Yes	No	Yes	No	No	Yes
UN-322	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	931.6	16	14	0.24	0.21	0.03	No	Yes	Yes	Yes	No	Yes
UN-323	59	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-328	0.7	1,059.0	16	14	0.27	0.24	0.03	No	No	Yes	No	No	Yes
UN-324	60	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	314.7	16	10	0.12	0.07	0.04	Yes	No	Yes	No	No	Yes
UN-325	59	Proposed Route	New Road, Bladed	PV	Other	UN-328	1.0	272.2	35	14	0.22	0.09	0.13	Yes	No	Yes	No	No	Yes
UN-326	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,037.2	16	14	0.27	0.23	0.03	No	Yes	Yes	Yes	No	Yes
UN-327	59	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-328	0.7	1,022.5	16	14	0.26	0.23	0.03	No	No	Yes	No	No	Yes
UN-328	59	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,225.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-329	60	Morgan Lake Alternative	New Road, Bladed	PV	No	NA	1.0	289.0	35	14	0.23	0.09	0.14	Yes	No	Yes	No	No	Yes
UN-330	59	Proposed Route	New Road, Bladed	PV	Other	UN-328	1.0	311.1	35	14	0.25	0.10	0.15	Yes	No	Yes	No	No	Yes
UN-331	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	698.6	16	14	0.18	0.16	0.02	No	Yes	Yes	Yes	No	Yes
UN-332	59	Proposed Route	New Road, Bladed	PV	Other	UN-328	1.0	916.7	35	14	0.74	0.29	0.44	No	No	Yes	No	No	Yes
UN-333	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	514.9	16	14	0.13	0.12	0.02	No	Yes	Yes	Yes	No	Yes
UN-334	60	Morgan Lake Alternative	New Road, Bladed	PV	No	NA	1.0	159.3	35	14	0.13	0.05	0.08	Yes	No	Yes	No	No	Yes
UN-335	59	Proposed Route	New Road, Primitive	PV	Other	UN-328	1.0	218.8	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-336	59	Proposed Route	New Road, Primitive	PV	Other	UN-328	1.0	758.5	16	10	0.28	0.17	0.10	No	No	Yes	No	No	Yes
UN-337	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,062.3	16	14	0.27	0.24	0.03	No	Yes	Yes	Yes	No	Yes
UN-338	59	Proposed Route	New Road, Primitive	PV	Other	UN-328	1.0	469.2	16	10	0.17	0.11	0.06	Yes	No	Yes	No	No	Yes
UN-339	60	Morgan Lake Alternative	New Road, Bladed	PV	No	NA	1.0	150.9	35	14	0.12	0.05	0.07	Yes	No	Yes	No	No	Yes

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
UN-340	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	515.4	16	14	0.13	0.12	0.02	No	Yes	Yes	Yes	No	Yes
UN-341	59	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	7,434.0	16	14	1.91	1.67	0.24	No	No	Yes	No	No	Yes
UN-342	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	6,000.9	16	14	1.54	1.35	0.19	No	Yes	Yes	Yes	No	Yes
UN-343	60	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	2,461.1	16	10	0.90	0.56	0.34	No	Yes	Yes	Yes	No	Yes
UN-344	61	Proposed Route	New Road, Bladed	PV	Other	UN-341	1.0	621.4	35	14	0.50	0.20	0.30	Yes	No	Yes	No	No	Yes
UN-345	60	Morgan Lake Alternative	New Road, Bladed	PV	No	NA	1.0	69.5	35	14	0.06	0.02	0.03	Yes	No	Yes	No	No	Yes
UN-346	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	596.3	16	14	0.15	0.13	0.02	No	Yes	Yes	Yes	No	Yes
UN-347	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	45.9	16	14	0.01	0.01	0.00	Yes	No	Yes	No	No	Yes
UN-348	61	Proposed Route	New Road, Primitive	PV	Other	UN-341	1.0	503.9	16	10	0.19	0.12	0.07	Yes	No	Yes	No	No	Yes
UN-349	61	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-341	0.7	3,214.2	16	14	0.83	0.72	0.10	No	No	Yes	No	No	Yes
UN-350	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,120.7	16	14	0.29	0.25	0.04	No	Yes	Yes	Yes	No	Yes
UN-351	61	Proposed Route	New Road, Primitive	PV	Other	UN-341	1.0	597.2	16	10	0.22	0.14	0.08	Yes	No	Yes	No	No	Yes
UN-352	60	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	374.5	16	10	0.14	0.09	0.05	Yes	No	Yes	No	No	Yes
UN-353	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,146.0	16	14	0.29	0.26	0.04	No	Yes	Yes	Yes	No	Yes
UN-354	60	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	313.9	16	10	0.12	0.07	0.04	Yes	No	Yes	No	No	Yes
UN-355	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	5,468.9	16	14	1.41	1.23	0.18	No	Yes	Yes	Yes	No	Yes
UN-356	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	873.6	16	14	0.22	0.20	0.03	No	Yes	Yes	Yes	No	Yes
UN-357	60	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	121.1	16	10	0.04	0.03	0.02	Yes	No	Yes	No	No	Yes
UN-358	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,104.7	16	14	0.28	0.25	0.04	No	Yes	Yes	Yes	No	Yes
UN-359	61	Proposed Route	New Road, Bladed	PV	Other	UN-378	1.0	78.2	35	14	0.06	0.03	0.04	Yes	No	Yes	No	No	Yes
UN-360	61	Proposed Route	New Road, Primitive	PV	Other	UN-378	1.0	327.8	16	10	0.12	0.08	0.05	No	No	Yes	No	No	Yes
UN-361	60	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	122.4	16	10	0.04	0.03	0.02	Yes	No	Yes	No	No	Yes
UN-362	61	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-378	0.7	538.3	16	14	0.14	0.12	0.02	No	No	Yes	No	No	Yes
UN-363	61	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-378	0.7	349.5	16	14	0.09	0.08	0.01	No	No	Yes	No	No	Yes
UN-364	60	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	969.9	16	14	0.25	0.22	0.03	No	Yes	Yes	Yes	No	Yes
UN-365	61	Proposed Route	New Road, Bladed	PV	Other	UN-378	1.0	370.6	35	14	0.30	0.12	0.18	Yes	No	Yes	No	No	Yes
UN-366	62	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	257.8	16	14	0.07	0.06	0.01	No	Yes	Yes	Yes	No	Yes
UN-367	62	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	302.7	16	10	0.11	0.07	0.04	Yes	No	Yes	No	No	Yes
UN-368	62	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	7,265.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-369	61	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-378	0.7	1,017.6	16	14	0.26	0.23	0.03	No	No	Yes	No	No	Yes
UN-370	61	Proposed Route	New Road, Primitive	PV	Other	UN-378	1.0	317.5	16	10	0.12	0.07	0.04	Yes	No	Yes	No	No	Yes
UN-371	62	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,962.4	16	14	0.50	0.44	0.06	No	Yes	Yes	Yes	No	Yes
UN-372	61	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-378	0.7	1,359.8	16	14	0.35	0.31	0.04	No	No	Yes	No	No	Yes
UN-373	62	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,171.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-374	62	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	187.0	16	10	0.07	0.04	0.03	Yes	No	Yes	No	No	Yes
UN-375	62	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,688.5	16	14	0.43	0.38	0.05	No	Yes	Yes	Yes	No	Yes
UN-376	62	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	719.4	16	14	0.18	0.16	0.02	No	Yes	Yes	Yes	No	Yes
UN-377	61	Proposed Route	New Road, Primitive	PV	Other	UN-378	1.0	170.3	16	10	0.06	0.04	0.02	Yes	No	Yes	No	No	Yes
UN-378	61	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	7,728.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-379	62	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	10,074.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-380	61	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-378	0.7	656.0	16	14	0.17	0.15	0.02	No	No	Yes	No	No	Yes
UN-381	62	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	617.8	16	14	0.16	0.14	0.02	No	Yes	Yes	Yes	No	Yes
UN-382	61	Proposed Route	New Road, Bladed	PV	Other	UN-378	1.0	192.7	35	14	0.15	0.06	0.09	No	No	Yes	No	No	Yes
UN-383	62	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	408.2	16	10	0.15	0.09	0.06	No	Yes	Yes	Yes	No	Yes
UN-384	62	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	743.4	16	14	0.19	0.17	0.02	Yes	No	Yes	No	No	Yes
UN-385	61	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-397	0.7	5,704.4	16	14	1.47	1.28	0.18	No	No	Yes	No	No	Yes
UN-386	62	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,913.6	16	14	0.49	0.43	0.06	No	Yes	Yes	Yes	No	Yes
UN-387	62	Morgan Lake Alternative	New Road, Bladed	PV	No	NA	1.0	811.2	35	14	0.65	0.26	0.39	No	Yes	Yes	Yes	No	Yes
UN-388	61	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	428.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-389	62	Morgan Lake Alternative	New Road, Bladed	PV	No	NA	1.0	1,006.2	35	14	0.81	0.32	0.49	No	Yes	Yes	Yes	No	Yes
UN-390	62	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-399	0.7	1,091.6	16	14	0.28	0.25	0.04	No	No	Yes	No	No	Yes
UN-391	62	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-399	0.7	1,617.6	16	14	0.42	0.36	0.05	No	No	Yes	No	No	Yes
UN-392	62	Morgan Lake Alternative	New Road, Bladed	PV	No	NA	1.0	500.4	35	14	0.40	0.16	0.24	No	Yes	Yes	Yes	No	Yes
UN-393	62	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	616.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-394	62	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	1,404.6	16	10	0.52	0.32	0.19	No	Yes	Yes	Yes	No	Yes
UN-395	62	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-399	1.0	452.0	16	10	0.17	0.10	0.06	No	No	Yes	No	No	Yes
UN-396	62	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	633.2	16	14	0.16	0.14	0.02	No	Yes	Yes	Yes	No	Yes
UN-397	63	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	9,575.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-398	62	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-399	1.0	1,468.6	35	14	1.18	0.47	0.71	No	No	Yes	No	No	Yes
UN-399	62	Morgan Lake Alternative	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	1,538.2	16	14	0.40	0.35	0.05	No	No	Yes	No	No	Yes
UN-400	62	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,032.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-401	61	Proposed Route	New Road, Primitive	PV	Other	UN-408	1.0	1,116.3	16	10	0.41	0.26	0.15	No	No	Yes	No	No	Yes
UN-402	NA	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	10,409.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-403	61	Proposed Route	New Road, Primitive	PV	Other	UN-408	1.0	365.4	16	10	0.13	0.08	0.05	Yes	No	Yes	No	No	Yes
UN-404	63	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,428.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-405	62	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,745.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-406	62	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-399	1.0	1,381.5	16	10	0.51	0.32	0.19	No	No	Yes	No	No	Yes
UN-407	63	Proposed Route	New Road, Primitive	PV	Other	UN-408	1.0	1,503.3	16	10	0.55	0.35	0.21	No	No	Yes	No	No	Yes
UN-408	63	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,128.5	16	14	0.55	0.48	0.07	NA	NA	No	No	No	No
UN-409	63	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-408	0.7	1,034.7	16	14	0.27	0.23	0.03	No	No	Yes	No	No	Yes
UN-410	62	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-399	1.0	747.0	16	10	0.27	0.17	0.10	Yes	No	Yes	No	No	Yes
UN-411	63	Proposed Route	New Road, Primitive	PV	Other	UN-408	1.0	402.4	16	10	0.15	0.09	0.06	Yes	No	Yes	No	No	Yes
UN-412	63	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-408	0.7	280.5	16	14	0.07	0.06	0.01	No	No	Yes	No	No	Yes
UN-413	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,303.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-415	62	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,385.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
UN-416	63	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-408	0.7	745.8	16	14	0.19	0.17	0.02	No	No	Yes	No	No	Yes
UN-417	63	Proposed Route	New Road, Bladed	PV	Other	UN-408	1.0	289.5	35	14	0.23	0.09	0.14	Yes	No	Yes	No	No	Yes
UN-418	63	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-408	0.7	1,064.8	16	14	0.27	0.24	0.03	No	No	Yes	No	No	Yes
UN-419	64	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-426	1.0	463.5	16	10	0.17	0.11	0.06	Yes	No	Yes	No	No	Yes
UN-420	64	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-426	1.0	837.9	16	10	0.31	0.19	0.12	No	No	Yes	No	No	Yes
UN-423	63	Proposed Route	New Road, Bladed	PV	Other	UN-408	1.0	295.7	35	14	0.24	0.10	0.14	Yes	No	Yes	No	No	Yes
UN-424	64	Morgan Lake Alternative	New Road, Primitive	PV	Other	UN-426	1.0	746.6	16	10	0.27	0.17	0.10	Yes	No	Yes	No	No	Yes
UN-425	63	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-408	0.7	2,475.8	16	14	0.64	0.56	0.08	No	No	Yes	No	No	Yes
UN-426	64	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	1,741.7	16	10	0.64	0.40	0.24	No	Yes	Yes	Yes	No	Yes
UN-426	64	Morgan Lake Alternative	New Road, Primitive	PV	Yes	NA	1.0	331.4	16	10	0.12	0.08	0.05	No	No	Yes	No	No	Yes
UN-427	63	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-431	1.0	955.4	35	14	0.77	0.31	0.46	No	No	Yes	No	No	Yes
UN-428	64	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,189.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-429	64	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,299.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-430	63	Proposed Route	New Road, Primitive	PV	Other	UN-408	1.0	1,610.7	16	10	0.59	0.37	0.22	No	No	Yes	No	No	Yes
UN-431	63	Morgan Lake Alternative	New Road, Primitive	PV	Yes	NA	1.0	522.8	16	10	0.19	0.12	0.07	No	No	Yes	No	No	Yes
UN-431	63	Morgan Lake Alternative	New Road, Primitive	PV	No	NA	1.0	361.2	16	10	0.13	0.08	0.05	No	Yes	Yes	Yes	No	Yes
UN-432	63	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UN-408	1.0	1,968.0	30	14	1.36	0.63	0.72	No	No	Yes	No	No	Yes
UN-433	63	Proposed Route	New Road, Bladed	PV	Other	UN-408	1.0	520.4	35	14	0.42	0.17	0.25	Yes	No	Yes	No	No	Yes
UN-434	63	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-431	1.0	2,473.0	35	14	1.99	0.79	1.19	No	No	Yes	No	No	Yes
UN-435	63	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UN-458	1.0	3,188.3	30	14	2.20	1.02	1.17	No	No	Yes	No	No	Yes
UN-436	63	Proposed Route	New Road, Primitive	PV	Other	UN-408	1.0	491.5	16	10	0.18	0.11	0.07	No	No	Yes	No	No	Yes
UN-437	63	Proposed Route	New Road, Primitive	PV	Other	UN-408	1.0	371.5	16	10	0.14	0.09	0.05	No	No	Yes	No	No	Yes
UN-438	63	Proposed Route	New Road, Primitive	PV	Other	UN-408	1.0	194.6	16	10	0.07	0.04	0.03	No	No	Yes	No	No	Yes
UN-439	63	Proposed Route	New Road, Bladed	PV	Other	UN-408	1.0	211.1	35	14	0.17	0.07	0.10	Yes	No	Yes	No	No	Yes
UN-440	63	Proposed Route	New Road, Primitive	PV	Other	UN-408	1.0	456.8	16	10	0.17	0.10	0.06	No	No	Yes	No	No	Yes
UN-441	63	Proposed Route	New Road, Bladed	PV	Other	UN-408	1.0	336.3	35	14	0.27	0.11	0.16	No	No	Yes	No	No	Yes
UN-442	63	Proposed Route	New Road, Bladed	PV	Other	UN-458	1.0	644.0	35	14	0.52	0.21	0.31	No	No	Yes	No	No	Yes
UN-443	63	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UN-458	1.0	1,051.7	30	14	0.72	0.34	0.39	No	No	Yes	No	No	Yes
UN-444	63	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-458	1.0	853.7	35	14	0.69	0.27	0.41	No	No	Yes	No	No	Yes
UN-445	63	Morgan Lake Alternative	New Road, Bladed	PV	Other	UN-458	1.0	741.9	35	14	0.60	0.24	0.36	No	No	Yes	No	No	Yes
UN-446	63	Proposed Route	New Road, Primitive	PV	Other	UN-458	1.0	67.4	16	10	0.02	0.02	0.01	No	No	Yes	No	No	Yes
UN-447	63	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UN-458	1.0	85.5	30	14	0.06	0.03	0.03	No	No	Yes	No	No	Yes
UN-448	63	Proposed Route	New Road, Primitive	PV	Other	UN-458	1.0	61.0	16	10	0.02	0.01	0.01	No	No	Yes	No	No	Yes
UN-449	63	Proposed Route	New Road, Primitive	PV	Other	UN-458	1.0	304.7	16	10	0.11	0.07	0.04	No	No	Yes	No	No	Yes
UN-450	63	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	348.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-451	63	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-458	0.7	958.3	16	14	0.25	0.22	0.03	No	No	Yes	No	No	Yes
UN-452	63	Proposed Route	New Road, Primitive	PV	Other	UN-458	1.0	251.1	16	10	0.09	0.06	0.03	No	No	Yes	No	No	Yes
UN-453	63	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-458	0.7	584.6	16	14	0.15	0.13	0.02	No	No	Yes	No	No	Yes
UN-454	63	Proposed Route	New Road, Primitive	PV	Other	UN-458	1.0	480.8	16	10	0.18	0.11	0.07	No	No	Yes	No	No	Yes
UN-455	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,508.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-456	63	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-458	0.7	1,516.5	16	14	0.39	0.34	0.05	No	No	Yes	No	No	Yes
UN-457	65	Proposed Route	New Road, Primitive	PV	Other	UN-458	1.0	395.3	16	10	0.15	0.09	0.05	No	No	Yes	No	No	Yes
UN-458	65	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,660.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-460	65	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-458	0.7	1,138.2	16	14	0.29	0.26	0.04	No	No	Yes	No	No	Yes
UN-461	63	Morgan Lake Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,861.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-462	65	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	337.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-464	65	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,772.3	16	14	0.71	0.62	0.09	NA	NA	No	No	No	No
UN-465	65	Proposed Route	New Road, Primitive	PV	Other	UN-458	1.0	3,254.9	16	10	1.20	0.75	0.45	No	No	Yes	No	No	Yes
UN-466	65	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	189.1	16	10	0.07	0.04	0.03	NA	NA	No	No	No	No
UN-467	65	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-464	0.7	1,155.4	16	14	0.30	0.26	0.04	No	No	Yes	No	No	Yes
UN-468	65	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-464	0.7	1,245.2	16	14	0.32	0.28	0.04	No	No	Yes	No	No	Yes
UN-469	65	Proposed Route	New Road, Primitive	PV	Other	UN-464	1.0	540.3	16	10	0.20	0.12	0.07	Yes	No	Yes	No	No	Yes
UN-470	65	Proposed Route	New Road, Primitive	PV	Other	UN-464	1.0	458.6	16	10	0.17	0.11	0.06	Yes	No	Yes	No	No	Yes
UN-471	65	Proposed Route	New Road, Primitive	PV	Other	UN-473	1.0	2,074.5	16	10	0.76	0.48	0.29	No	No	Yes	No	No	Yes
UN-472	65	Proposed Route	New Road, Bladed	PV	Other	UN-473	1.0	4,140.8	35	14	3.33	1.33	2.00	No	No	Yes	No	No	Yes
UN-473	65	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Yes	NA	1.0	3,428.6	30	14	2.36	1.10	1.26	No	No	Yes	No	No	Yes
UN-474	65	Proposed Route	New Road, Bladed	PV	Other	UN-473	1.0	3,212.6	35	14	2.58	1.03	1.55	No	No	Yes	No	No	Yes
UN-475	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,094.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-476	66	Proposed Route	New Road, Primitive	PV	Other	UN-473	1.0	1,442.3	16	10	0.53	0.33	0.20	No	No	Yes	No	No	Yes
UN-477	66	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-473	0.7	2,073.7	16	14	0.53	0.47	0.07	No	No	Yes	No	No	Yes
UN-478	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	372.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-479	66	Proposed Route	New Road, Bladed	PV	Other	UN-490	1.0	486.7	35	14	0.39	0.16	0.23	No	No	Yes	No	No	Yes
UN-480	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	562.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-481	66	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-490	0.7	985.2	16	14	0.25	0.22	0.03	No	No	Yes	No	No	Yes
UN-482	66	Proposed Route	New Road, Primitive	PV	Other	UN-490	1.0	1,131.6	16	10	0.42	0.26	0.16	Yes	No	Yes	No	No	Yes
UN-483	66	Proposed Route	New Road, Bladed	PV	Other	UN-490	1.0	649.1	35	14	0.52	0.21	0.31	Yes	No	Yes	No	No	Yes
UN-484	66	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-490	0.7	1,935.6	16	14	0.50	0.44	0.06	No	No	Yes	No	Yes	Yes
UN-485	66	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-490	0.7	1,076.5	16	14	0.28	0.24	0.03	No	No	Yes	No	No	Yes
UN-486	66	Proposed Route	New Road, Primitive	PV	Other	UN-490	1.0	630.0	16	10	0.23	0.14	0.09	Yes	No	Yes	No	No	Yes
UN-487	66	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,049.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-488	66	Proposed Route	New Road, Primitive	PV	Other	UN-490	1.0	1,986.8	16	10	0.73	0.46	0.27	Yes	No	Yes	No	No	Yes
UN-489	66	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-490	0.7	2,458.9	16	14	0.63	0.55	0.08	No	No	Yes	No	Yes	Yes
UN-490	66	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	532.6	16	14	0.14	0.12	0.02	No	No	Yes	No	Yes	Yes
UN-491	66	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-490	0.7	2,027.9	16	14	0.52	0.46	0.07	No	No	Yes	No	Yes	Yes
UN-492	66	Proposed Route	New Road, Bladed	PV	Other	UN-490	1.0	984.4	35	14	0.79	0.32	0.47	Yes	No	Yes	No	No	Yes

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
UN-493	66	Proposed Route	New Road, Primitive	PV	Other	UN-490	1.0	468.0	16	10	0.17	0.11	0.06	Yes	No	Yes	No	No	Yes
UN-494	66	Proposed Route	New Road, Primitive	PV	Other	UN-490	1.0	1,500.0	16	10	0.55	0.34	0.21	Yes	No	Yes	No	No	Yes
UN-495	66	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,642.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-496	67	Proposed Route	New Road, Bladed	PV	Other	UN-501	1.0	595.1	35	14	0.48	0.19	0.29	Yes	No	Yes	No	No	Yes
UN-497	67	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UN-501	1.0	516.5	30	14	0.36	0.17	0.19	No	No	Yes	No	No	Yes
UN-498	67	Proposed Route	New Road, Bladed	PV	Other	UN-501	1.0	253.2	35	14	0.20	0.08	0.12	Yes	No	Yes	No	No	Yes
UN-499	67	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	UN-501	1.0	875.8	30	14	0.60	0.28	0.32	No	No	Yes	No	No	Yes
UN-500	67	Proposed Route	New Road, Primitive	PV	Other	UN-501	1.0	1,396.1	16	10	0.51	0.32	0.19	No	No	Yes	No	No	Yes
UN-501	67	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Yes	NA	1.0	2,496.4	30	14	1.72	0.80	0.92	No	No	Yes	No	No	Yes
UN-502	67	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	933.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-503	67	Proposed Route	New Road, Primitive	PV	Other	UN-504	1.0	231.3	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-504	67	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Yes	NA	1.0	4,374.2	30	14	3.01	1.41	1.61	No	No	Yes	No	Yes	Yes
UN-505	67	Proposed Route	New Road, Primitive	PV	Other	UN-522	1.0	182.5	16	10	0.07	0.04	0.03	Yes	No	Yes	No	No	Yes
UN-506	67	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-522	0.7	1,385.8	16	14	0.36	0.31	0.04	No	No	Yes	No	No	Yes
UN-507	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	12,226.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-508	67	Proposed Route	New Road, Primitive	PV	Other	UN-522	1.0	202.8	16	10	0.07	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-509	67	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-522	0.7	1,140.9	16	14	0.29	0.26	0.04	No	No	Yes	No	No	Yes
UN-510	67	Proposed Route	New Road, Primitive	PV	Other	UN-522	1.0	207.4	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-511	67	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-522	0.7	1,123.9	16	14	0.29	0.25	0.04	No	No	Yes	No	No	Yes
UN-512	67	Proposed Route	New Road, Primitive	PV	Other	UN-522	1.0	181.7	16	10	0.07	0.04	0.03	Yes	No	Yes	No	No	Yes
UN-513	67	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-522	0.7	785.0	16	14	0.20	0.18	0.03	No	No	Yes	No	No	Yes
UN-514	67	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-522	0.7	2,615.8	16	14	0.67	0.59	0.08	No	No	Yes	No	No	Yes
UN-515	67	Proposed Route	New Road, Primitive	PV	Other	UN-522	1.0	637.0	16	10	0.23	0.15	0.09	Yes	No	Yes	No	No	Yes
UN-516	67	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-522	0.7	946.6	16	14	0.24	0.21	0.03	No	No	Yes	No	No	Yes
UN-517	67	Proposed Route	New Road, Primitive	PV	Other	UN-522	1.0	193.7	16	10	0.07	0.04	0.03	No	No	Yes	No	No	Yes
UN-518	67	Proposed Route	New Road, Primitive	PV	Other	UN-522	1.0	375.6	16	10	0.14	0.09	0.05	Yes	No	Yes	No	No	Yes
UN-519	67	Proposed Route	New Road, Primitive	PV	Other	UN-522	1.0	757.4	16	10	0.28	0.17	0.10	No	No	Yes	No	No	Yes
UN-520	67	Proposed Route	New Road, Primitive	PV	Other	UN-522	1.0	146.0	16	10	0.05	0.03	0.02	Yes	No	Yes	No	No	Yes
UN-521	67	Proposed Route	New Road, Primitive	PV	Other	UN-522	1.0	1,097.5	16	10	0.40	0.25	0.15	No	No	Yes	No	No	Yes
UN-522	67	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	5,481.9	16	14	1.41	1.23	0.18	No	No	Yes	No	Yes	Yes
UN-523	69	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	297.0	16	14	0.08	0.07	0.01	No	No	Yes	No	No	Yes
UN-524	69	Proposed Route	New Road, Primitive	PV	Other	UN-523	1.0	156.5	16	10	0.06	0.04	0.02	Yes	No	Yes	No	No	Yes
UN-525	69	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,196.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-526	69	Proposed Route	New Road, Primitive	PV	Other	UN-528	1.0	373.6	16	10	0.14	0.09	0.05	Yes	No	Yes	No	No	Yes
UN-527	69	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-528	0.7	684.1	16	14	0.18	0.15	0.02	No	No	Yes	No	No	Yes
UN-528	69	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,704.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-529	69	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	487.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-530	69	Proposed Route	New Road, Primitive	PV	Other	UN-528	1.0	197.5	16	10	0.07	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-531	69	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,216.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-532	69	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	324.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
UN-533	69	Proposed Route	New Road, Bladed	PV	Other	UN-528	1.0	417.8	35	14	0.34	0.13	0.20	No	No	Yes	No	No	Yes
UN-534	69	Proposed Route	New Road, Bladed	PV	Other	UN-528	1.0	17.4	35	14	0.01	0.01	0.01	No	No	Yes	No	No	Yes
UN-535	69	Proposed Route	New Road, Primitive	PV	Other	UN-528	1.0	210.1	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-536	69	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-528	0.7	1,500.4	16	14	0.39	0.34	0.05	No	No	Yes	No	No	Yes
UN-537	69	Proposed Route	New Road, Primitive	PV	Other	UN-528	1.0	224.5	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
UN-538	69	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	UN-528	0.7	1,351.0	16	14	0.35	0.30	0.04	No	No	Yes	No	Yes	Yes
UN-539	69	Proposed Route	New Road, Primitive	PV	Other	UN-528	1.0	277.4	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	Yes
UN-540	70	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	713.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-001	71	Proposed Route	New Road, Bladed	PV	Other	BA-031	1.0	125.0	35	14	0.10	0.04	0.06	Yes	No	Yes	No	Yes	No
BA-002	71	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-031	0.7	1,319.8	16	14	0.34	0.30	0.04	No	No	Yes	No	Yes	No
BA-003	71	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	295.6	16	10	0.11	0.07	0.04	Yes	No	Yes	No	Yes	No
BA-004	71	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-031	0.7	1,505.8	16	14	0.39	0.34	0.05	No	No	Yes	No	Yes	No
BA-005	71	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	513.1	16	10	0.19	0.12	0.07	Yes	No	Yes	No	Yes	No
BA-006	71	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-031	0.7	2,148.0	16	14	0.55	0.48	0.07	No	No	Yes	No	Yes	No
BA-007	71	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	417.6	16	10	0.15	0.10	0.06	Yes	No	Yes	No	Yes	No
BA-008	71	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-031	0.7	58.4	16	14	0.02	0.01	0.00	No	No	Yes	No	Yes	No
BA-009	71	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	657.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-010	71	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	125.7	16	10	0.05	0.03	0.02	Yes	No	Yes	No	Yes	No
BA-011	71	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-031	0.7	1,760.8	16	14	0.45	0.40	0.06	No	No	Yes	No	Yes	No
BA-012	71	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	328.8	16	10	0.12	0.08	0.05	Yes	No	Yes	No	Yes	No
BA-013	71	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-031	0.7	601.4	16	14	0.15	0.14	0.02	No	No	Yes	No	Yes	No
BA-014	71	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	711.4	16	10	0.26	0.16	0.10	Yes	No	Yes	No	Yes	No
BA-015	71	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-031	0.7	1,989.4	16	14	0.51	0.45	0.06	No	No	Yes	No	Yes	No
BA-016	71	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	343.5	16	10	0.13	0.08	0.05	Yes	No	Yes	No	Yes	No
BA-017	71	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-031	0.7	1,295.5	16	14	0.33	0.29	0.04	No	No	Yes	No	Yes	No
BA-018	71	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	105.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-019	71	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	408.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-020	71	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	116.5	16	10	0.04	0.03	0.02	Yes	No	Yes	No	Yes	No
BA-021	71	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	406.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-022	71	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	445.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-023	71	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	424.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-024	71	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	748.4	16	10	0.27	0.17	0.10	Yes	No	Yes	No	Yes	No
BA-025	71	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,671.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-026	71	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	367.3	16	10	0.13	0.08	0.05	Yes	No	Yes	No	Yes	No
BA-027	71	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,268.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
BA-028	71	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	376.5	16	10	0.14	0.09	0.05	Yes	No	Yes	No	Yes	No
BA-029	71	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	924.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-030	72	Proposed Route	New Road, Primitive	PV	Other	BA-031	1.0	150.7	16	10	0.06	0.03	0.02	Yes	No	Yes	No	Yes	No
BA-031	72	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,669.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-032	72	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	276.4	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	No
BA-033	72	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,023.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-034	72	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,285.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-035	72	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	216.2	16	10	0.08	0.05	0.03	Yes	No	Yes	No	Yes	No
BA-036	72	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	806.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-037	72	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	585.7	16	14	0.15	0.13	0.02	No	No	Yes	No	Yes	No
BA-038	72	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,606.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-039	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	5,293.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-040	72	Proposed Route	New Road, Primitive	PV	Other	BA-037	1.0	536.0	16	10	0.20	0.12	0.07	Yes	No	Yes	No	Yes	No
BA-041	72	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	270.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-042	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,211.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-043	72	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	2,857.8	16	14	0.73	0.64	0.09	No	No	Yes	No	Yes	No
BA-044	72	Proposed Route	New Road, Primitive	PV	Other	BA-043	1.0	2,276.4	16	10	0.84	0.52	0.31	No	No	Yes	No	Yes	No
BA-045	72	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-043	0.7	514.9	16	14	0.13	0.12	0.02	No	No	Yes	No	Yes	No
BA-046	72	Proposed Route	New Road, Primitive	PV	Other	BA-043	1.0	374.8	16	10	0.14	0.09	0.05	Yes	No	Yes	No	Yes	No
BA-047	72	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-054	0.7	1,159.2	16	14	0.30	0.26	0.04	No	No	Yes	No	Yes	No
BA-048	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,837.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-049	72	Proposed Route	New Road, Primitive	PV	Other	BA-054	1.0	97.6	16	10	0.04	0.02	0.01	Yes	No	Yes	No	Yes	No
BA-050	72	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-054	0.7	1,298.1	16	14	0.33	0.29	0.04	No	No	Yes	No	Yes	No
BA-051	72	Proposed Route	New Road, Primitive	PV	Other	BA-054	1.0	151.2	16	10	0.06	0.03	0.02	Yes	No	Yes	No	Yes	No
BA-052	72	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-054	0.7	176.1	16	14	0.05	0.04	0.01	No	No	Yes	No	Yes	No
BA-053	72	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-054	0.7	568.9	16	14	0.15	0.13	0.02	No	No	Yes	No	Yes	No
BA-054	72	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,924.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-055	72	Proposed Route	New Road, Primitive	PV	Other	BA-054	1.0	2,798.1	16	10	1.03	0.64	0.39	No	No	Yes	No	Yes	No
BA-056	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,719.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-057	73	Proposed Route	New Road, Primitive	PV	Other	BA-059	1.0	154.4	16	10	0.06	0.04	0.02	Yes	No	Yes	No	Yes	No
BA-058	73	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-059	1.0	1,533.2	30	14	1.06	0.49	0.56	No	No	Yes	No	Yes	No
BA-059	73	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	5,550.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-060	73	Proposed Route	New Road, Primitive	PV	Other	BA-059	1.0	402.7	16	10	0.15	0.09	0.06	Yes	No	Yes	No	Yes	No
BA-061	73	Proposed Route	New Road, Primitive	PV	Other	BA-072	1.0	348.2	16	10	0.13	0.08	0.05	Yes	No	Yes	No	Yes	No
BA-062	73	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-072	0.7	1,048.2	16	14	0.27	0.24	0.03	No	No	Yes	No	Yes	No
BA-063	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	9,141.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-064	73	Proposed Route	New Road, Primitive	PV	Other	BA-072	1.0	264.5	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	No
BA-065	73	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-072	0.7	1,264.9	16	14	0.33	0.28	0.04	No	No	Yes	No	Yes	Yes
BA-066	73	Proposed Route	New Road, Primitive	PV	Other	BA-072	1.0	276.0	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	Yes
BA-067	73	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-072	0.7	1,242.0	16	14	0.32	0.28	0.04	No	No	Yes	No	Yes	Yes
BA-068	73	Proposed Route	New Road, Primitive	PV	Other	BA-072	1.0	263.2	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	No
BA-069	73	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-072	0.7	1,471.9	16	14	0.38	0.33	0.05	No	No	Yes	No	Yes	No
BA-070	73	Proposed Route	New Road, Primitive	PV	Other	BA-072	1.0	142.9	16	10	0.05	0.03	0.02	Yes	No	Yes	No	Yes	No
BA-071	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,474.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-072	73	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	2,308.3	16	14	0.59	0.52	0.07	No	No	Yes	No	Yes	No
BA-073	73	Proposed Route	New Road, Primitive	PV	Other	BA-075	1.0	428.9	16	10	0.16	0.10	0.06	Yes	No	Yes	No	Yes	No
BA-074	73	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	2,558.1	16	14	0.66	0.58	0.08	No	Yes	Yes	Yes	Yes	No
BA-075	73	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	650.7	16	14	0.17	0.15	0.02	No	No	Yes	No	Yes	No
BA-076	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,893.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-077	73	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	855.5	16	14	0.22	0.19	0.03	No	Yes	Yes	Yes	Yes	No
BA-078	73	Proposed Route	New Road, Primitive	PV	No	NA	1.0	267.0	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	No
BA-079	73	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,636.9	16	14	0.42	0.37	0.05	No	Yes	Yes	Yes	Yes	No
BA-080	73	Proposed Route	New Road, Primitive	PV	No	NA	1.0	239.6	16	10	0.09	0.06	0.03	Yes	No	Yes	No	Yes	No
BA-081	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,618.0	16	14	0.42	0.36	0.05	No	Yes	Yes	Yes	Yes	No
BA-082	74	Proposed Route	New Road, Primitive	PV	No	NA	1.0	462.8	16	10	0.17	0.11	0.06	Yes	No	Yes	No	Yes	No
BA-083	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	756.0	16	14	0.19	0.17	0.02	No	Yes	Yes	Yes	Yes	No
BA-084	74	Proposed Route	New Road, Primitive	PV	No	NA	1.0	535.2	16	10	0.20	0.12	0.07	Yes	No	Yes	No	Yes	No
BA-085	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	2,463.1	16	14	0.63	0.55	0.08	No	Yes	Yes	Yes	Yes	No
BA-086	74	Proposed Route	New Road, Primitive	PV	No	NA	1.0	297.1	16	10	0.11	0.07	0.04	Yes	No	Yes	No	Yes	No
BA-087	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,561.7	16	14	0.40	0.35	0.05	No	Yes	Yes	Yes	Yes	No
BA-088	74	Proposed Route	New Road, Primitive	PV	No	NA	1.0	253.6	16	10	0.09	0.06	0.03	Yes	No	Yes	No	Yes	No
BA-089	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,193.8	16	14	0.31	0.27	0.04	No	Yes	Yes	Yes	Yes	No
BA-090	74	Proposed Route	New Road, Primitive	PV	No	NA	1.0	247.2	16	10	0.09	0.06	0.03	Yes	No	Yes	No	Yes	No
BA-091	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	831.5	16	14	0.21	0.19	0.03	No	Yes	Yes	Yes	Yes	No
BA-092	74	Proposed Route	New Road, Primitive	PV	No	NA	1.0	291.7	16	10	0.11	0.07	0.04	Yes	No	Yes	No	Yes	No
BA-093	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,227.7	16	14	0.32	0.28	0.04	No	Yes	Yes	Yes	Yes	No
BA-094	74	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	603.3	16	10	0.22	0.14	0.08	Yes	No	Yes	No	Yes	No
BA-095	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	738.3	16	14	0.19	0.17	0.02	No	Yes	Yes	Yes	Yes	No
BA-096	74	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	600.2	16	10	0.22	0.14	0.08	Yes	No	Yes	No	Yes	No
BA-097	74	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	192.5	35	14	0.15	0.06	0.09	Yes	No	Yes	No	Yes	No
BA-098	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	2,403.4	16	14	0.62	0.54	0.08	No	Yes	Yes	Yes	Yes	No
BA-099	74	Proposed Route	New Road, Primitive	PV	No	NA	1.0	255.7	16	10	0.09	0.06	0.04	Yes	No	Yes	No	Yes	No
BA-100	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	557.4	16	14	0.14	0.13	0.02	No	Yes	Yes	Yes	Yes	No
BA-101	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	715.7	16	14	0.18	0.16	0.02	No	No	Yes	No	Yes	No
BA-102	74	Proposed Route	New Road, Primitive	PV	Other	BA-101	1.0	239.5	16	10	0.09	0.05	0.03	Yes	No	Yes	No	Yes	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
BA-103	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	9,159.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-104	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-101	0.7	1,541.5	16	14	0.40	0.35	0.05	No	No	Yes	No	Yes	No
BA-105	74	Proposed Route	New Road, Primitive	PV	Other	BA-101	1.0	299.1	16	10	0.11	0.07	0.04	Yes	No	Yes	No	Yes	No
BA-106	74	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-101	0.7	1,272.4	16	14	0.33	0.29	0.04	No	No	Yes	No	Yes	No
BA-107	75	Proposed Route	New Road, Primitive	PV	Other	BA-101	1.0	218.4	16	10	0.08	0.05	0.03	Yes	No	Yes	No	Yes	No
BA-108	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-101	0.7	1,305.4	16	14	0.34	0.29	0.04	No	No	Yes	No	Yes	No
BA-109	75	Proposed Route	New Road, Primitive	PV	Other	BA-101	1.0	246.9	16	10	0.09	0.06	0.03	Yes	No	Yes	No	Yes	No
BA-110	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-101	0.7	1,367.8	16	14	0.35	0.31	0.04	No	No	Yes	No	Yes	No
BA-111	75	Proposed Route	New Road, Primitive	PV	Other	BA-114	1.0	300.9	16	10	0.11	0.07	0.04	Yes	No	Yes	No	Yes	No
BA-112	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-114	0.7	1,369.6	16	14	0.35	0.31	0.04	No	No	Yes	No	Yes	No
BA-113	75	Proposed Route	New Road, Primitive	PV	Other	BA-114	1.0	299.9	16	10	0.11	0.07	0.04	Yes	No	Yes	No	Yes	No
BA-114	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	2,612.9	16	14	0.67	0.59	0.08	No	No	Yes	No	Yes	No
BA-115	75	Proposed Route	New Road, Primitive	PV	Other	BA-118	1.0	145.2	16	10	0.05	0.03	0.02	Yes	No	Yes	No	Yes	No
BA-116	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-118	0.7	333.1	16	14	0.09	0.07	0.01	Yes	No	Yes	No	Yes	No
BA-117	75	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,682.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-118	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	1,253.4	16	14	0.32	0.28	0.04	No	No	Yes	No	Yes	No
BA-119	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-118	0.7	1,173.1	16	14	0.30	0.26	0.04	No	No	Yes	No	Yes	No
BA-120	75	Proposed Route	New Road, Primitive	PV	Other	BA-118	1.0	234.8	16	10	0.09	0.05	0.03	Yes	No	Yes	No	Yes	No
BA-121	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-118	0.7	1,208.3	16	14	0.31	0.27	0.04	No	No	Yes	No	Yes	No
BA-122	75	Proposed Route	New Road, Primitive	PV	Other	BA-118	1.0	205.9	16	10	0.08	0.05	0.03	Yes	No	Yes	No	Yes	No
BA-123	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-118	0.7	833.1	16	14	0.21	0.19	0.03	No	No	Yes	No	Yes	No
BA-124	75	Proposed Route	New Road, Primitive	PV	Other	BA-118	1.0	278.8	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	No
BA-125	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-118	0.7	1,645.5	16	14	0.42	0.37	0.05	No	No	Yes	No	Yes	No
BA-126	75	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,686.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-127	75	Proposed Route	New Road, Primitive	PV	Other	BA-118	1.0	295.2	16	10	0.11	0.07	0.04	Yes	No	Yes	No	Yes	No
BA-128	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-118	0.7	848.2	16	14	0.22	0.19	0.03	No	No	Yes	No	Yes	No
BA-129	75	Proposed Route	New Road, Primitive	PV	Other	BA-118	1.0	224.2	16	10	0.08	0.05	0.03	Yes	No	Yes	No	Yes	No
BA-130	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-133	0.7	949.4	16	14	0.24	0.21	0.03	No	No	Yes	No	Yes	No
BA-131	75	Proposed Route	New Road, Primitive	PV	Other	BA-133	1.0	259.1	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	No
BA-132	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-133	0.7	983.9	16	14	0.25	0.22	0.03	No	No	Yes	No	Yes	No
BA-133	75	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	2,495.8	16	10	0.92	0.57	0.34	No	No	Yes	No	Yes	No
BA-134	75	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-133	0.7	355.9	16	14	0.09	0.08	0.01	No	No	Yes	No	Yes	No
BA-135	75	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	733.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-136	76	Proposed Route	New Road, Primitive	PV	Other	BA-133	1.0	230.9	16	10	0.08	0.05	0.03	Yes	No	Yes	No	Yes	No
BA-137	76	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-133	0.7	643.2	16	14	0.17	0.14	0.02	No	No	Yes	No	Yes	No
BA-138	76	Proposed Route	New Road, Primitive	PV	Other	BA-133	1.0	426.4	16	10	0.16	0.10	0.06	No	No	Yes	No	Yes	No
BA-139	76	Proposed Route	New Road, Bladed	PV	Yes	NA	1.0	4,335.3	35	14	3.48	1.39	2.09	No	No	Yes	No	Yes	No
BA-140	76	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,904.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-141	76	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	398.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-142	76	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,292.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-143	76	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	1,937.6	16	10	0.71	0.44	0.27	No	No	Yes	No	Yes	No
BA-144	76	Proposed Route	New Road, Bladed	PV	Other	BA-153	1.0	3,408.8	35	14	2.74	1.10	1.64	No	No	Yes	No	Yes	No
BA-145	76	Proposed Route	New Road, Primitive	PV	Other	BA-153	1.0	274.7	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	No
BA-146	76	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-153	0.7	1,056.4	16	14	0.27	0.24	0.03	No	No	Yes	No	Yes	No
BA-147	76	Proposed Route	New Road, Primitive	PV	Other	BA-153	1.0	335.7	16	10	0.12	0.08	0.05	Yes	No	Yes	No	Yes	No
BA-148	76	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-153	0.7	236.3	16	14	0.06	0.05	0.01	No	No	Yes	No	Yes	No
BA-149	76	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-153	0.7	1,346.4	16	14	0.35	0.30	0.04	No	No	Yes	No	Yes	No
BA-150	76	Proposed Route	New Road, Primitive	PV	Other	BA-153	1.0	264.5	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	No
BA-151	76	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,155.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-152	76	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-153	1.0	459.4	30	14	0.32	0.15	0.17	No	No	Yes	No	Yes	No
BA-153	76	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,436.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-154	76	Proposed Route	New Road, Primitive	PV	Other	BA-153	1.0	263.2	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	No
BA-155	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-153	1.0	1,164.6	30	14	0.80	0.37	0.43	No	No	Yes	No	Yes	No
BA-156	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	365.7	16	10	0.13	0.08	0.05	NA	NA	No	No	No	No
BA-157	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	947.8	30	14	0.65	0.30	0.35	NA	NA	No	No	No	No
BA-158	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	244.0	16	10	0.09	0.06	0.03	NA	NA	No	No	No	No
BA-159	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,208.7	30	14	0.83	0.39	0.44	NA	NA	No	No	No	No
BA-160	77	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	388.7	35	14	0.31	0.12	0.19	NA	NA	No	No	No	No
BA-161	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,058.0	30	14	0.73	0.34	0.39	NA	NA	No	No	No	No
BA-162	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	59.4	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
BA-163	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	71.5	30	14	0.05	0.02	0.03	NA	NA	No	No	No	No
BA-164	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,140.9	30	14	0.79	0.37	0.42	NA	NA	No	No	No	No
BA-165	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	403.3	16	10	0.15	0.09	0.06	NA	NA	No	No	No	No
BA-166	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,165.6	30	14	0.80	0.37	0.43	NA	NA	No	No	No	No
BA-167	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	389.4	16	10	0.14	0.09	0.05	NA	NA	No	No	No	No
BA-168	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	601.4	30	14	0.41	0.19	0.22	NA	NA	No	No	No	No
BA-169	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	144.1	16	10	0.05	0.03	0.02	NA	NA	No	No	No	No
BA-170	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,161.3	30	14	0.80	0.37	0.43	NA	NA	No	No	No	No
BA-171	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	187.9	16	10	0.07	0.04	0.03	NA	NA	No	No	No	No
BA-172	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-185	1.0	1,129.1	30	14	0.78	0.36	0.41	No	No	Yes	No	Yes	No
BA-173	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	359.9	16	10	0.13	0.08	0.05	NA	NA	No	No	No	No
BA-174	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,360.5	30	14	0.94	0.44	0.50	NA	NA	No	No	No	No
BA-175	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	278.2	16	10	0.10	0.06	0.04	NA	NA	No	No	No	No
BA-176	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,304.6	30	14	0.90	0.42	0.48	NA	NA	No	No	No	No
BA-177	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	549.8	16	10	0.20	0.13	0.08	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
BA-178	77	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	198.2	16	14	0.05	0.04	0.01	NA	NA	No	No	No	No
BA-179	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	431.1	16	10	0.16	0.10	0.06	NA	NA	No	No	No	No
BA-180	77	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	549.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-181	77	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	637.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-182	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	129.3	16	10	0.05	0.03	0.02	NA	NA	No	No	No	No
BA-183	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	400.2	16	10	0.15	0.09	0.06	NA	NA	No	No	No	No
BA-184	77	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	680.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-185	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,160.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-186	77	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,831.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-187	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	425.2	30	14	0.29	0.14	0.16	NA	NA	No	No	No	No
BA-188	77	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	215.0	35	14	0.17	0.07	0.10	NA	NA	No	No	No	No
BA-189	77	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	1,143.5	35	14	0.92	0.37	0.55	NA	NA	No	No	No	No
BA-190	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	975.5	30	14	0.67	0.31	0.36	NA	NA	No	No	No	No
BA-191	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	414.1	30	14	0.29	0.13	0.15	NA	NA	No	No	No	No
BA-192	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	117.6	30	14	0.08	0.04	0.04	NA	NA	No	No	No	No
BA-193	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	331.4	30	14	0.23	0.11	0.12	NA	NA	No	No	No	No
BA-194	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	181.8	30	14	0.13	0.06	0.07	NA	NA	No	No	No	No
BA-195	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	738.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-196	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	52.3	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
BA-197	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,058.0	30	14	0.73	0.34	0.39	NA	NA	No	No	No	No
BA-198	78	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	365.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-199	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	1,258.4	30	14	0.87	0.40	0.46	No	Yes	Yes	Yes	Yes	No
BA-200	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	157.8	16	10	0.06	0.04	0.02	NA	NA	No	No	No	No
BA-201	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	197.9	30	14	0.14	0.06	0.07	NA	NA	No	No	No	No
BA-202	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	325.5	16	10	0.12	0.07	0.04	NA	NA	No	No	No	No
BA-203	77	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	30.4	16	10	0.01	0.01	0.00	NA	NA	No	No	No	No
BA-204	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	357.5	30	14	0.25	0.11	0.13	NA	NA	No	No	No	No
BA-205	77	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	246.0	30	14	0.17	0.08	0.09	No	Yes	Yes	Yes	Yes	No
BA-206	77	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	272.2	16	14	0.07	0.06	0.01	No	Yes	Yes	Yes	Yes	No
BA-207	78	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,814.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-208	77	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	840.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-209	77	Proposed Route	New Road, Primitive	PV	No	NA	1.0	208.2	16	10	0.08	0.05	0.03	Yes	No	Yes	No	Yes	No
BA-210	77	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,197.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-211	78	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Yes	NA	1.0	306.7	30	14	0.21	0.10	0.11	No	No	Yes	No	Yes	No
BA-212	78	Proposed Route	New Road, Primitive	PV	Other	BA-211	1.0	93.2	16	10	0.03	0.02	0.01	Yes	No	Yes	No	Yes	No
BA-213	78	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-211	1.0	1,351.3	30	14	0.93	0.43	0.50	No	No	Yes	No	Yes	No
BA-214	78	Proposed Route	New Road, Primitive	PV	Other	BA-211	1.0	147.2	16	10	0.05	0.03	0.02	Yes	No	Yes	No	Yes	No
BA-215	78	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-211	1.0	1,034.5	30	14	0.71	0.33	0.38	No	No	Yes	No	Yes	No
BA-216	78	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-211	1.0	224.9	30	14	0.15	0.07	0.08	Yes	No	Yes	No	Yes	No
BA-217	78	Proposed Route	New Road, Primitive	PV	Other	BA-211	1.0	135.5	16	10	0.05	0.03	0.02	Yes	No	Yes	No	Yes	No
BA-218	78	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-211	1.0	2,109.5	30	14	1.45	0.68	0.77	No	No	Yes	No	Yes	No
BA-219	79	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	41.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-220	79	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,693.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-221	79	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-220	1.0	4,284.0	30	14	2.95	1.38	1.57	No	No	Yes	No	Yes	No
BA-222	79	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-211	1.0	983.7	30	14	0.68	0.32	0.36	No	No	Yes	No	Yes	No
BA-223	78	Proposed Route	New Road, Primitive	PV	Other	BA-211	1.0	84.4	16	10	0.03	0.02	0.01	Yes	No	Yes	No	Yes	No
BA-224	79	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	835.7	16	14	0.21	0.19	0.03	NA	NA	No	No	No	No
BA-225	79	Proposed Route	New Road, Primitive	PV	Other	BA-220	1.0	975.7	16	10	0.36	0.22	0.13	Yes	No	Yes	No	Yes	No
BA-226	79	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-220	1.0	3,602.1	30	14	2.48	1.16	1.32	No	No	Yes	No	Yes	No
BA-227	79	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,528.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-228	79	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,773.3	16	14	0.46	0.40	0.06	NA	NA	No	No	No	No
BA-229	79	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	453.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-230	79	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	372.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-231	79	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	502.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-232	79	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,463.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-233	79	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,315.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-234	79	Proposed Route	New Road, Primitive	PV	Other	BA-220	1.0	1,320.9	16	10	0.49	0.30	0.18	Yes	No	Yes	No	Yes	No
BA-235	79	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	27.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-236	79	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-220	0.7	2,023.8	16	14	0.52	0.46	0.07	No	No	Yes	No	Yes	No
BA-237	79	Proposed Route	New Road, Primitive	PV	Other	BA-220	1.0	296.2	16	10	0.11	0.07	0.04	Yes	No	Yes	No	Yes	No
BA-238	79	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	3,046.2	16	14	0.78	0.69	0.10	NA	NA	No	No	No	No
BA-239	79	Proposed Route	New Road, Primitive	PV	Other	BA-220	1.0	582.8	16	10	0.21	0.13	0.08	Yes	No	Yes	No	Yes	No
BA-240	79	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	613.3	16	10	0.23	0.14	0.08	NA	NA	No	No	No	No
BA-241	79	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,267.9	16	14	0.33	0.29	0.04	NA	NA	No	No	No	No
BA-242	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	454.5	16	10	0.17	0.10	0.06	NA	NA	No	No	No	No
BA-243	80	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,344.1	16	14	0.35	0.30	0.04	NA	NA	No	No	No	No
BA-244	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	425.2	16	10	0.16	0.10	0.06	NA	NA	No	No	No	No
BA-245	80	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,355.1	16	14	0.35	0.30	0.04	NA	NA	No	No	No	No
BA-246	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	373.5	16	10	0.14	0.09	0.05	NA	NA	No	No	No	No
BA-247	80	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,171.5	16	14	0.30	0.26	0.04	NA	NA	No	No	No	No
BA-248	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	511.0	16	10	0.19	0.12	0.07	NA	NA	No	No	No	No
BA-249	80	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	547.2	30	14	0.38	0.18	0.20	NA	NA	No	No	No	No
BA-250	80	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	324.3	30	14	0.22	0.10	0.12	NA	NA	No	No	No	No
BA-251	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	484.9	16	10	0.18	0.11	0.07	NA	NA	No	No	No	No
BA-252	80	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,863.7	30	14	1.28	0.60	0.68	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
BA-253	80	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	362.7	35	14	0.29	0.12	0.17	NA	NA	No	No	No	No
BA-254	80	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	774.8	30	14	0.53	0.25	0.28	NA	NA	No	No	No	No
BA-255	80	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	142.8	30	14	0.10	0.05	0.05	NA	NA	No	No	No	No
BA-256	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	73.3	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
BA-257	80	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,609.7	30	14	1.11	0.52	0.59	NA	NA	No	No	No	No
BA-258	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	310.6	16	10	0.11	0.07	0.04	NA	NA	No	No	No	No
BA-259	80	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	919.9	30	14	0.63	0.30	0.34	NA	NA	No	No	No	No
BA-260	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	65.1	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
BA-261	80	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,399.2	30	14	0.96	0.45	0.51	NA	NA	No	No	No	No
BA-262	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	278.1	16	10	0.10	0.06	0.04	NA	NA	No	No	No	No
BA-263	80	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,385.0	30	14	0.95	0.45	0.51	NA	NA	No	No	No	No
BA-264	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	166.8	16	10	0.06	0.04	0.02	NA	NA	No	No	No	No
BA-265	80	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,564.2	30	14	1.08	0.50	0.57	NA	NA	No	No	No	No
BA-266	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	61.3	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
BA-267	80	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,447.4	16	14	0.37	0.33	0.05	NA	NA	No	No	No	No
BA-268	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,028.5	16	10	0.38	0.24	0.14	NA	NA	No	No	No	No
BA-269	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	201.4	16	10	0.07	0.05	0.03	NA	NA	No	No	No	No
BA-270	80	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,534.3	16	10	0.56	0.35	0.21	NA	NA	No	No	No	No
BA-271	81	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	6,050.5	16	14	1.56	1.36	0.19	NA	NA	No	No	No	No
BA-272	81	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,984.6	16	10	0.73	0.46	0.27	NA	NA	No	No	No	No
BA-273	81	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	125.6	35	14	0.10	0.04	0.06	NA	NA	No	No	No	No
BA-274	81	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	223.9	16	14	0.06	0.05	0.01	NA	NA	No	No	No	No
BA-275	81	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	419.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-276	81	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	819.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-277	81	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,413.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-278	81	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	420.9	16	10	0.15	0.10	0.06	NA	NA	No	No	No	No
BA-279	81	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,780.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-280	81	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	82.2	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
BA-281	81	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,087.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-282	81	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	400.6	16	14	0.10	0.09	0.01	NA	NA	No	No	No	No
BA-283	81	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	233.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-284	81	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	182.9	16	10	0.07	0.04	0.03	NA	NA	No	No	No	No
BA-285	81	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,421.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-286	81	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	332.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-287	81	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,062.5	16	14	0.27	0.24	0.03	NA	NA	No	No	No	No
BA-288	81	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,007.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-289	81	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	356.7	16	10	0.13	0.08	0.05	NA	NA	No	No	No	No
BA-290	81	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,292.6	16	14	0.33	0.29	0.04	NA	NA	No	No	No	No
BA-291	81	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	145.4	35	14	0.12	0.05	0.07	NA	NA	No	No	No	No
BA-292	81	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,270.9	16	14	0.33	0.29	0.04	NA	NA	No	No	No	No
BA-293	81	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,471.9	16	10	0.54	0.34	0.20	NA	NA	No	No	No	No
BA-294	81	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-300	0.7	1,576.5	16	14	0.41	0.35	0.05	No	No	Yes	No	Yes	No
BA-295	82	Proposed Route	New Road, Primitive	PV	No	NA	1.0	209.8	16	10	0.08	0.05	0.03	Yes	No	Yes	No	Yes	No
BA-296	82	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-300	0.7	1,248.7	16	14	0.32	0.28	0.04	No	No	Yes	No	Yes	No
BA-297	82	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	627.3	16	14	0.16	0.14	0.02	NA	NA	No	No	No	No
BA-298	82	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	291.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-299	82	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	714.4	16	14	0.18	0.16	0.02	NA	NA	No	No	No	No
BA-300	82	Proposed Route	New Road, Bladed	PV	Yes	NA	1.0	4,470.9	35	14	3.59	1.44	2.16	No	No	Yes	No	Yes	No
BA-301	82	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,377.7	16	14	0.61	0.53	0.08	NA	NA	No	No	No	No
BA-302	82	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-301	0.7	926.8	16	14	0.24	0.21	0.03	No	No	Yes	No	Yes	No
BA-303	82	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,430.3	16	14	0.62	0.55	0.08	NA	NA	No	No	No	No
BA-304	82	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-301	0.7	1,348.2	16	14	0.35	0.30	0.04	No	No	Yes	No	Yes	No
BA-305	82	Proposed Route	New Road, Bladed	PV	Other	BA-304	1.0	456.2	35	14	0.37	0.15	0.22	Yes	No	Yes	No	Yes	No
BA-306	82	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-304	0.7	378.7	16	14	0.10	0.09	0.01	No	No	Yes	No	Yes	No
BA-307	82	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	147.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-308	82	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	144.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-309	82	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	299.6	16	14	0.08	0.07	0.01	NA	NA	No	No	No	No
BA-310	82	Proposed Route	New Road, Bladed	PV	Other	BA-304	1.0	5,075.9	35	14	4.08	1.63	2.45	No	No	Yes	No	Yes	No
BA-311	82	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,139.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-312	82	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	198.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-313	82	Proposed Route	New Road, Primitive	PV	Other	BA-315	1.0	114.7	16	10	0.04	0.03	0.02	Yes	No	Yes	No	Yes	No
BA-314	82	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,129.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-315	82	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	1,452.5	16	14	0.37	0.33	0.05	No	No	Yes	No	Yes	No
BA-316	82	Proposed Route	New Road, Primitive	PV	Other	BA-315	1.0	1,920.1	16	10	0.71	0.44	0.26	No	No	Yes	No	Yes	No
BA-317	83	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,534.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-318	83	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	1,208.6	16	10	0.44	0.28	0.17	No	No	Yes	No	Yes	No
BA-318	83	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	450.7	16	10	0.17	0.10	0.06	No	Yes	Yes	Yes	Yes	No
BA-319	83	Proposed Route	New Road, Primitive	PV	Other	BA-315	1.0	38.4	16	10	0.01	0.01	0.01	Yes	No	Yes	No	Yes	No
BA-320	83	Proposed Route	New Road, Bladed	PV	Other	BA-318	1.0	769.7	35	14	0.62	0.25	0.37	No	No	Yes	No	Yes	No
BA-321	83	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	279.7	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	No
BA-322	83	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,948.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-323	83	Proposed Route	New Road, Primitive	PV	Other	BA-337	1.0	2,612.3	16	10	0.96	0.60	0.36	No	No	Yes	No	Yes	No
BA-324	83	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	986.6	35	14	0.79	0.32	0.48	No	Yes	Yes	Yes	Yes	No
BA-325	83	Proposed Route	New Road, Bladed	PV	Other	BA-337	1.0	844.6	35	14	0.68	0.27	0.41	No	No	Yes	No	Yes	No
BA-326	83	Proposed Route	New Road, Primitive	PV	No	NA	1.0	829.4	16	10	0.30	0.19	0.11	No	Yes	Yes	Yes	Yes	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
BA-327	82	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	5,381.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-328	83	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,489.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-329	83	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,321.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-330	83	Proposed Route	New Road, Bladed	PV	No	NA	1.0	460.9	35	14	0.37	0.15	0.22	No	Yes	Yes	Yes	Yes	No
BA-331	83	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	764.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-332	83	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-337	0.7	2,275.4	16	14	0.59	0.51	0.07	No	No	Yes	No	Yes	No
BA-333	83	Proposed Route	New Road, Bladed	PV	Other	BA-337	1.0	240.8	35	14	0.19	0.08	0.12	Yes	No	Yes	No	Yes	No
BA-334	83	Proposed Route	New Road, Bladed	PV	Other	BA-348	1.0	901.2	35	14	0.72	0.29	0.43	No	No	Yes	No	Yes	No
BA-335	83	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,275.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-336	83	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,395.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-337	83	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	108.3	16	14	0.03	0.02	0.00	No	No	Yes	No	Yes	No
BA-338	83	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-337	0.7	3,589.8	16	14	0.92	0.81	0.12	No	No	Yes	No	Yes	No
BA-339	83	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-348	1.0	1,831.2	30	14	1.26	0.59	0.67	No	No	Yes	No	Yes	No
BA-340	84	Proposed Route	New Road, Primitive	PV	Other	BA-346	1.0	1,843.9	16	10	0.68	0.42	0.25	No	No	Yes	No	Yes	No
BA-341	84	Proposed Route	New Road, Bladed	PV	Other	BA-346	1.0	1,233.4	35	14	0.99	0.40	0.59	No	No	Yes	No	Yes	No
BA-342	84	Proposed Route	New Road, Primitive	PV	Other	BA-346	1.0	1,331.3	16	10	0.49	0.31	0.18	No	No	Yes	No	Yes	No
BA-343	83	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,012.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-344	84	Proposed Route	New Road, Primitive	PV	Other	BA-346	1.0	632.8	16	10	0.23	0.15	0.09	No	No	Yes	No	Yes	No
BA-345	84	Proposed Route	New Road, Primitive	PV	Other	BA-346	1.0	228.9	16	10	0.08	0.05	0.03	Yes	No	Yes	No	Yes	No
BA-346	84	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,166.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-347	84	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	218.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-348	83	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,333.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-349	84	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	1,399.3	16	10	0.51	0.32	0.19	No	No	Yes	No	Yes	No
BA-350	84	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	1,917.1	35	14	1.54	0.62	0.92	No	No	Yes	No	Yes	No
BA-351	84	Proposed Route	New Road, Primitive	PV	Other	BA-349	1.0	126.6	16	10	0.05	0.03	0.02	Yes	No	Yes	No	Yes	No
BA-352	84	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	2,361.3	16	14	0.61	0.53	0.08	No	Yes	Yes	Yes	Yes	No
BA-353	84	Proposed Route	New Road, Primitive	PV	Other	BA-349	1.0	139.8	16	10	0.05	0.03	0.02	No	No	Yes	No	Yes	No
BA-354	83	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	5,795.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-355	84	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-349	0.7	936.4	16	14	0.24	0.21	0.03	No	No	Yes	No	Yes	No
BA-356	84	Proposed Route	New Road, Bladed	PV	Other	BA-349	1.0	1,198.6	35	14	0.96	0.39	0.58	No	No	Yes	No	Yes	No
BA-357	84	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	2,109.2	16	10	0.77	0.48	0.29	No	No	Yes	No	Yes	No
BA-358	84	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	6,565.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-359	84	Proposed Route	New Road, Primitive	PV	Other	BA-349	1.0	591.5	16	10	0.22	0.14	0.08	No	No	Yes	No	Yes	No
BA-360	84	Proposed Route	New Road, Primitive	BLM	Other	BA-365	1.0	423.7	16	10	0.16	0.10	0.06	Yes	No	Yes	No	Yes	No
BA-361	84	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	1,314.4	16	10	0.48	0.30	0.18	No	Yes	Yes	Yes	Yes	No
BA-362	84	Proposed Route	New Road, Primitive	BLM	Other	BA-365	1.0	1,101.9	16	10	0.40	0.25	0.15	No	No	Yes	No	Yes	No
BA-363	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,487.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-364	84	Proposed Route	New Road, Primitive	PV	Other	BA-370	1.0	871.5	16	10	0.32	0.20	0.12	No	No	Yes	No	Yes	No
BA-365	84	Proposed Route	New Road, Bladed	PV	Yes	NA	1.0	665.2	35	14	0.53	0.21	0.32	No	No	Yes	No	Yes	No
BA-366	84	Proposed Route	New Road, Primitive	PV	Other	BA-370	1.0	1,229.4	16	10	0.45	0.28	0.17	No	No	Yes	No	Yes	No
BA-367	84	Proposed Route	New Road, Primitive	PV	Other	BA-370	1.0	1,054.1	16	10	0.39	0.24	0.15	No	No	Yes	No	Yes	No
BA-368	84	Proposed Route	New Road, Bladed	PV	Other	BA-370	1.0	511.0	35	14	0.41	0.16	0.25	No	No	Yes	No	Yes	No
BA-369	85	Proposed Route	New Road, Primitive	PV	Other	BA-373	1.0	1,325.5	16	10	0.49	0.30	0.18	No	No	Yes	No	Yes	No
BA-370	85	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,674.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-371	85	Proposed Route	New Road, Bladed	PV	Other	BA-373	1.0	4,700.7	35	14	3.78	1.51	2.27	No	No	Yes	No	Yes	No
BA-372	85	Proposed Route	New Road, Bladed	PV	Other	BA-373	1.0	3,981.5	35	14	3.20	1.28	1.92	No	No	Yes	No	Yes	No
BA-373	85	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	624.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-374	85	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	216.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-375	85	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	168.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-376	85	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	211.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-377	85	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	250.8	16	10	0.09	0.06	0.03	Yes	No	Yes	No	Yes	No
BA-378	85	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	702.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-379	85	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	453.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-380	85	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	330.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-381	85	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	414.6	35	14	0.33	0.13	0.20	NA	NA	No	No	No	No
BA-382	86	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,560.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-383	86	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,059.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-384	86	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	466.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-385	85	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,899.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-386	86	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	9,757.9	35	14	7.84	3.14	4.70	NA	NA	No	No	No	No
BA-387	86	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	4,187.2	35	14	3.36	1.35	2.02	NA	NA	No	No	No	No
BA-388	86	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,747.1	16	14	0.45	0.39	0.06	NA	NA	No	No	No	No
BA-389	86	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	316.1	35	14	0.25	0.10	0.15	NA	NA	No	No	No	No
BA-390	86	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,404.5	35	14	1.13	0.45	0.68	NA	NA	No	No	No	No
BA-391	86	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	3,322.8	16	14	0.85	0.75	0.11	NA	NA	No	No	No	No
BA-392	86	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,107.7	35	14	0.89	0.36	0.53	NA	NA	No	No	No	No
BA-393	87	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	4,534.4	35	14	3.64	1.46	2.19	NA	NA	No	No	No	No
BA-394	87	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	482.5	35	14	0.39	0.16	0.23	NA	NA	No	No	No	No
BA-395	87	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	606.9	35	14	0.49	0.20	0.29	NA	NA	No	No	No	No
BA-396	87	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	11,882.1	16	14	3.06	2.67	0.38	NA	NA	No	No	No	No
BA-397	87	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	957.0	16	14	0.25	0.22	0.03	NA	NA	No	No	No	No
BA-398	87	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	677.8	16	10	0.25	0.16	0.09	NA	NA	No	No	No	No
BA-399	87	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	915.4	16	14	0.24	0.21	0.03	NA	NA	No	No	No	No
BA-400	87	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	942.4	30	14	0.65	0.30	0.35	NA	NA	No	No	No	No
BA-401	87	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	226.8	16	10	0.08	0.05	0.03	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
BA-402	87	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	210.9	16	14	0.05	0.05	0.01	NA	NA	No	No	No	No
BA-403	87	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	554.7	16	10	0.20	0.13	0.08	NA	NA	No	No	No	No
BA-404	87	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	6,258.5	16	14	1.61	1.41	0.20	NA	NA	No	No	No	No
BA-405	88	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	136.3	16	10	0.05	0.03	0.02	NA	NA	No	No	No	No
BA-406	88	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	251.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-407	88	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	7,940.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-408	88	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	2,129.3	30	14	1.47	0.68	0.78	NA	NA	No	No	No	No
BA-409	87	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,323.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-410	88	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	605.8	16	10	0.22	0.14	0.08	NA	NA	No	No	No	No
BA-411	87	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	329.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-412	87	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	356.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-413	88	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	1,056.6	30	14	0.73	0.34	0.39	NA	NA	No	No	No	No
BA-414	87	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	572.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-415	88	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,348.9	16	10	0.50	0.31	0.19	NA	NA	No	No	No	No
BA-416	89	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,706.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-417	89	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	11,813.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-418	88	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	2,694.3	35	14	2.16	0.87	1.30	NA	NA	No	No	No	No
BA-419	88	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,101.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-420	88	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,952.8	16	10	1.45	0.91	0.54	NA	NA	No	No	No	No
BA-421	88	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	5,718.1	16	10	2.10	1.31	0.79	NA	NA	No	No	No	No
BA-422	90	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	11,046.1	16	14	2.84	2.49	0.36	NA	NA	No	No	No	No
BA-423	88	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	2,988.6	16	10	1.10	0.69	0.41	NA	NA	No	No	No	No
BA-424	88	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	924.9	30	14	0.64	0.30	0.34	NA	NA	No	No	No	No
BA-425	88	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	142.5	16	10	0.05	0.03	0.02	NA	NA	No	No	No	No
BA-426	88	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	345.2	30	14	0.24	0.11	0.13	NA	NA	No	No	No	No
BA-427	91	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	13,950.4	30	14	9.61	4.48	5.12	NA	NA	No	No	No	No
BA-428	88	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	2,080.6	16	10	0.76	0.48	0.29	NA	NA	No	No	No	No
BA-429	91	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	5,333.6	16	14	1.37	1.20	0.17	NA	NA	No	No	No	No
BA-430	91	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	75.2	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
BA-431	91	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,425.6	30	14	0.98	0.46	0.52	NA	NA	No	No	No	No
BA-432	91	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,647.9	16	14	0.68	0.60	0.09	NA	NA	No	No	No	No
BA-433	91	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	1,112.3	35	14	0.89	0.36	0.54	NA	NA	No	No	No	No
BA-434	91	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	7,115.1	30	14	4.90	2.29	2.61	NA	NA	No	No	No	No
BA-435	91	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	4,473.4	30	14	3.08	1.44	1.64	NA	NA	No	No	No	No
BA-436	91	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	1,387.7	35	14	1.11	0.45	0.67	NA	NA	No	No	No	No
BA-437	91	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	252.9	35	14	0.20	0.08	0.12	NA	NA	No	No	No	No
BA-438	91	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-441	0.7	6,150.4	16	14	1.58	1.38	0.20	No	No	Yes	No	No	Yes
BA-439	91	Proposed Route	New Road, Primitive	PV	Other	BA-441	1.0	2,146.8	16	10	0.79	0.49	0.30	Yes	No	Yes	No	No	Yes
BA-440	92	Proposed Route	New Road, Primitive	PV	Other	BA-441	1.0	1,110.3	16	10	0.41	0.25	0.15	Yes	No	Yes	No	No	Yes
BA-441	92	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	5,173.9	16	14	1.33	1.16	0.17	No	Yes	Yes	Yes	No	Yes
BA-441	92	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	5,001.8	16	14	1.29	1.13	0.16	No	No	Yes	No	No	Yes
BA-442	92	Proposed Route	New Road, Primitive	PV	Other	BA-441	1.0	192.8	16	10	0.07	0.04	0.03	Yes	No	Yes	No	No	Yes
BA-443	92	Proposed Route	New Road, Primitive	PV	Other	BA-441	1.0	880.1	16	10	0.32	0.20	0.12	Yes	No	Yes	No	No	Yes
BA-444	92	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-441	0.7	2,847.0	16	14	0.73	0.64	0.09	No	No	Yes	No	No	Yes
BA-445	92	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	5,761.1	16	14	1.48	1.30	0.19	No	Yes	Yes	Yes	No	Yes
BA-445	92	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	1,025.7	16	14	0.26	0.23	0.03	No	No	Yes	No	No	Yes
BA-446	92	Proposed Route	New Road, Primitive	PV	Other	BA-445	1.0	863.6	16	10	0.32	0.20	0.12	No	No	Yes	No	No	Yes
BA-447	92	Proposed Route	New Road, Bladed	PV	Other	BA-445	1.0	1,542.4	35	14	1.24	0.50	0.74	No	No	Yes	No	No	Yes
BA-448	92	Proposed Route	New Road, Primitive	PV	Other	BA-445	1.0	596.2	16	10	0.22	0.14	0.08	Yes	No	Yes	No	No	Yes
BA-449	93	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	3,885.3	16	14	1.00	0.87	0.12	No	No	Yes	No	No	Yes
BA-449	93	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	3,735.7	16	14	0.96	0.84	0.12	No	Yes	Yes	Yes	No	Yes
BA-450	92	Proposed Route	New Road, Bladed	BLM	Other	BA-445	1.0	361.0	35	14	0.29	0.12	0.17	No	No	Yes	No	No	Yes
BA-451	92	Proposed Route	New Road, Primitive	BLM	Other	BA-445	1.0	990.0	16	10	0.36	0.23	0.14	No	No	Yes	No	No	Yes
BA-452	92	Proposed Route	New Road, Primitive	BLM	Other	BA-445	1.0	348.4	16	10	0.13	0.08	0.05	Yes	No	Yes	No	No	Yes
BA-453	92	Proposed Route	New Road, Primitive	PV	Other	BA-445	1.0	1,384.9	16	10	0.51	0.32	0.19	No	No	Yes	No	No	Yes
BA-454	92	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-445	0.7	240.5	16	14	0.06	0.05	0.01	Yes	No	Yes	No	No	Yes
BA-455	92	Proposed Route	New Road, Primitive	PV	Other	BA-445	1.0	106.7	16	10	0.04	0.02	0.01	Yes	No	Yes	No	No	Yes
BA-456	92	Proposed Route	New Road, Primitive	BLM	Other	BA-445	1.0	1,220.6	16	10	0.45	0.28	0.17	No	No	Yes	No	No	Yes
BA-457	92	Proposed Route	New Road, Primitive	BLM	Other	BA-445	1.0	186.5	16	10	0.07	0.04	0.03	Yes	No	Yes	No	No	Yes
BA-458	92	Proposed Route	New Road, Primitive	BLM	Other	BA-445	1.0	1,214.6	16	10	0.45	0.28	0.17	No	No	Yes	No	No	Yes
BA-459	93	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,493.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-460	92	Proposed Route	New Road, Primitive	PV	Other	BA-445	1.0	260.1	16	10	0.10	0.06	0.04	Yes	No	Yes	No	No	Yes
BA-461	92	Proposed Route	New Road, Primitive	PV	Other	BA-445	1.0	978.6	16	10	0.36	0.22	0.13	No	No	Yes	No	No	Yes
BA-462	93	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	712.4	16	10	0.26	0.16	0.10	Yes	No	Yes	No	No	Yes
BA-463	93	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	625.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-464	93	Proposed Route	New Road, Primitive	PV	Other	BA-469	1.0	919.8	16	10	0.34	0.21	0.13	No	No	Yes	No	No	Yes
BA-465	93	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,765.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-466	93	Proposed Route	New Road, Bladed	PV	Other	BA-469	1.0	261.0	35	14	0.21	0.08	0.13	No	No	Yes	No	No	Yes
BA-467	92	Proposed Route	New Road, Bladed	PV	Other	BA-469	1.0	2,165.6	35	14	1.74	0.70	1.04	No	No	Yes	No	No	Yes
BA-468	93	Proposed Route	New Road, Bladed	PV	Other	BA-469	1.0	84.7	35	14	0.07	0.03	0.04	Yes	No	Yes	No	No	Yes
BA-469	93	Proposed Route	New Road, Bladed	PV	Yes	NA	1.0	1,137.2	35	14	0.91	0.37	0.55	No	No	Yes	No	No	Yes
BA-470	93	Proposed Route	New Road, Bladed	PV	Yes	NA	1.0	4,084.0	35	14	3.28	1.31	1.97	No	No	Yes	No	No	Yes
BA-471	93	Proposed Route	New Road, Primitive	PV	Other	BA-470	1.0	105.0	16	10	0.04	0.02	0.01	Yes	No	Yes	No	No	Yes
BA-472	93	Proposed Route	New Road, Bladed	PV	Other	BA-470	1.0	1,703.9	35	14	1.37	0.55	0.82	No	No	Yes	No	No	Yes
BA-473	93	Proposed Route	New Road, Bladed	PV	Other	BA-470	1.0	1,387.0	35	14	1.11	0.45	0.67	No	No	Yes	No	No	Yes

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
BA-474	93	Proposed Route	New Road, Primitive	PV	Other	BA-470	1.0	565.1	16	10	0.21	0.13	0.08	No	No	Yes	No	No	Yes
BA-475	93	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-487	1.0	1,724.3	30	14	1.19	0.55	0.63	No	No	Yes	No	No	Yes
BA-475	93	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	1,135.6	30	14	0.78	0.36	0.42	No	Yes	Yes	Yes	No	Yes
BA-475	93	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	2,860.1	30	14	1.97	0.92	1.05	NA	NA	No	No	No	No
BA-476	93	Proposed Route	New Road, Primitive	PV	Other	BA-470	1.0	53.0	16	10	0.02	0.01	0.01	No	No	Yes	No	No	Yes
BA-477	94	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-487	1.0	4,529.1	30	14	3.12	1.46	1.66	No	No	Yes	No	No	Yes
BA-478	93	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	377.1	16	10	0.14	0.09	0.05	No	No	Yes	No	No	Yes
BA-479	93	Proposed Route	New Road, Bladed	PV	Other	BA-470	1.0	4,552.2	35	14	3.66	1.46	2.19	No	No	Yes	No	No	Yes
BA-480	93	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	1,237.7	30	14	0.85	0.40	0.45	No	Yes	Yes	Yes	No	Yes
BA-481	93	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	990.9	30	14	0.68	0.32	0.36	No	Yes	Yes	Yes	No	Yes
BA-482	93	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	148.5	35	14	0.12	0.05	0.07	No	Yes	Yes	Yes	No	Yes
BA-483	93	Proposed Route	New Road, Primitive	PV	Other	BA-487	1.0	1,831.3	16	10	0.67	0.42	0.25	No	No	Yes	No	No	Yes
BA-483	93	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	1,301.0	16	10	0.48	0.30	0.18	No	Yes	Yes	Yes	No	Yes
BA-484	93	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	1,028.8	16	10	0.38	0.24	0.14	No	Yes	Yes	Yes	No	Yes
BA-485	94	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-487	1.0	2,341.0	30	14	1.61	0.75	0.86	No	No	Yes	No	No	Yes
BA-486	94	Proposed Route	New Road, Primitive	PV	Other	BA-487	1.0	1,816.4	16	10	0.67	0.42	0.25	No	No	Yes	No	No	Yes
BA-487	94	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Yes	NA	1.0	9,140.7	30	14	6.30	2.94	3.36	No	No	Yes	No	No	Yes
BA-487	94	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	3,071.0	30	14	2.12	0.99	1.13	No	Yes	Yes	Yes	No	Yes
BA-488	94	Proposed Route	New Road, Primitive	PV	Other	BA-487	1.0	2,314.2	16	10	0.85	0.53	0.32	No	No	Yes	No	No	Yes
BA-489	94	Proposed Route	New Road, Bladed	PV	Other	BA-487	1.0	597.7	35	14	0.48	0.19	0.29	No	No	Yes	No	No	Yes
BA-490	94	Proposed Route	New Road, Primitive	PV	Other	BA-487	1.0	568.7	16	10	0.21	0.13	0.08	Yes	No	Yes	No	No	Yes
BA-491	94	Proposed Route	New Road, Primitive	PV	Other	BA-487	1.0	949.2	16	10	0.35	0.22	0.13	Yes	No	Yes	No	No	Yes
BA-492	94	Proposed Route	New Road, Primitive	PV	Other	BA-505	1.0	880.5	16	10	0.32	0.20	0.12	No	No	Yes	No	No	Yes
BA-493	94	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-505	1.0	4,476.6	30	14	3.08	1.44	1.64	No	No	Yes	No	No	Yes
BA-494	94	Proposed Route	New Road, Primitive	PV	Other	BA-505	1.0	83.2	16	10	0.03	0.02	0.01	Yes	No	Yes	No	No	Yes
BA-495	94	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-505	1.0	1,394.3	30	14	0.96	0.45	0.51	No	No	Yes	No	No	Yes
BA-496	95	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-505	0.7	1,517.0	16	14	0.39	0.34	0.05	No	No	Yes	No	No	Yes
BA-496	95	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	993.7	16	14	0.26	0.22	0.03	No	Yes	Yes	Yes	No	Yes
BA-496	95	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,511.5	16	14	0.65	0.57	0.08	NA	NA	No	No	No	No
BA-497	95	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	497.5	30	14	0.34	0.16	0.18	No	Yes	Yes	Yes	No	Yes
BA-498	95	Proposed Route	New Road, Bladed	PV	No	NA	1.0	825.2	35	14	0.66	0.27	0.40	Yes	No	Yes	No	No	Yes
BA-499	95	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	No	NA	1.0	1,586.6	30	14	1.09	0.51	0.58	No	Yes	Yes	Yes	No	Yes
BA-500	95	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	1,215.4	35	14	0.98	0.39	0.59	No	Yes	Yes	Yes	No	Yes
BA-501	95	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	255.3	35	14	0.21	0.08	0.12	Yes	No	Yes	No	No	Yes
BA-502	95	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	1,631.6	16	10	0.60	0.37	0.22	No	Yes	Yes	Yes	No	Yes
BA-503	95	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	2,373.4	16	10	0.87	0.54	0.33	No	Yes	Yes	Yes	No	Yes
BA-504	95	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	452.4	16	10	0.17	0.10	0.06	Yes	No	Yes	No	No	Yes
BA-505	95	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	4,149.9	16	14	1.07	0.93	0.13	No	Yes	Yes	Yes	No	Yes
BA-505	95	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	1,939.0	16	14	0.50	0.44	0.06	No	No	Yes	No	No	Yes
BA-506	95	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	4,624.9	16	14	1.19	1.04	0.15	No	No	Yes	No	No	Yes
BA-506	95	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	4,023.3	16	14	1.03	0.91	0.13	No	Yes	Yes	Yes	No	Yes
BA-507	95	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	635.5	16	10	0.23	0.15	0.09	Yes	No	Yes	No	No	Yes
BA-508	95	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	239.7	35	14	0.19	0.08	0.12	Yes	No	Yes	No	No	Yes
BA-509	95	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	2,427.1	16	10	0.89	0.56	0.33	No	Yes	Yes	Yes	No	Yes
BA-510	95	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	180.4	16	10	0.07	0.04	0.02	Yes	No	Yes	No	No	Yes
BA-511	95	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	525.3	35	14	0.42	0.17	0.25	Yes	No	Yes	No	No	Yes
BA-512	95	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	269.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-513	95	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	3,211.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-514	95	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	2,234.4	16	10	0.82	0.51	0.31	No	Yes	Yes	Yes	No	Yes
BA-514	95	Proposed Route	New Road, Primitive	PV	Other	BA-506	1.0	1,244.0	16	10	0.46	0.29	0.17	No	No	Yes	No	No	Yes
BA-515	96	Proposed Route	New Road, Bladed	PV	Other	BA-506	1.0	676.0	35	14	0.54	0.22	0.33	No	No	Yes	No	No	Yes
BA-516	96	Proposed Route	New Road, Primitive	PV	Other	BA-506	1.0	249.7	16	10	0.09	0.06	0.03	Yes	No	Yes	No	No	Yes
BA-517	96	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	155.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-518	96	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	453.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-519	96	Proposed Route	New Road, Primitive	PV	Other	BA-525	1.0	272.2	16	10	0.10	0.06	0.04	No	No	Yes	No	No	Yes
BA-520	96	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-525	1.0	578.4	30	14	0.40	0.19	0.21	No	No	Yes	No	No	Yes
BA-521	96	Proposed Route	New Road, Bladed	PV	Other	BA-525	1.0	177.6	35	14	0.14	0.06	0.09	Yes	No	Yes	No	No	Yes
BA-522	96	Proposed Route	New Road, Bladed	PV	Other	BA-525	1.0	687.3	35	14	0.55	0.22	0.33	No	No	Yes	No	No	Yes
BA-523	96	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-525	1.0	707.2	30	14	0.49	0.23	0.26	No	No	Yes	No	No	Yes
BA-524	96	Proposed Route	New Road, Primitive	PV	Other	BA-525	1.0	452.4	16	10	0.17	0.10	0.06	Yes	No	Yes	No	No	Yes
BA-525	96	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	846.5	30	14	0.58	0.27	0.31	No	Yes	Yes	Yes	No	Yes
BA-525	96	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Yes	NA	1.0	789.4	30	14	0.54	0.25	0.29	No	No	Yes	No	No	Yes
BA-526	97	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	328.6	16	10	0.12	0.08	0.05	Yes	No	Yes	No	No	Yes
BA-527	97	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	868.7	30	14	0.60	0.28	0.32	No	Yes	Yes	Yes	No	Yes
BA-528	97	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	228.4	16	10	0.08	0.05	0.03	Yes	No	Yes	No	No	Yes
BA-529	97	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	1,504.6	35	14	1.21	0.48	0.73	No	Yes	Yes	Yes	Yes	Yes
BA-530	97	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	343.4	16	14	0.09	0.08	0.01	No	Yes	Yes	Yes	Yes	Yes
BA-531	97	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	313.2	16	10	0.12	0.07	0.04	Yes	No	Yes	No	Yes	Yes
BA-532	97	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	620.2	16	14	0.16	0.14	0.02	No	Yes	Yes	Yes	Yes	Yes
BA-533	97	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,425.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-534	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	11,873.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-535	97	Proposed Route	New Road, Primitive	PV	No	NA	1.0	328.6	16	10	0.12	0.08	0.05	Yes	No	Yes	No	Yes	Yes
BA-536	97	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,326.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-537	97	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	903.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-538	97	Proposed Route	New Road, Primitive	PV	No	NA	1.0	309.5	16	10	0.11	0.07	0.04	Yes	No	Yes	No	Yes	Yes

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							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
BA-539	97	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,642.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-540	97	Proposed Route	New Road, Primitive	PV	No	NA	1.0	378.5	16	10	0.14	0.09	0.05	Yes	No	Yes	No	Yes	Yes
BA-541	97	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	894.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-542	97	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-541	0.7	331.9	16	14	0.09	0.07	0.01	Yes	No	Yes	No	Yes	Yes
BA-543	97	Proposed Route	New Road, Primitive	PV	Other	BA-541	1.0	264.1	16	10	0.10	0.06	0.04	Yes	No	Yes	No	Yes	Yes
BA-544	97	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	BA-541	0.7	3,560.6	16	14	0.92	0.80	0.11	No	No	Yes	No	Yes	Yes
BA-545	97	Proposed Route	New Road, Bladed	PV	Other	BA-541	1.0	126.2	35	14	0.10	0.04	0.06	No	No	Yes	No	Yes	Yes
BA-546	97	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,994.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-547	97	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	106.6	16	10	0.04	0.02	0.01	Yes	No	Yes	No	Yes	Yes
BA-548	97	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,440.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-549	97	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	331.9	16	10	0.12	0.08	0.05	Yes	No	Yes	No	Yes	Yes
BA-550	97	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,349.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-551	97	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	326.1	16	10	0.12	0.07	0.04	Yes	No	Yes	No	Yes	Yes
BA-552	98	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	888.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-553	98	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	387.4	16	10	0.14	0.09	0.05	Yes	No	Yes	No	Yes	Yes
BA-554	98	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,136.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-555	98	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	446.3	16	10	0.16	0.10	0.06	Yes	No	Yes	No	Yes	Yes
BA-556	98	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,068.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-557	98	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	295.7	16	10	0.11	0.07	0.04	Yes	No	Yes	No	Yes	Yes
BA-558	98	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	940.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-559	98	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	284.7	16	10	0.10	0.07	0.04	Yes	No	Yes	No	Yes	Yes
BA-560	98	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,135.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-561	98	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	191.2	16	10	0.07	0.04	0.03	Yes	No	Yes	No	Yes	Yes
BA-562	98	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,800.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-563	98	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	243.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-564	98	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	273.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-565	98	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,301.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-566	98	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,432.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-567	98	Proposed Route	New Road, Bladed	PV	Other	BA-565	1.0	850.2	35	14	0.68	0.27	0.41	No	No	Yes	No	Yes	Yes
BA-568	98	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	1,570.2	16	10	0.58	0.36	0.22	No	No	Yes	No	Yes	Yes
BA-569	98	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	307.4	16	10	0.11	0.07	0.04	Yes	No	Yes	No	Yes	Yes
BA-570	98	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-565	1.0	1,566.3	30	14	1.08	0.50	0.58	No	No	Yes	No	Yes	Yes
BA-571	98	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	BA-565	1.0	1,488.0	30	14	1.02	0.48	0.55	No	No	Yes	No	Yes	Yes
BA-572	98	Proposed Route	New Road, Bladed	PV	Other	BA-565	1.0	1,048.6	35	14	0.84	0.34	0.51	No	No	Yes	No	Yes	Yes
BA-573	98	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	257.7	16	10	0.09	0.06	0.04	Yes	No	Yes	No	Yes	Yes
BA-574	98	Proposed Route	New Road, Primitive	PV	Other	BA-565	1.0	716.0	16	10	0.26	0.16	0.10	No	No	Yes	No	Yes	Yes
BA-575	98	Proposed Route	New Road, Bladed	PV	Other	BA-565	1.0	898.2	35	14	0.72	0.29	0.43	Yes	No	Yes	No	Yes	Yes
BA-576	99	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,217.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-577	99	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	816.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-578	99	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,043.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-579	99	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	5,081.2	35	14	4.08	1.63	2.45	No	No	Yes	No	Yes	Yes
BA-580	99	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,079.1	16	14	0.28	0.24	0.03	No	Yes	Yes	Yes	Yes	No
BA-581	99	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,530.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-582	99	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	325.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-583	99	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	144.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-584	100	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	8,328.1	35	14	6.69	2.68	4.01	No	No	Yes	No	Yes	No
BA-584	100	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	781.3	35	14	0.63	0.25	0.38	No	Yes	Yes	Yes	Yes	No
BA-585	100	Proposed Route	New Road, Primitive	PV	Other	BA-586	1.0	788.7	16	10	0.29	0.18	0.11	Yes	No	Yes	No	Yes	No
BA-586	100	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,610.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-587	100	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	324.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-588	100	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	357.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-589	100	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,076.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-590	100	Proposed Route	New Road, Primitive	PV	Other	BA-592	1.0	1,452.2	16	10	0.53	0.33	0.20	No	No	Yes	No	Yes	No
BA-591	100	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,887.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-592	100	Proposed Route	New Road, Bladed	PV	Yes	NA	1.0	662.6	35	14	0.53	0.21	0.32	No	No	Yes	No	Yes	No
BA-593	100	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	864.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
BA-594	100	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	1,616.4	16	10	0.59	0.37	0.22	No	No	Yes	No	Yes	No
BA-595	100	Proposed Route	New Road, Bladed	PV	Yes	NA	1.0	3,340.6	35	14	2.68	1.07	1.61	No	No	Yes	No	Yes	No
BA-596	100	Proposed Route	New Road, Bladed	PV	Other	BA-595	1.0	177.5	35	14	0.14	0.06	0.09	Yes	No	Yes	No	Yes	No
BA-597	101	Proposed Route	New Road, Bladed	BLM	Other	BA-595	1.0	2,527.4	35	14	2.03	0.81	1.22	No	No	Yes	No	Yes	No
BA-598	101	Proposed Route	New Road, Bladed	BLM	Other	BA-595	1.0	817.4	35	14	0.66	0.26	0.39	Yes	No	Yes	No	Yes	No
MA-001	101	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,740.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-002	101	Proposed Route	New Road, Bladed	BLM	Other	BA-595	1.0	1,025.9	35	14	0.82	0.33	0.49	No	No	Yes	No	Yes	No
MA-002	101	Proposed Route	New Road, Bladed	PV	Other	MA-028	1.0	3,607.7	35	14	2.90	1.16	1.74	No	No	Yes	No	Yes	No
MA-002	101	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	2,116.2	35	14	1.70	0.68	1.02	No	No	Yes	No	Yes	No
MA-003	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	749.1	16	10	0.28	0.17	0.10	Yes	No	Yes	No	Yes	No
MA-004	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	283.5	16	10	0.10	0.07	0.04	Yes	No	Yes	No	Yes	No
MA-005	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	653.8	16	10	0.24	0.15	0.09	Yes	No	Yes	No	Yes	No
MA-006	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	336.2	16	10	0.12	0.08	0.05	Yes	No	Yes	No	Yes	No
MA-007	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	55.8	16	10	0.02	0.01	0.01	Yes	No	Yes	No	Yes	No
MA-008	101	Proposed Route	New Road, Bladed	PV	Other	MA-028	1.0	375.5	35	14	0.30	0.12	0.18	No	No	Yes	No	Yes	No
MA-009	101	Proposed Route	New Road, Bladed	PV	Other	MA-028	1.0	114.4	35	14	0.09	0.04	0.06	No	No	Yes	No	Yes	No
MA-010	101	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	Other	MA-028	1.0	153.6	30	14	0.11	0.05	0.06	No	No	Yes	No	Yes	No
MA-011	101	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	133.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-012	101	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	157.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MA-013	101	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	91.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-014	101	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	638.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-015	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	1,007.4	16	10	0.37	0.23	0.14	No	No	Yes	No	Yes	No
MA-016	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	647.2	16	10	0.24	0.15	0.09	Yes	No	Yes	No	Yes	No
MA-017	101	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	MA-028	0.7	1,951.7	16	14	0.50	0.44	0.06	No	No	Yes	No	Yes	No
MA-018	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	451.5	16	10	0.17	0.10	0.06	No	No	Yes	No	Yes	No
MA-019	101	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,852.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-020	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	152.8	16	10	0.06	0.04	0.02	Yes	No	Yes	No	Yes	No
MA-021	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	82.4	16	10	0.03	0.02	0.01	Yes	No	Yes	No	Yes	No
MA-022	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	654.7	16	10	0.24	0.15	0.09	No	No	Yes	No	Yes	No
MA-023	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	158.3	16	10	0.06	0.04	0.02	Yes	No	Yes	No	Yes	No
MA-024	101	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	MA-028	0.7	617.7	16	14	0.16	0.14	0.02	No	No	Yes	No	Yes	No
MA-025	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	504.2	16	10	0.19	0.12	0.07	No	No	Yes	No	Yes	No
MA-026	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	44.9	16	10	0.02	0.01	0.01	Yes	No	Yes	No	Yes	No
MA-027	101	Proposed Route	New Road, Primitive	PV	Other	MA-028	1.0	300.6	16	10	0.11	0.07	0.04	No	No	Yes	No	Yes	No
MA-028	101	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	874.8	16	14	0.22	0.20	0.03	No	No	Yes	No	Yes	No
MA-029	101	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	589.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-030	101	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	1,315.5	16	14	0.34	0.30	0.04	No	No	Yes	No	Yes	No
MA-031	101	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	253.3	16	14	0.07	0.06	0.01	NA	NA	No	No	No	No
MA-032	101	Proposed Route	New Road, Primitive	PV	Other	MA-030	1.0	240.7	16	10	0.09	0.06	0.03	Yes	No	Yes	No	Yes	No
MA-033	101	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,930.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-034	101	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	420.1	16	10	0.15	0.10	0.06	NA	NA	No	No	No	No
MA-035	101	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	MA-030	0.7	586.9	16	14	0.15	0.13	0.02	No	No	Yes	No	Yes	No
MA-036	101	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	263.0	16	10	0.10	0.06	0.04	NA	NA	No	No	No	No
MA-037	101	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	444.6	16	14	0.11	0.10	0.01	NA	NA	No	No	No	No
MA-038	101	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	568.2	16	14	0.15	0.13	0.02	NA	NA	No	No	No	No
MA-039	101	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	294.9	16	10	0.11	0.07	0.04	NA	NA	No	No	No	No
MA-040	101	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	776.1	16	14	0.20	0.17	0.02	NA	NA	No	No	No	No
MA-041	101	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	51.0	16	10	0.02	0.01	0.01	NA	NA	No	No	No	No
MA-042	101	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	599.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-043	101	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	875.6	16	10	0.32	0.20	0.12	NA	NA	No	No	No	No
MA-044	102	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	187.8	16	10	0.07	0.04	0.03	NA	NA	No	No	No	No
MA-045	102	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	865.8	16	14	0.22	0.19	0.03	NA	NA	No	No	No	No
MA-046	102	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	500.4	16	14	0.13	0.11	0.02	NA	NA	No	No	No	No
MA-047	102	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	2,133.0	16	14	0.55	0.48	0.07	NA	NA	No	No	No	No
MA-048	102	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,656.4	16	10	0.61	0.38	0.23	NA	NA	No	No	No	No
MA-049	102	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,615.8	16	14	0.42	0.36	0.05	NA	NA	No	No	No	No
MA-050	102	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,003.8	35	14	0.81	0.32	0.48	NA	NA	No	No	No	No
MA-051	102	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	913.4	16	10	0.34	0.21	0.13	NA	NA	No	No	No	No
MA-052	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	271.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-053	102	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	741.6	16	14	0.19	0.17	0.02	NA	NA	No	No	No	No
MA-054	102	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,338.2	16	10	0.49	0.31	0.18	NA	NA	No	No	No	No
MA-055	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	167.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-056	102	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	553.5	16	10	0.20	0.13	0.08	NA	NA	No	No	No	No
MA-057	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	91.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-058	102	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	698.6	16	10	0.26	0.16	0.10	NA	NA	No	No	No	No
MA-059	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	227.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-060	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,746.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-061	102	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	4,150.3	16	14	1.07	0.93	0.13	NA	NA	No	No	No	No
MA-062	102	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	445.8	16	14	0.11	0.10	0.01	NA	NA	No	No	No	No
MA-063	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,517.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-064	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	5,773.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-065	102	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,247.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-066	102	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	4,401.2	35	14	3.54	1.41	2.12	NA	NA	No	No	No	No
MA-067	102	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	4,084.2	16	14	1.05	0.92	0.13	NA	NA	No	No	No	No
MA-068	102	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,957.3	35	14	1.57	0.63	0.94	NA	NA	No	No	No	No
MA-069	102	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	212.1	35	14	0.17	0.07	0.10	NA	NA	No	No	No	No
MA-070	103	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	11,847.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-071	103	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	4,081.4	35	14	3.28	1.31	1.97	NA	NA	No	No	No	No
MA-072	103	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	836.7	35	14	0.67	0.27	0.40	NA	NA	No	No	No	No
MA-073	103	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,495.5	16	14	0.38	0.34	0.05	NA	NA	No	No	No	No
MA-074	103	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	616.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-075	103	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	6,619.9	35	14	5.32	2.13	3.19	NA	NA	No	No	No	No
MA-076	103	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	200.2	35	14	0.16	0.06	0.10	NA	NA	No	No	No	No
MA-077	103	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	8,768.2	35	14	7.05	2.82	4.23	NA	NA	No	No	No	No
MA-078	104	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,773.7	16	14	0.46	0.40	0.06	NA	NA	No	No	No	No
MA-079	104	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	6,815.0	16	14	1.75	1.53	0.22	NA	NA	No	No	No	No
MA-080	104	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,607.0	35	14	1.29	0.52	0.77	NA	NA	No	No	No	No
MA-081	104	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	2,350.4	35	14	1.89	0.76	1.13	NA	NA	No	No	No	No
MA-082	104	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	4,822.3	16	14	1.24	1.08	0.15	NA	NA	No	No	No	No
MA-083	104	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,152.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-084	104	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	2,979.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-085	104	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	544.9	16	10	0.20	0.13	0.08	NA	NA	No	No	No	No
MA-086	104	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	6,660.2	35	14	5.35	2.14	3.21	NA	NA	No	No	No	No
MA-087	104	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	182.0	35	14	0.15	0.06	0.09	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MA-088	104	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	5,747.4	35	14	4.62	1.85	2.77	NA	NA	No	No	No	No
MA-089	104	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	120.5	35	14	0.10	0.04	0.06	NA	NA	No	No	No	No
MA-090	105	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	19,259.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-091	105	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	10,475.7	35	14	8.42	3.37	5.05	NA	NA	No	No	No	No
MA-092	105	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	2,593.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-093	105	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	477.7	35	14	0.38	0.15	0.23	NA	NA	No	No	No	No
MA-094	105	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,472.0	16	10	0.54	0.34	0.20	NA	NA	No	No	No	No
MA-095	105	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	9,345.2	35	14	7.51	3.00	4.51	NA	NA	No	No	No	No
MA-096	106	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,440.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-097	106	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	808.6	35	14	0.65	0.26	0.39	NA	NA	No	No	No	No
MA-098	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	9,365.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-099	106	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	4,236.8	35	14	3.40	1.36	2.04	NA	NA	No	No	No	No
MA-100	106	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	238.3	35	14	0.19	0.08	0.11	NA	NA	No	No	No	No
MA-101	106	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	382.6	35	14	0.31	0.12	0.18	NA	NA	No	No	No	No
MA-102	106	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	971.3	35	14	0.78	0.31	0.47	NA	NA	No	No	No	No
MA-103	106	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,331.9	35	14	1.07	0.43	0.64	NA	NA	No	No	No	No
MA-104	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	18,792.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-105	106	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	285.9	16	10	0.11	0.07	0.04	NA	NA	No	No	No	No
MA-106	106	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	622.7	35	14	0.50	0.20	0.30	NA	NA	No	No	No	No
MA-107	106	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,854.6	16	10	0.68	0.43	0.26	NA	NA	No	No	No	No
MA-108	106	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	7,055.3	35	14	5.67	2.27	3.40	NA	NA	No	No	No	No
MA-109	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,113.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-110	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,114.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-111	107	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	9,888.4	35	14	7.95	3.18	4.77	NA	NA	No	No	No	No
MA-112	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,614.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-113	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	445.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-114	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	263.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-115	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	939.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-116	108	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,030.0	16	10	0.38	0.24	0.14	NA	NA	No	No	No	No
MA-117	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,465.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-118	108	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	106.6	16	10	0.04	0.02	0.01	NA	NA	No	No	No	No
MA-119	108	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	3,043.1	16	10	1.12	0.70	0.42	NA	NA	No	No	No	No
MA-120	108	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	284.7	16	10	0.10	0.07	0.04	NA	NA	No	No	No	No
MA-121	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,439.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-122	108	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,323.2	16	14	0.34	0.30	0.04	NA	NA	No	No	No	No
MA-123	108	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,411.1	16	10	0.52	0.32	0.19	NA	NA	No	No	No	No
MA-124	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	678.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-125	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,150.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-126	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,915.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-127	108	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,470.0	16	10	0.54	0.34	0.20	NA	NA	No	No	No	No
MA-128	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,058.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-129	108	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	448.1	16	10	0.16	0.10	0.06	NA	NA	No	No	No	No
MA-130	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,929.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-131	108	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	370.0	16	10	0.14	0.08	0.05	NA	NA	No	No	No	No
MA-132	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	11,440.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-133	108	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,317.1	16	10	0.48	0.30	0.18	NA	NA	No	No	No	No
MA-134	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,468.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-135	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	592.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-136	108	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	101.0	35	14	0.08	0.03	0.05	NA	NA	No	No	No	No
MA-137	108	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	97.1	16	10	0.04	0.02	0.01	NA	NA	No	No	No	No
MA-138	109	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	282.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-139	109	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,651.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-140	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,196.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-141	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	722.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-142	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	207.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-143	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	476.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-144	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,428.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-145	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	54.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-146	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	98.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-147	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	579.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-148	108	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,448.1	16	10	0.53	0.33	0.20	NA	NA	No	No	No	No
MA-149	109	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,431.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-150	108	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,782.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-151	109	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	968.5	16	10	0.36	0.22	0.13	NA	NA	No	No	No	No
MA-152	109	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	797.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-153	109	Proposed Route	New Road, Bladed	BLM	Other	MA-159	1.0	2,986.6	35	14	2.40	0.96	1.44	No	No	Yes	No	Yes	No
MA-154	109	Proposed Route	New Road, Primitive	BLM	Other	MA-159	1.0	142.3	16	10	0.05	0.03	0.02	Yes	No	Yes	No	Yes	No
MA-155	109	Proposed Route	New Road, Bladed	BLM	Other	MA-159	1.0	370.5	35	14	0.30	0.12	0.18	No	No	Yes	No	Yes	No
MA-156	110	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	946.7	16	14	0.24	0.21	0.03	No	Yes	Yes	Yes	Yes	No
MA-157	110	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	436.6	16	10	0.16	0.10	0.06	NA	NA	No	No	No	No
MA-158	109	Proposed Route	New Road, Primitive	BLM	Yes	NA	1.0	2,945.6	16	10	1.08	0.68	0.41	No	No	Yes	No	Yes	No
MA-159	109	Proposed Route	New Road, Primitive	BLM	Yes	NA	1.0	1,715.7	16	10	0.63	0.39	0.24	No	No	Yes	No	Yes	No
MA-160	110	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	3,595.8	35	14	2.89	1.16	1.73	No	Yes	Yes	Yes	Yes	No
MA-161	109	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	527.0	16	14	0.14	0.12	0.02	No	Yes	Yes	Yes	Yes	No
MA-162	110	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	184.8	16	10	0.07	0.04	0.03	Yes	No	Yes	No	Yes	No

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							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MA-163	110	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	785.3	16	14	0.20	0.18	0.03	No	Yes	Yes	Yes	Yes	No
MA-164	110	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	208.8	16	10	0.08	0.05	0.03	Yes	No	Yes	No	Yes	No
MA-165	110	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	438.0	16	10	0.16	0.10	0.06	Yes	No	Yes	No	Yes	No
MA-166	110	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	1,581.5	35	14	1.27	0.51	0.76	No	Yes	Yes	Yes	Yes	No
MA-167	110	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	2,134.9	35	14	1.72	0.69	1.03	No	Yes	Yes	Yes	Yes	No
MA-168	110	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	888.9	16	14	0.23	0.20	0.03	No	Yes	Yes	Yes	Yes	No
MA-169	110	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,333.9	16	14	0.34	0.30	0.04	No	Yes	Yes	Yes	Yes	No
MA-170	110	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	487.8	35	14	0.39	0.16	0.24	NA	NA	No	No	No	No
MA-171	110	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	326.5	35	14	0.26	0.10	0.16	NA	NA	No	No	No	No
MA-172	110	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	1,930.0	35	14	1.55	0.62	0.93	No	No	Yes	No	Yes	No
MA-173	110	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	3,482.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-174	109	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	4,385.6	16	14	1.13	0.99	0.14	No	Yes	Yes	Yes	Yes	No
MA-175	110	Proposed Route	New Road, Bladed	BLM	Other	MA-172	1.0	1,759.1	35	14	1.41	0.57	0.85	No	No	Yes	No	Yes	No
MA-176	110	Proposed Route	New Road, Primitive	BLM	Other	MA-172	1.0	193.0	16	10	0.07	0.04	0.03	Yes	No	Yes	No	Yes	No
MA-177	110	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	3,857.0	35	14	3.10	1.24	1.86	No	No	Yes	No	Yes	No
MA-178	110	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	2,178.8	16	14	0.56	0.49	0.07	NA	NA	No	No	No	No
MA-179	110	Proposed Route	New Road, Primitive	BLM	Other	MA-172	1.0	382.0	16	10	0.14	0.09	0.05	No	No	Yes	No	Yes	No
MA-180	110	Proposed Route	New Road, Bladed	BLM	Other	MA-172	1.0	452.6	35	14	0.36	0.15	0.22	No	No	Yes	No	Yes	No
MA-181	110	Proposed Route	New Road, Primitive	BLM	Other	MA-172	1.0	349.5	16	10	0.13	0.08	0.05	Yes	No	Yes	No	Yes	No
MA-182	111	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	5,581.0	16	14	1.43	1.26	0.18	No	Yes	Yes	Yes	Yes	No
MA-183	111	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,051.2	16	10	0.39	0.24	0.14	NA	NA	No	No	No	No
MA-184	111	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,023.7	35	14	0.82	0.33	0.49	NA	NA	No	No	No	No
MA-185	111	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	3,861.1	35	14	3.10	1.24	1.86	NA	NA	No	No	No	No
MA-186	111	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	665.0	35	14	0.53	0.21	0.32	NA	NA	No	No	No	No
MA-187	111	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,616.7	16	14	0.42	0.36	0.05	No	Yes	Yes	Yes	Yes	No
MA-188	110	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	4,567.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-189	111	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,448.3	16	14	0.37	0.33	0.05	Yes	No	Yes	No	Yes	No
MA-190	111	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,038.9	16	14	0.27	0.23	0.03	Yes	No	Yes	No	Yes	No
MA-191	111	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	6,396.3	35	14	5.14	2.06	3.08	No	No	Yes	No	Yes	No
MA-192	112	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	359.8	30	14	0.25	0.12	0.13	No	Yes	Yes	Yes	Yes	No
MA-193	111	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,194.9	16	14	0.31	0.27	0.04	No	Yes	Yes	Yes	Yes	No
MA-194	111	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	886.8	35	14	0.71	0.29	0.43	Yes	No	Yes	No	Yes	No
MA-195	111	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	212.7	16	10	0.08	0.05	0.03	Yes	No	Yes	No	Yes	No
MA-196	112	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	1,437.9	35	14	1.16	0.46	0.69	Yes	No	Yes	No	Yes	No
MA-197	112	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	2,112.2	35	14	1.70	0.68	1.02	No	Yes	Yes	Yes	Yes	No
MA-198	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BOR	NA	NA	0.0	534.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-199	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BOR	NA	NA	0.0	803.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-200	112	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,359.7	16	14	0.35	0.31	0.04	No	Yes	Yes	Yes	Yes	No
MA-201	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	12,850.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-202	112	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	1,002.5	35	14	0.81	0.32	0.48	Yes	No	Yes	No	Yes	No
MA-203	112	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	2,154.0	16	14	0.55	0.48	0.07	No	Yes	Yes	Yes	Yes	No
MA-204	112	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,960.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-205	112	Proposed Route	New Road, Bladed	PV	No	NA	1.0	265.0	35	14	0.21	0.09	0.13	Yes	No	Yes	No	Yes	No
MA-206	112	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	792.2	35	14	0.64	0.25	0.38	Yes	No	Yes	No	Yes	No
MA-207	112	Double Mountain Alternative	New Road, Bladed	PV	No	NA	1.0	235.7	35	14	0.19	0.08	0.11	Yes	No	Yes	No	Yes	No
MA-208	112	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,501.7	16	14	0.39	0.34	0.05	No	Yes	Yes	Yes	Yes	No
MA-209	112	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,755.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-210	112	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,147.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-211	112	Proposed Route	New Road, Bladed	PV	Other	MA-210	1.0	568.4	35	14	0.46	0.18	0.27	Yes	No	Yes	No	Yes	No
MA-212	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,134.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-213	112	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	MA-210	0.7	2,640.9	16	14	0.68	0.59	0.08	No	No	Yes	No	Yes	No
MA-214	112	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	MA-210	0.7	146.7	16	14	0.04	0.03	0.00	No	No	Yes	No	Yes	No
MA-215	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	337.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-216	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	741.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-217	112	Proposed Route	New Road, Primitive	PV	Other	MA-210	1.0	692.1	16	10	0.25	0.16	0.10	Yes	No	Yes	No	Yes	No
MA-218	112	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Other	MA-210	0.7	1,447.6	16	14	0.37	0.33	0.05	No	No	Yes	No	Yes	No
MA-219	112	Proposed Route	New Road, Bladed	PV	Other	MA-210	1.0	3,875.9	35	14	3.11	1.25	1.87	No	No	Yes	No	Yes	No
MA-220	113	Proposed Route	New Road, Primitive	PV	No	NA	1.0	2,244.0	16	10	0.82	0.52	0.31	No	Yes	Yes	Yes	Yes	No
MA-221	114	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	25,928.8	30	14	17.86	8.33	9.52	No	Yes	Yes	Yes	Yes	No
MA-222	113	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	3,879.3	35	14	3.12	1.25	1.87	NA	NA	No	No	No	No
MA-223	113	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	4,676.1	35	14	3.76	1.50	2.25	NA	NA	No	No	No	No
MA-224	113	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	3,816.5	16	14	0.98	0.86	0.12	NA	NA	No	No	No	No
MA-225	113	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	493.6	30	14	0.34	0.16	0.18	NA	NA	No	No	No	No
MA-226	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,908.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-227	113	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,354.2	35	14	1.09	0.44	0.65	NA	NA	No	No	No	No
MA-228	113	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	610.5	16	10	0.22	0.14	0.08	NA	NA	No	No	No	No
MA-229	113	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	807.9	16	10	0.30	0.19	0.11	NA	NA	No	No	No	No
MA-230	113	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	332.6	30	14	0.23	0.11	0.12	NA	NA	No	No	No	No
MA-231	113	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	596.9	35	14	0.48	0.19	0.29	NA	NA	No	No	No	No
MA-232	113	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	653.4	16	10	0.24	0.15	0.09	NA	NA	No	No	No	No
MA-233	113	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,170.4	35	14	0.94	0.38	0.56	NA	NA	No	No	No	No
MA-234	113	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	2,340.4	35	14	1.88	0.75	1.13	NA	NA	No	No	No	No
MA-235	113	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	792.9	35	14	0.64	0.25	0.38	NA	NA	No	No	No	No
MA-236	113	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	975.0	35	14	0.78	0.31	0.47	NA	NA	No	No	No	No
MA-237	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	9,383.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MA-238	115	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BOR	NA	NA	0.7	2,750.6	16	14	0.71	0.62	0.09	NA	NA	No	No	No	No
MA-239	115	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	131.5	16	10	0.05	0.03	0.02	NA	NA	No	No	No	No
MA-240	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	261.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-241	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	252.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-242	116	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	6,086.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-243	115	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	4,260.7	35	14	3.42	1.37	2.05	No	No	Yes	No	Yes	No
MA-244	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	4,123.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-245	116	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,221.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-246	115	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	3,261.2	30	14	2.25	1.05	1.20	No	Yes	Yes	Yes	Yes	No
MA-247	116	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,398.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-248	115	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	2,226.7	30	14	1.53	0.72	0.82	No	Yes	Yes	Yes	Yes	No
MA-249	115	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	713.6	16	10	0.26	0.16	0.10	No	Yes	Yes	Yes	Yes	No
MA-250	115	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	1,076.6	16	14	0.28	0.24	0.03	No	Yes	Yes	Yes	Yes	No
MA-251	115	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	No	NA	0.7	729.6	16	14	0.19	0.16	0.02	No	Yes	Yes	Yes	Yes	No
MA-252	115	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,086.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-253	115	Proposed Route	New Road, Primitive	BLM	Yes	NA	1.0	1,291.6	16	10	0.47	0.30	0.18	No	No	Yes	No	Yes	No
MA-254	115	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	650.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-255	115	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	2,178.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-256	115	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	131.5	16	10	0.05	0.03	0.02	Yes	No	Yes	No	Yes	No
MA-257	115	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,128.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-258	115	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	186.2	35	14	0.15	0.06	0.09	Yes	No	Yes	No	Yes	No
MA-259	115	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,505.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-260	117	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	162.6	16	10	0.06	0.04	0.02	Yes	No	Yes	No	Yes	No
MA-261	117	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,305.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-262	117	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	240.9	16	10	0.09	0.06	0.03	Yes	No	Yes	No	Yes	No
MA-263	117	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,023.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-264	117	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	100.1	16	10	0.04	0.02	0.01	Yes	No	Yes	No	Yes	No
MA-265	117	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	930.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-266	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	876.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-267	117	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	2,183.2	35	14	1.75	0.70	1.05	No	No	Yes	No	Yes	No
MA-268	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	959.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-269	117	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	427.8	35	14	0.34	0.14	0.21	Yes	No	Yes	No	Yes	No
MA-270	117	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	760.6	30	14	0.52	0.24	0.28	No	Yes	Yes	Yes	Yes	No
MA-271	117	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	499.5	35	14	0.40	0.16	0.24	Yes	No	Yes	No	Yes	No
MA-272	117	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	842.5	30	14	0.58	0.27	0.31	No	Yes	Yes	Yes	Yes	No
MA-273	117	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	9,254.5	16	14	2.38	2.08	0.30	No	Yes	Yes	Yes	Yes	No
MA-274	117	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	1,268.1	35	14	1.02	0.41	0.61	Yes	No	Yes	No	Yes	No
MA-275	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	8,216.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-276	117	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	2,913.7	30	14	2.01	0.94	1.07	No	Yes	Yes	Yes	Yes	No
MA-277	117	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	2,289.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-278	117	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	60.6	16	14	0.02	0.01	0.00	No	Yes	Yes	Yes	Yes	No
MA-279	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	21,447.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-280	117	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	1,897.2	35	14	1.52	0.61	0.91	No	Yes	Yes	Yes	Yes	No
MA-281	117	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	3,174.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-282	117	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	489.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-283	117	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	2,828.2	16	14	0.73	0.64	0.09	No	Yes	Yes	Yes	Yes	No
MA-284	117	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	2,638.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-285	118	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	4,750.5	35	14	3.82	1.53	2.29	NA	NA	No	No	No	No
MA-286	118	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	965.1	35	14	0.78	0.31	0.47	NA	NA	No	No	No	No
MA-287	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	9,482.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-288	118	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	571.6	35	14	0.46	0.18	0.28	NA	NA	No	No	No	No
MA-289	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	22,709.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-289	NA	Double Mountain Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	23,249.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-290	118	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	4,468.5	35	14	3.59	1.44	2.15	NA	NA	No	No	No	No
MA-292	118	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	6,357.6	35	14	5.11	2.04	3.06	NA	NA	No	No	No	No
MA-293	118	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	6,466.4	35	14	5.20	2.08	3.12	NA	NA	No	No	No	No
MA-294	120	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	9,615.0	35	14	7.73	3.09	4.64	NA	NA	No	No	No	No
MA-295	118	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	8,609.7	35	14	6.92	2.77	4.15	NA	NA	No	No	No	No
MA-296	118	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	418.8	35	14	0.34	0.13	0.20	NA	NA	No	No	No	No
MA-297	120	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	205.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-298	120	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	202.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-299	120	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	199.4	35	14	0.16	0.06	0.10	NA	NA	No	No	No	No
MA-300	120	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,202.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-301	118	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	8,100.8	35	14	6.51	2.60	3.91	NA	NA	No	No	No	No
MA-302	120	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	939.7	35	14	0.76	0.30	0.45	NA	NA	No	No	No	No
MA-303	122	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,480.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-304	120	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	4,337.0	35	14	3.48	1.39	2.09	NA	NA	No	No	No	No
MA-305	118	Double Mountain Alternative	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	4,629.2	30	14	3.19	1.49	1.70	NA	NA	No	No	No	No
MA-306	120	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	3,055.7	35	14	2.46	0.98	1.47	NA	NA	No	No	No	No
MA-307	120	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	1,279.5	35	14	1.03	0.41	0.62	NA	NA	No	No	No	No
MA-308	120	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	754.0	16	14	0.19	0.17	0.02	NA	NA	No	No	No	No
MA-309	122	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	528.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-310	120	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	524.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-311	120	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	83.2	35	14	0.07	0.03	0.04	NA	NA	No	No	No	No
MA-312	120	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	167.2	35	14	0.13	0.05	0.08	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MA-313	120	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	201.1	35	14	0.16	0.06	0.10	NA	NA	No	No	No	No
MA-314	119	Double Mountain Alternative	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	6,212.4	16	14	1.60	1.40	0.20	NA	NA	No	No	No	No
MA-315	122	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,256.8	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-316	119	Double Mountain Alternative	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	829.4	30	14	0.57	0.27	0.30	NA	NA	No	No	No	No
MA-317	122	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	222.9	35	14	0.18	0.07	0.11	NA	NA	No	No	No	No
MA-318	122	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	1,086.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-319	119	Double Mountain Alternative	New Road, Primitive	BLM	NA	NA	1.0	631.4	16	10	0.23	0.14	0.09	NA	NA	No	No	No	No
MA-320	122	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,973.5	16	10	0.72	0.45	0.27	NA	NA	No	No	No	No
MA-321	119	Double Mountain Alternative	New Road, Primitive	BLM	NA	NA	1.0	3,843.7	16	10	1.41	0.88	0.53	NA	NA	No	No	No	No
MA-322	122	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	3,218.8	35	14	2.59	1.03	1.55	NA	NA	No	No	No	No
MA-323	119	Double Mountain Alternative	New Road, Primitive	BLM	NA	NA	1.0	207.8	16	10	0.08	0.05	0.03	NA	NA	No	No	No	No
MA-324	121	Double Mountain Alternative	New Road, Primitive	BLM	NA	NA	1.0	3,244.1	16	10	1.19	0.74	0.45	NA	NA	No	No	No	No
MA-325	121	Double Mountain Alternative	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	1,425.7	30	14	0.98	0.46	0.52	NA	NA	No	No	No	No
MA-326	121	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	3,620.3	35	14	2.91	1.16	1.75	NA	NA	No	No	No	No
MA-327	122	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	4,001.1	35	14	3.21	1.29	1.93	NA	NA	No	No	No	No
MA-328	121	Double Mountain Alternative	New Road, Primitive	BLM	NA	NA	1.0	2,272.1	16	10	0.83	0.52	0.31	NA	NA	No	No	No	No
MA-329	122	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	539.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-330	122	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	3,481.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-330	122	Double Mountain Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	3,481.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-332	121	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	3,344.4	35	14	2.69	1.07	1.61	NA	NA	No	No	No	No
MA-333	122	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	357.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-333	122	Double Mountain Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	357.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-334	121	Double Mountain Alternative	New Road, Primitive	BLM	NA	NA	1.0	4,456.6	16	10	1.64	1.02	0.61	NA	NA	No	No	No	No
MA-335	122	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	359.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-335	122	Double Mountain Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	359.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-337	122	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	2,017.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-338	122	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	269.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-338	122	Double Mountain Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	269.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-339	121	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	1,915.8	35	14	1.54	0.62	0.92	NA	NA	No	No	No	No
MA-340	122	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	1,715.6	35	14	1.38	0.55	0.83	NA	NA	No	No	No	No
MA-341	121	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	2,265.9	35	14	1.82	0.73	1.09	NA	NA	No	No	No	No
MA-342	121	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	978.8	35	14	0.79	0.31	0.47	NA	NA	No	No	No	No
MA-343	121	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	190.5	35	14	0.15	0.06	0.09	NA	NA	No	No	No	No
MA-344	121	Double Mountain Alternative	New Road, Primitive	BLM	NA	NA	1.0	1,801.2	16	10	0.66	0.41	0.25	NA	NA	No	No	No	No
MA-345	121	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	3,517.1	35	14	2.83	1.13	1.70	NA	NA	No	No	No	No
MA-346	121	Double Mountain Alternative	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	868.6	30	14	0.60	0.28	0.32	NA	NA	No	No	No	No
MA-347	122	Double Mountain Alternative	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,544.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-348	121	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	1,416.1	35	14	1.14	0.46	0.68	NA	NA	No	No	No	No
MA-349	123	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	4,616.7	35	14	3.71	1.48	2.23	NA	NA	No	No	No	No
MA-350	121	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	1,554.1	35	14	1.25	0.50	0.75	NA	NA	No	No	No	No
MA-351	122	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	1,571.9	35	14	1.26	0.51	0.76	NA	NA	No	No	No	No
MA-352	122	Double Mountain Alternative	New Road, Bladed	BLM	NA	NA	1.0	182.0	35	14	0.15	0.06	0.09	NA	NA	No	No	No	No
MA-353	122	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	938.9	16	10	0.34	0.22	0.13	NA	NA	No	No	No	No
MA-354	124	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	7,775.0	16	14	2.00	1.75	0.25	NA	NA	No	No	No	No
MA-355	123	Double Mountain Alternative	New Road, Primitive	BLM	NA	NA	1.0	2,299.9	16	10	0.84	0.53	0.32	NA	NA	No	No	No	No
MA-356	124	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,353.0	16	14	0.35	0.30	0.04	No	Yes	Yes	Yes	Yes	No
MA-357	122	Double Mountain Alternative	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	2,004.2	30	14	1.38	0.64	0.74	NA	NA	No	No	No	No
MA-358	124	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	155.1	35	14	0.12	0.05	0.07	Yes	No	Yes	No	Yes	No
MA-359	124	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,319.6	16	14	0.34	0.30	0.04	No	Yes	Yes	Yes	Yes	No
MA-360	123	Double Mountain Alternative	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	10,246.8	30	14	7.06	3.29	3.76	NA	NA	No	No	No	No
MA-361	124	Proposed Route	New Road, Bladed	BLM	No	NA	1.0	2,711.2	35	14	2.18	0.87	1.31	No	Yes	Yes	Yes	Yes	No
MA-362	124	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	2,286.2	16	14	0.59	0.51	0.07	NA	NA	No	No	No	No
MA-363	124	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	85.3	16	14	0.02	0.02	0.00	NA	NA	No	No	No	No
MA-364	124	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	939.5	35	14	0.75	0.30	0.45	NA	NA	No	No	No	No
MA-365	124	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,170.6	35	14	0.94	0.38	0.56	NA	NA	No	No	No	No
MA-366	124	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	3,133.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-367	124	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,711.7	35	14	1.38	0.55	0.83	NA	NA	No	No	No	No
MA-368	124	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,528.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-369	124	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	194.7	35	14	0.16	0.06	0.09	NA	NA	No	No	No	No
MA-370	124	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,040.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-371	124	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	134.8	35	14	0.11	0.04	0.06	NA	NA	No	No	No	No
MA-372	124	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,061.0	16	14	0.27	0.24	0.03	NA	NA	No	No	No	No
MA-373	124	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	228.1	35	14	0.18	0.07	0.11	NA	NA	No	No	No	No
MA-374	125	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,054.4	16	14	0.27	0.24	0.03	NA	NA	No	No	No	No
MA-375	125	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	355.4	35	14	0.29	0.11	0.17	NA	NA	No	No	No	No
MA-376	125	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,252.9	16	14	0.32	0.28	0.04	NA	NA	No	No	No	No
MA-377	125	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	571.1	35	14	0.46	0.18	0.28	NA	NA	No	No	No	No
MA-378	125	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	270.1	16	14	0.07	0.06	0.01	NA	NA	No	No	No	No
MA-379	125	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,158.3	16	14	0.30	0.26	0.04	NA	NA	No	No	No	No
MA-380	125	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	576.9	35	14	0.46	0.19	0.28	NA	NA	No	No	No	No
MA-381	125	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	674.7	16	14	0.17	0.15	0.02	NA	NA	No	No	No	No
MA-382	125	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	242.2	35	14	0.19	0.08	0.12	NA	NA	No	No	No	No
MA-383	125	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	3,806.9	16	14	0.98	0.86	0.12	NA	NA	No	No	No	No
MA-384	125	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,998.5	16	10	0.73	0.46	0.28	NA	NA	No	No	No	No
MA-385	125	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	749.6	16	14	0.19	0.17	0.02	NA	NA	No	No	No	No

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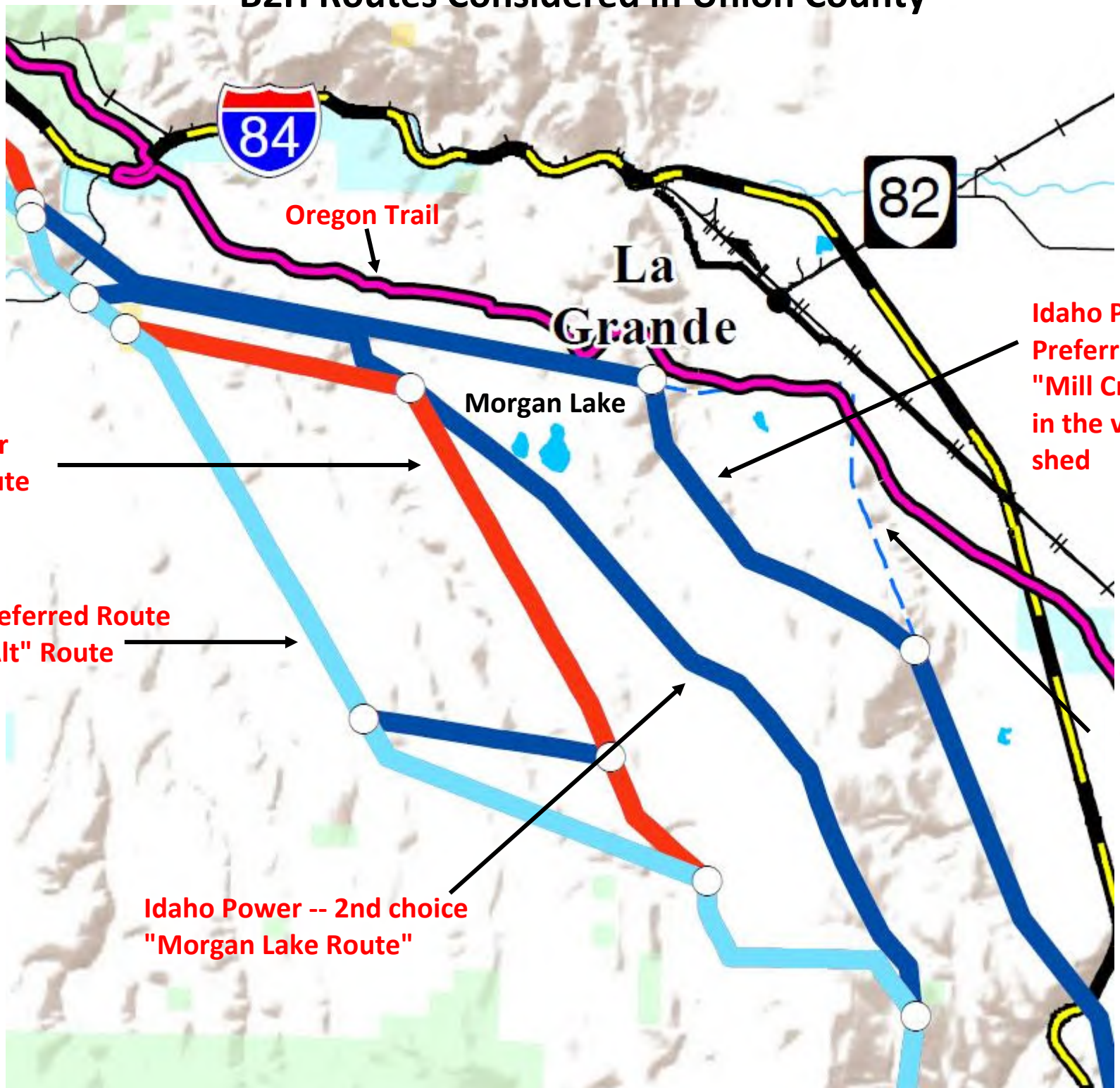
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MA-386	125	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	2,256.7	16	14	0.58	0.51	0.07	NA	NA	No	No	No	No
MA-387	125	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	2,506.4	16	10	0.92	0.58	0.35	NA	NA	No	No	No	No
MA-388	125	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	2,676.7	16	14	0.69	0.60	0.09	NA	NA	No	No	No	No
MA-389	125	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	2,135.4	30	14	1.47	0.69	0.78	NA	NA	No	No	No	No
MA-390	126	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,111.3	16	10	0.41	0.26	0.15	NA	NA	No	No	No	No
MA-391	126	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	11,622.1	16	14	2.99	2.61	0.37	No	Yes	Yes	Yes	Yes	No
MA-392	126	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	2,543.1	16	14	0.65	0.57	0.08	NA	NA	No	No	No	No
MA-393	126	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	3,414.0	35	14	2.74	1.10	1.65	NA	NA	No	No	No	No
MA-394	127	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	6,994.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-395	126	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	3,521.3	30	14	2.43	1.13	1.29	No	Yes	Yes	Yes	Yes	No
MA-396	127	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	3,562.6	35	14	2.86	1.15	1.72	No	No	Yes	No	Yes	No
MA-397	126	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	281.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-398	127	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	7,755.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-399	127	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	541.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-400	127	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	447.2	35	14	0.36	0.14	0.22	Yes	No	Yes	No	Yes	No
MA-401	127	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,141.3	16	14	0.29	0.26	0.04	No	Yes	Yes	Yes	Yes	No
MA-402	127	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	379.0	35	14	0.30	0.12	0.18	Yes	No	Yes	No	Yes	No
MA-403	127	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	1,247.7	16	14	0.32	0.28	0.04	No	Yes	Yes	Yes	Yes	No
MA-404	127	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	2,050.5	35	14	1.65	0.66	0.99	No	No	Yes	No	Yes	No
MA-405	127	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	426.5	16	14	0.11	0.10	0.01	No	Yes	Yes	Yes	Yes	No
MA-406	127	Proposed Route	New Road, Bladed	BLM	Other	MA-407	1.0	148.0	35	14	0.12	0.05	0.07	Yes	No	Yes	No	Yes	No
MA-407	127	Proposed Route	New Road, Bladed	BLM	Yes	NA	1.0	1,760.8	35	14	1.41	0.57	0.85	No	No	Yes	No	Yes	No
MA-408	127	Proposed Route	New Road, Bladed	BLM	Other	MA-407	1.0	5,577.0	35	14	4.48	1.79	2.69	No	No	Yes	No	Yes	No
MA-409	127	Proposed Route	New Road, Bladed	BLM	Other	MA-407	1.0	505.2	35	14	0.41	0.16	0.24	Yes	No	Yes	No	Yes	No
MA-410	127	Proposed Route	New Road, Bladed	BLM	Other	MA-407	1.0	3,504.1	35	14	2.82	1.13	1.69	No	No	Yes	No	Yes	No
MA-411	128	Proposed Route	New Road, Primitive	BLM	Yes	NA	1.0	1,173.5	16	10	0.43	0.27	0.16	No	No	Yes	No	Yes	No
MA-411	128	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	249.7	16	10	0.09	0.06	0.03	No	Yes	Yes	Yes	Yes	No
MA-412	128	Proposed Route	New Road, Primitive	BLM	No	NA	1.0	239.6	16	10	0.09	0.06	0.03	No	Yes	Yes	Yes	Yes	No
MA-413	128	Proposed Route	New Road, Primitive	PV	Other	MA-420	1.0	1,351.2	16	10	0.50	0.31	0.19	No	No	Yes	No	Yes	No
MA-414	128	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	460.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-415	128	Proposed Route	New Road, Primitive	PV	Yes	NA	1.0	488.9	16	10	0.18	0.11	0.07	Yes	No	Yes	No	Yes	No
MA-416	128	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	No	NA	0.7	526.1	16	14	0.14	0.12	0.02	No	Yes	Yes	Yes	Yes	No
MA-417	128	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	849.1	16	14	0.22	0.19	0.03	NA	NA	No	No	No	No
MA-418	128	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	57.0	16	14	0.01	0.01	0.00	NA	NA	No	No	No	No
MA-419	129	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	1,310.3	16	14	0.34	0.29	0.04	NA	NA	No	No	No	No
MA-420	128	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	Yes	NA	0.7	2,608.9	16	14	0.67	0.59	0.08	No	No	Yes	No	Yes	No
MA-421	128	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,003.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-422	129	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	290.6	16	10	0.11	0.07	0.04	NA	NA	No	No	No	No
MA-423	129	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	4,129.6	16	14	1.06	0.93	0.13	NA	NA	No	No	No	No
MA-424	129	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	142.3	35	14	0.11	0.05	0.07	NA	NA	No	No	No	No
MA-425	129	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,824.1	30	14	1.26	0.59	0.67	NA	NA	No	No	No	No
MA-426	129	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	937.0	16	10	0.34	0.22	0.13	NA	NA	No	No	No	No
MA-427	129	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,683.1	30	14	1.16	0.54	0.62	NA	NA	No	No	No	No
MA-428	129	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	8,949.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-429	129	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	90.2	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
MA-430	129	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	623.6	16	14	0.16	0.14	0.02	NA	NA	No	No	No	No
MA-431	129	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,195.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-432	129	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	95.1	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
MA-433	129	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	439.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-434	129	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	3,441.1	16	14	0.88	0.77	0.11	NA	NA	No	No	No	No
MA-435	129	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	398.1	16	10	0.15	0.09	0.05	NA	NA	No	No	No	No
MA-436	129	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	466.1	16	14	0.12	0.10	0.01	NA	NA	No	No	No	No
MA-437	129	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	267.3	16	10	0.10	0.06	0.04	NA	NA	No	No	No	No
MA-438	129	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	941.8	16	14	0.24	0.21	0.03	NA	NA	No	No	No	No
MA-439	129	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	173.9	16	10	0.06	0.04	0.02	NA	NA	No	No	No	No
MA-440	129	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	466.3	16	14	0.12	0.10	0.01	NA	NA	No	No	No	No
MA-441	129	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	11,871.3	16	14	3.05	2.67	0.38	NA	NA	No	No	No	No
MA-442	129	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	2,583.8	16	10	0.95	0.59	0.36	NA	NA	No	No	No	No
MA-443	131	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,656.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-444	131	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	2,267.0	16	10	0.83	0.52	0.31	NA	NA	No	No	No	No
MA-445	130	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	257.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-446	131	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	2,247.3	16	14	0.58	0.51	0.07	NA	NA	No	No	No	No
MA-447	131	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	447.5	16	10	0.16	0.10	0.06	NA	NA	No	No	No	No
MA-448	131	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	4,142.3	30	14	2.85	1.33	1.52	NA	NA	No	No	No	No
MA-449	131	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,017.0	16	10	0.37	0.23	0.14	NA	NA	No	No	No	No
MA-450	131	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	3,450.7	16	14	0.89	0.78	0.11	NA	NA	No	No	No	No
MA-451	131	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	325.2	16	10	0.12	0.07	0.04	NA	NA	No	No	No	No
MA-452	131	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	3,670.2	16	14	0.94	0.83	0.12	NA	NA	No	No	No	No
MA-453	131	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	106.8	16	10	0.04	0.02	0.01	NA	NA	No	No	No	No
MA-454	131	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,370.1	16	14	0.35	0.31	0.04	NA	NA	No	No	No	No
MA-455	131	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	820.5	16	10	0.30	0.19	0.11	NA	NA	No	No	No	No
MA-456	131	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	1,272.5	30	14	0.88	0.41	0.47	NA	NA	No	No	No	No
MA-457	132	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,113.9	35	14	0.90	0.36	0.54	NA	NA	No	No	No	No
MA-458	132	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	2,202.0	30	14	1.52	0.71	0.81	NA	NA	No	No	No	No
MA-459	132	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,633.8	35	14	1.31	0.53	0.79	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MA-460	132	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,577.0	35	14	1.27	0.51	0.76	NA	NA	No	No	No	No
MA-461	132	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	564.7	35	14	0.45	0.18	0.27	NA	NA	No	No	No	No
MA-462	132	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	1,481.7	30	14	1.02	0.48	0.54	NA	NA	No	No	No	No
MA-463	133	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,426.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-464	132	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	2,557.4	35	14	2.05	0.82	1.23	NA	NA	No	No	No	No
MA-465	132	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	5,579.9	30	14	3.84	1.79	2.05	NA	NA	No	No	No	No
MA-466	132	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	335.2	35	14	0.27	0.11	0.16	NA	NA	No	No	No	No
MA-467	133	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	920.9	35	14	0.74	0.30	0.44	NA	NA	No	No	No	No
MA-468	133	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	2,549.9	30	14	1.76	0.82	0.94	NA	NA	No	No	No	No
MA-469	133	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	2,349.1	16	14	0.60	0.53	0.08	NA	NA	No	No	No	No
MA-470	133	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	861.5	35	14	0.69	0.28	0.42	NA	NA	No	No	No	No
MA-471	133	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	3,841.4	16	14	0.99	0.86	0.12	NA	NA	No	No	No	No
MA-472	133	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	220.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-473	133	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	6,756.9	35	14	5.43	2.17	3.26	NA	NA	No	No	No	No
MA-474	133	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BOR	NA	NA	0.0	10,784.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-475	133	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	2,594.1	35	14	2.08	0.83	1.25	NA	NA	No	No	No	No
MA-476	133	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,065.6	16	10	0.39	0.24	0.15	NA	NA	No	No	No	No
MA-477	133	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	334.1	16	10	0.12	0.08	0.05	NA	NA	No	No	No	No
MA-478	133	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	410.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-479	133	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,130.8	16	14	0.29	0.25	0.04	NA	NA	No	No	No	No
MA-480	133	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,636.7	16	14	0.42	0.37	0.05	NA	NA	No	No	No	No
MA-481	133	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	758.0	16	14	0.19	0.17	0.02	NA	NA	No	No	No	No
MA-482	133	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	826.2	16	14	0.21	0.19	0.03	NA	NA	No	No	No	No
MA-483	133	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	339.1	16	14	0.09	0.08	0.01	NA	NA	No	No	No	No
MA-484	133	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	305.7	16	14	0.08	0.07	0.01	NA	NA	No	No	No	No
MA-485	133	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	132.2	16	14	0.03	0.03	0.00	NA	NA	No	No	No	No
MA-486	133	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,416.5	16	10	0.52	0.33	0.20	NA	NA	No	No	No	No
MA-487	133	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	183.3	16	14	0.05	0.04	0.01	NA	NA	No	No	No	No
MA-488	133	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,818.6	16	10	0.67	0.42	0.25	NA	NA	No	No	No	No
MA-489	133	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	945.1	35	14	0.76	0.30	0.46	NA	NA	No	No	No	No
MA-490	134	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	4,123.7	16	10	1.51	0.95	0.57	NA	NA	No	No	No	No
MA-491	133	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	919.6	16	10	0.34	0.21	0.13	NA	NA	No	No	No	No
MA-492	134	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	948.5	16	10	0.35	0.22	0.13	NA	NA	No	No	No	No
MA-493	134	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	756.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-494	134	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	770.1	16	10	0.28	0.18	0.11	NA	NA	No	No	No	No
MA-495	NA	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,048.1	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-496	134	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	2,289.7	16	14	0.59	0.52	0.07	NA	NA	No	No	No	No
MA-497	134	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,096.8	35	14	0.88	0.35	0.53	NA	NA	No	No	No	No
MA-498	134	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	1,210.6	16	10	0.44	0.28	0.17	NA	NA	No	No	No	No
MA-499	134	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	2,577.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-500	134	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	2,449.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-501	134	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,280.8	35	14	1.03	0.41	0.62	NA	NA	No	No	No	No
MA-502	134	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	406.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-503	134	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,648.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-504	134	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	830.8	35	14	0.67	0.27	0.40	NA	NA	No	No	No	No
MA-505	134	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,723.2	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-506	134	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	5,073.3	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-507	134	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	82.8	16	10	0.03	0.02	0.01	NA	NA	No	No	No	No
MA-508	134	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,040.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-509	134	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	491.2	35	14	0.39	0.16	0.24	NA	NA	No	No	No	No
MA-510	134	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	737.0	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-511	134	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	837.4	35	14	0.67	0.27	0.40	NA	NA	No	No	No	No
MA-512	134	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	536.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-513	134	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BLM	NA	NA	0.0	1,102.7	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-514	134	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	380.8	16	10	0.14	0.09	0.05	NA	NA	No	No	No	No
MA-515	135	Proposed Route	New Road, Primitive	BLM	NA	NA	1.0	189.3	16	10	0.07	0.04	0.03	NA	NA	No	No	No	No
MA-516	135	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	8,650.5	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-517	135	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	686.6	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-518	135	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	461.5	16	10	0.17	0.11	0.06	NA	NA	No	No	No	No
MA-519	135	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	591.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-520	135	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	66.4	16	10	0.02	0.02	0.01	NA	NA	No	No	No	No
MA-521	135	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	9,551.3	16	14	2.46	2.15	0.31	NA	NA	No	No	No	No
MA-522	135	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	PV	NA	NA	0.0	3,746.9	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-523	135	Proposed Route	Existing Road, No Substantial Modification, 0-20% Improvements	BOR	NA	NA	0.0	5,379.4	0	0	0.00	0.00	0.00	NA	NA	No	No	No	No
MA-524	135	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	139.8	16	10	0.05	0.03	0.02	NA	NA	No	No	No	No
MA-525	135	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	4,049.6	16	14	1.04	0.91	0.13	NA	NA	No	No	No	No
MA-526	135	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	2,602.2	35	14	2.09	0.84	1.25	NA	NA	No	No	No	No
MA-527	136	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	347.0	16	14	0.09	0.08	0.01	NA	NA	No	No	No	No
MA-528	135	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	1,561.7	16	10	0.57	0.36	0.22	NA	NA	No	No	No	No
MA-529	135	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	458.0	16	10	0.17	0.11	0.06	NA	NA	No	No	No	No
MA-530	136	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	588.2	16	10	0.22	0.14	0.08	NA	NA	No	No	No	No
MA-531	136	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	PV	NA	NA	0.7	2,016.5	16	14	0.52	0.45	0.06	NA	NA	No	No	No	No
MA-532	136	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	2,785.9	16	10	1.02	0.64	0.38	NA	NA	No	No	No	No
MA-533	136	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	2,813.9	16	10	1.03	0.65	0.39	NA	NA	No	No	No	No
MA-534	136	Proposed Route	New Road, Primitive	PV	NA	NA	1.0	398.3	16	10	0.15	0.09	0.05	NA	NA	No	No	No	No

Unique ID	Mapbook Page	Route	Road Classification	Ownership	Access Control	Other	Direct Impacts Calculation							Indirect Impact Consideration				Sage-grouse	Elk
							Percent Modification	Road Length (feet)	Constr. Width (feet)	Operation Width (feet)	Constr. Disturbance (acres)	Operation Disturbance (acres)	Temporary Disturbance (acres)	Spur Road	Traffic Volume Increase	Wildlife	Include in Indirect		
MA-535	136	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	PV	NA	NA	1.0	1,126.4	30	14	0.78	0.36	0.41	NA	NA	No	No	No	No
MA-536	136	Proposed Route	New Road, Bladed	PV	NA	NA	1.0	442.2	35	14	0.36	0.14	0.21	NA	NA	No	No	No	No
MA-538	136	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	8,180.9	16	14	2.10	1.84	0.26	NA	NA	No	No	No	No
MA-539	136	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	1,249.8	16	14	0.32	0.28	0.04	NA	NA	No	No	No	No
MA-540	136	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	150.8	16	14	0.04	0.03	0.00	NA	NA	No	No	No	No
MA-541	136	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	591.4	16	14	0.15	0.13	0.02	NA	NA	No	No	No	No
MA-542	136	Proposed Route	New Road, Bladed	BLM	NA	NA	1.0	1,784.0	35	14	1.43	0.57	0.86	NA	NA	No	No	No	No
MA-544	136	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	6,125.4	16	14	1.57	1.38	0.20	NA	NA	No	No	No	No
MA-544	136	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	266.1	16	14	0.07	0.06	0.01	NA	NA	No	No	No	No
OW-001	136	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	No	NA	1.0	4,593.3	30	14	3.16	1.48	1.69	No	Yes	Yes	Yes	Yes	No
OW-001	136	Proposed Route	Existing Road, Substantial Modification, 71-100% Improvements	BLM	NA	NA	1.0	2,786.5	30	14	1.92	0.90	1.02	NA	NA	No	No	No	No
OW-007	136	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	613.9	16	14	0.16	0.14	0.02	NA	NA	No	No	No	No
OW-007	136	Proposed Route	Existing Road, Substantial Modification, 21-70% Improvements	BLM	NA	NA	0.7	646.9	16	14	0.17	0.15	0.02	NA	NA	No	No	No	No

B2H Routes Considered in Union County



TARDAEWETHER Kellen * ODOE

From: Fuji Kreider <fkreider@campblackdog.org>
Sent: Thursday, August 27, 2020 4:44 PM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE; jim@stopb2h.org
Subject: Petition for Party Status - Contested Case B2H
Attachments: STOP B2H Coalition-Petition for Party Status 8-27-2020.pdf

Judge Greene-Webster,

Please accept the attached Petition for Party Status in the Contested Case for the Boardman to Hemingway Transmission Project, on behalf of the Stop B2H Coalition.

Respectfully submitted,

Fuji Kreider, Secretary/Treasurer
Stop B2H Coalition
fuji@stopb2h.org
541-406-0921

Stop B2H Coalition
60366 Marvin Road
La Grande, Oregon 97850

August 27, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-373-7806
Email: OED_OAH_Referral@oregon.gov
Copy: kellen.tardaewether@oregon.gov

Subject: Petition to Request Party Status in the Contested Case
Regarding: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019; Proposed Order July 2, 2020.

Dear Judge Greene-Webster:

The Stop B2H Coalition and Greater Hells Canyon Council (collectively, "Commenters" or "STOP") are requesting party status to the contested case regarding the Proposed Order (PO) issued on July 2, 2020 by the Oregon Department of Energy on the Application for Site Certificate by the Idaho Power Company (IPC; or applicant; or developer) for the Boardman to Hemingway Transmission Project (B2H).

Commenter Stop B2H Coalition ("STOP") is a nonprofit organization with nearly 800 individual members and 8 organizational members representing thousands of additional individuals. STOP's mission is to stop the approval and construction of an unneeded 305 mile, 500 kv transmission line through Eastern Oregon and Western Idaho, thereby: protecting environmental, historical and cultural resources; preventing degradation of timber and agricultural lands and the Oregon National Historic Trail; promoting energy conservation and acknowledging the past decade's revolutionary developments in renewable energy, energy storage and distribution.

Commenter Greater Hells Canyon Council is a member of the Stop B2H Coalition. Greater Hells Canyon Council (GHCC) is a grassroots conservation organization founded in 1967 (as Hells Canyon Preservation Council) to stop last free-flowing segment of the Snake River in Hells Canyon from being dammed. Not only did we stop the dam, our advocacy led to the creation of

the Hells Canyon National Recreation Area. Our work now focuses on public lands management in the entire Greater Hells Canyon Region. We cover such diverse issues as logging, grazing, recreation, mining, species protection, wildlife connectivity, and more. Our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations. Attached is the letter of designation for the Stop B2H Coalition, to verify a joint petition for this proceeding.

Stop B2H Coalition was created to specifically address this proposed project and our mission states that clearly. There is no other person or organization that can represent our interests and those of our members. Collectively, we represent thousands of members, most of whom live, farm, ranch, recreate, hunt and fish, and worship in the northeast corner of Oregon. These members would be directly and indirectly impacted by the proposed project. They rely on our organizations in land use and other regulatory decision making processes that affect their lives and their environment. On August 22, 2019, we submitted extensive comments with many links and attachments embedded regarding the Draft Proposed Order to the ODOE/EFSC.

Presently we are representing our organizations and members without an attorney; however, we would like to reserve the right to legal representation at any point in these proceedings. Cost is a barrier for our nonprofits and we do not have an attorney on staff. As a matter of fact the Stop B2H Coalition is completely managed and operated by dedicated volunteers; there are no paid staff.

The following issues are those we desire to raise in the contested case proceedings. All issues were discussed in our extensive DPO comments referenced and linked above. They were raised with "sufficient specificity" because the applicant and the ODOE have responded to them in the "cross-walk" in Attachment 4 of the PO; therefore, we believe that they were understood. They are presented according to the following Table of Contents, which closely mirrors the order in our DPO comments.

Please feel free to contact me if you have any questions.

Sincerely,

Jim Kreider, Co-Chairperson
Stop B2H Coalition

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1. Acronyms and Abbreviations:

Draft Proposed Order = DPO
Energy Facilities Siting Council = EFSC, the Council
Greater Hells Canyon Council = GRCC
Idaho Power Company = IPC, applicant, developer
IRP = Integrated Resource Plan
Landowner = Property Owner = Home Owner
Oregon Department of Energy = agency, department, ODOE
Oregon Department of Environmental Quality = DEQ
Oregon Public Utilities Commission = OPUC
Proposed Order = PO
Stop B2H Coalition = STOP, Commenters

2. Need Standard

OAR Chapter 345 Division 23, "Need Standard for Nongenerating Facilities" requires the Council to affirmatively find that the applicant seeking a Site Certificate has demonstrated the need for the capacity of the proposed facility under either (1) the "Least-Cost Plan Rule" (OAR 345-023-0020) or (2) the "System Reliability Rule for Electric Transmission Lines," (OAR 345-023-0030) unless the facility is located in a "National Interest Electric Transmission Corridor" designated by the U. S. Department of Energy under Section 216 of the Federal Power Act. The proposed 500 kV transmission line is not proposed for location in a "National Interest Electric Transmission Corridor" and the Applicant makes no such claim.

In its earlier written comments, STOP identified that the Applicant failed to meet the Need Standard under either the Least Cost Plan Rule or the System Reliability Rule, in part because the OPUC only acknowledged Idaho Power's 21% capacity share of the proposed transmission line. Despite Applicant's failure to meet the Need Standard under either path (Least-Cost Plan Rule or System Reliability Rule), under the rules, the ODOE's Proposed Order instead proposes that the Applicant has met the Need Standard under both the Least-Cost Plan Rule and the System Reliability Rule. In reaching this faulty determination, the ODOE has ignored the clear requirements in OAR 345 Division 23 Need Standard for Nongenerating Facilities (Need Standard) and introduced a new policy in the Proposed Order by formally adopting a definition of "capacity" that is in direct conflict with the clear language and intent of the Need Standard and a departure from past Council precedent.

Instead of evaluating whether applicant has demonstrated need for the capacity of a proposed high capacity transmission line, the ODOE appears to have deviated from the requirements of EFSC's rules and adopted the unsupported position that the use of the term capacity in the Need Standard refers to kilovolts, or operating voltage of the transmission line, instead of the capacity of the proposed line to transfer power, expressed in MW.

For the ODOE to reach this conclusion that the term capacity, as used in the Need Standard, is measured in kilovolts, the ODOE looks to the definition of a "Transmission Line that is an Energy Facility" under statute ORS 469.300(11)(a)(C):

> ORS 469.300(11)(a)(C)
> (a) "Energy facility" means any of the following…. A high voltage transmission line of more than 10 miles in length with a capacity of 230,000 volts or more to be constructed in more than one city or county in this state.

The term "capacity" as used in the Need Standard is not a defined term, there is nothing in the Need Standard that suggests capacity is defined in kilovolts. The ODOE has ignored the plain

language in OAR 345-023-0030 describing "capacity" in the Need Standard for Nongenerating Facilities as language that clearly requires capacity to be evaluated in MW and not kilovolts:

> OAR 345-23-0030(1)
> "The Council shall find that the applicant has demonstrated the need for an electric transmission line that is an energy facility under the definition in OAR 345-23-0030(1) if the Council finds that:
>
> (1) The facility is needed to enable the transmission system of which it is to be a part to meet the *firm capacity demands for electricity or firm annual electricity sales* (emphasis added) that are reasonably expected to occur within five years of the facility's proposed in-service date …"

The fact is that *firm capacity demands for electricity or firm annual electricity sales* are both measured in MW and neither can be measured in voltage of kilovolts.

ORS 469.300 Definitions, clearly states that the definitions in ORS 469.300 *do not apply when the context requires otherwise*: (emphasis added)

> ORS 469.300(11)(a)(C)
> As used in ORS 469.300 (Definitions) to 469.563 (Court orders for enforcement) … 469.992 (Civil penalties), ***unless the context requires otherwise****:* (emphasis added)
> (11)(a) "Energy facility" means any of the following:
>
> > (C) A high voltage transmission line of more than 10 miles in length with a capacity of 230,000 volts or more to be constructed in more than one city or county in this state, but excluding:

The ODOE's newly surfaced reliance in this Proposed Order on a reference to "operating voltage" embedded in the definition of an Energy Facility in ORS 469.300 when evaluating the Applicant's claims of compliance with the Need Standard is out of context, inapposite to the Need Standard as reflected in OAR 345-023, and reflects an abdication by the ODOE of its clear responsibilities to apply EFSC's rules in a consistent and unbiased manner. By incorrectly conflating the definition of a high voltage transmission line in ORS 469.300 to the evaluation of capacity in OAR Chapter 345 Division 23 Need Standard for Nongenerating Facilities, the ODOE is taking the definition out of context and the resulting conclusion that the Applicant has met the Need Standard is arbitrary, ignores the plain language of the OAR and subverts the intent of the Need Standard as adopted by EFSC. Furthermore, evaluating the capacity of a transmission line in kilovolts as the ODOE has done in the Proposed Order, is inconsistent with the applicable mandatory and enforceable North American Electric Reliability Corporation

(NERC) Reliability Standards, itself a violation of the clear requirements of OAR 345-023-0030(2).

Finally, the ODOE's newfound definition of capacity as measured by voltage, not power (i.e., MW), when applied to OAR Chapter 345 Division 23 Need Standard, constructively eliminates any meaningful evaluation of whether the proposed transmission line has been sized for the need, in clear violation of the plain language and intent of the OAR.

> *OAR 345-023-0020(1) clearly states that:*
>
> "the capacity of the proposed facility (emphasis added)….is identified in the short-term plan of action of *an energy resource plan or combination of plans* [emphasis added] that is adopted by a municipal utility, people's utility district, electrical cooperative, other governmental body that makes or implements energy policy, or electric transmission system operator that has a governance that is independent of owners and users of the system and if the energy resource plan…"

In the Proposed Order, the ODOE takes the novel and unsupported position that for purposes of EFSC review, the ODOE considers the capacity of the proposed facility to be 500,000 volts, and that the amount of power that the line can transmit (i.e., transfer capability measured in MW) is wholly irrelevant to EFSC's evaluation of the Applicant's compliance with OAR Chapter 345 Division 23. Indeed, under the ODOE's flawed determination that voltage defines that capacity under OAR 345-023…, only a single plan is ever necessary to meet the Least Cost Plan Rule, as the mere appearance of a transmission line 230,000 kV or larger in only one plan always meets the standard under EFSC's interpretation, and a collection of plans as envisioned in the rules would never be needed to establish need under OAR 345-23-0020(1). This position taken by the ODOE as reflected in the Proposed Order is contrary to the plain language of OAR 345-23-… that provided for a collection of plans and subverts the intent of Division 23 of EFSC's rules.

Furthermore, the ODOE, in their evaluation of the Applicant's compliance with Division 23 Need Standard for Nongenerating Facilities, appears to have erred by applying the balancing rule in violation of EFSC's own General Standards for Siting Facilities (OAR345-022-…). OAR 345-022-000(2) states that:

> "The Council may issue or amend a site certificate for a facility that does not meet one or more of the applicable standards adopted under ORS 469.501 if the Council determines that the overall public benefits of the facility outweigh any adverse effects on a resource or interest protected by the applicable standards the facility does not meet."

However, OAR 345-022-000(3)(d) expressly prohibits the Council for applying the above balancing standard when determining whether the Applicant has met the Need Standard:

> (3) Notwithstanding section (2) of this rule, the Council shall not apply the balancing determination to the following standards:
> (d)The need standards described in OAR 345-023-0005

Despite this clear rule, the ODOE appears to have applied balancing considerations by embracing the Applicant's pleas that awarding a site certificate for which the Applicant has only demonstrated the need for 21 percent of the capacity of the Energy Facility is good public policy.

> The applicant states that; "... it would be counterproductive and short-sighted for the Council to interpret its rules such that capacity must be scaled precisely to the applicant's need. The current proposal to meet needs of all three partners—Idaho Power, BPA, and PacifiCorp—with one transmission line would result in far smaller impacts than three separate transmission lines each scaled to meet the individual utility needs… the capacity of the transmission line needed to be scaled to meet the precise need of the applicant, there would be no extra capacity for expansion, which could then trigger the need for another transmission line where it otherwise could be avoided." The ODOE concurs with the applicant's position… "(Proposed Order p 601 footnote 621)

The ODOE's concurrence with the Applicants position is contrary to Council's rules, deviates from Council precedent in previous transmission site certificate applications and ignores the express prohibition against the Council applying the balancing determination to the need standards. The standards require the Applicant to demonstrate need for the capacity of the facility. Although the applicant claims it has "partners" that need the remaining 79% of the capacity of the proposed transmission line, there is no evidence in the record that these proposed partners have such need, nor have these proposed "partners" appeared or corroborated the Applicant's claims in these proceedings, nor did they do so in the proceedings leading to acknowledgement by the OPUC of the proposed transmission line in the Applicant's 2017 IRP. It is a clear violation of EFSC rules for the ODOE to embrace the Applicant's speculative claims of need for the project's capacity based upon unsubstantiated claims that there are other partners than need the remaining capacity, a need that was expressly not acknowledged by the OPUC in Idaho Power's 2017 IRP.

These issues identified above justify a contested case hearing for multiple reasons. First, a contested case is needed to allow STOP to submit evidence, including sworn expert witness testimony. Second, a contested case is needed to allow Requesters to seek discoverable information likely to bear on the disputed issues, and Requestor's have no other means of obtaining such information and presenting it to the Council.

3. Noise Notification

STOP stated[1] that the ODOE in the DPO improperly modified/reduced the distance for noise evaluation of the noise sensitive properties, from 1 mile to ½ mile. This has not been corrected and has been carried into the Proposed Order. STOP wishes to contest this error.

In 2020-07-01-B2H-PO-Attachment-4 at comment ID: Stop B2H Notice-1, the applicant and ODOE do not address the rule change that occurred in OAR 345-021-0010 (1)(x)(E). This rule states, "[a] list of the names and addresses of all owners of noise sensitive property, as defined in OAR 340-035-0015, within one mile of the proposed site boundary."

The ODOE is asserting that it can amend the project order at any time. A project order is not a rule. In Section II.B. Project Order, on page 4 it states, the project order is amended to establish analysis areas for the proposed facility under OAR 345-015-0160. The ODOE is using the creation of the analysis areas to give the ODOE the authority--it does not have--to change the rule on noise generated by construction and operation of the proposed facility for the collection of the names and addresses of the owners of noise sensitive property from 1 mile to ½ mile. This is incorrect as the ODOE is justifying changing a rule, OAR 345-021-0010(1)(x)(E), by developing an analysis area to amend the project order. Under OAR 345-015-0160 (f) they can determine an analysis area -- but not to an extent that it is incompatible with the state noise rule.

The ODOE does not have authority to substantively amend a Rule, through a Project Order. Amendment of a Rule can only occur through a properly noticed Rulemaking, under the Oregon Administrative Procedures Act (APA). *See*, ORS 183.335 and OAR 345-001-0000(1).

Initially, and during the subsequent (post-DPO comments) analysis, some NSRs were evaluated at 1 mile[2] and the predicated noise exceedance included an additional 6 noise sensitive properties. This indicates that noise sensitive properties *do* exist outside of the ½ mile noise analysis area. What other landowner properties could have been missed (e.g.: those assigned to MP11)? This further justifies the need to comply OAR 345-021-0010(1)(x)(E) as written.

The applicant and ODOE say that the notification done for noise was a courtesy, not required by rule. We are disappointed that the applicant and ODOE had little consideration and respect for the homeowners of potentially noise sensitive properties. ORS 183.415(1) states, "The Legislative Assembly finds that persons affected by actions taken by state agencies have a right to be informed of their rights and remedies with respect to the actions." ODOE has an obligation, not a courtesy, to notify all homeowners within one mile of the proposed site boundary that are affected by action taken by a state agency, ODOE.

[1] In STOP's DPO public comments Section 3. Notification (p. 15)
[2] PO, Attachment 4, p. 139, Section Stop B2H Noise First Supplemental Response, p. 7.

STOP wanted to make sure that homeowners of noise sensitive properties were aware of the impending harm and public safety issues that would be confronting them. However, the names and addresses of Exhibits F and X were combined and no designation was made to identify which list the landowner came from? We asked ODOE to separate the list by Exhibit and were told that was not possible. This lack of designation obstructed STOP's efforts to identify and contact specific landowners that were to be impacted and therefore they are left vulnerable and uninformed. Additionally, the mailer(s) sent did not distinguish *why* the landowners were being notified (i.e.: they are a noise sensitive property.) It merely listed a number of possible reasons, with noise sensitive property and the bottom. STOP believes that this was deliberately misleading.

The remedies that STOP requests are:

1. The ODOE and Idaho Power/applicant comply with OAR 345-021-0010(1)(x)(E) in this proceeding before continuing.
2. The ODOE and Idaho Power/applicant comply with ORS 183.415(1) for all landowners identified in OAR 345-021-0010(1)(x)(E) in this proceeding before continuing. The landowners should be informed about this Proposed Order, the specifics of the methodologies and impacts of the noise study to their land and rights to participate and contest actions in this proceeding.
3. Rulemaking is promulgated to modify OAR 345-021-0010(1)(x)(E) to guarantee that any landowners meeting the requirements be notified. That the exhibit be kept separate and not combined with any other. If combined proper identification coding will be in place to determine what exhibit or list the name and address came from.

4. Noise Standards

We are requesting party status to the contested case, within the noise standard of the Proposed Order, IV.Q.1. Noise Control Regulations: OAR 340-035-0035, OAR 340-035-0010 and OAR 340-035-0100. We addressed these issues extensively in our DPO comments of 8-22-2019, pp 18-32. Both Idaho Power and ODOE responded in Attachment 4 of the PO; therefore we believe that our comments were understood and sufficiently specific. However, STOP believes that a number of points have been glossed over or disregarded, particularly given the "standards-based" approach of the EFSC siting process.

Our request follows three main issues:
1) The **variance and exception** request: Proposed Order is not compliant with the over-riding state statute, ORS 467.010, which is designed to protect the public health, safety and welfare of the citizens of Oregon from unreasonable noise pollution. ODOE is over-reaching its authority in

recommending the variance and exception; and the rationale is not supported by current and future anticipated events.

2) The **methodology** was improperly authorized and does not comply with state standards OAR 340-035-0035 and the DEQ Standard Procedures Manual. A staff member issued a memo that authorized the methodology without following the above rule or receiving Council approval; nor were any rules promulgated/modified to authorize the change in rule and procedure manual.

The rule requires that every NSR must be monitored for ambient baseline noise. The assessment study is inadequate and incomplete. There are only 17 "site-specific" monitoring points, for determining baseline noise of Noise Sensitive Properties (NSRs) not 132 as required by the rule and the manual based on the estimate of NSRs in the ASC and PO.

If the methodology were authorized--or updated rulemaking conducted--there are still so many flaws in the application of the methodology that the assessment must be re-conducted. For example, over 63 monitoring points are suspect out of 132 MPs (nearly half), because they are non-representative of the NSRs.

3) The mitigation/**site conditions** do not adequately protect the public health, safety and welfare, per ORS 467.010; STOP recommends further remedies, see **Attachment 2,** which also elaborates on STOP's rationale for these contested case issues.

5. Scenic, Recreation and Protected Areas

STOP is requesting party status to the contested case, within the Scenic (345-022-0080) and Recreation (345-022-0100) EFSC Standards. We addressed these issues extensively in our DPO comments of 8-22-2019, pp 33 and 34, with attachments 5.1 Morgan Lake, and 5.2. Twin Lake.

In particular, we will address these standards in the context of a primary resource: Morgan Lake Park. In the ASC, DPO and Proposed Order, visual assessments have been based on an outdated 1974 USFS Handbook. STOP is requesting a contested case based on applicant's use of an outdated USFS Reference as a basis for B2H visual analysis methodology. This error invalidates Applicant's conclusions on visual impacts on Morgan Lake Park and other Protected Areas, Scenic Resources and Important Recreational Opportunities.

In the ASC Exhibit R, p. 8, Part 1: Baseline Conditions:

> "The BLM and USFS systems were adapted to this Project-level assessment to remain consistent with these procedures within lands administered by either agency. Resources not administered by either agency were assessed using one of the two procedures based on whether the resource was located in forested or non-forested areas. Resources located

in non-forested areas were analyzed using the BLM methodology, whereas those located in forested areas were analyzed using the USFS methodology." (p.8)

The reference cited in applicant's ASC 2018 and DPO 2020 is *National Forest Landscape Management, Volume 2, Chapter 1, The Visual Management System* (VMS) 1974; it was superceded by *Landscape Aesthetic, Scenic Management System* (SMS) in 1995.[3]

The developer and ODOE have gone through extraordinary, subjective rationalizations, to justify their conclusions of "important and scenic" resources as required by the OAR, while all along NOT utilizing the current methodology. STOP incorporates by reference, Attachment 3, presented by Lois Barry, STOP B2H Coalition Board member. This attachment clearly demonstrates the non-compliance with both OAR 345-022-0080 and 345-022-0100.

6. Soil Protection Standards and Carbon

STOP commented extensively on Geology, Soils and Carbon, pp. 35-49, in the DPO comments submitted on 8-22-2029. The particular issue we would like to raise in this contest case relates Soil Protection. In particular our disagreement concerns Idaho Power's repeated statements that there are no EFSC standards that require them to analyze or address carbon sequestration, carbon storage or carbon loss in the EFSC process. These statements are incorrect. EFSC 345-022-0000 (General Standard of Review) and EFSC 345-022-0022 (Soil Protection) make it clear that these aspects of soils must be considered.

In addition ODOE has disregarded Executive Order issued by Governor Brown, 20-04, in the context of all state agencies taking immediate action to reduce greenhouse gas emissions and address climate change in all state agency planning and actions.

Incorporated by reference, STOP includes Attachment 4, into the record for our justification regarding this request for contested case status on Soil Protection. Dr. Suzanne Fouty is a member of Stop B2H Coalition.

7. Fish & Wildlife Habitats and Threatened & Endangered Species (T&E)

State of Oregon, under its rules (OAR 345-022-0060) "*…must find that the design, construction and operation of the facility, taking into account mitigation, are consistent with: (1) The general fish and wildlife habitat mitigation goals and standards of OAR 635-415-0025 (1) through (6) in effect as of*

[3] Conceptually, the SMS differs from the VMS in that: it increases the role of constituents throughout the inventory and planning process; and it borrows from and is integrated with the basic concepts and terminology of Ecosystem Management. The Scenery Management System provides for improved integration of aesthetics with other biological, physical, and social/cultural resources in the planning process.

February 24, 2017…" It also, under (2) addresses impact sage-grouse habitat and the sage-grouse specific habitat mitigation requirements of the Greater Sage-Grouse Conservation Strategy.

OAR 635-415-0005 defines habitat as, "*the physical and biological conditions <u>within the geographic range of occurrence of a species</u>, extending over time, that affect the welfare of the species or any sub-population or members of the species."* OAR 635-415-0005 defines habitat quality as, "*the relative importance of a habitat with regard to its ability to influence species presence and <u>support the life-cycle requirements of the fish and wildlife species that use it</u>."* (emphasis added.)

OAR **345-022-0070, Threatened and Endangered Species, says that "*t*o** *issue a site certificate, the Council, after consultation with appropriate state agencies, must find that:*

> *(1) For plant species that the Oregon Department of Agriculture has listed as threatened or endangered under ORS 564.105(2), the design, construction and operation of the proposed facility, taking into account mitigation:*
>
> *(a) Are consistent with the protection and conservation program, if any, that the Oregon Department of Agriculture has adopted under ORS 564.105(3); or*
>
> *(b) If the Oregon Department of Agriculture has not adopted a protection and conservation program, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species; and*
>
> *(2) For wildlife species that the Oregon Fish and Wildlife Commission has listed as threatened or endangered under ORS 496.172(2), the design, construction and operation of the proposed facility, taking into account mitigation, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species*."

STOP commented extensively on a number of fish and wildlife habitat issues in the DPO comments of 8-22-2019, pp. 50-77. In this request for contested case, we would like to contest some of the following specific issues regarding the imperiled Greater Sage-Grouse (**OAR 345-022-0000(g), OAR 345-022-0060(2) and** Rule 635-140-0015 and 635-140-0025.) The Proposed Order inadequately and incorrectly addresses the following issues and STOP requests party status in the contested case to address them:

1. Lack of information and analysis of sage-grouse habitat connectivity. The 2011 ODFW Greater Sage-Grouse Conservation Assessment and Strategy for Oregon emphasizes the importance of habitat connectivity to the persistence of populations such as the Baker and Cow Valley Priority Areas of Conservation ("PACs") throughout its analysis, mapping, habitat categorization, and management objectives. Section 3.5 of Applicant's Exhibit P1 does not mention habitat connectivity or adequately describe how and to what extent this will be disrupted for the Baker PAC and Cow Valley PAC.

2. Lack of adequate information regarding and analysis of the indirect effects from the B2H transmission line on sage-grouse and the likelihood that the B2H transmission line will lead to avoidance of the line at distances far greater than disclosed (up to four to seven miles away from the transmission line), and lead to the abandonment of sage-grouse leks, particularly in the Baker PAC, and to the likely extirpation of the Baker PAC. A report that evaluated 10 years' worth of observation of the effects from a new 185-mile long transmission line in Nevada on sage-grouse nesting and mating observed that nesting success was lower up to 7.7 miles from the new transmission line, largely due to predation from predators who could use the new line's towers to perch and nest. (Gibson, D., *et al*. 2018. Effects of power lines on habitat use and demography of Greater sage-grouse. Wildlife Monographs 200). The breadth of these indirect effects on sage-grouse are not adequately evaluated in the Proposed Order or Application, nor is their likely effect on persistence of sage-grouse leks (and the populations) within the Baker and Cow Valley PACs adequately analyzed. Tall transmission towers and lines will lead sage-grouse to avoid areas up to four to seven miles away from the transmission lines, and new roads and clearance of vegetation underneath the line will also fragment habitat and promote the spread of invasive weeds and non-native grasses that cause sage-grouse habitat to deteriorate and adversely affect sage-grouse feeding and nesting/hiding habitat.

3. Lack of adequate information regarding and analysis of the numbers of sage-grouse remaining in the Baker PAC, Cow Valley PAC, and overall in Oregon, and the implications of the location of the B2H transmission line within and adjacent to the Baker and Cow Valley PAC habitat. The 2011 ODFW sage-grouse Conservation Strategy addresses the number of birds, not only the amount of habitat. "Amount of habitat" alone is not a sufficient metric because the Conservation Strategy focuses on a specific goal for the <u>number of birds</u> (for example, for the Baker PAC, "maintain or enhance greater sage-grouse abundance and distribution at the 2003 spring breeding population level, approximately 2,000 birds" – 2011 ODFW conservation strategy at p. 35), yet as of 2020 there are fewer than 500 individual birds, and perhaps as few as 100 males, in the Baker PAC. Much of the habitat of the Baker PAC, for example, is unoccupied – as of 2018, ODFW counted only seven active leks (out of 34 total in the Baker PAC). As of 2018, 48.9% of the remaining males counted at leks in the Baker PAC (92 males total) attended the three leks within four miles of the transmission line route, which the B2H transmission line is likely to affect, leading to abandonment of these leks and the likely extirpation of the Baker sage-grouse population. The lack of information about the status of sage-grouse statewide also precludes meaningful analysis of the importance of the Baker and Cow Valley PACs as sage-grouse populations have crashed in Oregon over the past four years, to their lowest level since analysis began in 1981. Without knowing where the very few remaining birds are located within the Baker PAC (and Cow Valley PAC), there is no way to address whether the mitigation and avoidance measures

proposed will be sufficient to meet the goal to "maintain or enhance" the Baker PAC's population to the 2,000 birds required under the Conservation Strategy.

8. Historic Cultural Pioneers Resources

Non-Compliance with Standards Relating to Protected Areas, Scenic Resources, Recreation and Historic, Cultural and Archaeological Resources for the National Historic Oregon Trail and Sites

OAR 345-022-0040 (Protected Areas) requires the Council to find that, taking into account mitigation, the design, construction and operation of a proposed facility are not likely to result in significant adverse impacts from noise, increased traffic, water use, wastewater disposal, visual impacts of facility structures or plumes, and visual impacts from air emissions.

OAR 345-022-0080 (Scenic Resources) requires the Council to determine that the design, construction and operation of the proposed facility, taking into account mitigation, will not be likely to have a "significant adverse impact" to any significant or important scenic resources and values in the analysis area.

OAR 345-022-0100 (Recreational Opportunities) requires the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order.

All three of these regulations have similar methods of analysis and rely upon the definition of significant as defined in OAR 345-001-0010(52). "Significant" means having an important consequence, either alone or in combination with other factors, based upon the magnitude and likelihood of the impact on the affected human population or natural resources, or on the importance of the natural resource affected, considering the context of the action or impact, its intensity and the degree to which possible impacts are caused by the proposed action. Nothing in this definition is intended to require a statistical analysis of the magnitude or likelihood of a particular impact.

Council rules do not prescribe specific methodology for assessing impacts to protected areas or outline specifically what constitutes a potential significant adverse impact from a proposed facility to a protected area.

STOP is requesting a contested case hearing as the methods used to determine significant in all three standards were not independently obtained. The following numeric values and measurements were developed without peer review or public input:

- Numeric values, were applied to impacts with the total value determining significance;
- Key measurement locations or observation points were not satisfactory for useful results.

Additionally staff has made several comments that have no basis in fact:

- *Underground technology and infrastructure would themselves create visual impacts*.
  This is incorrect. The visual impacts would be outside of the field of view of the National Historic Oregon Trail Interpretive Center which is the scenic resource being protected. The transition stations would not be visible from the NHOTIC per Exhibit BB Errata Info Figure 1 Underground Route Segment near the NHOTIC
- *Undergrounding would impact other resources protected and that were not evaluated in the ASC.*
  If a full analysis, rather than a courtesy analysis were done these factors would have been incorporated into the PO.

STOP respectfully maintains that the ODOE does not have adequate knowledge of the Oregon Trail, its location, and its historical meaning as a legislated National Historic Trail. ODOE, when showing Key Observation Point simulation 5-25D, indicated it was from the picture window looking at the Oregon Trail. In fact, the simulation is of Flagstaff Gulch where there is no Oregon Trail and view is from a secondary window in the Interpretive Center. The power line simulation did show a significant visual adverse impact.

The Interpretive Center is very inadequately analyzed for significance in all three standards. Most of the elements were assigned values based upon opinion of a consultant. The effect from the Interpretive Center picture window, Panorama Point, and the Oregon Trail ruts were not shown nor discussed in the PO or with the Council.

STOP believes that the proposed design, construction, and operation of the transmission line, considering mitigation, will likely have a "significant adverse impact" to Scenic, Recreational and Protected standards at the resource: National Historic Oregon Trail Interpretive Center. These points and our comments on the DPO, 8-22-2019 starting on p. 78, which also included by reference letter a member of STOP as well as the Oregon California Trails Association (OCTA), should provide standing in the contested case to raise these issues.

9. Conclusion

The Oregon Energy Facility Siting Council is responsible for overseeing the development of large electric generating facilities, high voltage transmission lines, gas pipelines, radioactive waste disposal sites, and other projects. State-level oversight of energy facilities helps ensure that Oregon has an adequate energy supply while protecting Oregon's environment and public safety. (Oregon.gov. About the Council, undated]

Ensuring Oregon's energy supply is not an issue. Oregon is looking for markets for its growing renewable energy providers, while neighboring states have similar oversupplies. Even Idaho, slow to acknowledge the benefits of conservation and energy efficiency, now has more power available from renewable resources than its Integrated Resource Plan (IRP) filings have identified as "need" for the B2H.

The Application for Site Certificate (ASC) is to construct a 500 kV transmission line across nearly 300 miles of Oregon, spanning five eastern Oregon counties, with a 250'-500' clear cut

and over 400 miles of new or substantially modified roads; over 73% of the project will impact private lands. Will approval of this project protect Oregon's environment? Will it make us more resilient in the face of climate change? Quite the contrary. Valuable farm and forest land as well as natural habitats will be carved-up and sacrificed. Vegetation and carbon sinks will be lost to ground disturbances, clear cutting and vegetative removal, so vital for sequestration and our climate resiliency. Species will be sacrificed and the materials and process of construction poses environmental and safety hazards. Scenic and recreation areas as well as community viewsheds will be negatively affected.

Rugged terrain, difficult for small public service agencies to access, will face dangers of fire, flooding and landslides. Rather than protecting public safety, approving this project will endanger not only open land but residents of bordering communities.

During its deliberations, it is essential that the Energy Facility Siting Council balance its oversight of high voltage transmission lines with the agency's mandate to guard Oregon's environment and public safety from unnecessary and potentially dangerous intrusions.

Idaho Power's Application is characterized by numerous errors of fact and unsupported conclusions. The Proposed Order is compromised with unsupported conclusions. Essential information to support applicant's conclusions is missing**. In Attachment 5.** STOP would like to point out a few more procedural or questionable actions on the part of Idaho Power.

Attachment 1: Greater Hells Canyon Council Designation

GHCC GREATER HELLS CANYON COUNCIL

Date: August 25, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol Street NE, Salem, OR 97301
Fax: 503-373-7806
Email: OED_OAH_Referral@oregon.gov

CC: kellen.tardaewether@oregon.gov

Dear Judge Greene-Webster,

Last summer, on August 22, 2019, the Greater Hells Canyon Council (GHCC) submitted joint comments with the Stop B2H Coalition on the Boardman to Hemingway Transmission Project's Draft Proposed Order, issued by the Oregon Department of Energy. This letter is to verify that as organizational members of the Stop B2H Coalition (STOP), we would like to continue to designate STOP as representing GHCC interests in the Contested Case process which you will be presiding over.

Greater Hells Canyon Council is a member of the Stop B2H Coalition. Greater Hells Canyon Council (GHCC) is a grassroots conservation organization founded in 1967 (as Hells Canyon Preservation Council) to stop Hells Canyon and the Snake River from being dammed. Not only did we stop the dam, our advocacy led to the creation of the Hells Canyon National Recreation Area. Our work now focuses on public lands management in the entire Greater Hells Canyon Region. We cover such diverse issues as logging, grazing, recreation, mining, species protection, wildlife connectivity, and more. Our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations.

I trust that this letter will verify our request to be party to the contested case, joining with STOP.

If you have any questions, feel free to contact me.

Sincerely,

Darilyn Parry Brown
Executive Director

Greater Hells Canyon Council
PO Box 2768, La Grande, Oregon 97850
(541) 963-3950

Attachment 2. Non-Compliant Application of the Noise Standards and Statute Intended to Protect Oregonians

Idaho Power cannot comply with the State DEQ Ambient Noise Rules/Standards, the project is "unpermittable." (ASC p. X-1.)

Instead of adherence to the standards, the ODOE is recommending in the Proposed Order: to grant a full variance to all of Oregon's noise standards, and an exception increasing by 10 dBA the maximum allowable noise, which bring it to a total of 20 dBA over ambient background noise in certain conditions. This is an industrial intrusion; STOP is stunned with this recommendation and the disregard for the people of Oregon's public health, safety and welfare.

We are requesting party status to the contested case, within the noise standard of the Proposed Order, *IV.Q.1. Noise Control Regulations: OAR 340-035-0035, OAR 340-035-0010 and OAR 340-035-0100.* We addressed these issues extensively in our DPO comments of 8-22-2019, pp 18-32. Both Idaho Power and ODOE responded in Attachment 4 of the PO; therefore we believe that our comments were understood and sufficiently specific.

Our request follows three main issues: **the variance, methodology and mitigation/site conditions**. Notification of noise impacts was covered above under Noise Notification.

1. Variance.

Numerous pages of attempted justification for this variance and exception still do not bring the project into compliance. The Proposed Order is not compliant with the over-riding state statute, ORS 467, which is designed to protect the public health, safety and welfare of the citizens of Oregon from unreasonable noise pollution.

> **"467.010 Legislative findings and policy.** The Legislative Assembly finds that the increasing incidence of noise emissions in this state at unreasonable levels is as much a threat to the environmental quality of life in this state and the health, safety and welfare of the people of this state as is pollution of the air and waters of this state. To provide protection of the health, safety and welfare of Oregon citizens from the hazards and deterioration of the quality of life imposed by excessive noise emissions, it is hereby declared that the State of Oregon has an interest in the control of such pollution, and that a program of protection should be initiated. To carry out this purpose, it is desirable to centralize in the Environmental Quality Commission the authority to adopt reasonable statewide standards for noise emissions permitted within this state and to implement and enforce compliance with such standards." [1971 c.452 §1]

a. Authority and Consultation.

The authority for determining to allow a variance is by statute the sole decision of the Environmental Quality Commission [467.040] however, they may delegate certain conditions and powers to the Oregon Department of Environmental Quality (DEQ). [467.060]

The DEQ's implementing administrative rules and standards manual [OAR 340-035-0005 through -0110] are also designed to protect the public health, safety and welfare of the citizens of Oregon.

In 1991, the Oregon Legislature withdrew funding for the DEQ noise program but did not specifically delegate the authorities elsewhere. To their credit, the Oregon Department of Energy and the Energy Facilities Siting Council, in their review of site certificate applications have been applying, ORS 467 and OAR Chapter 340 Division 35 to their decision making and assuming this role.

However, there is nowhere in "Suspension of the Commission and Department Responsibilities" ORS 340-035-0110, that specifically allows an agency (e.g.: ODOE/EFSC) to change or misinterpret the statute, rules, or standards, in the application of the state's noise protections. To change or modify the rules, there needs to be a formal rulemaking process; and to change a statute, it must go to the Legislative Assembly.

The Oregon Department of Energy in their analysis and review of the ASC and Proposed Order are taking extreme liberties in interpreting the statute, the rules, and moreover redesigning the rules and methodology that is embedded in DEQ's administrative rule and standards manual on the basis of the developer's self-serving request and interests--and not the interests of the public health, safety and welfare of the citizens of Oregon per ORS 467. "The Council cannot waive any applicable state statute." (OAR 345-022-0000(b)).

The Oregon Department of Energy must apply the rules of the other agency. ORS 469.505(l) states that consultation MUST occur during the notice of intent and application process. ORS 469.505(2) states the agency SHALL consult with the responsible agency when resolving any conflicting conditions in the certificates. There are no documentations of any interagency consultations with DEQ.

The Oregon Environmental Quality Commission continues to be responsible absent legislative action to change the statute. The DEQ continues, on an on-going basis, to update their rules OAR 340-035-0035 and NPCS-1 Sound Measurement Procedures Manual [DEQ 23-2018, 24-2017, 14-2017] This, in and of itself, shows they continue to act on their responsibility regarding these rules. And yet, the ODOE has not consulted with the DEQ on this matter in this site certificate review. Rather, the ODOE utilized the advice of a private consultant and the developer's own consultant.

Unfortunately ODOE, which generally insists on their "standards-based approach" disregarded the DEQ procedures and acquiesced to a methodology for determining ambient background

noise, completely created and designed, by consultants based on the request of the developer and not in the interest of the people.

We commented extensively last summer in the DPO comment period about noise and specifically about the recommendations of noise consultant, Golder. The review of Standlee, another consultant, was newly introduced[4] into the record in the PO. Standlee's letter states clearly that they needed more information to render advice about Monitoring Positions. Then, IPC and ODOE no longer utilized their services. While it is the developer and ODOE prerogative to consult with whomever they chose, not including the DEQ is counter legislative and administrative intent.

b. "Unusual and infrequent" events as a rationale for blanket variance.

We commented extensively in the DPO about unusual and infrequent events and as Golder described there are more reasons for increased corona noise than climate and weather-related events. The ASC does not include modeling of noise effects other than weather conditions and how they will increase noise levels. There is no modeling of "burn in period" which normally occurs during the first year, impact of dirt or oil from construction and maintenance of the lines, nicks and scrapes on the conductor surfaces, sharp edges on suspension hardware, nor the effects from fog, dew and bird feces. The Oregon Department of Energy's consultant, Golder Associates, stated in their letter of December 19, 2017, Project No. 17-88390, page 3 of their report, the following: "Some of the above irregularities such as nicks and scrapes, could result in longer term noise impacts (not infrequent) and may be within IPC's ability to fix and control. Such irregularities would not qualify as infrequent." The report also states that these would not be conditions outside the developer's control. In addition, since the developer *could* control some of the noise exceedances, according to their own consultant, there should not be an exemption or variance based on the "infrequent irregularities."

Still, weather-related events should be considered and should not be disregarded as "infrequent." Even the Proposed Order in other locations includes statements that are cognizant of climate change and the increase of weather related events: "Extreme precipitation events are also expected to increase, resulting in an increased risk of flooding, runoff, soil erosion, landslides, and mass wasting events" (p. 91). Climate change will not reduce these extreme precipitation events. It will only increase them. Since the B2H is planned into perpetuity, the noise exceedances will only increase.

Given increasing climate change and weather-related events and since the developer *could* control some of the noise exceedances, according to their own consultant, there should not be an exemption or variance based on the "infrequent irregularities."

c. Volume of missing information due to monitoring irregularities.

[4] Attachment 5: Documents and Agency Consultation in Referenced Proposed Order (added after DPO), p. 535.

The sheer number of NSRs not evaluated should cause a pause in any determination of variance or exception. This will become more apparent in the next section on Methodology. In particular, the monitoring point 11 (MP 11) needs to be re-evaluated. This MP contains 63 NSRs. There are 132 total NSRs identified within a half mile. So, nearly half of the NSRs have suspect baseline measurements.

As mentioned in the previous section under Noise Notification, only NSRs within a ½ mi from the line corridor (with the exception of 6 NSRs that are 1 mi from the line) were monitored; and only 17 were actually monitored per the rules. In the DPO, 36 noise receptor exceedances were predicted and the ODOE recommended an exception. In the PO there are now 41 noise exceedances predicated and STOP believes there are still more, especially given the problems with the MPs, described below.

Rather than contend with the volume of these noise exceedances, and making determinations about which ones could be granted an exception, ODOE is recommending a complete variance as well as an exception to raise the maximum exceedance level 10 dBA higher! In other words, the developer cannot comply! So ODOE's solution is to grant a blanket variance. This is clearly not in compliance with statutes and the public interest, nor does it protect the public health, safety and welfare of the people of eastern Oregon. There is no basis for this; no health studies or other factual justification. It is certainly not in compliance with the statute which allows exemptions and variances "to protect the public health and safety…"

We request to contest this analysis regarding the developer's request for a variance or exception to the noise standard; the determination cannot be made until all the required noise information has been provided.

2. Methodology.

We request to contest a number of issues in the methodology of establishing the ambient noise baseline from which the noise assessment is based.

a. **The DEQ Procedures Manual and methodology for establishing baseline, per OAR 340-035-0035(3)(b) is in effect but not used.**

The reason given was that it was outdated. Given the strict, "standards-based rules" of the entire ASC review and process, there is not a legitimate reason to carve away or disregard the noise rules and procedures other than the developer's own interests. This rule establishes the location and procedure for completing sound measurements as listed in the Sound Measurement Procedures Manual 1. It also includes "line noise source" using a linear highway as an example. (p. 33)

In an earlier Project Order (possibly, March 2012[5]) the alternative method of using 26 dBA, similar to wind farms was suggested for establishing baseline in lieu of actual site specific monitoring. This seemed reasonable given that ambient background noise is what it is, regardless of the *future* noise source. However, absent a formal EFSC approval, the current rules and procedures must be followed.

b. Site-specific monitoring was not being conducted per the manual's procedures.

There have been only 17 site-specific monitoring sites of the 132 NSRs within a ½ mile of the transmission corridor[6]. This does not comply with the rules or procedures for "site specific monitoring," and certainly not enough to base any variance or exemption determinations. The cost of all site-specific monitoring must not become the burden of the NSR property owner.

c. Significant problems with MP 11, 13 and 15[7].

In the event that a "representative" type of baseline methodology was authorized as an exception to the rules, there are still problems with averaging data, equipment malfunctions, and erroneous assignments of locations which are completely unrepresentative of the NSRs they are intended to represent. See STOP's public comments, pp. 20-24. The ODOE concurs with the problems with MP11. Monitoring Point 11 is intended to represent 63 NSRs—which are nearly half of all the 132 MPs!

MP 11 is completely out of compliance. The consultant Standlee never confirmed the use of this MP as representative of the two routes in Union County. Standlee's 2012 advice (during the EIS days-2012) was attempted to be verified in 2016 (presumably with the changed routes in Union Co). However Standlee "needed more information."

> *"I cannot agree at this time that the ambient noise levels at residences along the new segments of B2H are found at the monitoring locations proposed in the memorandum. To reach that conclusion I need to see more information concerning how the 2012 monitoring locations proposed in the March 15 memorandum would have noise levels like those that would be found at the new residences. Simply saying that the original monitoring locations are within the proximity of the new locations is not enough explanation for me." –Standlee, 2016 memo.*

This is the last documentation of Standlee, which has been verified by ODOE. Golder, the other consultant did not advise on the MP location only the times of day for conducting monitoring readings.

[5] The prior Project Orders have been removed from the website.
[6] According to the ASC, Exhibit X and Attachment X-4 there were 22; this was revised in the PO to 17.
[7] *PO: Section IV.Q.1., Noise Control Regulation; Methods and Assumptions for Corona Noise Analysis for added subsections titled Sound Measurement Points (ASC Exhibit X, Attachments X-1 – X-3) and Table NC-3*

d. Morgan Lake Park is a Recreation area <u>and</u> Campground. Contrary to the erroneous information from the City of La Grande, Morgan Lake Park has a 12-site primitive campground. The removal of NSR designations from this location is not appropriate under the DEQ rules because it is a "noise sensitive property.[8]" Furthermore, Morgan Lake Park itself is a Recreation area (and arguably a scenic area) and therefore it is noncompliant with noise standards in recreation areas as well.

e. **NHOTIC is a Protected Area, Scenic and Recreation area and people do more than "drive bye."** The fact that viewpoints are not normally used for sleeping and therefore not evaluated as NSRs under the Recreation and Protected Areas standards, is once again, the strictest of application of ODOE/EFSC standards-based approach and defies logic of what the NHOTIC protected area is all about. (pp121-122 Attachment 4).

f. Allowing for an additional increase of 10 dBA of industrial noise pollution, rather than forcing compliance with the noise standard, is NOT a "standards-based approach." It is a change of the goal-post. For ODOE/EFSC to change this standard, rule making will need to occur. In the DPO, ODOE believed that they *may need* to exempt 36 NSRs for noise exceedances; and now in the PO there are 41. However rather than pursuing these exemptions, they chose to simply raise the standard 10 dBA higher!

g. Confusion with "Monitoring" for baseline noise and "Modeling" for predicted noise (exceedances.) To be conservatively estimated, which seems to be the intent of the assessment, the monitoring methods should be a lowest estimates and the modeling at the higher. This is the reasoning behind Golder. There appears to be confusion with STOP's DPO comments regarding monitoring vs modeling. (p. 130 Attachment 4).

3. Site Conditions--Mitigation.

The draft Site Conditions in the PO (attachment 1) are not mitigations at all. Rather, a loose attempt at managing violations.

a. During pre-construction the developer merely has to provide lists with dates and contacts to the Department. (PRE-NC-01) Owners of NSRs will be extremely prejudiced if there is not a condition for actual baseline monitoring conducted prior to construction because once the line is built, you'll never get an accurate measurement after the fact.

Similar to the "Design Feature 32" p. 8 of the Draft Framework Blasting Plan (PO Attachment 5-G) regarding pre-testing of domestic wells and springs, there should be a "pre-testing" of all NSRs (essentially, site-specific monitoring) prior to any construction.

[8] OAR 340-035-0015(38)

b. The burden of proof lies with the landowner; and NSR owners wanting an independent evaluation, they must to pay for it themselves. This is completely unfair. All NSRs should have site specific monitoring conducted to determine baseline.

c. OPR-NC-01 "Noise Control Condition 2" the complaint response plan and process is not specific or complete. There are no remedies, fines or process to follow; and again the burden of proof is on the homeowner/landowner.

d. There should be **site-conditions during construction**—even though construction is exempt from noise standards. Considering the routes in Union County are close to the hospital, safety measures are warranted.

e. People have a right to a hearing and judicial redress: There appears to be a conflict with ORS 467.020 which states "…no person may emit, cause emission of, or permit emission of noise in excess of levels" established by DEQ and the fact that the Council used OAR 340-035-0100, to make the determination allowing the B2H to exceed the noise standard. The use of the DEQ variance rule incorporates the opportunity to have a public hearing and would result in the public opportunity to object through the civil courts as opposed to the Oregon Supreme Court.

In conclusion, there is just not sufficient documentation proving how the variance protects the public health, safety and welfare of the public or persons affected. The B2H development does not meet the requirements to be granted a complete variance to the state noise standard due to the fact that a variance must be "necessary to protect the public health and welfare." Not only is the allowance of a variance not justified to protect the public health and welfare, but in fact, it creates public health and welfare damages by exceeding the safety standards.

Attachment 3. Morgan Lake Park: an Unprotected Scenic Recreation Area

Incorporated by reference and with permission, Lois Barry, Stop B2H Board Member.

August 27, 2020

To: Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED_OAH_Referral@oregon.gov
cc: kellen.tardaewether@oregon.gov

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

My name is Lois Barry. I reside at 60688 Morgan Lake Road, La Grande, Oregon 97850 (mailing address: PO Box 566 La Grande, OR 97850)

I am not represented by an attorney but reserve the right to one should I be accepted into the case as a full party.

I am requesting to file as a party.

My interest in the contested case is in achieving a complete and accurate objective assessment of the impact of the proposed B2H transmission line on Morgan Lake Park.

As a close neighbor to the park, I represent my own interests and the public interest of visitors to the park who share my goal of retaining the park's natural setting.

Other parties to this petition are likely to add important comments on this section of the Proposed Order, but I believe I am exceptionally qualified by my experience and professional training to analyze the Department's assessment of the park's scenic and recreational values. I have lived a mile below Morgan Lake Park for more than 50 years; I am a retired Professor of English and Writing. During the early years I often visited the park, and since retiring in 1987 I have walked 2 miles around the lake almost daily spring through fall, and snow levels permitting, often ski around or on the lake in winter.

In 1973, our home was destroyed in the Rooster Peak forest fire that threatened Morgan Lake Park. Howard Fisk, one of the authors of the Morgan Lake Recreation and Development Plan, told me that in efforts to save the park, a backfire was set to burn through our 150 forested acre property on the hillside below the lake. That was a good decision; the park was saved; we built another house, planted 2,000 trees, and still enjoy Morgan Lake Park, a unique recreational opportunity which is truly irreplaceable.

I have read thousands of pages of B2H documents, written comments on the ASC, testified at the EFSC meeting in La Grande on June 19, 2020, and commented in writing on the DPO in various letters dated 5-22 August 2019, all in defense of Morgan Lake Park, a natural park area acknowledged as *irreplaceable* by applicant and as *an important opportunity primarily because of its unique designation status as a city park, rareness, and special qualities.*[9] I am especially aware of language and its misuse to obscure truth and to evade responsibility. As I remarked in my numerous comments on the DPO, Idaho Power's Application is definitely substandard, characterized by numerous errors of fact and unsupported conclusions.

ISSUE 1: In the ASC, DPO and Proposed Order, visual assessments have been based on an outdated 1974 USFS Handbook. I am requesting a contested case based on applicant's use of an outdated USFS Reference as a basis for visual analysis methodology. This material error invalidates Applicant's conclusions on visual impacts on Morgan Lake Park and other Protected Areas, Scenic Resources and Important Recreational Opportunities.

The reference cited in applicant's ASC 2018 and DPO 2020 is *National Forest Landscape Management, Volume 2, Chapter 1, The Visual Management System* (VMS) 1974; <u>it was superceded</u> by *Landscape Aesthetic, Scenic Management System* (SMS) in 1995. [10]

Since applicant uses the USFS criteria for visual assessment, <u>valid</u> USFS criteria must be used. USFS assessments are now in two parts: visual assessment and constituent assessment. DOE and EFSC should require applicant to reassess all the areas in question using criteria provided in the SMS.

The visual impact assessment in Exhibit R, and IPC's conclusions whether the project will result in a significant visual impact <u>is based entirely on impact assessment methodologies used by the BLM and USFS</u>. [11] The 1995 publication (SMS) focuses on the importance of viewer's experience, perceptions, and feelings about the scenery in places they value. These issues are not addressed in the 1974 Handbook (VMS), and they were not assessed in Idaho Power's Application for Site Certificate or in the Department's Proposed Order.

How will the significance of impacts from a facility's construction to a natural park and the area surrounding it be determined? In my comments on the DPO, I questioned the basis for applicant's conclusions, based on what I assumed to be common sense, reasonable expectations. I wrote: *Admittedly "viewer perception" and "enjoyment" are subjective. … Of course it is possible to fish and picnic and camp within sight of mega-towers supporting crackling, popping transmission lines, but to say that the impact of those towers on the experience will be "less than significant" is corporate self-serving and disingenuous. Unless these conclusions are supported by valid research showing that recreationists make no distinction between rural campsites in natural settings and noisy developed camp grounds, they are invalid.*

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[9] OAR 345-021-0010(1)(t)(A).

[10] *Conceptually, the SMS differs from the VMS in that: it increases the role of constituents throughout the inventory and planning process; and it borrows from and is integrated with the basic concepts and terminology of Ecosystem Management. The Scenery Management System provides for improved integration of aesthetics with other biological, physical, and social/cultural resources in the planning process.)*

[11] APPLICATION FOR SITE CERTIFICATE R-1 -1

I also wrote: *Applicant's conclusion that the B2H project will not preclude visitors from enjoying the day use and overnight facilities offered at the Morgan Lake Park (ASC T-4-56) is not supported with credible data.*

Applicant responded: *Commenter's assertion* <u>*lacks specificity*</u> *as to why Idaho Power's conclusion is not "supported with credible data," and Idaho Power respectfully disagrees.*

In the section on Morgan Lake submitted by STOP B2H I wrote: … *conclusions are unsupported with relevant credible data and fail to consider Oregonians' subjective "opinion/evaluation" of their scenic and recreational resource. Current tourism promotion of local scenic and recreational assets, as well as data from Chamber of Commerce records or campground host daily logs could give a more accurate measure of the resources.*

Applicant responded: *Idaho Power and its expert visual resources consultant developed the methodology for evaluating the potential impacts of the project to scenic resources, which is presented in ASC Exhibit R, Attachment R-1 – Scenic Resources Impact Assessment Methodology ("Scenic Resources Methodology").*

DOE added: *Comment does not identify specific issue with the applicant's methodology. No edits to the proposed order made. The Council's rules do not require, or provide, a specific methodology for evaluating visual impacts to Scenic resources, Protected Areas, or Recreational resources.* <u>*The applicant proposes a specific methodology based on prescribed methods used by the BLM and the US Forest Service for assessing visual impacts,*</u>

In the process of researching my response to the Proposed Order, I Googled "USFS Scenic Resources." The first document that appeared was "Landscape Aesthetics, Scenic Management System" (SMS) by Jack Ward Thomas. It definitely seemed to support my contention that applicant had not provided credible data for conclusions on visual impacts.

As I continued my research I checked a Proposed Order footnote reference to the "Department's Review of the Handbook." (pp. 406-407) [12] The Handbook cited was The National Forest Landscape Management Volume 2, April 1974. I then checked back to "Landscape Aesthetics." United States Department of Agriculture, Forest Service Agriculture Handbook Number 701. Landscape Aesthetics: A Handbook for Scenery Management, Jack Ward Thomas, December 1995. <u>*This handbook supercedes AH-462, National Forest Landscape Management*</u>*, Volume 2, Chapter 1, The Visual Management System (49 pages) Issued April 1974.*

In my previous comments I did not cite *Landscape Aesthetics: A Handbook for Scenery Management* because I was unaware of the reference until last week. I did, however, make specific references to the kinds of constituent data the SMS requires. Applicant and DOE did not include the SMS in their references or citations.

With respect to Morgan Lake Park, I will quote at some length from the SMS:

[12] (fn 424) B2HAPPDoc3-35 ASC 18_Exhibit R_Scenic Resources_ASC 2018-09-28, Section 3.2.2 and the National Forest Landscape Management Volume 2, April 1974; https://www.nrc.gov/docs/ML1224/ML12241A372.pdfAccessed 06-26-2020

Landscape Visibility is composed of two parts: human values as they relate to the relative importance to the public of various scenes and the relative sensitivity of scenes based on distance from an observer. Human values that affect perceptions of landscapes are derived from constituent analysis. This information may be derived from many sources including, but not limited to: independent research; other facets of ecosystem assessments; local, regional, and national studies. (SMS p.7)

The most difficult situation is where proposed deviations are in direct opposition to the dominance elements of valued landscape character being viewed. Examples include a horizontal road (line) in an otherwise vertical landscape above tree line or... a metal lattice work utility tower in the middle of a highly valued historic village.[or bordering a park valued for its natural forest and lake area.] *The first approach should be to relocate such deviations so they are not evident or can be subdued to be visually subordinate. …The evaluations of deviations in the Very High Scenic Integrity Level is based on a viewer wandering through any part of the area*. (SMS p. 60)

The Council is well aware of Union County residents' multiple comments about the Park's personal meaning to them, the emotional impact of losing an opportunity to hike and camp in a beautiful natural area close to their homes. According to the SMS, this information should be included in assessment of potential impacts on important recreation opportunities, protected areas and scenic resources. The Proposed Order contains no such data in its assessments.

Morgan Lake Park is important to the people who live near it, to the community of La Grande and to Union County residents. During this challenging summer of 2020, more citizens than ever before have been driving up the narrow, steep Morgan Lake Road in order to visit the park, seeking respite in its beautiful natural surroundings.

Research findings support the logic that scenic quality and naturalness of the landscape directly enhance human well-being, both physically and psychologically, and contribute to other important human benefits. Specifically, these benefits include people's improved physiological well-being as an important by-product of viewing interesting and pleasant natural appearing landscapes with high scenic diversity. (SMS, p.20)

Last year, when the Parks Department considered closing the park to overnight camping, almost a hundred concerned citizens crowded the Park Department's office, narrating heartfelt stories of their families' experiences dating back three generations, how they were introduced to camping in the wild "up on the mountain." They had taken their children and then their grandchildren to the Park where they learned to fish, took nature hikes, felt like they were "in the wild, but so safe and close to town." Because local residents would not tolerate losing that traditional family experience, overnight camping was continued, but reduced from seven to three nights to accommodate additional demand by campers.

Trips to Morgan Lake are embedded in the culture of La Grande. Altering the serenity of the Morgan Lake Park, three miles from downtown, a mountain top setting in harmony with the

natural world, will change the experience of hiking, birding, fishing and camping at Morgan Lake forever.

Landscapes that contain both diversity and harmony have the greatest potential for high scenic value. … Desires of constituents must be considered. … They have expectations, desires, preferences, behaviors, acceptable levels of quality, and values of landscape character and scenic integrity. (SMS p.32) Note: The SMS uses the word *natural* 63 times.

The Landscape Character description is used as a reference for the Scenic Integrity of all lands. Scenic Integrity indicates the degree of intactness and wholeness of the Landscape Character; conversely, Scenic Integrity is a measure of the degree of visible disruption of the Landscape Character. A landscape with very minimal visual disruption is considered to have high Scenic Integrity. Those landscapes having increasingly discordant relationships among scenic attributes are viewed as having diminished Scenic Integrity. (SMS p. 13)

ISSUE 2. The Department's legalistic language restrictions, requiring exact terminology within the most limited parameters, defies accepted language usage.

For example, the relevant planning document, the Morgan Lake Recreational Use and Development Plan, identifies a park objective as a "quality outdoor recreational experience harmonious with a natural forest and lake area" and a park goal to "preserve the maximum of natural setting." Idaho Power conservatively interpreted this to mean that scenery is therefore considered a valued attribute of this recreation opportunity, but arguably [by applicant] the resource is managed for recreation activities such as fishing, camping, picnicking, and boating and not for scenic views or vistas.
Valued is an accepted synonym for important; however, failure to use the term important is cited as a determining factor in deciding that Morgan Lake Park does not qualify as a Scenic Resource.

The DOE, however, often is less precise in its own use of language:

. . . the second amended project order issued by the Department explains that local land use plans include state and city planning documents or inventories for scenic resources. (p. 396 of 699)

Morgan Lake Park is an important opportunity primarily because of its unique designation status as a city park, rareness, and special qualities per OAR 345-021-0010(1)(t)(A).

Idaho Power claims:

Morgan Lake Park is not analyzed under the Scenic Resources Standard because it is not identified as an important or significant scenic resource or value in a local, tribal, or federal land use plan.

DOE then states: *Applicant response accurate. The evaluation for the Scenic resources standard looks at land use planning documents and management plans for local (County)* [sic] *tribal, or*

federal land use plan to determine whether scenic resources were identified as significant or important within the analysis area.

This shift from defining local as *county*, rather than *city* is inappropriate; it allows applicant to reject comments on the validity of defining Morgan Lake Park as a scenic resource.

Applicant further claims that Morgan Lake Park is not a "scenic resource" because the land use plan does not specify management for scenic values.

… significance was determined based on if the valued scenic attributes of the protected area could persist, or not, based on the proposed facility's potential impact." (273)

What are the synonyms for scenic? "Scenery Assessment: Scenic Beauty at the Ecoregion Scale," a 40 page government report, uses the term "natural landscape" 6 times and "scenic resource" 5 times. The article lists 70 references; only one of which uses "scenic resource" in its title. [13] Morgan Lake Park is managed to retain "quality outdoor recreational experience harmonious with a natural forest and lake area" and a park goal to "preserve the maximum of natural setting." (Morgan Lake Recreation and Development Plan)

Obviously a natural forest and lake area in an undeveloped setting on the top of hill is scenic. The Council admits this in its assessment:

Council has changed analysis of low resource change to high resource change because the landscape character and scenic attractiveness of the park will be reduced … vegetation will provide no or limited screening … visual contrasts will be strong, proposed facility will be dominant …,

ISSUE 3. DOE is unresponsive to comments:

Scenic impacts on an area within 10 miles of a proposed project, and recreational opportunities within a 2 mile area of proposed facility are to be evaluated.

As one crests the hill of the Morgan Lake Road, 2 miles from La Grande, suddenly there is a breathtaking, wide open landscape like those often seen in western films. Cloud formations fill the sky. They are the only impediment to a 360 degree view of the forested hills at least 20 miles to the west, Mount Emily to the north, rolling pasture land to the south, and to the east, a view across the entire Grande Ronde Valley, as far the Blue Mountains and Eagle Cap. This is a stunning viewscape, unmarred by buildings or power lines.

…the deglared steel is darker, less reflective, and better able to recede into the landscape when seen against a terrain backdrop. (401)

[13] Steven J. Galliano and Gary M. Loeffler, Interior Colombia Basin Ecosystem Management Project: Scientific Assessment, Thomas Quigley, editor, U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station, Portland, Oregon General Technology Report PNW-GTR-472, February 2000.)

The Morgan Lake alternative would be located 0.2 mile southwest of the park, Little Morgan Lake at its closest point. At .3 miles from the park boundary, a concrete block communication center, a pulling and tension site, and two 130' transmission towers -- not even partially shielded by vegetation, stark industrial silhouettes against the western sky -- would dominate the entrance to the park.

I commented on these structures' impact on the natural surroundings on the park because: "A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users..."

DOE responded: *the applicant is not proposing any facility components within the Park boundaries.* (529/699) This response is unacceptable; it is evasive and irrelevant.

ISSUE 4. Applicant's assessment of Morgan Lake Park focuses on a small portion of the Park, ignoring the valued wild and undeveloped areas that will be most severely impacted by the facility.

In response to Comments on the DPO, the applicant provided additional maps and visual simulations for the proposed Morgan Lake alternative route. The simulations illustrate the visual impacts of towers potentially visible from the main parking lot area at the lake where the boat dock and restroom facilities are located and assume an average height of 80-feet for existing trees.[14] *The applicant chose this location because it represents a high-traffic area where most users of the park will interact with the park's recreation opportunities.* (526)

This choice ignores the visitors who do not use the park's "day use and overnight facilities," but who value and recreate in the more than 160 acres of undeveloped park land and lake. This choice also is not supported by the requisite analysis of Constituent experience. It fails to recognize the significance of the facility's permanent intrusion on visitors' experience in the valued undeveloped and natural surroundings of the park.

The Morgan Lake Alternative will pass within .2 miles of Twin Lake, aka Little Morgan Lake. *The Park "shall be managed and improved in a manner consistent with the objective of providing a quality outdoor recreational experience harmonious with a natural forest and lake area.* (Morgan Lake Recreational Use and Development Plan)

The Little Morgan Lake area of the Morgan Lake Park should be left as a natural habitat for birds and animals with little change or interference from man's activities. (Morgan Lake Recreation and Development Plan)

Morgan Lake Park planners intended to assure isolation and solitude in the Park to those who choose to avoid the main parking lot, boat dock and camp sites and hike west downhill to Little Morgan Lake, a completely undeveloped wildlife area, to watch hundreds of ducks, including buffleheads, mergansers, grebes and loons, navigating a carpet of yellow water lilies; to look for osprey, cormorants and great blue herons; to listen to song birds and to relax in the isolation of this natural area.

[14] The trees are a maximum height of 80', not an average height of 80'.

Additionally, there are two trails, each almost a mile long, on the east side of Morgan Lake, one along the shore and one through the forest. I've hiked those trails hundreds of times, reveling in the quiet, admiring the delicate silhouette of pine trees to the west across the lake. White tail deer often observes hikers from the eastern hill, bear and cougar are occasionally sighted.

Following this incomplete assessment, the Council concluded there will be "no significant impact on recreation," even though the Morgan Lake Park plan specifically defines recreation as "fishing, bird watching, nature study and boating"– all activities enhanced by the Park's "rare, irreplaceable" unspoiled natural setting.

ISSUE 5. The Department's conclusions about effective mitigation would not be validated by the SMS.

Several comments on the record of the DPO expressed concerns about visual impacts from the proposed Morgan Lake alternative on users of Morgan Lake Park. In totality, the Department maintains that this indicates the magnitude and likelihood of an impact on the affected human population. (524)

Based on the analysis presented here, the Department recommends that the Council find that the proposed Morgan Lake alternative facility <u>with recommended mitigation would not cause a significant adverse impact to the recreational opportunities</u> at Morgan Lake Park. (pp. 531-531)

Following two pages of <u>visual assessment</u>, the Department found no adverse impacts on <u>recreation</u>. One may optimistically assume that such confusing and inappropriate conclusions are unlikely to result from assessments following the SMS.

Summary and Conclusion:
The Proposed Project will result in long-term visual impacts to Morgan Lake Park. Impacts will be medium intensity as measured by visual contrast and scale dominance, resource change, and viewer perception. <u>Visual impacts will not preclude visitors from enjoying the day use and overnight facilities</u> offered at the Morgan Lake Park. Therefore, visual impacts to Morgan Lake Park will be less than significant. (p. T-4-56)

Applicant concluded that an impact would be "less than significant" if the valued scenic attributes of the resource could persist. For Morgan Lake, the <u>valued scenic attributes of the resource</u> could not persist. Preservation allows for ecological changes only. Management activities, except for very low visual impact recreation facilities, are prohibited.

The Park's remote natural areas will in no way benefit from the "facilities" applicant has inappropriately agreed to purchase for the park as a trade-off for protecting the city's viewshed. Appropriate mitigation is impossible.

Visitors' negative reaction to 180' transmission towers bordering the park and dominating the skyline is not mitigated by making the towers shorter. The experience of camping, hiking,

fishing and nature study in a park surrounded by 130' towers is not the experience of a park preserved for its natural setting.

If my father-in-law installs his ugly12' metal sculptures beside my 4' azalea hedge, writing me a check to remodel the bathroom will not improve my feelings about the view from my window. If I am forced to attach an 18 pound weight to my ankle, decreasing the weight to 13 pounds will not make me comfortable. I will be miserable in either case. The only way to assure my comfort is to remove the sculpture and the weights altogether.

It is incumbent on the Council to require a complete reassessment of the conclusions presented in Idaho Power's application. Until that process is completed satisfactorily, Applicant's Site Certificate should be denied.

Attachment 4. Non-Complaint Soil Protections

Letter incorporated by reference and with permission: Dr. Suzanne Fouty, member of Stop B2H Coalition.

August 27, 2020

Alison Greene-Webster, Senior Administrative Law Judge
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also send copies to: kellen.tardaewether@oregon.gov and info@Stopb2h.org

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

My name is Suzanne Fouty and I reside at 2518 Valley Avenue, Baker City, OR 97814. I am not represented by an attorney and am requesting to file as a "party". I am a retired Forest Service hydrologist/soils specialist with a Ph.D. from the University of Oregon. My research, work, public presentations, and professional interests have focused on impacts to water and soil resources of various land use activities, climate change and its effects on water and soil resources, and climate change and its effect on human and wild communities. I have attached my resume (Appendix A) to present my qualifications for filing as a "party" rather than having my comments represented by others.

As presented in my August 20, 2019 letter to the Energy Facilities Siting Council (EFSC) my concerns are related to the public interest in the following ways:

1. The long-term negative impact of the project on soil productivity by removing vegetation and compacting the soil,

2. The long-term negative impact of the project on soils by removing sequestered carbon and preventing future carbon sequestration and the impacts of those changes on soil productivity and climate change,

3. The long-term negative impact of the project on soils and climate change by placing transmission lines through vegetative landscapes that experiencing the effects of increased frequency of drought due to climate change (Appendix B). The negative impact, in addition to those mentioned in 1 and 2, is the result of increased risk of wildfires started or exacerbated by the project's transmission lines and thus extensive impacts to soils.

I have reviewed a number of Idaho Power (IP) comments related to soils and carbon sequestration and strongly disagree with their conclusions. These points of disagreement

concern IP's repeated statements that there are no EFSC standards that require IP to analyze or address carbon sequestration, carbon storage or carbon loss in the EFSC process. These statements are incorrect. EFSC 345-022-0000 (General Standard of Review) and EFSC 345-022-0022 (Soil Protection) make it clear that these aspects of soils must be considered. I have listed several IP comments that I will address (Table 1).

Table 1. IP Responses that are addressed in this letter.

Comment ID: Stop B2H-Geology, Soils, Carbon	
Comment	IP response
C. IP did not address or quantify the amount of existing and potential future carbon sequestered above and below ground lost as a result of this project (p. 187)	Similar to the immediately preceding response, neither the 2018 Biennial Report nor any EFSC standard requires EFSC or Idaho Power to analyze or address carbon sequestration, carbon storage, or carbon loss in the EFSC process
D. Restoring soil productivity (p.189)	Any potential carbon sequestration impacts associated with a change in soil productivity are not relevant to the Council's consideration of the general standards for siting facilities contained in OAR Chapter 345, Division 22, including the land use and soil protection standards.
	Notably, the commenter appears to acknowledge that Idaho Power's proposed erosion and sediment control measures in fact meet local, county, state, and federal guidelines. While the commenter may desire something different, it is the local, county, state, and federal guidelines that represent the standards that the project must meet, and because those standards are met, the Council should find that those measures are sufficient. (NOTE—I said may, not having read all – I did not say they did)
E. Carbon sequestration as a land use (p. 189)	None of the EFSC standards or applicable substantive criteria require EFSC or Idaho Power to analyze or address carbon sequestration, and the commenter has not identified any specific applicable substantive criteria providing otherwise

For ease of discussion, I have included relevant sections of 345-022-0000 and address them as they apply to soils and carbon sequestration.

Energy Facility Siting Council - Chapter 345
Division 22
GENERAL STANDARDS FOR SITING FACILITIES
345-022-0000
General Standard of Review
(1) To issue a site certificate for a proposed facility or to amend a site certificate, **the Council shall determine that the preponderance of evidence on the record supports the following conclusions**:

(1)(a) The **facility complies with the requirements of the Oregon Energy Facility Siting statutes**, ORS 469.300 to 469.570 and 469.590 to 469.619, and the standards adopted by the Council pursuant to 469.501 or the overall public benefits of the facility outweigh any adverse effects on a resource or interest protected by the applicable standards the facility does not meet as described in section (2);

(2) The Council may issue or amend a site certificate for a facility that does not meet one or more of the applicable standards adopted under ORS 469.501 if the Council determines that the overall public benefits of the facility outweigh any adverse effects on a resource or interest protected by the applicable standards the facility does not meet. The Council shall make this balancing determination only when the applicant has shown that the proposed facility cannot meet applicable Council standards or has shown, to the satisfaction of the Council, that there is no reasonable way to meet the applicable Council standards through mitigation or avoidance of any adverse effects on a protected resource or interest. **The applicant has the burden to show that the overall public benefits outweigh any adverse effects on a resource** or interest, **and the burden increases proportionately with the degree of adverse effects on a resource** or interest. The **Council shall weigh overall public benefits and any adverse effects on a resource** or interest as follows:

(2)(a) The Council shall evaluate any adverse effects on a resource or interest by considering factors including, but not limited to, the following:

FOUTY: Key phrase in this section is "shall evaluate **any adverse effects** on a resource…. by considering factors **including, but not limited**". This phrase makes clear that the EFSC standards are not static but expected to evolve over time with greater understanding of how various resources can be impacted by a project. Therefore, the impact of the project on carbon sequestration in the soil via direct or indirect effects must be considered because the impacts are long-term and highly adverse on current and future soil productivity.

(2)(a)(A) The uniqueness and significance of the resource or interest that would be affected;

FOUTY: Soils meet this criteria. They are a unique and significant resource in that they have the ability to capture and store large volumes of carbon, vital as a climate change response strategy, and essential for the creation of food and quality habitat. In turn, increased carbon in the soil improves its productivity and its water holding capacity. Greater organic carbon and water holding capacity are critical elements in maintaining soil productivity. The improved water holding capability is especially important given that eastern Oregon is prone to drought (see Appendix B). As noted in the preface of van Breemen and Buurman's (2002) book titled *Soil Formation*[15], soils serve as a substrate for plant growth, play a dominant role in the biogeochemical cycling of water, carbon, nitrogen and other elements. In the process soils influence the chemical composition and turnover rate of these chemicals in the atmosphere and hydrosphere. This critical resource also takes decades to millennia to form and past and current land uses are destroying soils more rapidly than they can form. Thus, soil should be considered largely a non-renewable resource and steps taken to maintain and enhance its quality.

[15] Van Breemen and P. Buurman (2002). Soil Formation. Kluwer Academic Publishers.

(2)(a)(C) Proposed measures to reduce any adverse effects on a resource or interest by avoidance of impacts;

FOUTY: The transmission line project results directly in extensive soil compaction, a loss of carbon stored above and below ground, and increases the risk of wildfires as the line moves through forested and dry landscapes by being an ignition source. High intensity wildfires can have adverse effects on soil by removing vegetation and exposing it to the erosive power of wind and water, and by cooking the soil if it is hot enough and sterilizing it. Several fires in Baker County lead to large soil erosion events (debris flows, gully development) as a result of post-fire storms interacting with newly exposed soils. These fires include the Monument Fire 1989, Dooley Mountain Fire 1989, Cornet Windy fire 2015 and the Rail Fire 2016.

(2)(a)(D) The magnitude of any anticipated adverse effects on a resource or interest, taking into account any proposed mitigation.

FOUTY: The magnitude of any anticipated adverse effects on soil resources is expected to increase as drought increases the importance of stored carbon as a means of increasing the water holding capacity of the soil. Drought will also increase the dryness of the vegetation in the landscape that the transmission lines will pass through thereby increasing the potential for a wildfire to be started or exacerbated by the transmission lines which will in turn expose the soils. No mitigations have been identified that can address these concerns and it is possible that none exist. During my time with the Forest Service, I have seen how quickly wildfires can increase in size and outpace available resources. As Appendix B-1, Table B-1 shows, the suppression costs alone are in the 10 to 100s of millions of dollars. This does not include personal property losses, losses to fish and wildlife habitat, or restoration costs.

(2)(b) The Council shall evaluate overall public benefits by considering factors including, but not limited to, the following:

(2)(b)(A) The overall environmental effects of the facility, considering both beneficial and adverse environmental effects;

FOUTY: Again, key to (2)(b) (A) is the phrase "including, but not limited to," which allows 345-022-0000 to stay current to changing knowledge and environmental conditions. As has been noted, soils represent a unique and significant resource. The proposed transmission line will an adverse effect because of the important feedback loops between soils as a carbon sink and climate change. Therefore, the two cannot be separated as Idaho Power maintains. The interplay between soils and climate is captured in the abstract from Rosenzweig and Hillel (2000)[16] titled: Soils and Global Climate Change: Challenges and Opportunities.

> *"In the interplay of the soil and the atmosphere, the soil can be both a contributor to and a recipient of the impacts of climate change. In the past, land management has*

[16] Rosenzweig, C. and D. Hillel (2000). Soils And Global Climate Change: Challenges and Opportunities. Soil Science: January 2000 - Volume 165 - Issue 1 - p 47-56

generally resulted in considerable depletion of soil organic matter and the release into the atmosphere of such radiatively active gases as carbon dioxide, methane, and nitrous oxide. Global climate change, to the extent that it occurs, will strongly impact all soil processes. At this time, the task of soil management should be to restore soil organic carbon in order to enhance soil structure and fertility and to help counter the atmospheric greenhouse effect. Widely varying estimates of the soil's organic carbon content and of the potential for soil carbon sequestration point to the need to conduct a comprehensive inventory of this important property."

Next I examine ESFC standard 345-022-0022 as to how it applies to IP's responses related to soils and carbon sequestration. For ease of discussion, I have again included the standard below.

Division 22
GENERAL STANDARDS FOR SITING FACILITIES
345-022-0022
Soil Protection
To issue a site certificate, the Council must find that the design, construction and operation of the facility, taking into account mitigation, **are not likely to result in a significant adverse impact to soils including, but not limited to**, erosion and chemical factors such as salt deposition from cooling towers, land application of liquid effluent, and chemical spills. [emphasis added)

Statutory/Other Authority: ORS 469.470 & 469.501
Statutes/Other Implemented: ORS 469.501
History:
EFSC 1-2007, f. & cert. ef. 5-15-07
EFSC 1-2003, f. & cert. ef. 9-3-03
EFSC 1-2002, f. & cert. ef. 4-3-02
EFSC 2-1999, f. & cert. ef. 4-14-99
EFSC 5-1994, f. & cert. ef. 11-30-94

Examination of EFSC 345-022-0022 finds the same phrase as found in 345-022-0000: "are not likely to result in a significant adverse impact to soils **including, but not limited to**, erosion and chemical factors….[emphasis added]. Therefore, there are three key points that Idaho Power has not addressed with respect to EFSC 345-022-0022:

1) The phrase "not likely to result in a significant adverse impact to soils including, **but not limited to**," makes clear that the standard is intended to be flexible to the evolving understanding of soil productivity and interconnections between soils and other natural resources. Therefore, Idaho Power must evaluate soil compaction, loss of soil structure and infiltration and loss of stored carbon, all of which influence soil productivity and the water holding capacity of the soil. They have not done so. The importance of sequestered carbon on soil productivity and its water holding capability is captured in the increased attention the subject is given in the published literature (Figure 1a and 1b). In the last 10 years, over 34,000 articles have been published on the topic. And as mentioned above, soils take

decades to millennia to form and are a major influence on the chemical composition and turnover rates of various substances in the atmosphere and hydrosphere.[17]

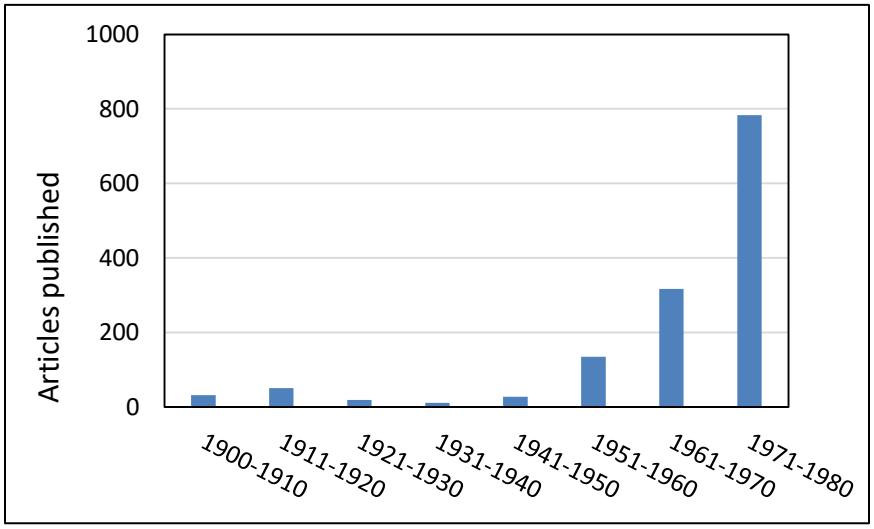

Figure 1a. Articles published by decade between 19000 and 1980 that examined carbon sequestration and soils. (*Source: Google Scholar, 8/26/2020)*

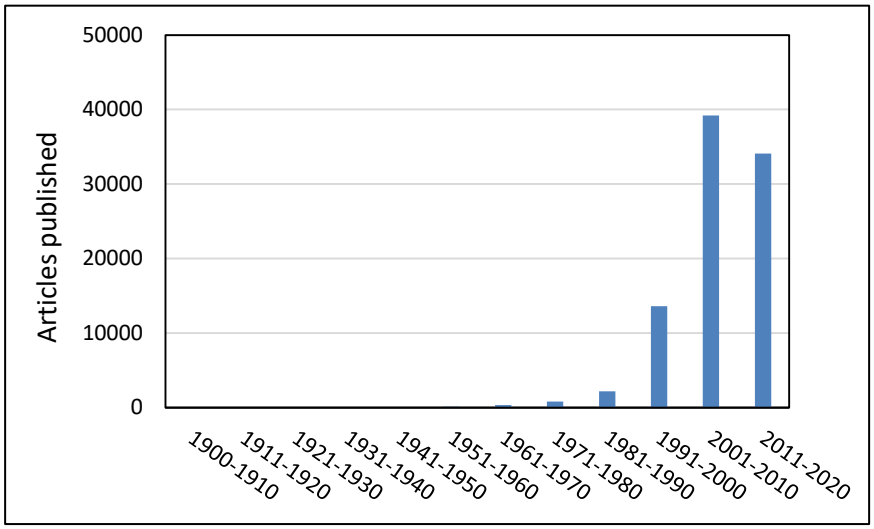

Figure 1b. Articles published by decade that examined carbon sequestration and soils from 1900 to 2020 (*Source: Google Scholar, 8/26/2020)*

The longevity of the impact of compaction is captured in a 2002 study of soils on the Mormon Trail. Brevik et al (2002)[18] found the following:

[17] Van Breemen and P. Buurman (2002)

[18] Brevik, E. T. Fenton, and L. Moran (2002). Effect of soil compaction on organic carbon amounts and distribution, South-Central Iowa. Environmental Pollution Volume 116, Supplement 1, March 2002, Pages S137-S141

"Soils on the Mormon Trail have been compacted for over 150 years. Bulk density, carbon, and nitrogen samples were taken in 5-cm increments to 20 cm……Results indicate the compacted layer on the trail alters the soil carbon pool by limiting additions of fresh organic matter to the soil, limiting vegetative production, and by "pooling" carbon additions in the upper 10 cm of the soil ."

2. EFSC 345-022-0022: states "are not likely to result in a significant adverse impact to soils **including,** but not limited to, **erosion** and chemical factors….[emphasis added].

As stated in my letter of August 20, 2019 (p.3), in IP's Tables I-5 and I-9 they note that many of the soils are highly wind erodible and/or have a High K Factor (easily detached soil particles). Therefore, the removal of vegetation due to construction and maintenance, or as a result of a wildfire that is the result of or exacerbated by the transmission lines will have a significant adverse impact on soil erosion. The remoteness of portions of the proposed line, the frequency of drought in eastern Oregon (Appendix B-2), and recent examples where transmission lines have been the source of wildfire ignition underscore the potential for significant adverse soil effects, in the area of the line and beyond. IP has not addressed this erosion concern and as noted in the standard, erosion is specifically called out as a concern.

3. The last time OAR 345-022-0022 was updated was in 2007. Again, the phrase "including but not limited to" indicates that standards were expected to evolve as our understanding of science, climate change and feedback loops evolved. Therefore, IP and the EFSC cannot ignore the impact of the project on carbon sequestration or the recent Governor's Executive Order No. 20-04 "Directing State Agencies to Take Action to Reduce and Regulate Greenhouse Gas Emissions." To state that this is not required is to ignore the language in 345-022-0000 and 345-022-0022 "including but not limited to" that requires a much broader analysis than Idaho Power has done to date.

EXECUTIVE ORDER NO. 20-04
PAGE THREE

WHEREAS, all agencies with jurisdiction over the sources of GHG emissions will need to continue to develop and implement programs that reduce emissions to reach the state's GHG goals; and

WHEREAS, all agencies with jurisdiction over natural and working landscapes in Oregon will need to prepare and plan for the impacts of climate change and take actions to encourage carbon sequestration and storage; and

EXECUTIVE ORDER NO. 20-04
PAGE FIVE

2. **GHG Emissions Reduction Goals.** Consistent with the minimum GHG reduction goals set forth in ORS 468A.205(1)(c), this Executive Order establishes science-based GHG emissions reduction goals, and calls for the State of Oregon to reduce its GHG emissions (1) at least 45 percent below 1990 emissions levels by 2035; and (2) at least 80 percent below 1990 emissions levels by 2050.

3. **General Directives to State Agencies.** From the date of this Executive Order, the state commissions and state agencies listed in paragraph 1 are directed to take the following actions:

   A. GHG Reduction Goals. Agencies shall exercise any and all authority and discretion vested in thein by law to help facilitate Oregon's achievement of the GHG emissions reduction goals set forth in paragraph 2 of this Executive Order.

   B. Expedited Agency Processes. To the full extent allowed by law, agencies shall prioritize and expedite any processes and procedures, including but not limited to rulemaking processes and agency dockets, that could accelerate reductions in GHG emissions.

   C. Agency Decisions. To the full extent allowed by law, agencies shall consider and integrate climate change, climate change impacts, and the state's GHG emissions reduction goals into their planning, budgets, investments, and policy making decisions. While carrying out that directive, agencies are directed to:

      (1) Prioritize actions that reduce GHG emissions in a cost-effective manner;

There is nothing in the above Executive Order that limits state agencies as to how they reduce GHG emissions or excludes consideration of carbon emissions as a result of soil degradation. On page 3 of the EO, it states "take actions to encourage carbon sequestration and storage". A project that removes existing store carbon above ground and contributes to the degradation of below ground carbon, and creates conditions where wildfire risk and thus soil erosion risk is elevated, leading to carbon released into the atmosphere is not in line with either EFSC 345-022-0000 and 345-022-0022 or the Executive Order.

WHEREAS, all agencies with jurisdiction over natural and working landscapes in Oregon will need to prepare and plan for the impacts of climate change and take actions to encourage carbon sequestration and storage; and

Maintaining the integrity of the soil requires maintaining the existing carbon sequestered and

creating conditions where additional carbon can be sequestered. This is an appropriate action and one that will help "reduce GHG emissions in a cost-effective manner (EO 20-40, 3 (C) (1). When talking cost-effective, it is important to note the suppression costs of wildfire alone are in the 10s to 100s of millions of dollars (Appendix B, Table B-1). Additional recovery and restoration costs further increase the economic costs to Oregonians.

Contrary to IP's statements that EFSC standards 345-022-000 and 345-022-0022 do not require IP to consider carbon sequestration or carbon emissions as a result their impacts on soils via construction and maintenance and wildfire, the phrase "including, but not limited to," makes clear that they do. Therefore, the EFSC and IP must evaluate the impacts to soils related to carbon sequestration due to the proposed project from its building and maintaining of the transmission lines and due to the increased risk the project creates by placing a new wildfire ignition source through miles and miles eastern Oregon.

The importance of this topic was again made clear in a search of Google Scholar. 46,700 articles were identified from 2000-2020 that discuss carbon emissions and soil degradation. Therefore, it is clear that carbon sequestration, soil degradation and carbon emissions are considered of great importance. Some of the articles noted were:

1. Lal, R. (2010). Managing soils and ecosystems for mitigating anthropogenic carbon emissions and advancing global food security. BioScience, Vol. 60, Issue 9. pp. 708-721. https://doi.org/10.1525/bio.2010.60.9.8

2. Houghton, R.A., House, J. I., and J. Pongratz (2012). Carbon emissions from land use and land-cover change. Biogeosciences, Vol. 9, No. 12: pp. 5125-5142. https://epub.ub.uni-muenchen.de/68541/

3. Lal, R. (2003). Offsetting global CO_2 emissions by restoration of degraded soils and intensification of world agriculture and forestry. Land Degradation & Development. Vol. 14, Issue 3. pp. 209-322. **https://doi.org/10.1002/ldr.562**

In conclusion, Idaho Power has not sufficiently identified key aspects of soils as required by EFSC standards 345-022-0000 and 345-022-0022. Nor has the Department of Energy via the EFSC sufficiently addressed the Governor's EO 20-04 directing state agencies to take actions to reduce and regulate greenhouse gas emissions when approving actions such as that proposed by Idaho Power. Therefore, I request party status in the contested case.

Sincerely,

s/n Suzanne Fouty, Ph.D.
2518 Valley Avenue
Baker City, OR 97814

Attachment 5. Ten Questionable Actions and Procedures Merit Council's Attention

1. Idaho Power in a letter, March 24, 2020, assured all residents on the Mill Creek route that applicant was "now focused on building the Morgan Lake Alternative." The letter concluded "Since your property is near the Mill Creek Route, you don't need to take any further action." Applicant has not formally withdrawn the Mill Creek Route from EFSC consideration; if approved, either route may still be chosen and those along the Mill Creek Route will have lost the opportunity to comment. **Attachment 6** is a copy of the letter, absent the resident address.

2. According to the letter in Attachment 6, the Morgan Lake Alternative Route is described *as the only alternative route proposed in Union County and was developed based on input from landowners.* STOP asserts that input has been primarily from groups requesting the route be moved from their land to someone else's land (Glass Hill Coalition) or that the B2H not be built at all (Union County Advisory Committee, City of La Grande, STOP B2H Coalition.) Michael McAllister has contacted the applicant and ODOE several times, urging the B2H be constructed on the BLM Environmentally Preferred Route. Joel Rice has identified three areas that merit protection and offered easements through the rest of his land. The Morgan Lake Alternate Route would cross all three of the fragile areas on his land. STOP questions what precise "input" applicant may be referring to?

3. Idaho Power's March 24 letter states "a committee of Union County residents asked the Bureau of Land Management to consider a route that parallels the existing line along the hillside west of La Grande." The Union County Advisory Committee published only one report; it advocated no support for the B2H because it had failed to demonstrate need for the line: *The Full Advisory Committee concludes that the 2015 IRP is substantially deficient regarding the required analyses to demonstrate the need for the B2H transmission line, especially with respect to analysis of unmet energy need, distributed generation, and energy conservation. The Sub-Committee does not feel that the data provided by Idaho Power (IRP 2015) supports the "need" for the project as proposed.*

4. In 2018 OPUC granted only partial acknowledgement of Applicant's demonstration of Need after applicant's appeal based on urgent "time constraints." Applicant has subsequently withdrawn and amended its 2019 IRP during three 180 day extensions, and has not yet received a firm financial commitment from its partners, BPA (24%) and Pacific Corps (54%), even though "immediate commitment" was promised at the same meeting in 2018. Furthermore, Pacific Corps has not included the B2H in its 5 year plan within its IRP. Applicant has, nevertheless, assured Council that all necessary approvals are imminent.

5. The BLM and USFS FEIS, the controversial basis for applicant's two proposed B2H routes in Union County, is currently being challenged in federal court based on the agencies' failure to observe NEPA requirements.

6. In the Proposed Order, all visual analyses have been based on an outdated 1974 USFS document, superceded in 1995 by *Landscape Aesthetics* by Jack Ward Thomas.

7. Applicant has chosen to omit challenging areas and roads from the ASC site boundary, "delayed until after application is approved." For example, applicant states *it is not proposing to substantially modify Morgan Lake Road for construction or operation of the proposed facility, therefore the road is not included in the site boundary under EFSC review.* The Morgan Lake Road would be used for construction of either route. It is a steep, graveled winding road, not surveyed since 1880 when it was used for hauling logs; it would require at least four months of construction before facility construction. Applicant's apparent intention of not including the Morgan Lake Road , as well as other access roads, such as the Modelaire-Hawthorne Loop in La Grande, is to avoid the full ASC process of notification, assessment of impacts on properties and residents, noise, wells, public safety, and recreation at Morgan Lake Park, as well as substantial impact on the city streets and residents along that route.

8. Applicant assured Union County Commissioners that the county would receive $600,000 a year in taxes from the B2H. The Oregon Department of Revenue states that a precise figure for this facility is not available.

9. After the City of La Grande published a Proclamation against the B2H, applicant offered the City Manager $100,000 for "improvements" to Morgan Lake Park if the City would agree not to dispute the Morgan Lake Alternative Route.

10. ODOE states in the PO, Attachment 4, on pdf p. 195 comment ID: Stop B2H FW-1;

    The Council's Fish and Wildlife Habitat and T&E standards do not implement federal requirements. There is not a Council standard authorizing Council to impose or enforce regulations related to federally listed T&E species listed under 16 USC Section 1533. ODFW could make recommendations under its Fish and Wildlife Habitat Mitigation Policy based on information about federally listed T&E species, which would then be implemented through the Council's standard. Federal wildlife laws must be adhered to by the applicant, which are under the jurisdiction and authority of the United State Fish and Wildlife Service (USFWS).

STOP asserts that while there may be no council standards at ODOE to implement federal requirements we see no attempt to use information or comply with federal standards per:

ORS 469.370(13) it states ...

> (13) For a facility that is subject to and has been or will be reviewed by a federal agency under the National Environmental Policy Act, 42 U.S.C. Section 4321, et seq., the council shall conduct its site certificate review, to the maximum extent feasible, in a manner that is consistent with and does not duplicate the federal agency review. Such coordination shall include, but need not be limited to:
> (a) Elimination of duplicative application, study and reporting requirements;
> (b) Council use of information generated and documents prepared for the federal agency review;
> (c) Development with the federal agency and reliance on a joint record to address applicable council standards;
> (d) Whenever feasible, joint hearings and issuance of a site certificate decision in a time frame consistent with the federal agency review; and
> (e) To the extent consistent with applicable state standards, establishment of conditions in any site certificate that are consistent with the conditions established by the federal agency. [Formerly 453.365; 1977 c.296 §14; 1977 c.794 §11; 1977 c.895 §1; 1985 c.569 §17; 1993 c.544 §4; 1993 c.569 §8; 1995 c.79 §288; 1995 c.505 §11; 1997 c.428 §2; 2001 c.134 §6]

STOP is very concerned because there is no coordination on or establishment of conditions in any site certificate that are consistent with the conditions established by the federal agency in these and many other elements of the PO. The follow are examples from the BLM ROD:

1. Cumulative effects on existing agriculture could include the creation of a utility corridor through agricultural land. Because Oregon law promotes collocating transmission lines, future transmission lines could be colocated with the B2H Project, if constructed. While the B2H Project may be micro-sited around most agricultural operations, minimum offset requirements would make it more difficult for future transmission lines to avoid agricultural operations, particularly in the case of pivot irrigation.
   (02.2_Executive_Summary; Pdf p 50)
2. Depending on the route selected, the B2H Project could adversely affect water rights and irrigation infrastructure used for agriculture. Under Oregon law water rights are tied to specific parcels of land and must be used at least once every 5 years or risk cancellation. For example, if water rights are granted to irrigate 160 acres of land, but irrigate only 80 acres of the land, the rights for the unused water for the remaining 80 acres are subject to cancellation. Since the B2H Project may require the removal of irrigated farmland from irrigation for more than 5 years, water rights could be subject to cancellation. Additionally, because some locations in the study corridor are critical groundwater areas (in Morrow and Umatilla Counties), it can be difficult, if not impossible, to reobtain water rights.
   (02.2_Executive_Summary; Pdf p 50)
3. Cumulative effects on existing agriculture could include the creation of a utility corridor through agricultural land. Because Oregon law promotes colocating transmission lines,

> future transmission lines could be colocated with the B2H Project, if constructed. (02.2_Executive_Summary; Pdf p 50)

STOP wishes a contested case because ODOE is not in compliance with ORS 469.370(13). We see: 1) no coordination or use of information generated and documents prepared for the federal agency review utilized and; 2) see no effort to establish conditions in the site certificate that are consistent with the conditions established by the federal agency.

Attachment 6. Letter to Landowners along the Mill Creek Route in Union County

IDAHO POWER
An IDACORP Company

March 24, 2020

BOARDMAN TO HEMINGWAY

Route Update: Boardman to Hemingway Transmission Line

I'm writing to update you on the Boardman to Hemingway transmission line. Until now, we have considered two routes for the line in Union County: the Mill Creek Route and the Morgan Lake Alternative. We're now focused on building the Morgan Lake Alternative. Please see the back side of this letter for a map of both routes.

As you may recall, in 2016, a committee of Union County residents asked the U.S. Bureau of Land Management to consider a route that parallels the existing transmission line along the hillside west of La Grande. That led to the Mill Creek Route, which would be visible from town.

With help from local landowners, Idaho Power developed the Morgan Lake Alternative. This route would run behind the ridge southwest of Morgan Lake Park, out of the city's view. To further reduce visibility near the park, strategic sections would use shorter, H-frame structures instead of lattice towers.

We've also committed to helping improve recreation at Morgan Lake Park. The community can choose the improvements. Idaho Power and our fellow project participants will help pay for them.

Over the past two years, the community has shown a preference for the Morgan Lake Alternative. That's why we are pursuing it instead of the Mill Creek Route.

Since your property is near the Mill Creek Route, you don't need to take any further action. If you have any questions, please contact me at 208-388-2483 or mstokes@idahopower.com.

Sincerely,

M. Mark Stokes, P.E.
Idaho Power Engineering Project Leader
mstokes@idahopower.com

208-388-2323, or
1-800-488-6151
(outside the Treasure Valley)

1221 W. Idaho St. (83702)
P.O. Box 70
Boise, ID 83707

TARDAEWETHER Kellen * ODOE

From: Deborah S Lentz <DEBORAH_S_LENTZ@progressive.com>
Sent: Wednesday, August 26, 2020 8:53 AM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE; KellenTardaewether@oregon.gov; larkingreg34 @gmail.com; DEBBIE LENTZ
Subject: Greg Larkin - contested case letter for B2H transmission line project
Attachments: Greg Larkin.docx

Importance: High

Attached please find the referenced letter. Greg is requesting a return receipt: larkingreg34@gmail.com

August 24, 2020

Greg Larkin
59655 Morgan Lake Road
La Grande, OR 97850

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED-OAH-Referral@oregon.gov
also: Kellen.taraewether@oregon.gov
also: Stopb2h.org

Dear Honorable Greene-Webster

I am requesting to be a full party to the contested case hearings regarding the Boardman to Hemingway Transmission line. I have many other concerns, however, the personal damages that I will experience if this transmission line were to go in left me incapable of completing a review of the entire application and Draft Proposed Order.

I do not at present plan to be represented by an attorney. I am the best person to present and articulate my concerns on this proposed order. I did comment regarding my concerns with the level of noise the transmission line would create in my verbal comments during the June 20, 2019 comment period. This is a requirement for the contested case.

I have since participated in a meeting with OPUC on April 23, 2020, that allowed me to provide additional testimony to present additional concerns on how this project if approved on it current route will have a devastating affect on my life and not allow me to continue to live in my home or on my property.

I agree with all of the concerns presented by the property owners that will be affected by this project, as well as the community members who realize the adverse impact this project will have on our lives and the beauty of this eastern Oregon area.

Sincerely,

Greg Larkin

TARDAEWETHER Kellen * ODOE

From: JOHN H LUCIANI <dirtfarmerjohn@gmail.com>
Sent: Thursday, August 27, 2020 10:03 AM
To: TARDAEWETHER Kellen * ODOE
Subject: RE: Contested case against B2H

John H. Luciani
27633 Butter Creek Road
Echo, Oregon 97826
I strongly oppose the B2H line being built. Aside from health reasons, possible cancer causing, there would be noise issues, fire danger, losing my wheat crop, ability to make a living, land erosion both wind and water from the land being raped, lowering of land values, strangers in vehicles driving everywhere and your land is no longer yours, weeds and no longer being able to use airplane spraying. A private company in another state should not be able to steal peoples land. Idaho power will not build this fiasco on my farm. I will not allow it. John H. Luciani

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From: JOHN H LUCIANI
Sent: Thursday, August 27, 2020 8:36 AM
To: JOHN H LUCIANI
Subject: FW: From GIlbert

Sent from Mail for Windows 10

From: JOHN H LUCIANI
Sent: Wednesday, August 26, 2020 8:37 PM
To: Rlmorter@gmail.com
Subject: From GIlbert

Sent from Mail for Windows 10
Sam: Strong comments on fire and the cumulative impacts.
Elizabeth: views, fire--more than just land and buildings--person died fighting
Shane-Cumulative impacts causing significant increased costs-increased --preservation for future farmers
John--erosion--weeds--vehicles drive on range or farmland erosion--views--quality of life--risk of work under lines-- utility corridor cumulative impacts--significant impacts resulting in loss of farm
Roger--I didn't have your last name, so was not able to locate your comments. Sorry.

I am attaching some contested case issues that apply to the comments you made
The first one includes some things Shane spoke on. The second is challenging the procedure for putting together the farm assesment which anyone could submit. Just say you were unable to comment as the procedure only appeared in the Proposed Order. The third document is a bunch of impacts. It could be used in it's entirety by Shane, John or Sam due to the large numbers of issues they cited in their comments. It also could be used to pull out individual issues and make the one issue into a contested case.

Noise could be a contested case request for any of you as the variance or exception to allow the noise level to exceed the standard along the entire transmission line only just appeared in the Proposed Order. You would just have to say you didn't comment because it is a new item.

The last file is the "fill in the blanks" document for organizing your contested case and getting all the things in the record that they require. You can use a form or just write it up as a paragraph or a letter.

Don't forget that you have to add the information required to any of these you send. It is the items on the draft form which I used to list the first two contested cases. If you leave anything out, they will not let you have a contested case. I wish I could tell you that by submitting these you will be allowed a contested case. The Oregon Department of Energy and the developer will be looking for any reason, legitimate or not to throw the case out. Not to be discouraged. Part of what we need to do is get as much information in the record as possible on the issues so that we have a more complete record for appeal. I know the timeframes are short, but add whatever comes to mind to any of these issues you submit.

THESE HAVE TO BE IN THE HANDS OF THE HEARINGS OFFICER BEFORE 5:00 ON THURSDAY, AUG. 27. The email addresses they need to go to are on the top of the blank form for submission. Good luck guys, and thanks! Call if you have questions. Irene

TARDAEWETHER Kellen * ODOE

From: Charles Lyons <marvinroadman@gmail.com>
Sent: Thursday, August 27, 2020 11:46 AM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Subject: Contested Case Request Regarding the Proposed Site Certificate for the Boardman to Hemingway Transmission Line
Attachments: B2H Contested Case Request Lyons.docx

Attached please find my comments contesting the site certificate for the proposed Boardman-to-Hemingway Transmission Project.
Thank you,

-Charles A. Lyons
60332 Marvin Rd.
La Grande, OR 97850

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

a. My name and address:

Charles A. Lyons
60332 Marvin Rd
La Grande, OR 97850

b. Attorney name and address

I am not represented by an attorney.

Requesting to file as a "party" or "limited party"

I am requesting to file as a party.

c. What is your interest and how will it be affected? (economic, recreation, health, etc.)

My interests are economic as well as those relate to health and safety, all of which will be negatively impacted by construction of B2H in the La Grande area.

d. If it is a public interest, how will it be affected?

Public economic and health/safety interests will also be affected by this construction.

e. Can others represent your issue(s) or do you need to represent them yourself?

Because I have lived in the Morgan Lake area for 32 years, I need to represent these issues myself.

f. A short statement of your issue and why you are requesting a contested case.

The Proposed Order does not adequately address my concerns about wildfire risk and slope stability. The Draft Fire Prevention and Suppression Plan prepared by Idaho Power in July 2020 (presented with the proposed order as "Exhibit U") appears to rely almost entirely on potential negotiated agreements with nearby fire response organizations or the federal agencies to provide fire response. Unfortunately, local resources are already insufficient to meet the needs created by climate change-related fire risks, and those risks

will only increase as line construction, operation, and maintenance come into play. A much more substantial fire protection proposal from Idaho Power is necessary.

In addition, the Landslide summary (included in the proposed order as Attachment H-4) identifies areas of recognized landslide risk but in most cases simply proposes that "A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program," indicating that a large degree of uncertainty still exists regarding the geological risks that the construction presents. Until adequate geotechnical exploration demonstrates that slope instability does not pose serious risks, construction should not begin.

g. State *when* in your written or verbal comments you brought up this concern (date of letter or testimony at hearing)

I stated these concerns in writing in my August 21, 2019 letter to the Energy Facilities Siting Council.

ANY OTHER INFORMATION YOU WANT TO ADD:

Any emergency situation involving wildfires or slope instability created by the construction, operation, or maintenance of the B2H line would be greatly magnified by the very limited egress opportunities for Morgan Lake Road residents.

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 27, 2020 7:55 AM
To: TARDAEWETHER Kellen * ODOE
Subject: [Fortimail Spam Detected] Fwd: Petition to Request for Party Status
Attachments: Scan 2020-8-27 07.21.42.pdf

Begin forwarded message:

From: Dale Mammen <dmammen@eoni.com>
Subject: Petition to Request for Party Status
Date: August 27, 2020 at 7:31:51 AM PDT
To: OED OAH Referral@oregon.gov@oregon.gov
Cc: kellen.tardaewether@oregon.gov

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol Street NE
Salem, OR 97301

Dear Judge Greene-Webster,

My name is Virginia Mammen and I live at 405 Balsa, La Grande, Oregon with my husband Dale Mammen and we are requesting to file as a full party.

My interest in the B2H Project was piqued when I realized that it was literally going to move into my immediate neighborhood of thirty-seven homes, including that of our daughter and her family. As I began to learn more about the project I realized there were many aspects of it which could impact our health, our enjoyment of our neighborhood and possibly change our lives forever. When thinking about both the construction stage and the completed project, I look at B2H like having the neighbor from hell buying one of the most beautiful properties in my neighborhood and moving in with a brood of mean unruly children. There would be constant noise and worry about fires from the "creative kid activities", the landscaping would be uprooted and cleared down to the dirt in places, we would wonder what caused the absence of the gentle neighborhood wild animals who normally entertain us, and the neighborhood children and adults would no longer feel free to walk in the neighborhood and roam the surrounding hills. Then there would be the fear of what other families the new neighbor might invite to move into/onto their property with them. It wouldn't be long before our previous neighbors would begin to sell out, property values would be devalued, ruining economic security, and the neighborhood would be destroyed. I realize what they do on their property is not my problem, but when what they do impacts my property or my life, immediately or any time in the future, they need to be held responsible.

I do not believe anyone can represent my husband and me, as we are in our early 80s and have lived in this neighborhood for over fifty years. There are possibly only two or three other persons who have lived here as long. Because I know most of my neighbors and know of their health situations and their love of the area and what it provides, I feel especially responsible to speak up for our quiet, calm, safe little oasis here on the southwest hills of La Grande.

I have many concerns about the construction of a high-voltage transmission line being constructed on a slide area above a residential area and that has a great potential for wild fires even without the addition of the new construction.

I have commented on these and other subjects many times both in written and oral testimony. Orally on June 20, 2019 in La Grande and again in Pendleton on June 26, 2019. Two written letters sent, each with exhibits and many neighbors signatures, on August 10, 2019 and a letter on August 12, 2019. Another letter was sent on August 20, 2019. I might add that my neighbors all still feel very strongly about this.

Reading this last proposed order has made me realize even more that what I have written has not been taken as seriously as I feel it should. A few of the basic concerns have been answered to some extent, but not enough for me to feel they had adequately addressed the subjects.

The PO identifies the access to the work site at "Hawthorne Lane" from the staging area using multiple street and roads including Sunset to reach the Hawthorne/Modelaire Loop (later to be referred to as the Loop). ("562" on page 550 of the Proposed Order addresses "Hawthorne Lane" which is in the site boundary.)

The route looks good on a flat piece of paper, without houses or people, but there are so many other elements, which for safety sake if nothing else, make it very unacceptable for the traffic that would be necessary for a project such as B2H. The need for safety goes outside the worksite when neighborhoods are involved. One literally has to walk the walk before they can talk the talk. But no one has talked to any of the residents except those who are in the actual site, even though we would all be greatly impacted by the construction phase as well as into the future.

My particular concern is for the Loop and all of the elements of safety that would be involved. These elements include blind curves, noise, safety for children and adults being able to walk on the street with no sidewalks, narrow street passage, steep grade, and streets constructed for basic car travel not for heavy equipment and trucks. In addition to these there is always the silent soil creep that makes the area especially vulnerable. My

list of reasons and violations to the state standards are expressed in detail in my comments submitted August 10, 2019.

Reviewing some of my concerns and finding in the PO their response made me realize that those who are responding have not been on the ground. What they have said looks and sounds good but it is not practical and not doable in most instances. For most of the project they are dealing with either open areas or with roads that have a beginning and an ending at two separate places. The Modelaire-Hawthorne Loop is a city small neighborhood of thirty-six homes and does not fit into this category as its streets are neither physically constructed nor meant to handle an excessive flow of heavy loads. It covers a relatively short distance, but for a driver it has blind curves, multiple driveways, a 16+% grade and no sidewalks.

The use of this Loop will virtually hold the residents hostage, either in or out of their property, for much of the time if Table PS-7 is correct. It seems that the Loop failed to make it into any Table, but nearly every other road considered seems to have been figured to have the same "Existing Peak Traffic Volume" of 120 and the "Road Capacity" of 1000 for the purpose of allowing the "Estimated Daily Personal and Construction Vehicles". This is not true for the Loop. Sometimes hours pass with no cars on the Loop. But because the Loop has only a single entry/exit from Sunset Drive for all of the homes, it is used the whole day by people, walking or driving, going/coming to work, shopping, school, etc. Because of the heavy volume of expected traffic, given the figures on Table PS-7, about one vehicle every three minutes, there would need to be multiple flaggers at the various dangerous curves, blind driveway exits, etc. to create the safety needed for both vehicles and pedestrians. This would be especially needed at the entry at Sunset Drive. Although the PO indicates such precautions will be taken, under the circumstances of the terrain I find this hard to accept as we had to deal with this many years ago when they were logging because of the Rooster Peak Fire. And that was for only a short time.

A garbage truck does a once a week run and other than that anything weighing over the weight of an automobile is unusual. Knowing this to be the expected use, the streets on the Loop were constructed as "local streets" and not designed to support commercial traffic let alone a daily parade of heavy construction traffic. In fact the City denied both the

hospital (located next to Hawthorne) and commercial vehicles the use of Hawthorne except in cases of emergency. (See La Grande Ordinance Number 3077). (Again "562" on page 550 of PO refers to Public Services Condition 2 and states that "because construction-related traffic would result in less than 400 passenger car equivalents per day, a TIA is not required." The applicant is not talking of just passenger car equivalents, they are talking also about extremely large and heavy construction equipment vehicles with their loads.

Speaking of being held hostage, let us take a look at the "Hawthorne Lane" situation. This is a road that has a beginning and a dead end. While doing the major major road construction (up to 70% "562" on page 550) there would be no entrance nor exit for at least five properties while construction was underway. It would also eliminate the access for any fire or emergency vehicle. It would be a difficult construction because of the slope of the road on both the upside of the road and the road itself because of its location in the major portion of the creeping slide area that plagues the people on the Loop and in the Sunset Drive area all year round for a variety reasons. I personally do not feel the least bit comforted by the remarks made on page 78 of PO that "in general, historic landslide hazard areas are stable and have been revegetated, and are not likely to be reactivated based on the relatively small loads and grade changes imparted by facility construction." Having lived on the Loop for over fifty years and having experienced the soil creep which has caused us and our neighbors (including the Grande Ronde Hospital) to have experienced cracks in foundations and driveways and broken pipes to our homes, we know it is not stable. City infrastructure water and plumbing systems also have failed because of the unstable soil and it has also necessitated the City to rebuild the Loop streets. Being responsible for only the site area is shirking the duty of the applicant, because what happens in the site area for this particular part of La Grande is not limited to the site, it will affect the surrounding area for years into the future because of the structure of the land.

I have discussed the safety measures of the road as it stands today. Both Idaho Power and I know that no part of the Loop would stand up to the traffic that would be expected during the construction phase, or hold up in the years to come. They state in several places in the PO that roughly half of their vehicles are 10,000 pounds or less. The other half are said to be greater—that's it. But let's look at some comparative figures. An average

car weighs 4,000 pounds and an average pickup 8,000 pounds. I would imagine that pickups would be the transportation for the construction workers. This is the expected weight to be used on the Loop and on Sunset. But then we need to look at the materials being carried up to or away from the site. And there would be a number of them. There would be logs to transport if they planned to cut timber. Those trucks could be up to 80,000 pounds loaded. And then there are the concrete mixers which weigh about 30,000 pounds empty, and could also go up to as much as 80,000 when loaded. As I have said before in my letters, our Loop as other a local streets are not constructed to take heavy traffic, either in weight or in numbers. One truck or two trucks might be alright, but a daily stream would not. La Grande Ordinance Number 3077, which adopted Oregon State Traffic Laws by reference, states in Section 17 pg 8 "It shall be unlawful for any person, firm or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000 pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes."

The PO addresses the street situation (on pages 560-564) so it looks that perhaps a portion of Sunset Drive and C Street, which are also not a truck routes, would fit into the category of having to be reconstructed. Even if the streets could hold the weight of the truck parade there is still one more thing to be considered in the safety category. That is the grade of the hill after coming off of Sunset and going up Hawthorne to "Hawthorne Lane". This is a 16+% grade with no place for any type of safety measures like an escape ramp in case of brake failure or any other emergency type failure. The only place to go would be down the hill and right through a house. Presently there is a guard rail at the bottom for a normal car, but that would be no barrier at all to a heavy construction vehicle.

Knowing the concern that I hold for the safety of this construction route, I reached out to a professional who had walked the walk through the years and could talk the talk and found that my concerns are valid ones and should be considered carefully. See attached letter from retired La Grande Public Works Director, Norm Paullus, dated August 23, 2020.

For the above reasons and the comments made in "562" page 550 of PO saying "the applicant is not representing to substantially modify these roads" (meaning C Street to Sunset to Modelaire-Hawthorne Loop up to "Hawthorne Lane") is totally irresponsible and unrealistic in their

presentation and is a gross misrepresentation of the facts. It is quite evident the applicant has not completed a sufficient study of the area and has truly not walked the walk honestly. For these access streets to be used it would be necessary to substantially modify them solely to serve the energy facility. OAR 345-001-0010(50).

There is another item that needs to be addressed. In "562" page 550 of the PO refers to "Hawthorne Lane". There is no such street, lane, etc. The area in "562" is a part of Hawthorne Drive. Hawthorne Drive comes up the hill from Modelaire and then crosses Modelaire and continues on up the hill. For a short portion of that which is referred to as "Hawthorne Lane" in the PO is within the city limits. This seems to have been misrepresented/ misunderstood when the City of La Grande and land user/owners were in negotiations/discussion with the applicant.

Considering all the above mentioned elements and because it is apparent that the applicant would be responsible for only what occurs in the site plan itself there is a great rift between what could happen and what should happen. I request that the application for site certificate be modified to remove "Hawthorne Lane" from the site plan, because to include it in the site plan causes major insurmountable issues and impact for the City and the neighborhood below.

Sincerely,

Virginia L. Mammen

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850
gmammen@eoni.com

D. Dale Mammen

D. Dale Mammen
405 Balsa
La Grande, Oregon 97850
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Hawthorne Drive Background

Sunday, August 23, 2020

Ginny Mammen -

You recently asked me about my knowledge and history of Hawthorne Drive over the course of my 45 year employment with the City of La Grande. I began work at La Grande in 1973 and can only speak to the Hawthorne developments from that point forward. The history as I remember it is as follows:

- The street was designed and built the first time to a Class 1 local street standard for the purpose of serving residential housing in the mid to late 1970's. The structure consisted of the following:
    - 8" of base rock
    - 2" of leveling course
    - 2" of asphalt
    - Class 'C' curbs
    - Catch basins place at the bottom of the new project

The City had already designed a cross section of all road designs built to a Class I local standard at that time and the street was constructed with that standard. There were several things reviewed at that time for consideration during construction. They had added hardships over the conventional street constructed in 90% of the rest of the city. The things that come to mind are:

- Hillside slippage because of the documented geological hazard from previous studies
- Steep gradient of the ground at 17% that required paving with a track paver and rollers only being able to roll down hill
- Driveway access with a steep cross slope

Once the road was constructed and placed in use a couple of new problems with the street appeared as a result of winter use. The following had to be addressed to make the street safe:

- Cars slid into the neighbors yards at the bottom of the hill so the City placed a guard rail at the bottom of the hill to protect those properties

- With the steep grade plowing and sanding became difficult and special sanding trucks were acquired that threw sanding gravel in front of the sanding truck tires for traction
- Snow removal with trucks was difficult so the graders were assigned to do Modelaire Drive and Hawthorne Drive

The street worked well as a local street with residential traffic until approximately 5 years after its construction when a flood occurred that allowed storm water to come down from Hawthorne Drive Extension to the west (a private road) and run down the full length of the newly paved road washing it out for the entire length of the new road. During the redesign period it was discovered from the proposed hospital expansion project that there is a slippage zone of blue clay located on the hospital site approximately 10-feet below ground level. Knowing that water added to surface soils increases soil weight and could induce slippage or the clay surface soils to liquefy and move, the new redesign of Hawthorne Drive took into consideration the removal of water to try to keep the ground stabile for local traffic. The following construction was added to the original design:

- A series of catch basins were added to each side of the road at intervals of about every 70-foot the length of the road with specially built grates to direct water directly into them because of the steep grade of the road.
- A pipe was constructed behind the curb on the west end of Hawthorne Drive where Modelaire Drive crosses.
- If my memory serves me correctly it seems like we used a geotech fabric, it was new at the time, between the base rock and the natural soils

Once the street was reconstructed it has served the residences well. Construction traffic for the construction of the B2H developments is something that needs to be evaluated with caution and several things should be considered such as:

- Neighborhood safety -
    - Safety for the residents and kids that may play or walk in the street since the street has an absence of sidewalks;
    - Safety for every day vehicular traffic;
    - Safety consideration for heavy equipment coming down a stretch of road grade about a mile long and the possibility of a loss of brakes

(Cabbage Hill has a 6% grade and has escape ramps periodically while Hawthorne Drive has a 17% grade);

  - Safety consideration for the houses at the base of Hawthorne Drive because if heavy equipment should lose their brakes the guard rail will not deflect them from going through the houses at the base but is adequate enough to deflect residential vehicle;

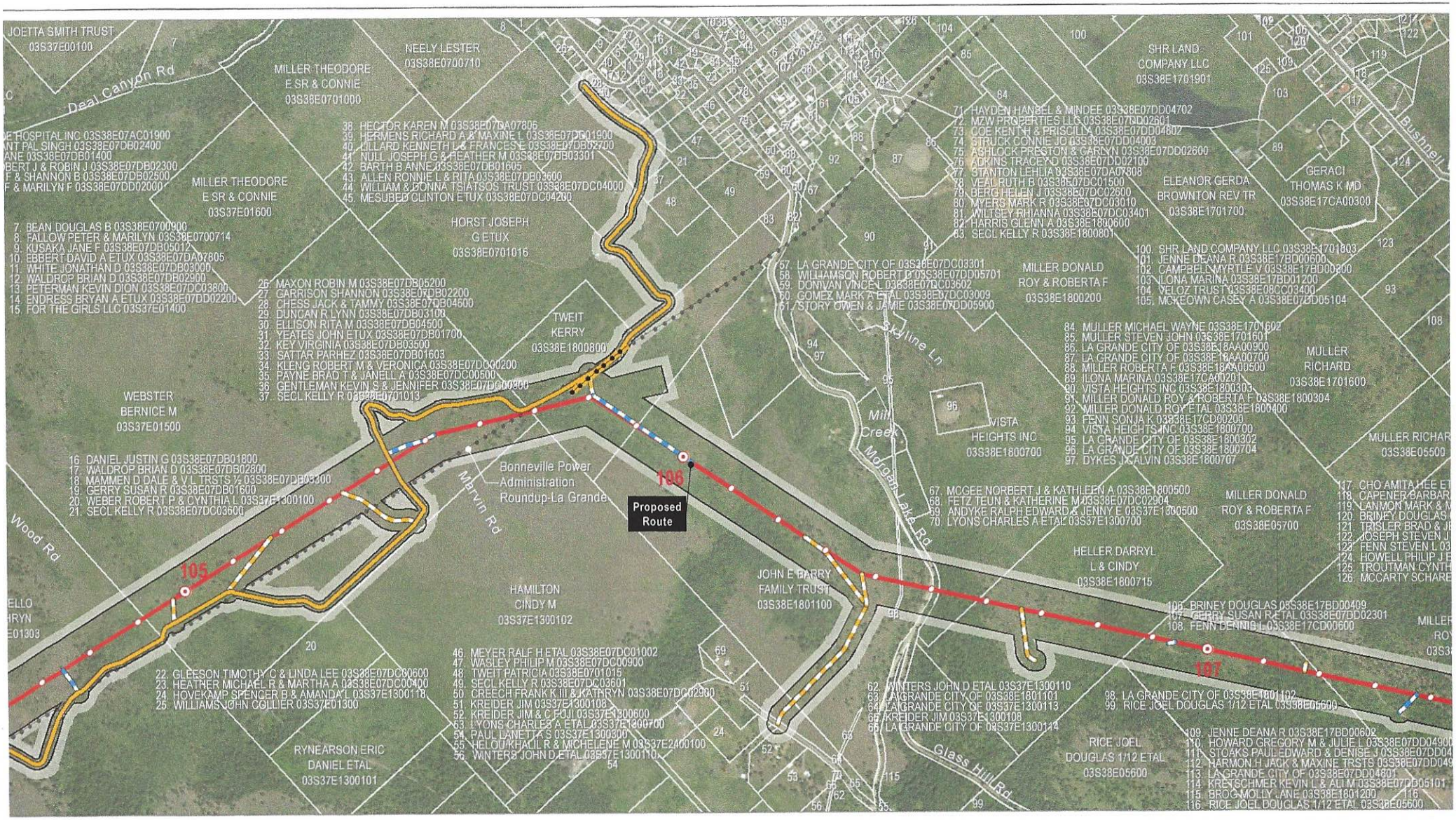
- Long term maintenance needs to be addressed for damage that may be done to the street structure from use that exceeds what the street was designed for and may not show up for years after construction is complete. That is reflected in the most recent franchise agreement with Avista establishing a 5-year maintenance requirement when they cut a street.

The design of the street was originally done as a local street for residential travel and since that time other uses were viewed with great scrutiny. An example is the hospital originally looked at using Madelaire Drive extension as a major access but was denied the use because of the added impact and traffic to the road but they were allowed an emergency access by the Planning Commission because of condition of this low use street. The emergency access has a cable with a padlock to restrict daily use.

I hope that helps Ginny with trying to understand the road status and history of it's' development. Thank you for the opportunity to share this information for consideration and if you have any questions please feel free to contact me.

X Norman Paullus Jr.

Norman Paullus Jr.
Retired La Grande Public Works Director



Parcels

Landowner Name/Parcel #
(*Current as of March 2016*)

Project Features

Site Boundary (Oregon Only)

Project Features

Proposed Route

Mileposts

Mile

Tenth-mile

Access

Existing Road, Substantial Modification, 21-70% Improvements

New Road, Bladed

New Road, Primitive

Distribution Line to Communication Station (IPC Service Territory Only)

Land Status

Private

,000

or's Office (various), IPC, Esri, DigitalGlobe, GeoEye, Earthstar
AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo

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Boardman to Hemingway Transm
Applica

Parcels U
union County
MAP 51

Roads that had barriers to the movement of the crane vehicle included roads that are too narrow or steep, have intersections with inadequate turning radii, inadequate surfacing, narrow bridges or other existing road structures, and therefore were not selected as a preliminary haul or access route. As discussed in Section III.C., *Proposed Facility; Related or Supporting Facilities (Permanent and Temporary); Access Roads,* and in Attachment B-5, Road Classification Guide and Access Control Plan, the applicant determined if existing roads need substantial modification to be used for construction and operation of the proposed facility.[561] The applicant classified road segments for existing roads to determine the extent of improvements needed and whether or not the road would then be included in the site boundary as a related or supporting facility. Existing roads that would be used for construction and operation of the proposed facility but would not require substantial modification are not "related or supporting facilities" and, therefore, are not included in the site boundary.[562]

The applicant explains that the proposed facility would be constructed in phases, and that for each phase specific traffic controls will be utilized as described in the below section and the county-specific Transportation and Traffic Plan:

- Phase I - Civil construction – Activities along the transmission line will involve clearing the corridor and constructing access roads and, if applicable, harvestable timber will be cleared then hauled off.
- Phase II – Foundation Construction – Foundations will be constructed at each structure site to support the steel towers. Track mounted drills and excavators will be mobilized

[561] OAR 345-001-0010(50) states that "related or supporting facilities does not include any structure existing prior to construction of the energy facility, unless such structure must be substantially modified solely to serve the energy facility."

[562] Commenters, including Union County and the City of La Grande, expressed concerns about impacts from traffic and to roads including but not limited to Morgan Lake Road, Glass Hill Road, Old Oregon Trail Road, Olsen Road, Modelaire-Hawthorne Loop, and Sunset Drive. The Department notes that the applicant identifies these existing public roads as potential connecting access roads assumed to be maintained to meet road maintenance standards of the owner (County, ODOT, etc.). The applicant is not representing to substantially modify these roads; therefore, they are not included in the site boundary proposed by the applicant in the ASC, under EFSC review. See Recommended Public Services Condition 21 which requires a county-specific Transportation and Traffic Plan that identifies final haul routes, documentation of existing road conditions, and the requirement that if the applicant must substantially modify roads not currently within the site boundary, it must submit an Amendment Determination Request or submit a Request for Amendment of the Site Certificate receive Council approval via an amendment, if necessary. Hawthorne Lane is included in the site boundary, requiring substantial modification, 21-70% improvements which may include reconstruction of portions of the road to improve road function. Possible road prism widening, profile adjustments, horizontal curve adjustments, or material placement. Final road improvements would be reviewed and approved by the Department, in consultation with each County as part of the county-specific Transportation and Traffic Plan. B2HAPPDoc8-1 All DPO Comments Combined-Rec'd 2019-05-22 to 08-22; B2HAPPDoc8-008 DPO Special Advisory Group Comment_Union County Hartel, Horst, J., Mammen, V. Howell, J., Valentine, E., et al. 2019-07-10 to 08-21.

TARDAEWETHER Kellen * ODOE

From: Anne March <amarch@eoni.com>
Sent: Thursday, August 27, 2020 4:04 PM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Subject: [Fortimail Spam Detected] B2H Contested Case Request
Attachments: 81819 B2H Letter - Anne March.pdf; 82720 B2H Letter - Anne March.pdf

Attached please find 2 documents (1 current and 1 from last year), submitted as part of my contested case request.

August 26, 2020

Ms. Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE
Salem, OR 97301

Re: Petition to Request for Party Status re Proposed Order on Application for Site Certification for Boardman to Hemingway Transmission Line

Dear Judge Greene-Webster,

This letter is a request for participation to file as a party in the above referenced matter. It is in reference to a written letter sent to and accepted by the Energy Facilities Siting Council on August 18, 2019. A PDF of this original letter is included.

I am requesting party status as a longtime Oregon and Federal tax-paying resident who is concerned about Idaho Power's lack of attention to details that pertain to threatened anadromous fish runs in the Ladd Canyon watershed. I am deeply concerned that the lack of specific project details will lead to the further endangerment of threatened fish species in this watershed, and that public money already spent in this watershed will have been wasted.

Idaho Power, in their response to the many letters they received regarding fish habitat "proposes to request any new information about stream status from ODFW and seek ODFW concurrence on stream status prior to finalizing the Fish Passage Plan." Approval should not be granted to Idaho Power until they rework their entire fish passage plan and THEN seek the approval of ODFW since all of the original information they based their passage plan on is outdated and wrong.

ODFW rules for Category 2 Habitat states that there is to be "no net loss of habitat quantity or quality and to provide a net benefit of habitat quantity or quality." Without proper specifics, this Idaho Power proposal cannot guarantee that this will happen. Now is the time for details and proper planning since Idaho Power assessed this crossing prior to the discovery of threatened Snake River Steelhead redds in the Ladd Creek Canyon watershed.

My original letter contained a concern about a bridge crossing on an unnamed stream (Crossing ID R-37969 in Exhibit BB-2) in Ladd Canyon. Idaho power proposed "no new construction or major replacement" of a 1.7 foot and 2 foot diameter pipe currently in place and has stated "ODFW Fish Passage Plan not anticipated." This is not an appropriate size pipe for fish passage and needs to be addressed. I need assurance that the millions of dollars already spent on this watershed will not be adversely affected by the proposed B2H project.

In addition, Idaho Power proposes of the crossing the "3A) installation of temporary bridge over existing structure; 3B) installation of temporary bridge adjacent to existing structure." Because

of the discovery of native Steelhead redds in the creek since Idaho Power originally proposed this plan, this entire plan needs to be re-worked and re-approved by ODFW with a new Fish Passage Plan and new EIS in order to guaranty that there is "no net loss of habitat quantity or quality."

As a tax-paying citizen I am concerned that millions of dollars were spent to enhance the fish passage by the Oregon Dept. of Transportation where I-84 passes over Ladd Creek, and that Idaho Power, in its revised proposal, fails to identify exactly what is planned for protection of salmon and steelhead in the area. The onus should be on Idaho Power to provide this information NOW rather than at a later date further along in the process.

I respectfully submit this request for a contested case for the reasons stated above. Furthermore, I also understand that others may be requesting a contested case based on these same issues but believe that they will not be able to specifically represent my personal situation and interest in this issue. My concerns with B2H are best addressed by me.

Sincerely,

Anne March
206 Main Ave.
La Grande, OR 97850
541 786-0802

Cc: Kellen Tardaewether

August 18, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St, N.E.
Salem, OR 97301

Sent Via email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

RE: Endangered Fish in Ladd Creek and Tributaries, Union County

Dear Chair Beyeler and Members of the Energy Facility Siting Council:

I am writing in protest of the proposed Boardman to Hemingway Transmission Line Project. As a citizen of La Grande who cares deeply about our local watersheds, I have found, while searching through the Draft Proposed Order, that the project plans are in violation of the Endangered Species Act. Idaho Power's B2H DPO is not in compliance with State or Federal Protected Species laws.

Both of the proposed routes in Union County for the Boardman to Hemingway Transmission Line project include a crossing of the Ladd Creek and/or its tributaries. Ladd Creek flows approximately 14 miles through the Wallowa Whitman National Forest and private land on the east side of the Blue Mountains, into the Ladd Marsh Wildlife area, connecting with Catherine Creek and the Grande Ronde, Snake, and Columbia Rivers.

Historically, there were anadromous fish (steelhead and salmon returning from the ocean) in Ladd Creek. ODFW has documented that steelhead and salmon used Ladd Creek for spawning. However, construction of Interstate 84 in the 1970's stopped the passage of these fish above the interstate due to a vertical culvert being installed (see attached Power Point "Ladd Creek Fish Passage Project - ODOT FTP").

The Oregon Department of Fish and Wildlife's mission is to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. The department is the only state agency charged exclusively with protecting Oregon's fish and wildlife resources. The state Wildlife Policy (ORS 496.012) and Food Fish Management Policy (ORS 506.109) are the primary statutes that govern management of fish and wildlife resources.

The B2H Draft Proposed Order (pages 9-10 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*), states that Ladd Creek and its tributaries contain only local fish (trout), but that status has changed due to major culvert work along and under the I-84 interstate in the last 4 years. As a result, the information contained in the B2H Draft Proposed Order is incorrect and out of compliance with Oregon and Federal statutes.

In 2015, ODOT completed a 2-year project to replace culverts that previously had blocked fish passage in the creek and at the I-84 crossing of Ladd Creek (see https://www.lagrandeobserver.com/csp/mediapool/sites/LaGrandeObserver/LocalState/story.csp?cid=4108250&sid=824&fid=151).

According to ODFW Fish biologist Tim Bailey, in the year after completion of the fish passage project (2016) a steelhead redd was documented above the culvert, upstream from the freeway.

ODOT has continued this fish passage project in 2019 along with plans for freeway reconstruction and additional traffic lanes (see https://www.constructionequipmentguide.com/odot-works-to-improve-i-84-fish-passage-in-ladd-canyon/45648). Construction projects have resulted in costs above 32 million dollars, and the list of agencies and individuals in support of this costly fish passage project include ODFW, Union County Board of Commissioners, The Grande Ronde Model Watershed, the US Army Corps of Engineers, Senator Jeff Merkley, Senator Ron Wyden, and the National Marine Fisheries Service (see https://www.oregon.gov/odot/projects/pages/project-details.aspx?project=20381) and attached ([PPT]Ladd Creek Fish Passage Project - ODOT FTP).

An entire watershed is protected when it is determined that it contains federally threatened or endangered fish species. Idaho Power in its application and the B2H Draft Proposed Order have failed to incorporate information regarding identification of the habitat category or locations which will be impacted by the proposed B2H powerline development. Critical habitat is specifically identified in the federal law recording the listing of threatened species. The current application and site certificate fails to include requirements that would assure that the state is complying with federal laws in providing habitat protection for listed species (salmon and steelhead).

Idaho Power has two proposed line routes across and through Ladd Canyon, a preferred and an alternative. Idaho power has also stated that because there are only resident fish in Ladd Creek, that "No new fish passage plan anticipated" (page 9-11 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2).*

Because the alternative route through Ladd Canyon would necessitate a 3a/3b design change for a bridge crossing on Ladd Creek and there are threatened anadromous fish in Ladd Creek, an ODFW fish passage plan will need to be implemented **(***OAR 17 412-0035)* based on *(OAR) 635-412-0020* for this route for Ladd Creek and its tributaries.

In conclusion, the B2H DPO contains improper evaluation of the potential long term negative impacts on fish habitat in the Ladd Creek drainage, including tributaries. The Endangered Species Act requires identification and evaluation of effects of the proposed action through ESA section 7(a)(2) consultation with NMFS (anadromous fish species). Federally protected anadromous species are currently present in Ladd Creek, and its tributaries.

Idaho Power's B2H DPO is not in compliance with State or Federal Protected Species laws. The applicant has failed to meet the requirements for issuance of a Site Certificate contained in OAR-345-022-0080. Therefore, issuance of a Site Certificate should be denied.

Sincerely,

Anne March
206 Main Avenue
La Grande, OR 97850
amarch@eoni.com
(541) 786-0802

TARDAEWETHER Kellen * ODOE

From: Kevin March <kmarch1961@gmail.com>
Sent: Thursday, August 27, 2020 4:08 PM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Subject: B2H Contested Case Submission
Attachments: 8-18-19 Kevin March B2H.pdf; 8-27-20 Kevin March B2H.pdf

Attached are 2 documents related to my contested case submission.

Sincerely,

Kevin March

August 26, 2020

Ms. Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE
Salem, OR 97301

Re: Petition to Request for Party Status re Proposed Order on Application for Site Certification for Boardman to Hemingway Transmission Line

Dear Judge Greene-Webster,

This letter is a request for participation to file as a party in the above referenced matter. It is in reference to a written letter sent to and accepted by the Energy Facilities Siting Council on August 18, 2019. PDF of this original letter is included.

I am requesting party status as a longtime Oregonian who is concerned about water quality, and specifically, about threatened species of salmon and steelhead. B2H has the potential to negatively affect anadromous fish runs in the Ladd Canyon watershed. As a fisherman and recreational user, I am deeply concerned that this project will further endanger our precious and struggling fish species by the further degradation of their habitat through the Ladd Canyon watershed.

Millions of dollars were spent to enhance the fish passage by the Oregon Dept. of Transportation where I-84 passes over Ladd Creek, and that Idaho Power in their Site Certification Application stated that there were only resident fish in these waters. According to ODFW, steelhead spawning redds appeared in Ladd Creek the year after these freeway mitigation measures were completed (2016). The information Idaho Power used to draft their proposal was outdated and INCORRECT.

Idaho Power, in their response to my original letter "proposes to request any new information about stream status from ODFW and seek ODFW concurrence on stream status prior to finalizing the Fish Passage Plan." Approval should not be granted to Idaho Power until they rework their entire fish passage plan and THEN seek the approval of ODFW since all of the original information they based their passage plan on is outdated and wrong. An entirely new fish passage plan and EIS is needed before any approval is granted.

Idaho Power states that "The protective measures described in the draft Fish Passage Plan in attachment BB-2 to the Final Order on the ASC, shall be included as part of the final Fish Passage Plan, unless otherwise approved by the department." Because attachment BB-2 is based on old data, there is no specific specificity in this plan, and I fail to see how this guarantees that this Category 2 Critical Habitat is not imperiled.

ODFW rules for Category 2 Habitat states that there is to be “no net loss of habitat quantity or quality and to provide a net benefit of habitat quantity or quality.” Again, without proper data this proposal cannot guarantee this.

The information that Idaho Power used was based on their data which stated that only resident fish were in the “Ladd Canyon pickup ditch” and the other 4 streams within this area, and that stream and project “risk ratings” are “medium.” A “medium” risk rating should never apply to an endangered species. According to Fish and Wildlife Mitigation Policy OAR 635-415-0000, if avoidance of impacts cannot be achieved, “the department shall recommend against or shall not authorize the proposed development action.”

I understand that others may be requesting a contested case based on these same issues. It is my belief however that as somebody who uses the Ladd Canyon area to recreate in and has watched the fish passage/freeway enhancement project with great interest and anticipation, that they will not be able to specifically represent my personal situation and interest in this issue. My concerns with B2H are best addressed by me.

Sincerely,

Kevin March
206 Main Ave.
La Grande, OR 97850
541 962 5726

August 18, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St, N.E.
Salem, OR 97301

Sent Via E-Mail: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

RE: Anadromous Fish in Ladd Creek, Union County

Dear Chair Beyeler and Members of the Energy Facility Siting Council:

As a very concerned citizen in regards to the Boardman to Hemingway Transmission Line Project, I am writing this letter to inform you that the proposed routes through the Ladd Canyon watershed in Oregon are in violation of the Endangered Species Act.

I am writing in protest of the proposed Boardman to Hemingway Transmission Line Project. Specifically, I am protesting as a concerned citizen regarding the B2H Draft Proposed Order, the Final Environmental Impact Statement, and the project's plan regarding wild and threatened fish.

Both of the proposed routes in Union County for the Boardman to Hemingway Transmission Line project include a crossing of the Ladd Creek and/or its tributaries. Ladd Creek flows approximately 14 miles through the Wallowa Whitman National Forest and private land on the east side of the Blue Mountains, into the Ladd Marsh Wildlife area, connecting with Catherine Creek and the Grande Ronde, Snake, and Columbia Rivers.

Historically, there were anadromous fish (steelhead and salmon returning from the ocean) in Ladd Creek. ODFW has documented that steelhead and salmon used Ladd Creek for spawning. However, construction of Interstate 84 in the 1970's stopped the passage of these fish above the interstate due to a vertical culvert being installed (see attached Power Point "Ladd Creek Fish Passage Project - ODOT FTP").

The Oregon Department of Fish and Wildlife's Mission is to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. The department is the only state agency charged exclusively with protecting Oregon's fish and wildlife resources. The state Wildlife Policy (ORS 496.012) and Food Fish Management Policy (ORS 506.109) are the primary statutes that govern management of fish and wildlife resources.

The B2H Draft Proposed Order (page 9-10 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*), states that Ladd Creek and its tributaries contain only local fish (trout), but **that status has changed** due to major culvert work along and under the I-84 interstate in the last 4 years. As a result, the information contained in the B2H Draft Proposed Order is incorrect and out of compliance with Oregon and Federal statutes.

In 2015, ODOT completed a 2-year project to replace culverts that previously had blocked fish passage in the creek and at the I-84 crossing of Ladd Creek (see

https://www.lagrandeobserver.com/csp/mediapool/sites/LaGrandeObserver/LocalState/story.csp?cid=4108250&sid=824&fid=151).

According to ODFW Fish biologist Tim Bailey, in the year after completion of the fish passage project (2016) a steelhead redd was documented above the culvert, upstream from the freeway.

ODOT has continued this fish passage project in 2019 along with plans for freeway reconstruction and additional traffic lanes (see https://www.constructionequipmentguide.com/odot-works-to-improve-i-84-fish-passage-in-ladd-canyon/45648). Construction has resulted in costs over 32 million dollars, and the list of agencies and individuals in support of this costly fish passage project include ODFW, Union County Board of Commissioners, The Grande Ronde Model Watershed, the US Army Corps of Engineers, Senator Jeff Merkley, Senator Ron Wyden, and the National Marine Fisheries Service (see https://www.oregon.gov/odot/projects/pages/project-details.aspx?project=20381) and attached ([PPT] Ladd Creek Fish Passage Project - ODOT FTP).

An entire watershed is protected when it is determined that it contains federally threatened or endangered fish species. Idaho Power in its application and the B2H Draft Proposed Order have failed to incorporate information regarding identification of the habitat category or locations which will be impacted by the proposed B2H powerline development. Critical habitat is specifically identified in the federal law recording the listing of threatened species (ESA). The current application and site certificate fails to include requirements that would assure that the state is complying with federal laws in providing habitat protection for listed species (salmon and steelhead).

The B2H Draft Proposed Order contains the following outdated information:

1. In *Table 1. Road-Stream Crossing Ownership, Risk Summaries, Proposed Crossing Types, and Fish Passage Information* Idaho Power names 5 waters in the Ladd Creek area (page 9-11 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*) with stream crossings. The report states that the only fish in these waters are resident fish. <u>This information is now incorrect.</u>

2. The B2H Draft Proposed Order states that for all of Ladd Creek and its tributary streams that "No new ODFW fish plan anticipated." (page 9-11 of Attachment BB-2). It cannot be overemphasized that <u>this information is now incorrect.</u>

3. The alternative route Idaho Power has chosen will necessitate a 3a/3b (page 11 BB-2) design change for a bridge crossing on Ladd Creek if this route is chosen, this will trigger an ODFW fish passage plan to be implemented **(***OAR 17 412-0035) based on Oregon Administrative Rules (OAR) 635-412-0020. Again, the B2H Draft Proposed Order information <u>is now incorrect.</u>*

Because of the change of status of the fish population in Ladd Creak, the B2H Draft Proposed Order is out of compliance with several Federal and State laws including*:*

1. *ORS 509.580 through 509.910: Fish Passage; Fishways; Screening Devices; Hatcheries Near Dams*
2. *OAR 635-41-0005 through 635-412-0040: Fish Passage*
3. *Oregon Forest Practice Administrative Rules and Forest Practices Act, OAR Chapter 629 (ODF 2014)*
4. *Forest Practices Technical Note Number 4, Fish Passage Guidelines for New and Replacement Structures (ODF 2002)*
5. *Fish and Wildlife Mitigation Policy (OAR 635-415-0000), which states that :*

(a) The mitigation goal if impacts are unavoidable, is no net loss of either habitat quantity or quality and to provide a net benefit of habitat quantity or quality.

(b) The Department shall act to achieve the mitigation goal for Category 2 habitat by recommending or requiring:

(A) Avoidance of impacts through alternatives to the proposed development action; or

(B) Mitigation of impacts, if unavoidable, through reliable in-kind, in-proximity habitat mitigation to achieve no net loss of either pre-development habitat quantity or quality. In addition, a net benefit of habitat quantity or quality must be provided. Progress towards achieving the mitigation goals and standards shall be reported on a schedule agreed to in the mitigation plan performance measures. The fish and wildlife mitigation measures shall be implemented and completed either prior to or concurrent with the development action.

(c) If neither 635-415-0025(2)(b)(A) or (B) can be achieved, the Department shall recommend against or shall not authorize the proposed development action.

In conclusion, the B2H Draft Proposed Order contains an improper evaluation of the potential short and long term negative impacts to the fish habitat in the Ladd Creek drainage, including surrounding creeks, given the fact that species listed as threatened under the Endangered Species Act are now returning to Ladd Creek, with their numbers expected to increase in upcoming months and years.

Sincerely,

Kevin March
206 Main Avenue
La Grande, OR 97850
amarch@eoni.com
(541) 962-5726

TARDAEWETHER Kellen * ODOE

From: Gary Marlette <garymarlette@yahoo.com>
Sent: Tuesday, August 25, 2020 2:10 PM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE
Subject: CONTESTED CASE REQUEST REGARDING B2H

Allison Greene-Webster
Senior Administrative Law Judge
OREGON DEPARTMENT OF ENERGY

RE: CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

My name is JoAnn Marlette, and my address is 2031 Court Street #8, Baker City, OR 97814, and I am not represented by an attorney. I am requesting to file as a party in this contested case due to the fact that Idaho Power failed to utilize the existing utility corridor which will result in creating significant and unnecessary damages to Oregon wildlife, farm and forest lands. I feel I am the best person to represent me and my interest in this issue as I personally knew Governor Tom McCall and all that he stood for, and he understood how important it was to Oregon and Oregonians to preserve our wildlife, farm and forest lands.

Please be advised that I personally know of no one who is embracing this proposed B2H transmission line through five (5) of our Eastern Oregon Counties. In fact, it is quite the opposite. What Idaho Power proposes to do is to condemn farm land, private lands, forested lands, scenic lands and byways, and, basically, put an end to our only remaining commodity, our tourism, all in the name of the almighty Dollar. Profits for Idaho Power and it's shareholders.

On June 20, 2019, sometime between the hours of 4:30 pm and 8 pm, I testified at the VFW Hall here in Baker City as to the fact that, during Governor Tom McCall's administration, he put in place a utility corridor from Boardman, Oregon, to the Idaho border (which goes directly to Hemingway, Idaho), so that issues, such as what we have are having right now, would not exist. The permanent and negative economic impact on our communities will be insurmountable. The people responsible for B2H will be gone tomorrow, but we will be living with the damaging effects for years.

Accordingly, I find nowhere in the Proposed Order dated July 2, 2020, any comments from Idaho Power on this issue.

Respectfully submitted ~ JoAnn Marlette

TARDAEWETHER Kellen * ODOE

From: Gary Marlette <garymarlette@yahoo.com>
Sent: Thursday, August 27, 2020 10:51 AM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE
Subject: RE: CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Allison Greene-Webster, Senior Administrative Law Judge

OREGON DEPARTMENT OF ENERGY

500 Capitol Street NE, Salem, OR 97301

SUBMITTED VIA EMAIL: OED_OAH_Referral@oregon.gov (August 27, 2020)

My name is JoAnn Marlette, and my address is 2031 Court Street #8, Baker City, OR 97814. I am not represented by an attorney, but would like to reserve my right to an attorney in future proceedings as necessary. I feel I am the best person to represent me and my interest at this time.

I am not required to have commented on this issue as it is newly presented in the Proposed Order and represents a failure to comply with mitigation requirements. I am requesting party status and a contested case regarding the fact that the proposed mitigation, listed on Page 463 of the proposed order, fails to provide mitigation for damages to an irreplaceable public resource that is consistent with the visual damages the plan is supposed to provide mitigation for and the fact that the mitigation plan has not been completed to the extent that the public is able to participate in the plan. This contested case is based upon court decisions and interpretations regarding the requirements for mitigation of impacts as noted in Gould v. Deschutes County, 216 Or Ap. 150(2007) requiring that a mitigation proposal must be adequately developed or defer consideration of the plan to allow a full right to public participation in the plan.

Mitigation for impacts to the Oregon Trail and National Historic Trails Visual damages at the locations being impacted by visual intrusion of the transmission line structures.

The extent of damages to the public resources are not identified in relation to the necessary mitigation and most of the mitigation listed fails to apply to visual impacts. The appeals court has determined that mitigation must be consistent with the damages. To the public interest. There is no indication of the amount or type of mitigation that will be required, and most of the indicated mitigation methods fail to address the visual damages they are intended to compensate for. In addition, there is

no formal plan to monitor and assure that the mitigation remains in place for the life of the project.

1. Item (c), Historic trails restoration, would have to occur within the facility area to meet the requirement to be considered mitigation under criteria (c). The proposed mitigation action indicating the provision of Public signage, publication/print/media and/or interpretive plans, fails to meet the requirement to be considered mitigation under (c).

2. For mitigation under (d), the creation of Trail Management Plans, is not appropriate as there is no assurance they would remain in place for the life of the project, as has been shown with this project. Literature or archival review would not reduce the visual impacts, and, the transmission line would probably preclude many sites from listing as National Protected sites. Recording again does not meet the requirements of the condition (d) Item (e) which requires funding to replace or provide comparable substitute resources or environments. Item (e) in the table does not fit these criteria.

TARDAEWETHER Kellen * ODOE

From:	Gary Marlette <garymarlette@yahoo.com>
Sent:	Thursday, August 27, 2020 11:25 AM
To:	OED_OAH_REFERRAL * OED
Cc:	TARDAEWETHER Kellen * ODOE
Subject:	REQUEST FOR STANDING AND CONTESTED CASE REQUEST REGARDING THE BOARDMAN TO HEMINGWAY PROPOSED ORDER

Allison Greene-Webster, Senior Administrative Law Judge
500 Capitol Street NE, Salem, OR 97301

SUBMITTED VIA EMAIL: OED_OAH_Referral@oregon.gov (August 27, 2020)

My name is JoAnn Marlette, and my address is 2031 Court Street #8, Baker City, OR 97814. I am not represented by an attorney, but would like to reserve my right to an attorney in future proceedings as necessary. I feel I am the best person to represent me and my interest at this time.

I am requesting standing and a contested case on the following issue:

ISSUE: I am requesting standing and a contested case due to the fact that the proposed order fails to provide for public review of the final monitoring plans, monitor the site for hazardous materials during operation, and allows exceptions which substantially increase the likelihood of a hazardous material spill. These actions fail to comply with requirements of OAR 345-021-0010(w)

Supporting Comments:

The application establishes that hazardous materials will be present on-site during construction and operation of the development, including gas and grease used in vehicles and for maintenance, herbicides, etc. A failure to require a monitoring plan that includes the site operation time-frame, increases the risk of a discharge of hazardous material resulting in a failure to comply with OAR 345-021-0010(1) and increasing the cost and risk for cities, counties and wildlife habitat. This risk is substantially increased due to the site certificate condition allowing construction of facility components, including roads within 25 feet of water resources, and allowing roads and the transmission line to cross high value farm lands, protected areas, waters and wetlands containing Threatened and Endangered Species. The site certificate fails to comply with the above rule due to not allowing public review and comment on the Monitoring Plans being developed by contractors, failing to require setbacks established in the Environmental Impact Statement that would provide protection of water resources and providing for no monitoring during facility operation. This

substantially increases the risks the development will create for all property being crossed by the development. The plan is made further ineffective due to the exception to setbacks contained in G-4, Section 2.3.4 which allows the developer to ignore setbacks when roads are near water bodies. The location of roads, which can be within 25 feet of water bodies and road crossing water bodies, require an ongoing monitoring program to provide protection of the water bodies due to the significant risk posed by equipment utilizing and carrying hazardous materials in close proximity to water and wetland resources to assure no hazardous material discharges have or are occurring. Monitoring needs to include, at a minimum, visual inspections of areas where hazardous materials are being transported to identify any visible signs of spills, equipment leakage, etc., on either the roadways or areas within the EIS setback distances. The site certificate only requires monitoring of the Longhorn Station during the operation of the development. These actions fail to comply with the statutes and rules and fail to provide protection for the public, public agencies, farm and forest lands and the environment.

TARDAEWETHER Kellen * ODOE

From:	Gary Marlette <garymarlette@yahoo.com>
Sent:	Thursday, August 27, 2020 12:56 PM
To:	OED_OAH_REFERRAL * OED
Cc:	TARDAEWETHER Kellen * ODOE
Subject:	REQUEST FOR STANDING AND CONTESTED CASE REQUEST REGARDING THE BOARDMAN TO HEMINGWAY PROPOSED ORDER

Allison Greene-Webster, Senior Administrative Law Judge
OREGON DEPARTMENT OF ENERGY
500 Capitol Street NE, Salem, OR 97301

SUBMITTED VIA EMAIL: OED_OAH_Referral@oregon.gov (August 27, 2020)

My name is JoAnn Marlette, and my address is 2031 Court Street #8, Baker City, OR 97814. I am not represented by an attorney, but would like to reserve my right to an attorney in future proceedings as necessary. I feel I am the best person to represent me and my interest at this time.

ISSUE:
I am requesting party status and a contested case hearing due to the changes described on Page 10, Lines 24 through 32, which fail to comply with ORS 469.370(3) which only requires the comments to be sufficiently specific to provide an opportunity for the applicant to respond. For many of the comments, the applicant has already responded to the comments which clearly demonstrates understanding. The rules in OAR 345-015-0016 as well as the enabling statutes provide specific language regarding what is required, and the language has been addressed in Appeals Court Decisions to support the very minimal requirement that the issue be clear as is discussed in Bold v Clackamas Co. 107 Or. App 619, 813 P2d 1078 (1991) where the court found that the purpose of “raise it or waive it” is to provide “fair notice” of the issue and does not require citation to the relevant code standard. The council lacks the authority to redefine state statutes as the courts have determined that information cannot be added to statutes which is not currently there, nor can information, which is there, be removed.

The above information was included in the Proposed Order after the Draft Proposed Order was issued absent the challenged language. It is a material change that could not be commented on based upon the fact that there was nothing to respond to in the Draft Proposed Order. This is a material change in the application of decision making in contested case requests occurring based upon changes that occur in the Proposed Order. It is under the control of ODOE and the Council. They added the language absent the authority provided in the statute to do so. They now need to remove the language utilizing the same process.

SECOND ISSUE FROM Page 10:
I am requesting standing as a party due to the Proposed Order failure to comply with the Oregon Revised Statute ORS 469.370(5), which does not provide for a different standard for the opportunity to obtain a contested case based upon whether the counsel included the material in a Draft Proposed Order, or added it to a Proposed Order. The information contained on page 10, Lines 6 through 15, providing additional requirements for obtaining a contested case when new information is added to a Proposed Order, must be removed. This limitation on the request for a contested case fails to comply with ORS 469.370. The council lacks the authority to ignore a statute, and case law has determined that, in applying statutes, a party cannot add what is not there, nor remove what is.

Respectfully submitted, JoAnn Marlette

TARDAEWETHER Kellen * ODOE

From: wildlandmm@netscape.net
Sent: Thursday, August 27, 2020 3:19 PM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Cc: info@stopb2h.org
Subject: Petition for Party Status in Contested Case re B2H transmission ASC (McAllister)
Attachments: 8.27.2020_McAllister Petition for Party Status in Contested Case and Exs.pdf

Attached please find my Petition for Party Status in the Contested Case regarding the Proposed Order on Application for Site Certificate for Boardman to Hemingway Transmission Line.

Sincerely,
Michael McAllister

60069 Morgan Lake Road
La Grande, OR 97850
(541) 786-1507

Michael McAllister, 60069 Morgan Lake Road, La Grande, Oregon, 97850, (541) 786-1507

August 27, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy,
500 Capitol Street NE,
Salem OR 97301

SENT VIA EMAIL TO: OED OAH Referral@oregon.gov; Kellen.tardaewether@oregon.gov

Dear Honorable Judge Greene-Webster:

This letter is my petition for "Party Status" in the Contested Case Proceedings that will evaluate the Proposed Order on Application for Site Certificate for Boardman to Hemingway Transmission Line (July 2, 2020 Proposed Order).

As a concerned Oregon citizen with an empirical and professional knowledge of the state's natural resources, I have been involved in this Idaho Power Corporation (IPC) facility siting analysis for more than 10 years. I now petition for "party" status following the criteria defined on page 5 of the Public Notice – Proposed Order Application for Site Certificate for Boardman to Hemingway Transmission Line. Below are the required contents of my Petition for Party Status as stated in the Public Notice issued July 2, 2020:

1) I am Michael McAllister, 60069 Morgan Lake Road, La Grande, Oregon, 97850. (541) 786-1507.

2) I am not represented by an attorney.

3) I am requesting "party" status because I am representing both a personal interest, and the public interest - which is multifaceted and is covered by various Oregon statutes and regulations.

4) I maintain multiple personal interests that I seek to protect through this public process. My land and property line is 0.25 miles from the proposed site of the B2H Transmission Line as it runs through Union County on IPC's "Morgan Lake Alternative Route." I am the nearest Morgan Lake estate to the transmission line on the route and the most directly and immediately impacted.[1] I purchased my property over 30 years ago precisely because of the unique extent of the wildland and diverse native integrity as demonstrated by the Morgan Lake wetlands at the top of the Blue Mountains, which are directly and adversely impacted by the relevant section of the proposed site (the Morgan Lake Alternative Route).[2] In

[1] Despite the close proximity of my property to the Morgan Lake Alternative Route, I have never received any notification, correspondence, or contact of any kind from Idaho Power Company regarding the proposed route.

[2] The line as proposed runs within a mere 500 feet, and in full view of La Grande's Morgan Lake Park, which lies just above my property and is a place I visit almost daily. Morgan Lake Park

addition to the impact on the proximate wildlands, of particular concern to me is the increased fire risk associated with running the transmission line across the windy ridgetop just above my home and tree farm, which are at the ridgetop and within 1,500 feet of the B2H Transmission Line where it skirts the Morgan Lake Estates. Here, my residential property is the closest to the transmission line and directly to the east and downwind. Further, the southern boundary of my property (Union County Tax Lot 702) includes the thirty-inch diameter "trans-Alaska" natural gas pipeline. As applied for, the B2H Transmission Line crosses this gas line within 0.5 miles of my property. I consider this to be an unacceptable and potentially explosive situation.

Further, as a stakeholder in this matter with knowledge of the subject land in Union County, I have repeatedly proposed to IPC a least-impact alternative concerning a ten-mile segment of the B2H Transmission Line in Union County since approximately 2010. While IPC never communicated with me regarding my proposal, which, significantly, was later identified to be the appropriate route based on federal environmental impact analysis, IPC did respond to my neighbor in 2015, whose proposal became the basis for the current Morgan Lake Alternative Route across the subject ten-mile segment. It is unclear why my, federally corroborated route was disregarded, while my neighbor was able to influence the proposed siting.

My personal interest is further reflected in my oral and written comments during the Public Hearing on the Draft Proposed Order for the Boardman to Hemingway Transmission Line (June18-20 and June 26-27, 2019), which I incorporate by reference and have attached hereto as **Exhibit A**.

5) As a petitioner, I am also seeking to represent the "public interests": fisheries, forest, range, recreation, wildlife, and visual resources with which I have expertise and am intimately acquainted. Based on my own environmental analysis of the section of the project relating to Union County (the Morgan Lake Alternative Route), as well as the analysis of the Bureau of Land Management evaluating the least environmentally impactful route through Union County, IPC's proposed siting on the "Morgan Lake Alternative Route" in Union County does not adequately consider its impact as it relates to the local environment and is not consistent with: OARs 345-022-022; 345-022-0100; 345-022-0040; 345-022-0080; 345-022-0060;[3] 344-021-0010(b)(D); or ORS § 469.370(13).

   IPC's proposed B2H facility has been reviewed by the United States Department of Interior's Bureau of Land Management (BLM) under the National Environmental Policy Act (NEPA),

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Recreational Use Development Plan states: "A goal of minimum development of Morgan Lake Park should be maintained to preserve the maximum of natural setting and to encourage solitude, isolation, and limited visibility of users…"

[3] The reasoning as to why IPC's Morgan Lake Alternative Route in its application is inconsistent with these regulations is detailed in my environmental analysis submitted with my public comment, incorporated here by reference and attached in Exhibit A.

42 U.S.C. Section 4321, et seq. The BLM has, in fact, identified the least impactful route through Union County, which is depicted on the interactive map on IPC' website as the "Agency Selected Route (NEPA)."[4] I participated in this public process and contributed to the information used to identify the "Agency Selected Route" for an approximate nine-mile segment in Union County. IPC has actively and admittedly disregarded this route identified by the BLM to be least impactful, and of which it has been aware since 2010. IPC has applied for site certificate across a different nine-mile route segment they call the Morgan Lake Alternative. For the public resources identified above, the Morgan Lake Alternative will result in greater negative impacts. As a petitioner, I am qualified to represent such public interests because: (1) I am a lifelong Oregon outdoorsman, the son of Oregon's widely respected outdoorsman – Thomas H. McAllister; (2) I possess a B.S. from the University of Idaho in Wildlife Resources and Communications; (3) I have lived on and managed natural resources across the subject landscape for over 40 years; (4) as an independent natural resource contractor, I have made a career specializing in natural resources inventory for: federal, state, tribal, and private land stewards. Primarily, I gather data (facts) that are used for planning purposes – most often for NEPA analysis; and (5) the record will show that since IPC first announced their intent to build B2H, I have been committed, at every step in their process, to getting the project sited in the manner that will least impact the people of Oregon and their precious natural resources.

6) Existing parties to the proceeding cannot adequately represent my interests for a number of reasons. First, I am uniquely situated as to my personal interests in the matter. Not only is IPC's proposed line only 0.25 miles from my property, I have never personally received any notification or communication from IPC regarding the route, my interests, or participation in the process in any way—despite the fact that I have personally been sending correspondence to IPC regarding the local siting of this project since 2008 (attached hereto as **Exhibit B** are my communications to IPC and the Oregon Department of Energy regarding the B2H project and siting). My unique long-term personal involvement in the matter (referenced in paragraph 5 above) and knowledge of the evolution of IPC's routes across the subject segment, is further reason why existing parties cannot adequately represent my interests here. Further, as stated above, I have specific and intimate knowledge of the subject land, which I have acquired both professionally and personally over the past 40 years. Finally, my public comments, both oral and written, are distinct in highlighting IPC's failure throughout the siting application process to adequately evaluate the line's local impact on environment, resources, recreation, and public safety as evidenced by the existence—and active exclusion—of the environmentally preferred route that had already been identified by the BLM as the appropriate route through Union County based on consideration of environmental impacts.

7) The focus of the issues I intend to raise in the contested case concern a nine-mile segment of the B2H Transmission Line in Union County. This segment is referred to as the **Morgan**

[4] https://www.boardmantohemingway.com/maps (screenshot attached hereto as Exhibit C).

Lake Alternative in IPC's application. IPC compromised the process when they filed their Application for Site Certificate without following the Oregon Department of Energy process with respect to this route. Consistent with my public comments, I intend to raise that IPC has failed to adequately consider nearly every aspect of the Morgan Lake Alternative Route's impact on Union County's local resources and public safety. IPC's failure to adequately evaluate relevant factors in its corridor selection is laid bare by the fact that the least impactful route, consistent with the National Environmental Policy Act (NEPA), was, in fact, identified and this is not the route for which IPC has applied. In other words, the very existence of the Agency Selected NEPA Route, is evidence that IPC has not complied with OAR 344-021-0010(1)(b); and that the route applied for, as to Union County, is inconsistent with the considerations and goals of OARs 345-022-022; 345-022-0100; 345-022-0040; 345-022-0080; 345-022-0060. Further, IPC's application and deliberate exclusion of the NEPA route is inconsistent with ORS 469.370(13) which provides:

> For a facility that is subject to and has been or will be reviewed by a federal agency under the National Environmental Policy Act, 42 U.S.C. Section 4321, et seq., the council shall conduct *its site certificate review, to the maximum extent feasible, in a manner that is consistent with and does not duplicate the federal agency review.* (Emphasis added).

IPC's failure to adequately evaluate relevant factors in selecting its corridor was made clear during a public meeting during which EFSC member Hanley Jenkin inquired as to why IPC had excluded the Agency Selected NEPA Route. IPC's response was as follows:

> "**Back when BLM was working on getting their ROD issue, the delays in their process happened, occurred. We had to move ahead with the state process late in the application. And by the time BLM came out with their ROD, their record of decision, it was too late for us to really go back at that point**. Now when I had conversations with BLM's program manager about this and whether that created any issues for BLM, they recognized that the Glass Hill route that you're talking about and the Morgan Lake route were identical on parcels that were under control of BLM, federal government. So, the fact that in our state application we had the Morgan Lake route did not influence or impact BLM's record of decision in their process."

(Public Hearing Tr. June 20, 2019, La Grande, OR at p. 151:1-18)(emphasis added). Thus, IPC concedes it disregarded the least impactful route despite its knowledge that it was environmentally preferred without any justification other than it purportedly was not required to include it. Significantly, IPC has been aware of a lesser impact route since 2010 when I first raised it to IPC, and of the BLM's assessment of this route as the preferred route based its environmental impact assessment in 2014, both before its site application including the current proposed Morgan Lake Alternative Route in July 2017. Accordingly, the inadequate justification provided in the public meeting also appears to be false based on the timeline of events. The admitted disregard without justification for an identified, NEPA-consistent (*i.e.*, least

environmental impact) route runs counter to OARs 345-022-022; 345-022-0100; 345-022-0040; 345-022-0080; 345-022-0060;[5] 344-021-0010(b)(D); or ORS § 469.370(13).[6]

While the Oregon Department of Energy does not evaluate or consider alternative routes in evaluating the application for site certificate, it need not evaluate or compare the routes to find that the very existence of an identified, environmentally preferred route based on public interest considerations renders IPC's evaluation of the Morgan Lake Alternative inadequate and inconsistent with purpose of the regulations referenced above, and with the public interest. The fact that IPC did not, and could not, provide meaningful, or credible, justification to EFSC or the public as to why it ultimately disregarded the environmentally preferred route demonstrates that IPC has not adequately evaluated significant relevant factors with respect to the particular corridor selection.

I further wish to raise my environmental analysis (included in my public comment) of the impacts of IPC's Morgan Lake Alternative Route, which is consistent with the findings of the BLM and reflects why the BLM identified its preferred route.

8) My comments, both oral and written, addressing the issues outlined above are attached hereto as Exhibit A. Specifically, I address my concerns with respect to the aggregate environmental impacts of the Morgan Lake Alternative Route, and IPC's clear failure to adequately evaluate these impacts, evidenced by the exclusion of the Agency identified preferred, least impact route.

Sincerely,

Michael McAllister

60069 Morgan Lake Road
La Grande, OR 97850

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[5] The reasoning as to why IPC's Morgan Lake Alternative Route through Union County is inconsistent with these regulations is detailed in my environmental analysis submitted with my public comment, incorporated here by reference and attached as Exhibit A.

[6] IPC's active disregard for the identified least impactful route is also directly counter to UCZPSO 20.09(5)(D) (ENVIRONMENTAL) which requires that consideration should be given to alternative sites in Union County for proposed development that which would create less of an environmental impact of any on the resources listed in Section 20.09(1), if alternatives are available. Contrary to the findings in the Proposed Order (p. 175:20-27), IPC cannot have conducted a comprehensive avoidance and minimization analysis for all environmental resources and other resources to create the least overall impact, as evidenced by the pre-existence of route with least overall impact, which, IPC admittedly ignores. (*See* Public Hearing Tr. June 20, 2019 at 151:1-18).

EXHIBIT A

EXHIBIT A

Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (*mandatory*) MICHAEL MCALLISTER

Mailing Address (*mandatory*) 60069 MORGAN LK RD
LA GRANDE OR 97850

Phone Number (*optional*) 541 786 1507 Email Address (*optional*) _____

Today's Date: 6/20

Do you wish to make oral public testimony at this Hearing: Yes ✓ No_____

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony
(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

Page 126

1 litigation that had proven that. So I have to trust
2 them on that, I guess.
3 I think you'll have to understand, I'm a
4 little bit skeptical about this. Idaho Power hasn't
5 been -- I haven't been contacted -- I mean, I have now.
6 But through this planning process, I really wasn't
7 contacted. Nobody came to my place and looked at the
8 site. I don't know if they know there is a pond right
9 next to where they want to put this tower. I don't know
10 if they understand I had to put a well in 700 feet deep,
11 the water is amazing. I don't know if that will change.
12 The road coming up Hawthorne has to have a lot
13 of annual maintenance on it for just three houses. The
14 idea of them hauling that heavy equipment, and I don't
15 know what they are going to do to improve or better that
16 road, my concern is they will make it worse. Only
17 because of the limited history that I've had with them
18 hasn't really been very supportive. Tonight was the
19 first night that I got a chance to listen to this many
20 people talk about their concerns.
21 Honestly, I'm more concerned now than before I
22 came in. I have heard a lot of information tonight that
23 kind of would make, I think, anybody in my shoes afraid
24 of the future of what's going to happen up there. I
25 love this place. I think it's going to change

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1 dramatically. That is all I have.
2 HEARING OFFICER WEBSTER: Thank you.
3 Following Mr. McAllister we have Charles
4 Gillis on deck.
5 MR. MICHAEL McALLISTER: I'm Michael
6 McAllister. I live at 60069 Morgan Lake Road right at
7 the top where you confront the wind as you break the
8 summit.
9 I am of the Move B2H camp, an advocate of
10 moving and have been for at least 10 years, when the
11 initial proposed route was presented. I am a natural
12 resource inventory expert, and made a career
13 inventorying fish, forest, wildlife, range, ozone
14 damage, carbon sequestration. I collect facts from the
15 landscape and have been in La Grande since 1979, when I
16 lived right below lower Morgan Lake, which apparently is
17 not recognized by Idaho Power.
18 The eagles built two nests right above my wall
19 tent where I lived as I went to school here at Eastern
20 Oregon University. And it's really a pleasure to be
21 here tonight with the community and hearing all of their
22 different concerns and considerations. It's always been
23 above my mental capacity to explore the rightness or
24 wrongness of the power line; so I have focused on moving
25 B2H.

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1 For everybody here, if you are to looking at
2 the computer screen that's up on the back wall, there is
3 a third power line, which is the green route. There is
4 red, green, and yellow. And I'm pleased to see that the
5 green line was turned on this evening. It wasn't on
6 when I originally looked at it.
7 I also came in late and I was told that I'm
8 not supposed to advocate for the western route
9 recognized by the BLM and environmental analysis because
10 it has not been applied for. That route is what I've
11 been involved with advocating for for 10 years now,
12 since day one, really.
13 I think I probably wrote Adam Bless, with the
14 Oregon Energy Council, probably the first letter he
15 received with my concerns about siting this line through
16 Union County here. And with an empirical background for
17 virtually every acre of the stretch from Hilgard to Ladd
18 Canyon that probably nobody else has, I feel like it's
19 my community contribution to represent it as completely
20 and as well as I can.
21 The green route is by far the superior route
22 when you consider just about any aspect; fish, forest,
23 wildlife, range, fire, feasibility, all the above. In
24 my analysis collecting facts relative to all these
25 resources, the green route is by far the best route.

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1 And I can honestly say that it's a travesty that, for
2 whatever reason, Idaho Power has chosen to completely
3 disregard that route. I have seen no evidence in
4 10 years that Idaho Power has shown any consideration of
5 that route. I think it's appalling.
6 I do credit Idaho Power for having in the
7 10 years considered routes through John Day, extensively
8 routes through the Blue Mountains, and having recognized
9 the importance of not further fragmenting large-scale
10 forest tracks, and that the I-84 corridor is probably
11 the best route. But specifically through this neck of
12 the woods, through Union County, Ladd Canyon, I think
13 every concern I've heard here this evening can be
14 mitigated by placing this transmission line on the
15 environmentally-preferred route.
16 And I am providing comment, written comment
17 that will specify as well as I can with the time that I
18 have. I don't believe it's up to me to demonstrate a
19 burden of proof to this end, but I'm doing my best to do
20 that.
21 And I thank you all for your listening here
22 this evening.
23 HEARING OFFICER WEBSTER: Thank you.
24 Following Mr. Gillis, we will hear from, I
25 believe it's John Winters, if I'm reading that

Michael McAllister, 60069 Morgan Lake Road, La Grande, Oregon, 97850, (541) 786-1507.

June 23, 2019

Todd Cornett, Energy Facility Siting Division Administrator, Energy Facility Siting Division, Oregon Department of Energy, 550 Capitol Street NE, 1st Floor, Salem, OR, 97301, todd.cornett@oregon.gov .

Dear Mr Cornett,

On January 14, 2019, I delivered to you a letter (attached – page 2) to express my concerns about Idaho Power Corporations (IPC) "incomplete application" for *Site Certificate* of their **Boardman to Hemingway Transmission Line** through Union County. The application is incomplete because IPC did not include the Agency Selected Route, adopted by the National Environmental Planning Act (NEPA) process – conducted by the U.S. Department of Interior's Bureau of Land Management.

This past Thursday – June 20, 2019 – the **Energy Facility Siting Council** held Public Hearing on the *Draft Proposed Order and Request for Comments* – here in Union County. I attended that meeting and I did make comments regarding my position with regards to Idaho Power Corporations Incomplete Application for Site Certificate.

In brief, the most significant point that I made was – the **Agency Identified Route A** would affectively mitigate nearly all the concerns expressed by the many attendee's comments at that meeting.

Following the public comments, two representatives from Idaho Power were seated before the Siting Committee, this so that committee members could ask questions in response to the public comments previously made.

Committee Member Hanley Jenkins asked the only question and he phrased it this way – **"I am going to ask you one very hard question – why did Idaho Power Corporation not include the BLM Agency Identified Route into their Application"?**

Idaho Power's Mark Stokes provided the following as an answer – **the BLM Agency Alternative was not included because their process was being drawn out – we were under time constraints to submit our application and went ahead without it.**

There were no further questions, and no further opportunity for the public to respond to this **Revelation.**

I have been involved over ten years in advocating for what is now the BLM Agency Identified Route A.

Idaho Power Corporation and others are currently processing an incomplete application. IPC has been asked to amend their application repeatedly, too include the **Agency Identified Route A.** This issue should not become a Contested Case.

Respectfully Michael McAllister

Michael McAllister

RECEIVED
JUN 26 2019
DEPARTMENT OF ENERGY

Michael McAllister

January 14, 2019

Todd Cornett, Energy Facility Siting Division Administrator, Energy Facility Siting Division, Oregon Department of Energy, 550 Capitol Street NE, 1st Floor, Salem, OR, 97301, todd.cornett@oregon.gov .

Dear Mr Cornett,

I am gravely concerned that Idaho Power Corporation (IPC) has submitted an incomplete application to Oregon's Energy Facility Siting Council (EFSC). Their application for *Site Certificate* of the **Boardman to Hemingway Transmission Line** through Union County does not include for consideration, the Agency Selected Route, adopted by the National Environmental Planning Act (NEPA) process – conducted by the U.S. Department of Interior's Bureau of Land Management. The two routes that IPC has applied for: **Proposed Route (B)** and **Morgan Lake Alternative (3),** were developed late in the NEPA process and have not undergone environmental analysis or public comment. IPC's failure to gather satisfactory evidence has limited the ability of the public, EFSC, and other regulators in their ability to make fully informed decisions in the public interest.

I am requesting that Idaho Power Corporation amend their Oregon EFSC Application for Site Certificate to include the U.S. Bureau of Land Management's **Agency Identified Route A** for consideration by the State of Oregon EFSC board members. It is the only route that was fully subjected to environmental analysis and public comment during the Federal EIS. It was established through community consultation and environmental review in a multi-year process. It must be on the table for full consideration by Oregon EFSC for a "Complete Application" review.

I am Michael McAllister, a long-time resident of Union County and private contractor specializing in natural resources inventory and management. I hold a Bachelor of Science degree, *Wildlife Resources*, from the University of Idaho. As a 40-year resident on Morgan Lake road, I have an intimate knowledge of the geology, habitat, environmental issues, wildfire hazards and recreational value of the area. My interest is both professional and personal.

Oregon Department of Energy and Idaho Power Corporation records show that, since 2008, I have been encouraging Idaho Power Corporation to site the Boardman to Hemingway (B2H) Transmission Line in a manner, whereby the cumulative impacts of the Right-Of-Way will have a minimal impact on Oregon's public and their natural resources.

Attached is my comparative analysis of IPC's two routes (B and 3) and the BLM's Agency Selected Route (A). This analysis demonstrates that the Agency Selected Route minimizes risks to public safety and imposes the least impacts on the natural resources of both the City of La Grande and Union County.

At this time, I ask that Idaho Power Corporation amend their Oregon EFSC Application for Site Certificate to include additional environmental and community evidence regarding their proposed routes and to include the BLM *Agency Identified Route A* for consideration.

Respectfully Michael McAllister

Michael McAllister

Public Comment: Michael McAllister

Proposed Boardman to Hemingway Transmission Line
Site Certificate Application Review

June 23, 2019

Introduction

The reader is advised to follow along using the Google Earth maps provided at http://www.boardmantohemingway.com/LandownerMaps.aspx. Expand the map to full screen and zoom in on Routes A, B, and 3 near La Grande, Oregon. Note you can switch between Earth View, Map View, and Topography View using the tab at the top left of the screen. To see vegetation coverages, use Earth View. Too see geographic features switch to Topography View.

Map 3 (Union County) Legend:

(A) – BLM Agency Selected Route (NEPA) - Route Color is Green on Map;

(B) – Proposed Route (EFSC) – Route Color is Red on Map;

(3) – Morgan Lake Alternative (EFSEC) – Route Color is Blue on Map.

Proposed Route B (EFSC)

IPC's Proposed Route has been identified as a best attempt to site B2H along the existing 230 kV transmission line as it passes through Union County. In 2008 and again in 2012, I asked that IPC construct their new B2H transmission line adjacent to the existing 230 kV transmission line passing through La Grande and Union County. After much further review of the evidence presented, I deemed that such a route would not meet the screens for the 500 kV transmission line for the following reasons:

1) The valley slopes to the west above La Grande are steep, with unstable geology; many areas have been identified by the U.S. Geologic Survey as unsuitable for construction.
2) La Grande's western skyline viewshed would be severely impacted. Both the City of La Grande and Union County have asked IPC to keep B2H out of their viewshed.
3) The "Powerful Rocky" stretch of Oregon Trail, and its archaeological artifacts, would be desecrated by the construction and continued maintenance requirements of the B2H towers.
4) Impacts to Oregon's Ladd Marsh Wildlife Management Area would be severe and permanent. Ladd Marsh was established as a wildlife mitigation area for past federal projects and the refuge should not be compromised. IPC itself recognizes and designates Ladd Marsh as "irreplaceable."

Based upon the above considerations, **Proposed Route (B)** has *High Cumulative Impact*, and few mitigation options.

Comparative Analysis of BLM Agency Selected Route (A) and Morgan Lake Alternative Route (3)

From here forward I will explain and contrast the **Agency Selected Route A**, with the **Morgan Lake Route 3.** The analysis begins at the Divergence Point – where Routes A and 3 diverge. The analysis then proceeds from north (DP), then south to the Convergence Point (CP) of the two routes near Ladd Canyon. The distance between DP and CP is approximately eleven miles for both Routes: A and 3. The elevation at DP (north end) is approximately 3,400 feet. The Elevation at CP (south) is approximately 4,800 feet. The Divergence Point is located near the middle of section 7, Township 3 South, Range 37 East, approximately 1.5 miles south of the Highway 244 junction with Interstate 84 at Hilgard. It is approximately 0.75 miles south of Highway 244, traveling south on the Whiskey Creek Road.

Geographic Setting

The biggest difference between the two routes is how each of them has been established geographically. This can best be recognized by comparison in *Topography View*. Recognize that the Grande Ronde Valley is the dominant geographic feature for the region, and further that it is oriented in a slightly northwest by southeast alignment - as is the Blue Mountain Range along the valley's west side. Recognize that from Divergence Point (near the Grande Ronde River at Hilgard) that the landscape rises as you go south following the west side of Grande Ronde Valley, all the way to near the Convergence Point above Ladd Canyon.

Now notice how the two routes, A and 3, ascend from 3,400 feet up to just over 5,200 feet elevation near the high point at Glass Hill. And notice that between the two routes there is a series of parallel ridges and drainages that are also oriented in the northwest by southeast alignment. This alignment is caused by the orientation of the faults associated with the origins of the Grande Ronde Valley. The highest of the fault generated-ridges is the one following the Mill Creek Fault – which also establishes the west edge of the valley. This highest ridge is known by geologists as the Glass Hill Monocline – **Morgan Lake Route 3 sites the transmission line along this monocline ridgetop.**

Comparatively, the Agency Selected Route A is the lower elevation route where the mean elevation is approximately 4,100 feet. See that from DP Route A proceeds southerly at an azimuth of approximately 150 degrees, along the same northwest/southeast geologic alignment. Route A gains elevation slowly as it moves up "Graves Ridge" in a straight line for approximately 5.0 miles. "Graves Ridge" is a broad gentle slope, where the only vegetation is sparse grass and forbs – much of it is rocky scab vegetation. The Graves Ridge Road (East Fork of the Whiskey Creek Road) mostly parallels the Route A with an elevation gain of about 200 feet per mile – a slope grade of just 5 percent. Importantly, note that existing roads provide excellent road access for at least two thirds of the Route A. These roads are bladed across solid basalt with few corners and no steep grades. Route A then makes only one turn, easterly to approximately 110 degrees. On this course, **Agency Selected Route A crosses the Rock Creek drainage 8.5 miles upstream from the Grande Ronde River – above the lower 6 miles deemed important to Threatened Snake River Chinook Salmon.**

Comparatively, the Morgan Lake Route 3 on the other-hand, moves east from DP and away from the Whiskey Creek Road. Route 3 then crosses the Rock Creek watershed just three miles up-stream of the Grande Ronde River. Note that there are four distinct drainages that make up the Rock Creek Watershed, from west to east they are: Graves, Little Rock, Rock, and Sheep Creeks. Notice that all four of the drainages converge near to where Route 3 crosses Rock Creek. There are no real existing roads

that access the north two thirds of Route 3. After crossing Rock and Sheep Creeks, Route 3 then intersects the Glass Hill Monocline (near Morgan Lake), where it turns southerly and follows the ridgetop. **Morgan Lake Route 3 is the high elevation route where the mean elevation across the route is approximately 4,500 feet.**

Soil Protection - OAR 345-022-022

The 400 feet mean elevation difference between **(A and 3)** is the predominant variable responsible for the difference in soils. The higher elevations along the top of the Glass Hill Monocline gather more precipitation, summer temperatures are cooler, more layered vegetation provide more shading, and windblown snow and soil particulates accumulate. The variability in soils is well demonstrated when you superimpose the **Union County Soil Survey Map** over IPC's Route Map overlay. Using this soils inventory, **I have identified the four predominant soil types for both: Route A and Route 3. They are listed hear from most coverage, to least coverage:**

<u>Agency Selected Route A,</u> Soils are: 1) = 69C - *Watama-Gwinly complex*, is on biscuit-scabland uplands, vegetation is mainly bunchgrasses, and annual forbs; **2)** = 35E – *Klicker-Anatone complex* - mountainous uplands where the native vegetation is mainly Ponderosa pine, bunchgrasses and elk sedge, a warm moist plant community suited to the production of pine, on a patchy basis - where soil is deep enough, also as rangeland and wildlife habitat. **3)** = 4E *Anatone extremely stony loam* - is shallow, well-drained soil at ridgetops, and on south and west facing slopes where vegetation is mainly blue-bunch wheatgrass, Idaho fescue and stiff sage; used mainly as rangeland. **4)** = 58E – *Starkey very stony silt loam* – shallow well drained soil on uplands, the vegetations is mainly bunchgrasses and annual forbs, Idaho fescue, blue-bunch wheatgrass and Sandberg bluegrass. The unit is used mainly for rangeland. Collectively, the soils makeup for Route A, tend to be shallower, and of residual decomposed basalt in its origin. The site index for timber production is lower, and shrubs are limited in the vegetation composition. **Agency Selected Route A crosses 44% forested acres - mostly warm dry plant communities. And it is noteworthy that Route A crosses 33% less timber acres than does Morgan Lake Route**

<u>Morgan Lake Route 3</u>, Soils are; 1) = 4E - *Anatone extremely stony loam*, is shallow, well drained, at ridgetops and on south and west facing slopes, derived predominately from basalt; vegetation in mainly blue-bunch wheatgrass, Idaho Fescue and stiff sage; used mainly as rangeland. **2)** = 32E - *Kalema very stony silt loam*, moderately deep, well drained, mainly coniferous forest and an understory of shrubs, forbs and grasses; used mainly for timber production, also used for woodland grazing and wildlife habitat. **3)** = 33E – *Klicker stony silt loam*, moderately deep, well drained, mountainous uplands, vegetation is mainly coniferous forest with bunchgrasses annual forbs and perennial shrubs, unit is used mainly for timber production, also for woodland grazing and wildlife habitat. **4)** = 61E – *Ukiah-Starkey complex*, Ukiah moderately deep and well drained, vegetation mainly Idaho Fescue, Blue-bunch wheatgrass and Sandberg bluegrass; used mainly as rangeland. Collectively, the soils makeup for Route 3, tend to be deeper, loamier, of residual decomposed basalt, but with more volcanic ash composition. The site index for timber production is higher, where shrub composition is greater. **Morgan Lake Route 3 crosses 66 % forested acres mostly *cool moist plant communities*, and that is 33% more timber acres than does the Agency Selected Route A crosses.**

Recreation - OAR 345-022-0100
Protected Areas - OAR 345-022-0040
Scenic Resources – OAR 345-022-0080.

Morgan Lake Route 3 also establishes towers within 500 feet of Morgan Lake Park. Here, the impact on La Grande's public will be *High*. The first stated goal in the Morgan Lake Park Recreational Use and Development Plan (Section 1, Page 2) - *A goal of minimum development of Morgan Lake Park should be maintained to preserve the maximum of natural setting and to encourage solitude, isolation, and limited visibility of users while at the same time providing safe and sanitary condition for users.* Also noteworthy is the fact that the **City of La Grande Chamber of Commerce** has long promoted Morgan Lake Park as the #1 Recreation Tourist Destination in the La Grande Area. And the State of Oregon designated **Morgan Lake Park as a State Wildlife Refuge** in the 1960s. Today Oregon Department of Fish and Wildlife identifies the Lake as an easy access fishing destination for the handycapped.

Morgan Lake Park encompasses two separate Lakes. Morgan Lake is 70 acres in size and is developed with road access and camping. Twin Lake is 27 acres in size, undeveloped, and with no road access or camping. **Twin Lake has been identified by both Federal and State programs to conserve, restore, and protect wetlands**. Oregon has developed a **Wetland Conservation Strategy** (Oregon Division of Lands, 1993). This Strategy is implemented through the Oregon Wetlands Inventory and Wetlands Conservation Plans (See Webpage). This planning process allows local governments to balance wetlands protection with other land-use needs. **Twin Lake is recognized as an important, persistent, emergent vegetation wetlands, which includes both submersed and floating plants.**

Fish and Wildlife Habitat - OAR 345-022-0060,

Morgan Lake Route 3 crosses Rock Creek approximately 2.5 miles upstream from the Grande Ronde River - just below where Sheep Creek flows into Rock Creek. Here is where the best water quality and the coolest water temperatures exist during the heat of summer. And here is where Route 3 will cross. Rock Creek is not a Chinook Salmon spawning habitat. However, **the lower six miles of Rock Creek have been identified as important habitat for both Steelhead and Chinook Salmon smolts.**

Twin Lake, at 4,100 feet elevation, supports one of the most diverse waterfowl nesting communities in the Blue Mountain Ecoregion. Most unusual is the nesting by: Ring-necked Ducks, Red Head, Rudy Duck, Blue-winged Teal, Shoveler, and Pied-billed Grebe. The species diversity surrounding this wetlands anomaly at 4100 feet elevation, is enhanced by the natural basalt rim rocks forming the south and west sides of the lake. Here the vegetation is a diverse mixture of native shrubs, aspen, black Cottonwood, and Ponderosa pine. These surrounding shrub and tree communities support as rich an assortment of both migratory and nesting passerine birds as can be recognized across the Blue Mountain Ecoregion. **Also frequenting these habitats are two bird species identified on the Oregon Department of Fish and Wildlife – *Sensitive Species List*: Great Gray Owl, and White-headed Woodpecker.**

In 2013 a Pair of Bald Eagles constructed a nest in the top of a large Ponderosa pine at the west edge of **Twin Lake** where they fledged their first two young. GPS coordinates (Degrees, Minutes,

Seconds) for **Nest-1** are: N 45*, 18', 06.0" by W118*, 08', 44.2". Route 3 places a **Tower 580 feet from Nest 1.** The pair of Eagles has since built **Nest-2** at N 45*, 17', 45.9" by W118*, 08',54.4". Route 3 places a **Tower 0.31 miles east of Nest 2.** Route 3 places the transmission line between the two nests. **Here I will point out that IPC's Avoidance Criterion Identifies Bald Eagle Nests as High Avoidance – recognizing a Buffer of one mile.** The Morgan Lake Route 3 demonstrates a disregard for these Bald Eagles. Here at the ridge-top, Morgan Lake supports an entire ecosystem of scale where the fall hawk migration follows south up the monocline ridge. **Here, watching Bald Eagles and their interaction with fishing Ospreys is a popular nature spectacle. If the Morgan Lake Route 3 is built, the spectacle will become a loud "crackling" transmission line towering over Morgan Lake Park.**

South of Morgan Lake, Route 3 advances southeast up the Glass Hill Monocline and into renowned high-density elk breeding grounds. Here in the upper reaches of Sheep Creek are numerous sedge meadow springs that are used heavily as elk wallows. All "muddied-up", large mature bulls now strut out onto the open bunchgrass slopes to breed on Cowboy and Sheep Ridges. Landowners here have a long history of promoting the Elk Resource as a viable economic and recreational endeavor. Oregon's Governor Pierce and Supreme Court Justice William O. Douglas once made this habitat their personal "getaway." One neighbor has made land acquisitions and established conservation easements to consolidate and preserve the native integrity of the area. The Rocky Mountain Elk Foundation is a cooperator in these efforts, as is the case with the Eastern Oregon University's Rebarrow Forest Project. Before the white-man's time, the Glass Hill Monocline was the gathering location for hundreds of horses that were summer pastured on what we now call the Starkey Range Lands. This is sacred ground, that has been long recognized for its richness and integrity of native vegetation.

Threatened and Endangered Species – OAR 345-022-0060

Morgan Lake Route 3 could impact Snake River Chinook Salmon habitat and water quality where the route crosses Rock Creek.

Oregon's Sensitive Species Rule – OAR 635-100-0040

Morgan Lake Route 3 will affect known Great Gray Owl and White-headed Woodpecker habitats across the 2.5 mile stretch between Rock Creek and Morgan Lake.

Health and Safety Standards for Siting Transmission Lines - OAR 345-024-0090
Specific Standards for Facilities Related to Underground Gas Storage Reservoirs - OAR 345-024-0030

At this point we need to consider the Transmission-line Tower that would stand closest to Morgan Lake recreationists. It is located within 100 feet of a thirty-inch diameter Natural Gas Line (Trans-Alaska, 1st leg constructed 1982). Here the gas-line is less than 600 feet from Morgan Lake Park. And here at the ridge-top is a known zone of weakness for said pipeline. From the top of the Glass Hill Monocline, the pipeline drops steep downslope in both directions – east and west. Over the years, there have been multiple pipeline ruptures less than a mile from Morgan Lake. This explosive potential exposes the residence of Morgan Lake Estates and the recreationist at Morgan Lake Park to unnecessary risk. IPC also needs to consider how their stray energy electrolysis will erode this Trans-Alaska Natural Gas Pipeline. **The Morgan Lake Route 3 crosses the natural gas line twice - once at Morgan Lake, and again it crosses at Rock Creek – approximately 2.5 miles to the northwest. Even more noteworthy, is the fact that the Agency Selected Route A avoids pipeline crossing all together.**

Looking at the statistics for American transmission lines, I see that between 1984 and 2006, approximately 44% of all power blackouts were weather-related, and of those – **11% were caused by lightning activity**. As a resident of the Morgan Lake Estates, I am extremely concerned that IPC's transmission line may act as a source of ignition for leaking gas from an aging pipeline, as well as for uncontrolled wildfire - we have recently seen this in California. My residential property is within 100 feet of the pipeline, and within 900 feet of the Morgan Lake transmission-line/powerline crossing. In 2005, Union County conducted a County-wide Wildland Urban Interface Fire Hazard Analysis. The resulting Analysis was published using Federal grant monies. The document identifies fourteen different Wildland Urban Interface (WUI) Zones within Union County. Based upon a set of Risk Analysis Criterion, each of the 14 WUI Areas were ranked from High-1 to Low-14. The Morgan Lake Estates WUI was given the Highest (#1) Ranking. It is also noteworthy that along the **Agency Identified Route A, there are no residences in any direction for well over a mile.**

Of the three routes under consideration, the **Morgan Lake Route 3 gets the Highest Fire Risk Rating for the following reasons:** it follows across the top of the Glasshill Monocline adjacent to the Grande Ronde Valley. The construction of a 200-foot-tall transmission line towers, along the highest ridgetop, where they are exposed to the most turbulent weather conditions is a recipe for fire. Here at this high elevation, the Morgan Lake Route 3 will be cut through *Cold Moist Ecotypes* that are dominated by mixed-conifer forests. Here, dense volatile fuels are exposed, where winds are the norm, and fuels dry quickly. It is highly significant that this area of the Blue Mountains is in the major lightning path, where cumulus buildups move up from the southwest. The storms track across the Blue Mountains strengthening as they move northeasterly. And as the storms cross the Glass Hill Monocline and the adjacent Grande Ronde Valley, thermals increase lightning activity at the ridgetop – not a good place for a major transmission line. Note here that the **Agency Selected Route A rapidly drops (west) down from the Glass Hill Monocline and onto a lowland ridge where winds and weather are diminished, and where vegetative fuel is sparse short grass vegetation of low flammability.**

As a resident in the Morgan Lake Estates for 40 years, I have always considered **Morgan Lake to be our greatest *Fire Fighting Asset***. At the ridgetop, Morgan Lake provides fire helicopters with buckets the ability to come and go from any direction without limitations. Morgan Lake is among the best water sources for helicopters in the region. **The proposed Morgan Lake Route 3 would significantly change helicopter activity around Morgan Lake, creating an unnecessary liability that puts us all at risk.**

Additionally, the Morgan Lake Route 3 (at the ridgetop) poses additional aviation liabilities that need consideration. Most air traffic in and out of La Grande Airport, the U.S. Forest Service Airtanker Base, and the Life Flight Base comes from and goes out to the west. Low Flying aircraft cross the Morgan Lake ridgetop commonly. Again, the **Morgan Lake Route B creates unnecessary liabilities that puts us all at risk. The Agency Identified Route A eliminates these liabilities.**

SUMMARY

Idaho Power's Proposed Routes offer Oregon decision makers a false choice. It is likely that **Idaho Power's Proposed Route B** will not achieve License Approval by EFSC. By default, IPC's request would become permit **Morgan Lake Route 3.** IPC put these two routes forward in the "11th hour" of the Final EIS. Neither route was evaluated by a credible environmental review team. I have dedicated my own time to comparing and contrasting **Morgan Lake Route 3** with the **Agency Identified Route A**

because Oregon's decision makers and the public deserve a full vetted and evaluated alternative. The **Morgan Lake Route 3 is High Impact.**

At the ridgetop, the Morgan Lake Route 3 would have greater impacts on: protected areas, recreation, scenic resources, soils, forested acres, and fish and wildlife habitats. The Morgan Lake Route poses unnecessary risks to: public health and safety, the wildland urban interface, fire suppression support systems, and to aircraft transportation. Morgan Lake Route is more topographically complex, has very limited road access, and requires much more disruption to wildlands. **All said, I calculate that the Morgan Lake Route 3 is a significantly more expensive transmission line segment to build, and to maintain.**

Alternatively, the Agency Identified Route A is topographically simple, has extensive solid road access, and crosses uninhabited lowlands. Here, soils are thin, vegetation is sparse and of low flammability. **It is clear to me why Route A is the *Agency Identified Route*. And it remains a complete mystery - why IPC chooses to disregard the Agency Identified Route.**

Idaho Power has been asked repeatedly – why the **Agency Identified Route 3** was not included in the EFSC Application? On October 17, 2018, IPC and EFSC held a joint informational meeting at the Blue Mountain Conference Center in La Grande. A member of the audience asked **IPC's Jim Maffuccio** the question – **why are you not using the BLM's environmentally preferred route?** His vague answer was essentially - **we have been working with landowners; there are habitat concerns; the tribes have some concerns; we are communicating with the BLM.** There has been no further elaboration or publicly presented documentation.

I am now asking EFSC, to ask Idaho Power Corporation, to amend their Oregon Application for Site Certificate - Include the *Agency Identified Route A* for consideration.

Going forward, I also ask that EFSC consider seriously the issues of Heath and Public Safety. And I ask that EFSC members consider the **Oregon Conservation Strategy (OCS)** as they weigh the impacts that each of the three routes: A, B, & 3. OCS is the state's overarching strategy for conserving fish and wildlife resources. It serves as the official State Wildlife Action Plan for Oregon, and it is a requirement for the federal State Wildlife Grant Program. The objective of OCS is too conserve fish and wildlife resources by maintaining and restoring *functioning habitats*. OCS breaks the state into *Ecoregions* - the entirety of Union County is within the *Blue Mountains Ecoregion*. It critical that EFSC members understand that the setting for this transmission Line analysis is arguably in one of the Highest Functioning Habitat Areas in the Blue Mountains Ecoregion. The variability of topography, elevation, soils, native vegetation, and wildlife habitats along the breaks of the Grande Ronde Valley is very high, especially for a two-mile radius surrounding Morgan and Twin Lakes...

Respectfully Michael McAllister

Michael McAllister (Owner), Wildland Resource Enterprises, 60069 Morgan Lake Road, La Grande, OR, 97850, wildlandmm@netscape.net, (541) 786-1507 .

cc. EFSC Facility Siting team – energy.siting@oregon.gov, Mark Stocks – Applicant/Certificate holder - mstokes@idahopower.com, Scott Hartell – Planning Director for Union County - shartell@union-county.org , Don Gonzale – BLM B2H NEPA Coordinator – dgonzale@blm.gov .

EXHIBIT B

EXHIBIT B

Michael McAllister
Wildland Resource Enterprises
wildlandmm@netscape.net
541-786-1507

October 5, 2010

Keith Georgeson
Boardman to Hemingway Project Leader
kgeorgeson@idahopower.com
208-388-2034

Dear Mr. Georgeson:

Attached are the two letters that I have previously written responding to the BH2 Transmission Project. As you may recognize, I have made a genuine attempt to at providing input both on the project as a whole, as well as specifically on the line section identified as section C21. I have been satisfied with the responsiveness of Idaho Power's input process up to this point.

Yesterday, I was contacted by landowner John Williams – to whom you sent a letter(dated October 1st) and a map of describing a "new alternative route" that crosses through his property. In fact this in not a new alternative as I read it – it is the original route proposed by Idaho Power before any input what-so-ever. It was this "new alternative" that first drew my attention as an unacceptable route back in 2008.

Please recognize that I previously provided Idaho Power with hard copy USGS 7.5 minute topo quad maps with a very specific delineation for the sighting of section C21 which would have the least impact - taking the following into account: 1) View-scapes; 2) Use of existing Roads; 3) Forest Resources; 4) Wildlife Resources.

The south or western (alternate route) for section C21that the planners have developed is very close to the best sighting considering. And as I have previously stated, I stand committed to getting this sighting right.

I have to say that I am currently very uncomfortable with the way that you have now presented this "new alternative" to John Williams. I think that it is a bit tacky to now be playing landowner against landowner which is what you are doing in your October 1st letter to John Williams. As I read your letter, the "argument for this proposal" has little to no merit.

I look forward to participating in a more credible analysis for the specific sighting for section C21 of the BH2 Transmission Line.

Respectfully - Michael McAllister

Michael McAllister
Wildland Resources
60069 Morgan Lake Road
La Grande, Oregon 97850

January 31, 2008

Adam Bless
Oregon Department of Energy
625 Marion St. NE
Salem, Oregon 97301

I am writing to make input on the sighting proposal for the Idaho Power – Boardman to Hemingway Transmission Power-Line (BHTP). I understand that there was a short window of time to make input in early November. I was elk hunting in the high Wallowa Mountains at the time.

I am a lifelong resident of Oregon - I am also a Wildlife Resource graduate from the University of Idaho, and I work as a natural resources consultant. In 1981 I moved to the Rock Creek Ranch (now the Elk-song Ranch) outside of La Grande. The proposed BHTP route completely bisects these ranches across the top of the Blue Mountains to the crossing of the Grande Ronde River near Hilgard. I now own, and live on, a twenty seven acre forest tract in the Morgan Lake Estates just to the east. I am asking that you site BHTP "in my front yard" where I will view it on the existing Bonneville Power Administration corridor. I am asking for this because the proposed route will bisect, fragment, and impact what is one of Oregon's premier pristine landscapes – the Starkey Range and Forest Lands that are world famous as one of North America's most important Elk Ranges. I am empirically familiar with the entirety of this landscape and I know the extent to which these wild-lands will be visually impacted and interrupted.

This Starkey landscape slopes, as a broad plateau, from the south to the north – from the Elkhorn Mountain Range to the Grande Ronde River. The proposed power-line corridor will be visually intrusive across much of the entire plateau landscape of the Grande Ronde River basin – designated as a State Model Watershed.

Placement of BHTP on the proposed route from Ladd Canyon to Hilgard would come at too great of a cost to Oregon's wild-lands. It should be situated on the existing BPA right-of-way which is routed through highly modified landscapes near the Interstate 84 corridor. Thank you for your very careful consideration of this matter.

Respectfully,

Michael L. McAllister

Cc: Dan Olmstead, Idaho Power.

Michael McAllister
Wildland Resources
60069 Morgan Lake Road
La Grande, Oregon 97850

January 6, 2010

Adam Bless
Oregon Department of Energy
625 Marion St. NE
Salem, Oregon 97301

On January 31, 2008 I wrote you a letter responding to the request for input on the siting proposal for the Idaho Power – Boardman to Hemingway Transmission Power-Line (BHTP). More recently I attended the Central Project Advisory Team Meeting #4, held in Baker City on December 17, 2009.

I was pleased to see that the advisory team has conducted a thorough analysis for a wide array of alternative route possibilities. After careful consideration of the various siting proposals, I see that the "I-84" route is both: most cost effective, and the least environmentally impacting. I state this because (as a contractor) I conduct a multitude of resource inventories across the, Malheur, Wallowa-Whitman, and Umatilla National Forests, as well as on lands administered by the Bureau of Land Management. The proposed routes, westerly, through Malheur and Grant Counties would interrupt and fragment very large areas of Oregon's most expansive "wild-lands" - this in not acceptable by my assessment.

Assuming that the I-84 route is selected, there are currently two possible routes proposed for the section C-21. This section is challenged by two primary considerations: 1) - routing past the Grande Ronde (Great Round) Valley – largest in North America – hemmed continuously by mountains, and 2) – Routing across the Grande Ronde River basin. C-21 is the route section that I previously wrote to you about – expressing my concerns. And it appears that the planners have responded to the comments received. They now propose routing the line more westerly dropping it from high on the ridge – to the lower elevation in the Grand Ronde basin where the visual impacts will be greatly diminished. They have also proposed an alternate C-21 that would follow the existing BPA transmission route to the extent possible. The problem with this route is that it would have a maximal visual impact on the town of La Grande and much of the Great Round Valley. Having weighed various trade-offs, I am inclined to support the current western proposal for C-21 where it is routed across the Grande Ronde basin at the lowest elevations.

However, frustrated by a lack of more definitive maps, I have attempted to more specifically delineate the two modified C-21 routes onto three USGS. (1:24,000 scale) topographic quad maps. I have drawn the two routes on as best as I can interpret them.

Please evaluate my C-21 route delineations, verify, or redefine them as best you can. This will provide me the means to: better evaluate, share with others, and make additional input. I am empirically familiar with this landscape and its resources. If the power-line is to be sited through this area, I would like to contribute to getting it right. Please feel free to call me for more specifics and discussion – (541) 786-1507. After you review of the maps please forward them to Dan Olmstead at Idaho Power so that his Siting Team may also review them.

Respectfully,

Michael L. McAllister

Cc: Dan Olmstead, Idaho Power.

Gmail

Hailey McAllister <haileyrose@gmail.com>

Fwd: Ladd Canyon to Hilgard

1 message

wildlandmm@netscape.net <wildlandmm@netscape.net> Thu, Aug 27, 2020 at 9:44 AM
Reply-To: wildlandmm@netscape.net
To: "haileyrose@gmail.com" <haileyrose@gmail.com>

-----Original Message-----
From: wildlandmm@netscape.net
To: kgeorgeson@idahopower.com
Sent: Tue, Mar 22, 2011 6:56 pm
Subject: Fwd: Ladd Canyon to Hilgard

-----Original Message-----
From: wildlandmm <wildlandmm@netscape.net>
To: wildlandmm <wildlandmm@netscape.net>
Sent: Fri, Mar 18, 2011 4:23 pm
Subject: Re: Ladd Canyon to Hilgard

Kieth,
I am sorry to report that I am again confused by what appears to be inconsistent information at your B2H web site. I logged in on March 16th and looked at the proposed and alternative routes by typing in both John Williams and Seyfried as ownership names. The current display was the basis of my March 16 email to you thanking you for listening to the input made over the last 2.5 years. I have since been notified that the maps I was looking at on March 16 were in fact old maps that were developed out of the public scoping process - which I previously expressed support for. When I first emailed you, I expressed my concerns that Idaho Power had just dropped the routes developed through the public review process and put the original proposed route - again as the "current proposed route." I deliniated for you the best possible route (wildlife and viewscape resources) and sent that to you. I am sorry to say that I am currently confused as to what the current proposed route is. Please go to your website and enter Seyfried as LANDOWNER. Are the proposed and alternative routes currently displayed current or out dated? If they are current - My thank-you note sent March 16th stands. If these routes are not correct - please respond and assist me in a correct frame-of reference - update the website. I am also curious - did you receive the hard copy maps that I mailed to you in January. Again - I am currently in Alaska participating in a commercial fishery.

Respectfully - Michael McAllister

-----Original Message-----
From: wildlandmm <wildlandmm@netscape.net>
To: kgeorgeson <kgeorgeson@idahopower.com>
Sent: Wed, Mar 16, 2011 12:14 pm
Subject: Ladd Canyon to Hilgard

Kieth,

Just a note to say thank you for paying attention to the input from us. Looking at the B2H website today, I see that you are zeroing in on the "best placement" from my empirical perspective. I am very pleased by the the current proposed and alternative routes. Count on me to provide site specific resource inputs as you move forward. Unfortunately I will not be able to make the Glass Hill group meeting coming up soon. I am in Sitka Alaska operating sonar for herring fishery. I will be back in the Blue Mountains (home) approx. April 10th.

Respectfully - Michael McAllister

Michael McAllister
60069 Morgan Lake Road
La Grande, OR 97850

(541) 786-1507

March 16, 2015

Idaho Power & Bureau of Land Management
B2H Project
P.O. Box 655
Vale, OR 97918

Comment on Draft Environmental Impact Statement -

As the record shows - I have been long involved in the siting analysis for the proposed 500 kV Transmission Line - Boardman, Oregon to Hemingway, Idaho. I first provided written input in 2008. I am well aware that Idaho Power has made an exhaustive effort to consider most options for siting this Line through both Oregon and Idaho. I recognize that a route following the Interstate 84 Corridor should be recognized as having the least cummulative effect on natural resources. However, in the final analysis, each segment of the Line must receive the most complete review possible - based upon changing resource circumstances.

Understand my frustration, and the disjointed nature of my inputs over time (copies of all past letters are attached). The project has been like trying to work with a transformer that is continuously changing shape and function. There has been repeated turnover of all project personnel. However, the focus of my input has been a constant. That focus is on one specific stretch of the Line - the bypass stretch that tracks the Line to the west around the town of La Grande - the stretch between the Grande Ronde River (at north) and Ladd Canyon (at south).

Recently I attended the B2H Open House in La Grande (January 7th, 2015) where the Bureau of Land Management (BLM) and Idaho Power shared with the public - their recently released Draft Environmental Impact Statement (DEIS). At the meeting I found a team of project analysis representatives that were respectful and very attentive to gathering additional details and information for consideration in making their final EIS analysis.

After making a cursory review of the DEIS I was interested to see that there is some talk about a No Action Alternative. The reading of this is not clear to me, and my best interpretation is that a No Action Alternative does not apply. It has been nearly ten years now since this B2H project was first proposed. Therefore I would ask that the No Action Alternative be something like a review of the justification for the project entirely. In the past 10 years, there have been many changes in conductive materials, technologies, energy conservation, and solar energy is developing rapidly now. I ask that a strong argument be made to the Oregon Energy Facility Siting Power Council (EFSC), that the project is “most justified” relative to other State and

National power planning options.

The focus of my comment is directed at the Glass Hill Alternate and the adjacent Proposed Route. I am commenting from an empirical frame of reference. For nearly 30 years I have lived on, inventoried, and managed forest, range and wildlife resources across this landscape. I have a BS degree in Wildlife Resources from the University of Idaho - 1984. This analysis is not guided by public or private land boundaries. The primary resource consideration here is the most exceptional Rocky Mountain Elk population that makes that landscape "home" during spring, summer, and fall. During the breeding season, 800 to 1200 elk gather and rutt on and around "Cowboy Ridge" - the high ridge that divides between Rock Creek and Sheep Creek. The Proposed Route runs from north to south a distance of five miles, up the open west slopes of Cowboy Ridge, potentially subjecting this large breeding concentration of Starkey elk to the noise created by corona and electromagnetic fields of a 500 kV transmission line - clearly an impact worthy of "High Avoidance." Although Rocky Mountain Elk are clearly not threatened as a species, large concentrations such as exists on Cowboy Ridges are indeed threatened and deserve "Exclusion" from the impacts of the B2H project. It is also important to recognize that Cowboy Ridge is the high ground between the Grande Ronde Valley and the Upper Grande Ronde River Basin. This high ground has an ecological richness that is unique in the Blue Mountain Province. This richness has been long recognized.

It is noteworthy that the Cowboy Ridge has a long history of private landowners that have "bought in" where the attraction is the most unique wildlife habitats associated with this landscape. All private landowners that have stewarded Cowboy Ridge have been featuring the elk, and their habitat by management objective. Wildlife, Range, and Forest Conservation have long been the predominant use of the Cowboy Ridge and Rock Creek Watershed. Oregon's Governor Pierce owned this land for many years, and he took great pride in sharing this pristine landscape with William O. Douglas - the Federal Judge and among America's greatest wilderness advocates. It was also here, on this landscape, that Oregon's, Managed Fee Hunting or Ranching for Wildlife Program was first established. It was for this management endeavor that I started my business, Wildland Resource Enterprises, in 1984.

Based upon my comprehensive 30 years of analysis across this landscape - avoidance of said elk population is better achieved by routing the transmission line to the west of Cowboy Ridge approximately 2.5 miles. The Glasshill Alternate accomplishes this by routing the Line up Graves Ridge - a ridge that is broad, low slope, and with a well established road built across solid basalt and shallow soils.

However as proposed, the Glass Hill Alternate corners away from Graves Ridge, turning easterly and then spanning the canyons of Graves Creek, Little Rock Creek, Rock Creek, and then on to the Highest elevation of Cowboy Ridge. As proposed, the Glasshill Alternate

crosses the canyons at their deepest locations where Elk Habitat Effectiveness is the greatest - topographic cover, vegetative cover, and forage diversity. A slight modification to the Glass Hill Alternate could: reduce the impact on Habitat Effectiveness, greatly reduce visual presence, reduce miles of new roads, and minimize the technical logistics of steep ground.

This modification is accomplished by extending the Graves Ridge segment of the Glass Hill Alternate, south, on up Graves Ridge another 0.5 miles, and then turning easterly to an azimuth of 110 degrees. This Variation of the Line would follow a course that better blends the towers to the landscape. A bend in the Rock Creek Drainage allows for the route to “drop away” from Cowboy Ridge and the surrounding high ground - greatly reducing the visual impacts.

Also noteworthy is the fact that when Idaho timber (shortly) owned the Elk Song Ranch, they built a new haul road (1993 - not on any map) from Glass Hill Road - west down into the bend of Rock Creek where the said Variation to the Glass Hill Alternate is proposed. This road accesses most of the proposed Variation between Graves Ridge and Glass Hill. Look closely at how the proposed Variation results in few new roads. And look very closely at how the Proposed Corridor (up Cowboy Ridge) requires new roads the entire five miles.

Another very important consideration that warrants consideration is that the Glass Hill Alternate moves the line three miles to the west of the Morgan Lake viewing platform. Morgan Lake has been identified by the Union County Chamber of Commerce as #1 in their top 10 places to see in Union County. The park is a State Wildlife Refuge and the adjacent Twin Lake is also registered as a State Research Natural Area - dedicated as such for it’s unique emergent vegetation communities. These diverse communities support a species richness that is very rare in the Blue Mountains. Both the American Bald Eagle, and the Osprey nest here.

Attached is a map that presents the Proposed Corridor, the Glass Hill Alternate, and a Variation of the Glass Hill Alternate - described above. And the following are three GPS points (the two lines between these three point define the proposed Variation to the Glass Hill Alternate).

GPS Coordinates - WGS84:

1) 45.315112, -118.222980 (At Whiskey Creek Road)
2) 45.252549, -118.170649 (At south end Graves Ridge Road)
3) 45.235976, -118.100836 (At Glass Hill Road).

Additionally, I would like to comment that I recently had the opportunity to appreciate the more visually pleasing monopole transmission line towers down in the desert southwest. I strongly advocate for the use of the monopoles to the extent that this is possible. The oxidized finish does blend well with landscape colors and tones.

Thank you for your careful consideration of this unique landscape and the associated natural wonder - Oregon's most dense elk population and a their breeding "LECK" on Cowboy Ridge.

Respectfully

Michael McAllister

Michael McAllister, 60069 Morgan Lake Road, La Grande, OR, 97850 (541) 786-1507.

December 21, 2018

Jeff Maffucio, Siting Coordinator, Idaho Power Corporation, 1221 West Idaho Street, P.O.Box 70 Boise,

Idaho, 83707.

cc. Kellen Tardaewether, Senior Siting Analysis, Energy Facility Siting Division, Oregon Department of Energy, 550 Capitol St. NE, 1st Floor, Salem, Oregon 97301

cc. Union County Board of Commissioners, 1106 K Avenue La Grande, Oregon 97850.

Your records will show that, since 2009, I have been encouraging Idaho Power Corporation (IPC) to site the Boardman to Hemingway (B2H) Transmission Line in a manner, whereby the cumulative impacts of the Right-Of-Way will have a minimal impact on Oregon's public and their natural resources. I am a long-term resident of Union County where I work as a private contractor specializing in Natural Resources Inventory. I hold a Bachelor of Science degree, *Wildlife Resources*, from the University of Idaho.

At this time, I am gravely concerned by the fact that IPC has submitted a "complete application" for *Site Certificate* to Oregon's Energy Facility Siting Council (EFSEC) without the *Agency Selected Route* - identified by the Bureau of Land Management (BLM) in their National Environmental Planning Act (NEPA) analysis – specifically through Union County. Rather, IPC applied for two routes that were developed late in the NEPA process, neither of IPC's routes have had an environmental analysis, or public comment. All three of the identified routes are identified at IPC's Boardman to Hemingway www.boardmantohemingway.com webpage. From this point on, the reader is advised to follow along with this website open. From the *Map Menu* select Map 3 - Union County.

Map 3 (Union County) Legend:

(A) – Agency Selected Route (NEPA) - Route Color is Green on Map;

(B) – Proposed Route (EFSC) – Route Color is Red on Map;

(3) – Morgan Lake Alternative (EFSEC) – Route Color is Blue on Map.

Now select *Landowner Maps* - it opens in Google Earth Imagery. Expand map to full screen and zoom in on Routes A, B, and 3. Note the tab at top left of the screen - it allows the viewer to change between Earth View, Map View, and Topography View. To see vegetation coverages, use Earth View, too see geographic features switch to Topography View.

For the sake of this analysis, the three routes will be referred to as: **A, B, and 3** – as above. I am going to limit my discussion about **Route B** (Idaho Powers Proposed Route) to a brief and cursory overview. **Route B** has been identified as a best attempt to site B2H along the existing 230 kv transmission line as it passes through Union County. In my first letter to Idaho power (2009) I asked that Idaho power put the power line "in my front yard" and site it along the existing 230 kv transmission line

passing through La Grande. In 2012 I signed a petition circulated by a local group organized as the Glass Hill Coalition. After much consideration however, I determined that such a route would not meet the screens for the 500 kv transmission line.

1) The valley slopes to the west above La Grande are steep, with unstable geology.
2) La Grande's western skyline viewshed would be severely impacted. Both: the City of La Grande and Union County have asked IPC to keep B2H out of their viewshed.
3) The "Powerful Rocky" stretch of Oregon Trail, and its archaeological artifacts, would be desecrated.
4) Oregon's Ladd Marsh was established as a wildlife mitigation area for past federal projects: the refuge should not be comprised.
5) The residential ownership pattern between the La Grande and the Morgan Lake does not accommodate construction and access is very poor.

Based upon the above considerations, 1 through 5, I deem that the **Proposed Route (B)** has *High Cumulative Impact*, and with few mitigation options. Therefore, I will spend no more time considering Proposed Route B. All further analysis and discussion will focus on Agency Selected Route A, and on Morgan Lake Alternative Route 3.

From here forward I will explain and contrast **Route A** (Agency Selected Route (NEPA)), with **Route 3** (Morgan Lake Alternative (EFSC)). The analysis begins at the Divergence Point (DP) – where Routes A and 3 diverge. The analysis then proceeds from north (DP), then south to the Convergence Point (CP) of the two routes near Ladd Canyon. The distance between DP and CP is approximately eleven miles. The distance for both routes, **A** and **3**, are very similar. The elevation at DP (north end) is approximately 3,400 feet. The Elevation at CP (south) is approximately 4,800 feet.

The DP is located near the middle of section 7, Township 3 South, Range 37 East. DP is approximately 1.5 miles south of Highway 244 junction with Interstate 84 – at Hilgard. DP is approximately 0.75 miles south of Highway 244, traveling south on the Whiskey Creek Road.

The biggest difference between the two routes is how each of them has been established geographically. This can best be recognized by comparison in *Topography View*. Recognize that the Grande Ronde Valley is the dominant geographic feature for the region, and further that it is oriented in a slightly northwest by southeast alignment - as is the Blue Mountain Range along the valleys west side. Recognize that from DP (near the Grande Ronde River at Hilgard) that the landscape rises as you go south following the west side of Grande Ronde Valley, all the way to near CP above Ladd Canyon.

Now notice how the two routes ascend, from 3,400 feet elevation, up to just over 5,200 feet elevation near the high point at Glass Hill. And notice that between the two routes there is a series of parallel ridges and drainages that are also on the northwest by southeast alignment. This alignment is caused by the orientation of the faults associated with the origins of the Grande Ronde Valley. The highest of the fault generated ridges is the one following the Mill Creek Fault – which also establishes the west edge of the valley. This ridge is also known as the Glass Hill Monocline. **Route 3** sites the transmission line along this highest ridgetop.

Comparatively, **Route A** is the low elevation route where the mean elevation is approximately 4,100 feet. See that from DP **Route A** proceeds southerly at an azimuth of approximately 150 degrees, along the same northwest/southeast alignment. **Route A** gains elevation slowly as it moves up Graves Ridge in a straight line for approximately 5.0 miles. Graves Ridge is a broad gentle slope, where the only vegetation is sparse grass and forbs. *Whiskey Creek Road* mostly parallels the **Route A** with an elevation gain of about 200 feet per mile – a slope grade of just 5 percent. Note that the *Whiskey Creek Road* provides excellent road access for at least two thirds of the **Route A**. This road is built across block basalt with few corners and no steep grades. **Route A** then makes one turn easterly to approximately 110 degrees. On this course, **Route A** crosses the Rock Creek drainages well above Chinook Salmon Habitat.

Route 3, on the other-hand, moves east from DP and away from the Whiskey Creek Road, and crosses the Rock Creek watershed just three miles south of the Grande Ronde River. Note here that there are four distinct drainages that make up the Rock Creek Watershed, from west to east they are: Graves, Little Rock, Rock, and Sheep Creeks. Notice that all four of the drainages converge near the Route 3 crossing. Here, **Route 3** compromises Critical Habitat for Chinook Salmon in the lower Rock Creek Watershed. Rock Creek is not chinook salmon spawning habitat. However, the lower three miles of Rock Creek is used by chinook salmon smolts as a cool water refuge during the summer months when the Grande Ronde River is low, warm, and oxygen deficient. Also note that there are **no existing roads** here to access **Route 3**. However, if your look at landowner map # 63, you will see that IPC identifies the natural gas pipeline as "Glass Hill Road." This is a flagrant deception that tricks the viewer. There is no existing road access for most of **Route 3**.

After crossing Sheep Creek, **Route 3** then intersects the Glass Hill Monocline (near Morgan Lake), where it turns southerly and follows the ridgetop. **Route 3** is the high elevation route where the mean elevation across the route is approximately 4,500 feet. The 400 feet mean elevation difference between (**A and 3)** is the predominant variable responsible for variability in soil characteristics. The higher elevations along the top of the Glass Hill Monocline gather more precipitation, summer temperatures are cooler, more layered vegetation provide more shading, and windblown snow and soil particulates accumulate. The variability in soils is well demonstrated when you superimpose the Union County Soil Survey Map over the Route Map overlay. I have identified the four predominant soil types for both: Route A and Route 3. They are listed hear from most coverage, to least coverage.

For **Route A**, they are: **1)** = 69C - *Watama-Gwinly complex*, is on biscuit-scabland uplands, vegetation is mainly bunchgrasses, and annual forbs; **2)** = 35E – *Klicker-Anatone complex* - mountainous uplands where the native vegetation is mainly Ponderosa pine, bunchgrasses and elk sedge, a warm moist plant community suited to the production of pine, on a patchy basis - where soil is deep enough, also as rangeland and wildlife habitat. **3)** = 4E *Anatone extremely stony loam* - is shallow, well-drained soil at ridgetops, and on south and west facing slopes where vegetation is mainly blue-bunch wheatgrass, Idaho fescue and stiff sage; used mainly as rangeland. **4)** = 58E – *Starkey very stony silt loam* – shallow well drained soil on uplands, the vegetations is mainly bunchgrasses and annual forbs, Idaho fescue, blue-bunch wheatgrass and Sandberg bluegrass. The unit is used mainly for rangeland. Collectively, the soils makeup for Route A, tend to be shallower, and of residual decomposed basalt in its origin. The site index for timber production is lower, and shrubs are limited in the vegetation composition. Route A

crosses 44% forested acres - mostly warm dry plant communities. It is noteworthy that Route A crosses 33% less timber acres than does Route 3

For **Route 3**, they are; **1)** = 4E - *Anatone extremely stony loam*, is shallow, well drained, at ridgetops and on south and west facing slopes, derived predominately from basalt; vegetation in mainly blue-bunch wheatgrass, Idaho Fescue and stiff sage; used mainly as rangeland. **2)** = 32E - *Kalema very stony silt loam*, moderately deep, well drained, mainly coniferous forest and an understory of shrubs, forbs and grasses; used mainly for timber production, also used for woodland grazing and wildlife habitat. **3)** = 33E – *Klicker stony silt loam*, moderately deep, well drained, mountainous uplands, vegetation is mainly coniferous forest with bunchgrasses annual forbs and perennial shrubs, unit is used mainly for timber production, also for woodland grazing and wildlife habitat. **4)** = 61E – *Ukiah-Starkey complex*, Ukiah moderately deep and well drained, vegetation mainly Idaho Fescue, Blue-bunch wheatgrass and Sandberg bluegrass; used mainly as rangeland. Collectively, the soils make for Route 3, tend to be deeper, loamier, of residual decomposed basalt, but with more volcanic ash composition. The site index for timber production is higher, where shrub composition is greater. Route 3 crosses 66 % forested acres mostly cool moist plant communities. Again, Route 3 crosses 33% more timber acres than does Route A.

MORGAN LAKE PARK

Route 3 also establishes towers within 500 feet of Morgan Lake Park. Here, the impact on La Grande's public will be High. The first stated goal in the Morgan Lake Park Recreational Use and Development Plan (Section 1, Page 2) - *A goal of minimum development of Morgan Lake Park should be maintained to preserve the maximum of natural setting and to encourage solitude, isolation, and limited visibility of users while at the same time providing safe and sanitary condition for users.* Also noteworthy is that the city of La Grande Chamber of Commerce has long promoted Morgan Lake Park as the #1 Recreation Tourist Destination in the La Grande Area. The State of Oregon designated Morgan Lake Park as a State Wildlife Refuge in the 1960s. Today Oregon Department of Fish and Wildlife identifies the Lake as an easy access fishing destination for the handy-capped.

Morgan Lake Park encompasses two separate Lakes; Morgan Lake is 70 acres in size and is developed with road access and camping. Twin Lake is 27 acres in size, undeveloped, and with no road access or camping. Twin Lake has been identified by both Federal and State efforts to conserve, restore, and protect wetlands. Oregon has developed a Wetland Conservation Strategy (Oregon Division of Lands, 1993). This Strategy is implemented through the Oregon Wetlands Inventory and Wetlands Conservation Plans (See Webpage). This planning process allows local governments to balance wetlands protection with other land-use needs. Twin Lake is recognized as an important – persistent emergent wetlands that includes both submersed and floating plants.

Twin Lake, at 4,100 feet elevation, supports one of the most unique waterfowl nesting communities in the Blue Mountains. Most unusual is the nesting by: Ring-necked Ducks, Red Head, Rudy Duck, Blue-winged Teal, Shoveler, and Pied-billed Grebe. Increasing the species

diversity surrounding this wetlands anomaly, the lake is created by natural basalt rim rocks along the south and west edge. Here the vegetation is a diverse mixture of native shrubs, aspen, black Cottonwood, and Ponderosa pine. These surrounding shrub and tree communities support as rich an assortment of both migratory and nesting passerine birds as can be recognized across the Blue Mountain Ecoregion.

In 2013 a Pair of Bald Eagles constructed a nest in at the top of a large Ponderosa pine at the west edge of Twin Lake where they fledged their first young. GPS coordinates (Degrees, Minutes, Seconds) for Nest-1 are: N 45*, 18', 06.0" by W118*, 08', 44.2". Route 3 places a Tower 580 feet from Nest 1. The pair of Eagles has since built Nest-2 at N 45*, 17', 45.9" by W118*, 08',54.4". Route 3 places a Tower 0.31 miles east of Nest 2. Route 3 places the transmission line between the two nests. Here at the ridge-top, Morgan Lake supports an entire ecosystem of scale where the fall hawk migration follows south up the ridge. Watching Bald Eagle and fishing Osprey interactions at Morgan Lake is a popular nature spectacle. If Route 3 is built, the spectacle will become a loud "crackling" transmission line.

From Morgan Lake, **Route 3** moves southeast up the ridge and into renowned high-density elk breeding grounds. Here in the upper reaches of Sheep Creek are numerous sedge meadow springs used heavily as elk wallows. All muddied-up, large mature bulls strut out onto the open bunchgrass slopes to breed on Sheep Ridge – right where Route 3 would be constructed - at the ridgetop. This is also my neighborhood, and to the best of my knowledge all the neighbors are strong advocates of this elk population. Neighbors have made land acquisitions and established conservation easements to consolidate and preserve the native integrity. The Rocky Mountain Elk Foundation is a cooperator in these efforts, as is the case with the Eastern Oregon University's Rebarrow Forest Project.

HAZARD ANALYSIS

It is also noteworthy that the **Route 3** Tower that would stand closest to Morgan Lake recreationists is located within thirty feet of a thirty-inch diameter Natural Gas Line (Trans-Alaska, 1st leg constructed 1982). At the ridge-top, this is a known weak point in the pipeline. From the sharp basalt ridgetop, the line drops steep downslope in both directions. The pipeline is bedded in sand so that over time gravity stretches the pipeline at the high point. This stretching has resulted in multiple gas leaks, over time, near where **Route 3** will cross the natural gas pipeline – and within less than 600 feet of Morgan Lake Park. This explosive potential exposes the residence of Morgan Lake Estates and the recreationist at Morgan Lake Park to unnecessary risk. Also note that **Route A** (Agency Selected Route) does not cross the natural gas pipeline at any point.

As a resident of the Morgan Lake Estates, I am extremely concerned about catastrophic fire potential. In 2005, Union County conducted a County-wide Wildland Urban Interface Fire Hazard Analysis. The resulting Analysis was published using Federal grant monies. The document identifies fourteen different Wildland Urban Interface (WUI) Zones within Union County. Based upon a set of Risk Analysis Criterion, each of the 14 WUI Areas were rated from High to Low. The Morgan Lake Estates WUI was given the Highest (#1) Rating.

Of the three routes under consideration, **Route 3** gets the Highest Fire Risk Rating for the following reasons: **Route 3** follows the ridgetops across the Blue Mountain Range as it parallels the Grande Ronde Valley. Between the Grande Ronde River and Ladd Canyon the transmission line is at or near the ridgetop the entire distance. From the river, the route rises to 4,300 feet at Morgan Lake, and too above 5,200 feet as it proceeds south to Glass Hill – an abandoned State Lookout. It is highly significant that this area of the Blue Mountains is in a major lightning path where cumulus buildups move up the North Fork of the John Day River. These storms then strengthen and build as they move east across the Blue Mountains to the Grande Ronde Valley where valley thermals increase lightning activity at the ridgetops – not a good place for a major transmission line.

As a resident in the Morgan Lake Estates for 40 years, I have always considered Morgan Lake to be our greatest *Fire Fighting Asset*. At the ridgetop, Morgan Lake provides fire helicopters with buckets the ability to come and go from any direction without limitations. Morgan Lake is among the best water sources for helicopters in the region. **Route 3** would significantly change any helicopter activity around Morgan Lake, creating an unnecessary liability that puts us all at risk.

Additionally, **Route 3** (at the ridgetop) poses additional aviation liabilities that need consideration. Most air traffic in and out of La Grande Airport, the U.S. Forest Service Airtanker Base, and the Life Flight Base comes from and goes out to the west. Low Flying aircraft across the ridgetop (**Route 3**) are very common. Again **Route 3** will create unnecessary liability that puts us all at risk.

SUMMARY

In Summary, it is likely that **Idaho Powers Proposed Route B** will not achieve License Approval by EFSC. In that case, IPC's application can only default permitting to Idaho Powers Alternative – Morgan Lake **Route 3**. This route was put forth by Idaho Power in the 11th hour of the Final EIS. The route was never evaluated by a credible environmental review team. Therefore, I have dedicated my own time to making this comprehensive assessment. I have contrasted the **Morgan Lake Route 3** with the **Agency Identified Route A**, in hopes that it will have some merit in the eyes of others going forward. Across the full spectrum of Factors considered, the **Morgan Lake Route 3 is High Impact** as opposed to the **Agency Identified Route A** which has much less impact.

At the ridgetop, **Route 3** would have greater impacts on: public places, viewsheds, soils, forests, fisheries, and wildlife. **Route 3** poses great risks to: the wildland urban interface, fire suppression support systems, and to aircraft transportation. **Route 3** is more topographically complex, has very limited road access, and requires much more disruption to wildlands.

Alternatively, **Route A** is topographically simple, has extensive solid road access, and crosses more uninhabited lowlands. It is clear to me why **Route A** is the *Agency Identified Route.* It remains a complete **mystery why IPC disregards the Agency Identified Route A**.

Idaho Power has been asked repeatedly – why was **Route A** not included in the EFSC Application? The only answers provided by Idaho Power to this point are (EFSEC public meeting

at the Armory): **1)** we have been working with landowners – none specifically identified, and **2)** something about tribal concerns – nothing specific.

At this time, I ask Idaho Power Corporation to amend their Oregon EFSC Application for Site Certificate. Include the *Agency Identified Route A* for consideration.

Respectfully

Michael McAllister

Route 3 will require extreme logistical complications that will tax all existing road infrastructure.

The Web site map identifies roads and shows roads that don't exist and never did exist. In one case Glass Hill Road is show in the bottom of Rock Creek near Hilgard. There is no road as shown.

Again, thank you for all considerations and I am willing to provide additional support at your request.

Visual Considerations

Grande Ronde Valley – Great Round Valley – Valley of Peace to all Rival Tribes came to trade on collective sacred ground.

By Ballot initiative, Union County voted down wind mill "farms" so as to preserve the aesthetic integrity of their sacred Valley surrounded entirely by mountains.

Morgan Lake – Union County Chamber of Commerce Identifies and #1 destination Point of Interest.

Tower # at the Park Entrance will tower and crackle 850 feet above this City Park – an ecological jewel.

Residential Considerations. One of the big issues for the Proposed Route B is that it would have a High Impact on the Morgan Lake Estates and the entire backdrop viewshed above La Grande. Route 3 moves beyond the La Grande viewshed but still conflicts with Morgan Lake Estate residence. Route A moves west well (3 miles) beyond all Union County residential homesites.

Noise Considerations

Cultural Considerations

Cost Analysis

Fisheries Considerations

Rock Creek Analysis

La Grande Airport, Hotshot and Tanker Base.

Life Flight / Grande Ronde Hospital.

At the ridgetop, Morgan Lake as the most important water source for helicopter bucketing.

Hazards Analysis

Between 1992 and 2011, 78% of electrical outages in the USA are related to severe weather conditions, and that percentage is growing annually driven increasingly by climate change. Between 1984 and 2006, approximately 44% of all power blackouts were weather-related, and of those – 11% were caused by lightning activity.

All of the above considered, Idaho Power should recognize that Route A – Agency Selected Route (NEPA) is by far and away the route which will least impact the Residence of Union County, the extended Oregon Public, and their collective natural resources.

I am asking that Idaho Power Amend the EFSEC Application to include Route A. As is, the Application is an overreach that shows a clear disregard for all the years of public and institutional participation. I would go even further and say that the application shows a clear disregard for your own siting. and avoidance criteria.

Michael McAllister, 60069 Morgan Lake Road, La Grande, Oregon, 97850, (541) 786-1507.

June 23, 2019

Todd Cornett, Energy Facility Siting Division Administrator, **Energy Facility Siting Division, Oregon Department of Energy, 550 Capitol Street NE, 1st Floor, Salem, OR, 97301, todd.cornett@oregon.gov .**

Dear Mr. Cornett,

On January 14, 2019, I delivered to you a letter (attached – page 2) to express my concerns about Idaho Power Corporations (IPC) "incomplete application" for *Site Certificate* of their **Boardman to Hemingway Transmission Line** through Union County. The application is incomplete because IPC did not include the Agency Selected Route, adopted by the National Environmental Planning Act (NEPA) process – conducted by the U.S. Department of Interior's Bureau of Land Management.

This past Thursday – June 20, 2019 – the **Energy Facility Siting Council** held Public Hearing on the *Draft Proposed Order and Request for Comments* – here in Union County. I attended that meeting and I did make comments regarding my position with regards to Idaho Power Corporations Incomplete Application for Site Certificate.

In brief, the most significant point that I made was – the **Agency Identified Route A** would effectively mitigate nearly all the concerns expressed by the many attendee's comments at that meeting.

Following the public comments, two representatives from Idaho Power were seated before the Siting Committee, this so that committee members could ask questions in response to the public comments previously made.

Committee Member Hanley Jenkins asked the only question and he phrased it this way – **"I am going to ask you one very hard question – why did Idaho Power Corporation not include the BLM Agency Identified Route into their Application"?**

Idaho Power's Mark Stokes provided the following as an answer **– the BLM Agency Alternative was not included because their process was being drawn out – we were under time constraints to submit our application and went ahead without it.**

There were no further questions, and no further opportunity for the public to respond to this **Revelation**.

I have been involved over ten years in advocating for what is now the BLM Agency Identified Route A.

Idaho Power Corporation and others are currently processing an incomplete application**.** IPC has been asked to amend their application repeatedly, too include the **Agency Identified Route A.** This issue should not become a Contested Case.

Respectfully

Michael McAllister

Michael McAllister

January 14, 2019

Todd Cornett, Energy Facility Siting Division Administrator, **Energy Facility Siting Division, Oregon Department of Energy, 550 Capitol Street NE, 1st Floor, Salem, OR, 97301, todd.cornett@oregon.gov .**

Dear Mr Cornett,

I am gravely concerned that Idaho Power Corporation (IPC) has submitted an incomplete application to Oregon's Energy Facility Siting Council (EFSC). Their application for *Site Certificate* of the **Boardman to Hemingway Transmission Line** through Union County does not include for consideration, the Agency Selected Route, adopted by the National Environmental Planning Act (NEPA) process – conducted by the U.S. Department of Interior's Bureau of Land Management. The two routes that IPC has applied for: **Proposed Route (B)** and **Morgan Lake Alternative (3),** were developed late in the NEPA process and have not undergone environmental analysis or public comment. IPC's failure to gather satisfactory evidence has limited the ability of the public, EFSC, and other regulators in their ability to make fully informed decisions in the public interest.

I am requesting that Idaho Power Corporation amend their Oregon EFSC Application for Site Certificate to include the U.S. Bureau of Land Management's **Agency Identified Route A** for consideration by the State of Oregon EFSC board members. It is the only route that was fully subjected to environmental analysis and public comment during the Federal EIS. It was established through community consultation and environmental review in a multi-year process. It must be on the table for full consideration by Oregon EFSC for a "Complete Application" review.

I am Michael McAllister, a long-time resident of Union County and private contractor specializing in natural resources inventory and management. I hold a Bachelor of Science degree, *Wildlife Resources*, from the University of Idaho. As a 40-year resident on Morgan Lake road, I have an intimate knowledge of the geology, habitat, environmental issues, wildfire hazards and recreational value of the area. My interest is both professional and personal.

Oregon Department of Energy and Idaho Power Corporation records show that, since 2008, I have been encouraging Idaho Power Corporation to site the Boardman to Hemingway (B2H) Transmission Line in a manner, whereby the cumulative impacts of the Right-Of-Way will have a minimal impact on Oregon's public and their natural resources.

Attached is my comparative analysis of IPC's two routes (B and 3) and the BLM's Agency Selected Route (A). This analysis demonstrates that the Agency Selected Route minimizes risks to public safety and imposes the least impacts on the natural resources of both the City of La Grande and Union County.

At this time, I ask that Idaho Power Corporation amend their Oregon EFSC Application for Site Certificate to include additional environmental and community evidence regarding their proposed routes and to include the BLM *Agency Identified Route A* for consideration.

Respectfully

Michael McAllister

Public Comment: Michael McAllister

Proposed Boardman to Hemingway Transmission Line
Site Certificate Application Review

January [14], 2019

Introduction

The reader is advised to follow along using the Google Earth maps provided at http://www.boardmantohemingway.com/LandownerMaps.aspx. Expand the map to full screen and zoom in on Routes A, B, and 3 near La Grande, Oregon. Note you can switch between Earth View, Map View, and Topography View using the tab at the top left of the screen. To see vegetation coverages, use Earth View. Too see geographic features switch to Topography View.

Map 3 (Union County) Legend:

(A) – BLM Agency Selected Route (NEPA) - Route Color is Green on Map;

(B) – Proposed Route (EFSC) – Route Color is Red on Map;

(3) – Morgan Lake Alternative (EFSEC) – Route Color is Blue on Map.

Proposed Route B (EFSC)

IPC's Proposed Route has been identified as a best attempt to site B2H along the existing 230 kV transmission line as it passes through Union County. In 2008 and again in 2012, I asked that IPC construct their new B2H transmission line adjacent to the existing 230 kV transmission line passing through La Grande and Union County. After much further review of the evidence presented, I deemed that such a route would not meet the screens for the 500 kV transmission line for the following reasons:

1) The valley slopes to the west above La Grande are steep, with unstable geology; many areas have been identified by the U.S. Geologic Survey as unsuitable for construction.
2) La Grande's western skyline viewshed would be severely impacted. Both the City of La Grande and Union County have asked IPC to keep B2H out of their viewshed.
3) The "Powerful Rocky" stretch of Oregon Trail, and its archaeological artifacts, would be desecrated by the construction and continued maintenance requirements of the B2H towers.
4) Impacts to Oregon's Ladd Marsh Wildlife Management Area would be severe and permanent. Ladd Marsh was established as a wildlife mitigation area for past federal projects and the refuge should not be compromised. IPC itself recognizes and designates Ladd Marsh as "irreplaceable."

Based upon the above considerations, **Proposed Route (B)** has *High Cumulative Impact*, and few mitigation options.

<u>Comparative Analysis of BLM Agency Selected Route (A) and Morgan Lake Alternative Route (3)</u>

From here forward I will explain and contrast the **Agency Selected Route A**, with the **Morgan Lake Route 3.** The analysis begins at the Divergence Point – where Routes A and 3 diverge. The analysis then proceeds from north (DP), then south to the Convergence Point (CP) of the two routes near Ladd Canyon. The distance between DP and CP is approximately eleven miles for both Routes: A and 3. The elevation at DP (north end) is approximately 3,400 feet. The Elevation at CP (south) is approximately 4,800 feet. The Divergence Point is located near the middle of section 7, Township 3 South, Range 37 East, approximately 1.5 miles south of the Highway 244 junction with Interstate 84 at Hilgard. It is approximately 0.75 miles south of Highway 244, traveling south on the Whiskey Creek Road.

Geographic Setting

The biggest difference between the two routes is how each of them has been established geographically. This can best be recognized by comparison in *Topography View*. Recognize that the Grande Ronde Valley is the dominant geographic feature for the region, and further that it is oriented in a slightly northwest by southeast alignment - as is the Blue Mountain Range along the valley's west side. Recognize that from Divergence Point (near the Grande Ronde River at Hilgard) that the landscape rises as you go south following the west side of Grande Ronde Valley, all the way to near the Convergence Point above Ladd Canyon.

Now notice how the two routes, A and 3, ascend from 3,400 feet up to just over 5,200 feet elevation near the high point at Glass Hill. And notice that between the two routes there is a series of parallel ridges and drainages that are also oriented in the northwest by southeast alignment. This alignment is caused by the orientation of the faults associated with the origins of the Grande Ronde Valley. The highest of the fault generated-ridges is the one following the Mill Creek Fault – which also establishes the west edge of the valley. This highest ridge is known by geologists as the Glass Hill Monocline **– Morgan Lake Route 3 sites the transmission line along this monocline ridgetop.**

Comparatively, the Agency Selected Route A is the lower elevation route where the mean elevation is approximately 4,100 feet. See that from DP Route A proceeds southerly at an azimuth of approximately 150 degrees, along the same northwest/southeast geologic alignment. Route A gains elevation slowly as it moves up "Graves Ridge" in a straight line for approximately 5.0 miles. "Graves Ridge" is a broad gentle slope, where the only vegetation is sparse grass and forbs – much of it is rocky scab vegetation. The Graves Ridge Road (East Fork of the Whiskey Creek Road) mostly parallels the Route A with an elevation gain of about 200 feet per mile – a slope grade of just 5 percent. Importantly, note that existing roads provide excellent road access for at least two thirds of the Route A. These roads are bladed across solid basalt with few corners and no steep grades. Route A then makes only one turn, easterly to approximately 110 degrees. On this course, **Agency Selected Route A crosses the Rock Creek drainage 8.5 miles upstream from the Grande Ronde River – above the lower 6 miles deemed important to Threatened Snake River Chinook Salmon.**

Comparatively, the Morgan Lake Route 3 on the other-hand, moves east from DP and away from the Whiskey Creek Road. Route 3 then crosses the Rock Creek watershed just three miles up-stream of the Grande Ronde River. Note that there are four distinct drainages that make up the Rock Creek Watershed, from west to east they are: Graves, Little Rock, Rock, and Sheep Creeks. Notice that all four of the drainages converge near to where Route 3 crosses Rock Creek. There are no real existing roads

that access the north two thirds of Route 3. After crossing Rock and Sheep Creeks, Route 3 then intersects the Glass Hill Monocline (near Morgan Lake), where it turns southerly and follows the ridgetop. **Morgan Lake Route 3 is the high elevation route where the mean elevation across the route is approximately 4,500 feet.**

Soil Protection - **OAR 345-022-022**

The 400 feet mean elevation difference between (**A and 3)** is the predominant variable responsible for the difference in soils. The higher elevations along the top of the Glass Hill Monocline gather more precipitation, summer temperatures are cooler, more layered vegetation provide more shading, and windblown snow and soil particulates accumulate. The variability in soils is well demonstrated when you superimpose the **Union County Soil Survey Map** over IPC's Route Map overlay. Using this soils inventory, **I have identified the four predominant soil types for both: Route A and Route 3. They are listed hear from most coverage, to least coverage**:

<u>Agency Selected Route A,</u> Soils are: 1) = 69C - *Watama-Gwinly complex*, is on biscuit-scabland uplands, vegetation is mainly bunchgrasses, and annual forbs; **2)** = 35E – *Klicker-Anatone complex* - mountainous uplands where the native vegetation is mainly Ponderosa pine, bunchgrasses and elk sedge, a warm moist plant community suited to the production of pine, on a patchy basis - where soil is deep enough, also as rangeland and wildlife habitat. **3)** = 4E *Anatone extremely stony loam* - is shallow, well-drained soil at ridgetops, and on south and west facing slopes where vegetation is mainly blue-bunch wheatgrass, Idaho fescue and stiff sage; used mainly as rangeland. **4)** = 58E – *Starkey very stony silt loam* – shallow well drained soil on uplands, the vegetations is mainly bunchgrasses and annual forbs, Idaho fescue, blue-bunch wheatgrass and Sandberg bluegrass. The unit is used mainly for rangeland. Collectively, the soils makeup for Route A, tend to be shallower, and of residual decomposed basalt in its origin. The site index for timber production is lower, and shrubs are limited in the vegetation composition**. Agency Selected Route A crosses 44% forested acres - mostly warm dry plant communities. And it is noteworthy that Route A crosses 33% less timber acres than does Morgan Lake Route**

<u>Morgan Lake Route 3</u>, Soils are; 1) = 4E - *Anatone extremely stony loam*, is shallow, well drained, at ridgetops and on south and west facing slopes, derived predominately from basalt; vegetation in mainly blue-bunch wheatgrass, Idaho Fescue and stiff sage; used mainly as rangeland. **2)** = 32E - *Kalema very stony silt loam*, moderately deep, well drained, mainly coniferous forest and an understory of shrubs, forbs and grasses; used mainly for timber production, also used for woodland grazing and wildlife habitat. **3)** = 33E – *Klicker stony silt loam*, moderately deep, well drained, mountainous uplands, vegetation is mainly coniferous forest with bunchgrasses annual forbs and perennial shrubs, unit is used mainly for timber production, also for woodland grazing and wildlife habitat. **4)** = 61E – *Ukiah-Starkey complex*, Ukiah moderately deep and well drained, vegetation mainly Idaho Fescue, Blue-bunch wheatgrass and Sandberg bluegrass; used mainly as rangeland. Collectively, the soils makeup for Route 3, tend to be deeper, loamier, of residual decomposed basalt, but with more volcanic ash composition. The site index for timber production is higher, where shrub composition is greater. **Morgan Lake Route 3 crosses 66 % forested acres mostly *cool moist plant communities*, and that is 33% more timber acres than does the Agency Selected Route A crosses.**

Recreation - OAR 345-022-0100
Protected Areas - OAR 345-022-0040
Scenic Resources – OAR 345-022-0080.

Morgan Lake Route 3 also establishes towers within 500 feet of Morgan Lake Park. Here, the impact on La Grande's public will be *High*. The first stated goal in the Morgan Lake Park Recreational Use and Development Plan (Section 1, Page 2) - *A goal of minimum development of Morgan Lake Park should be maintained to preserve the maximum of natural setting and to encourage solitude, isolation, and limited visibility of users while at the same time providing safe and sanitary condition for users.* Also noteworthy is the fact that the **City of La Grande Chamber of Commerce** has long promoted Morgan Lake Park as the #1 Recreation Tourist Destination in the La Grande Area. And the State of Oregon designated **Morgan Lake Park as a State Wildlife Refuge** in the 1960s. Today Oregon Department of Fish and Wildlife identifies the Lake as an easy access fishing destination for the handycapped.

Morgan Lake Park encompasses two separate Lakes. Morgan Lake is 70 acres in size and is developed with road access and camping. Twin Lake is 27 acres in size, undeveloped, and with no road access or camping**. Twin Lake has been identified by both Federal and State programs to conserve, restore, and protect wetlands**. Oregon has developed a **Wetland Conservation Strategy** (Oregon Division of Lands, 1993). This Strategy is implemented through the Oregon Wetlands Inventory and Wetlands Conservation Plans (See Webpage). This planning process allows local governments to balance wetlands protection with other land-use needs. **Twin Lake is recognized as an important, persistent, emergent vegetation wetlands, which includes both submersed and floating plants.**

Fish and Wildlife Habitat - OAR 345-022-0060,

Morgan Lake Route 3 crosses Rock Creek approximately 2.5 miles upstream from the Grande Ronde River - just below where Sheep Creek flows into Rock Creek. Here is where the best water quality and the coolest water temperatures exist during the heat of summer. And here is where Route 3 will cross. Rock Creek is not a Chinook Salmon spawning habitat. However**, the lower six miles of Rock Creek have been identified as important habitat for both Steelhead and Chinook Salmon smolts.**

Twin Lake, at 4,100 feet elevation, supports one of the most diverse waterfowl nesting communities in the Blue Mountain Ecoregion. Most unusual is the nesting by: Ring-necked Ducks, Red Head, Rudy Duck, Blue-winged Teal, Shoveler, and Pied-billed Grebe. The species diversity surrounding this wetlands anomaly at 4100 feet elevation, is enhanced by the natural basalt rim rocks forming the south and west sides of the lake. Here the vegetation is a diverse mixture of native shrubs, aspen, black Cottonwood, and Ponderosa pine. These surrounding shrub and tree communities support as rich an assortment of both migratory and nesting passerine birds as can be recognized across the Blue Mountain Ecoregion**. Also frequenting these habitats are two bird species identified on the Oregon Department of Fish and Wildlife – *Sensitive Species List*: Great Gray Owl, and White-headed Woodpecker.**

In 2013 a Pair of Bald Eagles constructed a nest in the top of a large Ponderosa pine at the west edge of **Twin Lake** where they fledged their first two young. GPS coordinates (Degrees, Minutes,

Seconds) for **Nest-1** are: N 45*, 18', 06.0" by W118*, 08', 44.2". Route 3 places a **Tower 580 feet from Nest 1**. The pair of Eagles has since built **Nest-2** at N 45*, 17', 45.9" by W118*, 08',54.4". Route 3 places a **Tower 0.31 miles east of Nest 2**. Route 3 places the transmission line between the two nests. **Here I will point out that IPC's Avoidance Criterion Identifies Bald Eagle Nests as High Avoidance – recognizing a Buffer of one mile.** The Morgan Lake Route 3 demonstrates a disregard for these Bald Eagles. Here at the ridge-top, Morgan Lake supports an entire ecosystem of scale where the fall hawk migration follows south up the monocline ridge. **Here, watching Bald Eagles and their interaction with fishing Ospreys is a popular nature spectacle. If the Morgan Lake Route 3 is built, the spectacle will become a loud "crackling" transmission line towering over Morgan Lake Park**.

South of Morgan Lake, Route 3 advances southeast up the Glass Hill Monocline and into renowned high-density elk breeding grounds. Here in the upper reaches of Sheep Creek are numerous sedge meadow springs that are used heavily as elk wallows. All "muddied-up", large mature bulls now strut out onto the open bunchgrass slopes to breed on Cowboy and Sheep Ridges. Landowners here have a long history of promoting the Elk Resource as a viable economic and recreational endeavor. Oregon's Governor Pierce and Supreme Court Justice William O. Douglas once made this habitat their personal "getaway." One neighbor has made land acquisitions and established conservation easements to consolidate and preserve the native integrity of the area. The Rocky Mountain Elk Foundation is a cooperator in these efforts, as is the case with the Eastern Oregon University's Rebarrow Forest Project. Before the white-man's time, the Glass Hill Monocline was the gathering location for hundreds of horses that were summer pastured on what we now call the Starkey Range Lands. This is sacred ground, that has been long recognized for its richness and integrity of native vegetation.

Threatened and Endangered Species – OAR 345-022-0060

Morgan Lake Route 3 could impact Snake River Chinook Salmon habitat and water quality where the route crosses Rock Creek.

Oregon's Sensitive Species Rule – OAR 635-100-0040

Morgan Lake Route 3 will affect known Great Gray Owl and White-headed Woodpecker habitats across the 2.5 mile stretch between Rock Creek and Morgan Lake.

Health and Safety Standards for Siting Transmission Lines - OAR 345-024-0090
Specific Standards for Facilities Related to Underground Gas Storage Reservoirs - OAR 345-024-0030

At this point we need to consider the Transmission-line Tower that would stand closest to Morgan Lake recreationists. It is located within 100 feet of a thirty-inch diameter Natural Gas Line (Trans-Alaska, 1st leg constructed 1982). Here the gas-line is less than 600 feet from Morgan Lake Park. And here at the ridge-top is a known zone of weakness for said pipeline. From the top of the Glass Hill Monocline, the pipeline drops steep downslope in both directions – east and west. Over the years, there have been multiple pipeline ruptures less than a mile from Morgan Lake. This explosive potential exposes the residence of Morgan Lake Estates and the recreationist at Morgan Lake Park to unnecessary risk. IPC also needs to consider how their stray energy electrolysis will erode this Trans-Alaska Natural Gas Pipeline. **The Morgan Lake Route 3 crosses the natural gas line twice - once at Morgan Lake, and again it crosses at Rock Creek – approximately 2.5 miles to the northwest. Even more noteworthy, is the fact that the Agency Selected Route A avoids pipeline crossing all together.**

Looking at the statistics for American transmission lines, I see that between 1984 and 2006, approximately 44% of all power blackouts were weather-related, and of those – **11% were caused by lightning activity**. As a resident of the Morgan Lake Estates, I am extremely concerned that IPC's transmission line may act as a source of ignition for leaking gas from an aging pipeline, as well as for uncontrolled wildfire - we have recently seen this in California. My residential property is within 100 feet of the pipeline, and within 900 feet of the Morgan Lake transmission-line/powerline crossing. In 2005, Union County conducted a County-wide Wildland Urban Interface Fire Hazard Analysis. The resulting Analysis was published using Federal grant monies. The document identifies fourteen different Wildland Urban Interface (WUI) Zones within Union County. Based upon a set of Risk Analysis Criterion, each of the 14 WUI Areas were ranked from High-1 to Low-14. The Morgan Lake Estates WUI was given the Highest (#1) Ranking. It is also noteworthy that along the **Agency Identified Route A, there are no residences in any direction for well over a mile.**

Of the three routes under consideration, the **Morgan Lake Route 3 gets the Highest Fire Risk Rating for the following reasons:** it follows across the top of the Glasshill Monocline adjacent to the Grande Ronde Valley. The construction of a 200-foot-tall transmission line towers, along the highest ridgetop, where they are exposed to the most turbulent weather conditions is a recipe for fire. Here at this high elevation, the Morgan Lake Route 3 will be cut through *Cold Moist Ecotypes* that are dominated by mixed-conifer forests. Here, dense volatile fuels are exposed, where winds are the norm, and fuels dry quickly. It is highly significant that this area of the Blue Mountains is in the major lightning path, where cumulus buildups move up from the southwest. The storms track across the Blue Mountains strengthening as they move northeasterly. And as the storms cross the Glass Hill Monocline and the adjacent Grande Ronde Valley, thermals increase lightning activity at the ridgetop – not a good place for a major transmission line. Note here that the **Agency Selected Route A rapidly drops (west) down from the Glass Hill Monocline and onto a lowland ridge where winds and weather are diminished, and where vegetative fuel is sparse short grass vegetation of low flammability.**

As a resident in the Morgan Lake Estates for 40 years, I have always considered **Morgan Lake to be our greatest *Fire Fighting Asset***. At the ridgetop, Morgan Lake provides fire helicopters with buckets the ability to come and go from any direction without limitations. Morgan Lake is among the best water sources for helicopters in the region. **The proposed Morgan Lake Route 3 would significantly change helicopter activity around Morgan Lake, creating an unnecessary liability that puts us all at risk.**

Additionally, the Morgan Lake Route 3 (at the ridgetop) poses additional aviation liabilities that need consideration. Most air traffic in and out of La Grande Airport, the U.S. Forest Service Airtanker Base, and the Life Flight Base comes from and goes out to the west. Low Flying aircraft cross the Morgan Lake ridgetop commonly. Again, the **Morgan Lake Route B creates unnecessary liabilities that puts us all at risk. The Agency Identified Route A eliminates these liabilities**.

SUMMARY

Idaho Power's Proposed Routes offer Oregon decision makers a false choice. It is likely that **Idaho Power's Proposed Route B** will not achieve License Approval by EFSC. By default, IPC's request would become permit **Morgan Lake Route 3**. IPC put these two routes forward in the "11th hour" of the Final EIS. Neither route was evaluated by a credible environmental review team. I have dedicated my own time to comparing and contrasting **Morgan Lake Route 3** with the **Agency Identified Route A**

because Oregon's decision makers and the public deserve a full vetted and evaluated alternative. The **Morgan Lake Route 3 is High Impact**.

At the ridgetop, the Morgan Lake Route 3 would have greater impacts on: protected areas, recreation, scenic resources, soils, forested acres, and fish and wildlife habitats. The Morgan Lake Route poses unnecessary risks to: public health and safety, the wildland urban interface, fire suppression support systems, and to aircraft transportation. Morgan Lake Route is more topographically complex, has very limited road access, and requires much more disruption to wildlands. **All said, I calculate that the Morgan Lake Route 3 is a significantly more expensive transmission line segment to build, and to maintain.**

Alternatively, the Agency Identified Route A is topographically simple, has extensive solid road access, and crosses uninhabited lowlands. Here, soils are thin, vegetation is sparse and of low flammability. **It is clear to me why Route A is the *Agency Identified Route.* And it remains a complete mystery - why IPC chooses to disregard the Agency Identified Route**.

Idaho Power has been asked repeatedly – why the **Agency Identified Route 3** was not included in the EFSC Application? On October 17, 2018, IPC and EFSC held a joint informational meeting at the Blue Mountain Conference Center in La Grande. A member of the audience asked **IPC's Jim Maffuccio** the question – **why are you not using the BLM's environmentally preferred route?** His vague answer was essentially - **we have been working with landowners; there are habitat concerns; the tribes have some concerns; we are communicating with the BLM.** There has been no further elaboration or publicly presented documentation.

I am now asking EFSC, to ask Idaho Power Corporation, to amend their Oregon Application for Site Certificate - Include the *Agency Identified Route A* for consideration.

Going forward, I also ask that EFSC consider seriously the issues of Heath and Public Safety. And I ask that EFSC members consider the **Oregon Conservation Strategy (OCS)** as they weigh the impacts that each of the three routes: A, B, & 3. OCS is the state's overarching strategy for conserving fish and wildlife resources. It serves as the official State Wildlife Action Plan for Oregon, and it is a requirement for the federal State Wildlife Grant Program. The objective of OCS is too conserve fish and wildlife resources by maintaining and restoring *functioning habitats*. OCS breaks the state into *Ecoregions* - the entirety of Union County is within the *Blue Mountains Ecoregion*. It critical that EFSC members understand that the setting for this transmission Line analysis is arguably in one of the Highest Functioning Habitat Areas in the Blue Mountains Ecoregion. The variability of topography, elevation, soils, native vegetation, and wildlife habitats along the breaks of the Grande Ronde Valley is very high, especially for a two-mile radius surrounding Morgan and Twin Lakes…

Respectfully

Michael McAllister (Owner), Wildland Resource Enterprises, 60069 Morgan Lake Road, La Grande, OR, 97850, wildlandmm@netscape.net, (541) 786-1507 .

cc. EFSC Facility Siting team – energy.siting@oregon.gov, Mark Stocks – Applicant/Certificate holder - mstokes@idahopower.com, Scott Hartell – Planning Director for Union County - shartell@union-county.org , Don Gonzale – BLM B2H NEPA Coordinator – dgonzale@blm.gov .

Stu Spence <sspence@cityoflagrande.org

In response to your call for information (Date: Fri, Aug 11, 2017 at 11:16 AM - Subject: B2H Morgan Lake) – "The City of La Grande is currently providing input to Idaho Power for their Boardman to Hemingway Transmission Line Project. Their current proposed route crosses the boundary of Morgan Lake along the West and Southwest and I have some major concerns about the environmental impacts on Little Morgan Lake. That's where I need your help."

I encourage you to emphasize to Idaho Power that - the first stated goal in the Morgan Lake Park Recreational Use and Development Plan (Section 1, Page 2) - *A goal of minimum development of Morgan Lake Park should be maintained to preserve the maximum of natural setting and to encourage solitude, isolation, and limited visibility of users while at the same time providing safe and sanitary condition for users.*

Morgan Lake Park encompasses two separate Lakes; Morgan Lake is 70 acres in size and is developed with road access and camping. Lower Morgan Lake is 27 acres in size, undeveloped, and with no road access or camping. Here it is important that we make one important clarification that (although little known) Little Morgan Lake is officially recognized by both the State of Oregon, and by Federal Agencies as Twin Lake (See USGS – Hilgard Quadrangle Topographic Map). This is especially confusing because the City of La Grande's Morgan Lake Park Plan recognizes Twin Lake as "Lower Morgan Lake." Semantics yes, but here is the reason that Twin Lake be recognized for this discussion. Twin Lake has been identified by both Federal and State efforts to conserve, restore, and protect wetlands. Oregon has developed a Wetland Conservation Strategy (Oregon Division of Lands, 1993). This Strategy is implemented through the Oregon Wetlands Inventory and Wetlands Conservation Plans (See Webpage). This planning process allows local governments to balance wetlands protection with other land-use needs. Twin Lake was recognized as an important – persistent emergent wetlands that includes both submersed and floating plants.

Between 1979 and 1987, I lived on Sheep Creek – within ¼ mile of Twin Lake. Most days I walked the south shore of the lake on my way to Eastern Oregon University where I was a student. In 1985, I received a B.S. degree from the University of Idaho in Wildlife Resources. Since graduation I have worked as independent contractor specializing in wildlife and vegetation inventory. My very first contract was with the Nature Conservancy – Baseline Inventory of Wildlife and Vegetation for the Downey Lake Preserve in Wallowa County. There I mapped all vegetation communities, emergent to upland. Like Downey Lake, Twin Lake is recognized in the Oregon Wetlands Inventory. Both are distinct wetlands anomalies in the Blue Mountain Ecoregion

Although I have not mapped the wildlife and vegetation communities of Twin Lake, I am empirically familiar with them for the past 38 years. This pristine wetland, and the surrounding uplands, have been uniquely preserved over time. The native integrity of Twin Lake is virtually

unchanged. In fact, both the Osprey and the Bald Eagle have established nesting since I moved here.

Twin Lake, at 4,100 feet elevation, supports one of the most unique waterfowl nesting communities in the Blue Mountains. Most unusual is the nesting by: Ring-necked Ducks, Red Head, Rudy Duck, Blue-winged Teal and Pied-billed Grebe. Other nesting waterfowl include: Shoveler, Green-winged Teal, Mallard, and Canada Geese.

Rush Sedge and Marsh Birds.

Increasing the species diversity surrounding this wetlands anomaly, the lake is created by natural basalt rim rocks along the south and west edge. Here the vegetation is a diverse mixture of native shrubs, Aspen, Black Cottonwood, and Ponderosa Pine. These surrounding shrub and tree communities support as rich an assortment of both migratory and nesting passerine birds as can be recognized across the Blue Mountain Ecoregion.

And with this species richness, so come the Raptors – both nesting and migratory.

Clearly, I understand why you have major concerns about the environmental impacts that a 500 kv Transmission Line would have towering along the south and west sides of Twin Lake. I assume that it was impacts on resources like Twin Lake that resulted in the Bureau of Land Management (BLM) identifying the Glass Hill Alternate as having the Least Environmental Impact – Hilgard to Ladd Canyon Reach.

I hope that the City also expresses concerns about the visual impacts that this Transmission Line would have on one of La Grande's and Union Counties premier viewsheds. Every visitor to Morgan Lake, at the top of the Blue Mountains, would have to first confront a visual assault from Idaho Power.

I encourage you and the City of La Grande to advice Idaho Power to Amend their Application for Site Certificate to include the Glass Hill Alternate Route - the BLM's "Least Environmental Impact Route." This will give the State of Oregon the opportunity to evaluate what Idaho Power has clearly disregarded.

Respectfully

Michael McAllister, wildlandmm@netscape.net

EXHIBIT C

EXHIBIT C

Search

Search **search**

Select Language

Powered by Google Translate (https://translate.google.com)

Boardman to Hemingway Transmission Line Project (/)

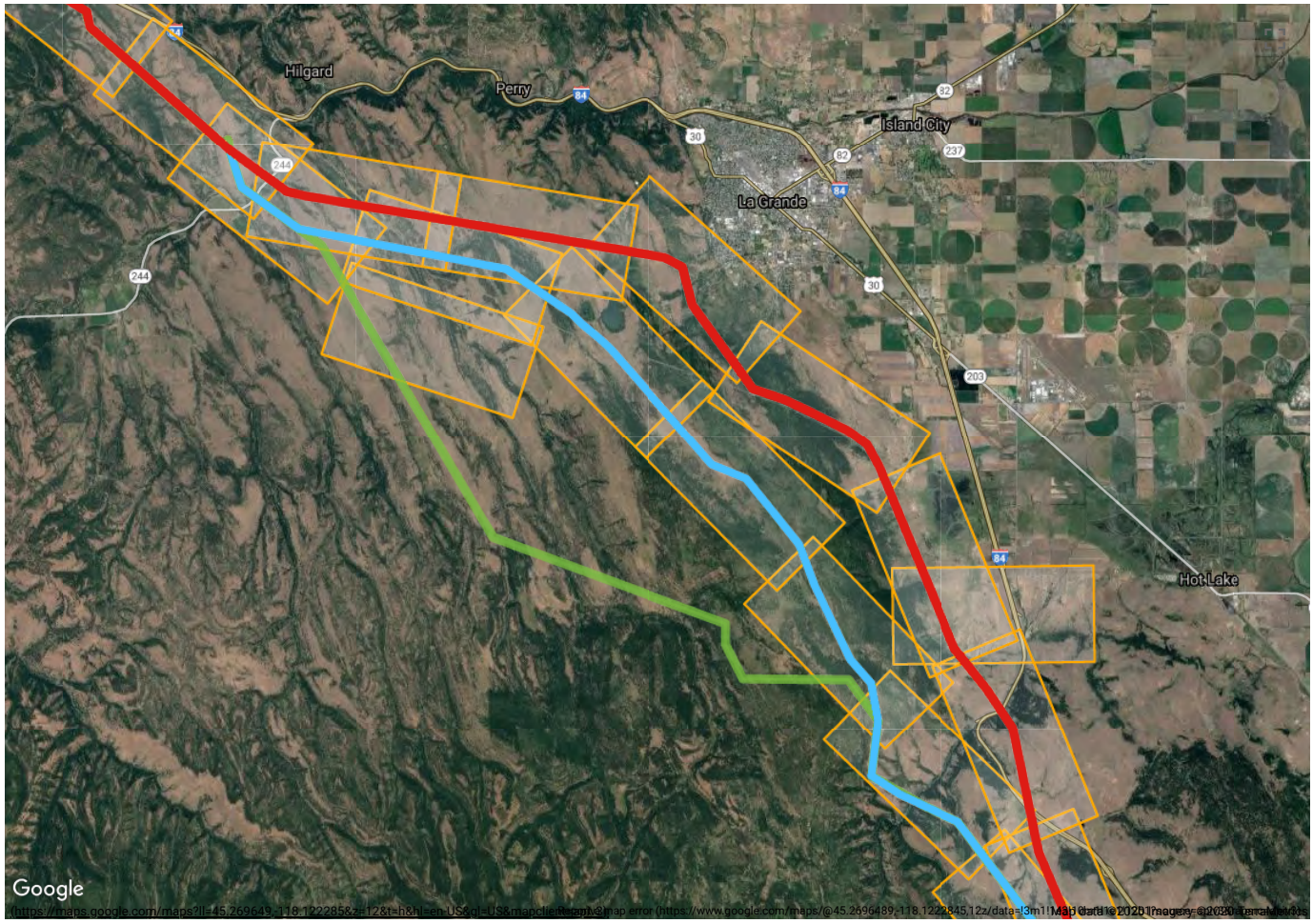
Interactive Map - Including landowner parcels

Property Search

Enter a physical address into the search box to find a property on the map.

Baker City, OR **Search**

☑ **Agency Selected Route (NEPA)** ☑ **Proposed Route (EFSC)** ☑ **Substations** ☑ **Detailed Maps**



For questions, contact:

Bureau of Land Management (https://www.blm.gov/oregon-washington/energy-independence/boardman-hemingway)

U.S. Forest Service (https://www.fs.usda.gov/project/?project=26709&exp=overview)

David Plummer

Wallowa-Whitman National Forest

Ms. Sue McCarthy
60760 Wood Rd
La Grande, OR 97850-1380

PORTLAND OR 972
29 JUL 2020 PM 2 L

FOREVER / USA

NSN

Alison Greene-Webster
Senior Administrative Law Judge
Oregon Dept. of Energy
500 Capital Street NE
Salem OR
97301

NOT AT THIS ADDRESS
RETURN TO SENDER

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NO SUCH NUMBER
UNABLE TO FORWARD
BC: 97850138060 *0449-00837-29-37

NSN
97850-1380

Ms. Sue McCarthy
60760 Wood Rd
La Grande, OR 97850-1380

PORTLAND OR 972
26 AUG 2020 PM 4 L

FOREVER / USA

AUG 31 2020 PM 1:34

Alison Greene-Webster
Senior Administrative Law Judge
Oregon Dept. of Energy
500 Capital Street NE
Salem OR 97301

97301-252900

July 25 2020

Oregon Dept. of Energy
Contested case B2H
Request filing as party

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Dept Energy, 550 Capital St. NE, Salem OR 97301

As stated in my public comment 6-20-19 I am concerned about the wildlife @ and around Morgan Lake Park, in particular the bald eagles population that nest and breed there. Bald eagles inhabit the entire Morgan Lake area including all proposed routes.

The Proposed Order states that "Federal wildlife laws must be adheared to by the applicant." This is under the jurisdiction of the United States Fish and Wildlife Services (USFWS).

The Proposed Order #317 States Although trees and structures with raptor nests within the analysis area are as Category 1 habitate the applicant omitted the acreage estimate within ASC Exhibit P, table 1-4 due to their relative small size on the landscape. No area should be omitted. Size should not be a determining factor.

The Oregon Department of Fish and Wildlife (ODFW) should follow the rule of the (USFWS). The ODFW stated that there is no guidance on quantifying

indirect impact to fish and wildlife species or their habitate other than elk and sage grouse. The USFWS has rules and guidelines regarding bald eagles and other raptor species. These need to be adhered to in the impact statement.

The raptor/eagle nest in the analysis area were designated as a Category 1 but this is not addressed in any of the mitigation tables because bald eagle were excluded. This needs to be addressed.

These concerns impact not only myself but the general public that enjoy the Morgan Lake Park and surrounding area. It is the unique wildlife that attract people to the area and it needs to be reserved. Our land abuts Morgan Lake Park. I understand personally the need to protect the wildlife, including bald eagles that habitate this beautiful area.

Sue McCarthy
60760 Wood Rd
La Grande OR 97850

TARDAEWETHER Kellen * ODOE

From: John Milbert <jmfisherman9@gmail.com>
Sent: Tuesday, August 4, 2020 11:59 AM
To: OED-OAH-Referral@oregon.gov
Cc: TARDAEWETHER Kellen * ODOE
Subject: Contested Case Request

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, OR 97301
email: OED-OAH-Referral@oregon.gov

Dear Ms. Greene-Webster

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

From: John B. Milbert 1812 Jefferson Ave La Grande, OR 97850 email: jmfisherman9@gmail.com

I am not currently represented by an Attorney.

I hereby request filing status as a "Party"

My interest is Personal Recreational, and Environmental, regarding a Threatened or Endangered Species. If the proposed transmission line is constructed as currently planned, the Threatened Bull Trout species will never recover in the upper Grande Ronde River system, and neither I nor anyone else will ever be able to fish for them, or even see them in a section of river that is actively being managed to restore fisheries, and which historically held a self-sustaining population of Bull Trout. This is unacceptable.

This is a matter of Public Interest, affecting many anglers and conservationists.

Someone else, possibly an attorney, may be chosen to represent me in the Hearings, at a later date.

My issue is that the Applicant has failed to address environmental impact on Bull Trout, a Federally listed Threatened Species. The listing criteria states that, if a species is present in any portion of a watershed, the entire watershed is protected. Bull Trout are present in the Grande Ronde River system. Therefore, the section of river directly affected by the proposed transmission line construction is also protected. The applicant has made NO provision for protection of the species. The issue MUST be addressed!

I filed comments on this issue electronically with Kellen Tardaewether, Senior Siting Analyst, Oregon Department of Energy, on Monday, August 12, 2019 at 10:56 a.m. Please reference said comments for the pertinent OAR statutes.

Thank you for your attention to my request!

John B. Milbert

Alison Greene-Webster, Senior Administrative Law Judge

Oregon Department of Energy

500 Capitol St. NE, Salem OR 97301

SUBMITTED CIA EMAIL: OED OAH Referral @oregon.gov

August 26, 2020

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

A. I am Jennifer Miller petitioner, 445 SE 9th Dr. Hermiston OR 97838
B. I am representing myself; I am not represented by an attorney.
C. I request filing as a party for all areas as this transmission line would affect the National Historic Oregon Trail and related sites.
D. I have strong personal interest in contesting this transmission line. It will greatly affect critical remaining segments of the Oregon Trail, it will create a great fire hazard, nor will it truly serve NE Oregon in general.
E. The public will be affected in many ways. Productive range and farmland will be negatively affected. Open viewsheds will be marred. The forest ecosystem will be changed. Fires will become even more common, affecting land, animals, plants and air quality. Tourism is a big component to Oregon's economy. Hiking and outdoor recreation takes advantage of NE Oregon's natural beauty. This includes the Oregon Trail. People will be unable to follow and appreciate the struggles, views and experiences that emigrants endured because the transmission line will detract or destroy what little is left of this great road that linked the East to the West to make our one great country.
F. I would like to represent myself concerning these issues.
G. Statement of Issues

Issue 1

Standards Relating to Protected Areas, Scenic Resources, Recreation and Historic, Cultural and Archaeological Resources for the National Historic Oregon Trail and sites

OAR 345-022-0040 (Protected Areas) requires the Council to find that, taking into account mitigation, the design, construction and operation of a proposed facility are not likely to result in significant adverse impacts from noise, increased traffic, water use, wastewater disposal, visual impacts of facility structures or plumes, and visual impacts from air emissions.

OAR 345-022-0080 (Scenic Resources) requires the Council to determine that the design, construction and operation of the proposed facility, taking into account mitigation, will not be likely to have a "significant adverse impact" to any significant or important scenic resources and values in the analysis area.

OAR 345-022-0100 (Recreational Opportunities) requires the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order.

All three of these regulations have similar methods of analysis and rely upon the definition of significant as defined in OAR 345-001-0010(53). "having an important consequence, either alone or in combination with other factors, based upon the magnitude and likelihood of the impact on the affected human population or natural resources, or on the importance of the natural resources affected, considering the context of the action or impact, its intensity and the degree to which possible impacts are caused by the proposed action. Nothing in this definition is intended to require a statistical analysis of the magnitude or likelihood of a particular impact."

Council rules do not prescribe specific methodology for assessing impacts to protected areas or outline specifically what constitutes a potential significant adverse impact from a proposed facility to a protected area.

I am requesting a contested case hearing as the methods used to determine significant in all three standards were not independently obtained. Numeric values were applied to impacts with the total value determining significant. Key measurement locations or observation points were not satisfactory for useful results, with no public input obtained.

I respectfully maintain that the Staff does not have adequate knowledge of the Oregon Trail, its location, and its historical meaning as a legislated National Historic Trail. Staff when showing Key Observation Point simulation 5-25D, indicated it was from the picture window looking at the Oregon Trail. In fact, the simulation is of Flagstaff Gulch where there is no Oregon Trail and view is from a secondary window in the Interpretive Center. The power line simulation did show a significant visual adverse impact.

The Interpretive Center is very inadequately analyzed for significance in all three standards. Most of the elements were assigned values based upon opinion of a consultant. The effect from the Interpretive Center picture window, Panorama Point, and the Oregon Trail ruts were not shown nor discussed with the Council.

I believe that the proposed design, construction, and operation of the transmission line, considering mitigation, will likely have a "significant adverse impact" to Scenic, Recreational and Protected standards.

I wrote about this in my letter of August 14, 2019 on these subjects.

Issue 2 **OAR 345-022-0080 Scenic Resources for the National Historic Oregon Trail Interpretive Center (NHOTIC)**

The Proposed Order did not respond to a Special Advisory Group (Baker County) and multiple public comments and in my letter of August 14,2019 letter, for Underground mitigation.

What is the value of the BLM ACEC protected area and its scenic resource at Flagstaff Hill? Idaho Power was asked to provide an evaluation of undergrounding 1.5 miles of the transmission line. Power Engineers provided a Desk Top Class 5 estimate of costs and included opinion of their results. Power Engineers has not indicated that they have set foot on the ground at the site.

Staff has made several comments that have no basis in fact:

1. underground technology and infrastructure would themselves create visual impacts
2. underground would impact other resources protected and not evaluated in the ASC

Power Engineers has not indicated that undergrounding was not feasible or that it could not be done, only that their estimate of cost was very high and ground disturbance would be substantially greater than overhead lines.

The route is the same for both overhead and underground lines, and do not cross cultivated land. Power Engineers has experience with undergrounding as they were part of the Southern California Edison underground 500-kV project, finished in 2019.

Staff has written that; Undergrounding could be considered as "minimizing" impacts of the action if it was found that undergrounding did, in fact, minimize the visual impact of the proposed facility to the extent that the mitigation reduced a potentially significant adverse impact to a level that was less than significant, in compliance with an applicable Council standard.

I am requesting a contested case as no analysis was done on how undergrounding could mitigate scenic views. All cost amounts are estimates with the potential for 100% adjustment as per Class 5 American Association of Civil Engineers.

Issue 3. **<u>Public Services, Fire Protection IV.M.8 (starting on page 571)</u>**

The proposed site certificate fails to provide adequate analysis of the Public Services
Standard (OAR) 345-022-0110. This standard provides that during construction and operation,
when considering mitigation, it is not likely that either will result in significant adverse impact
to the ability of public and private providers to provide fire protection.

In proposed Condition 7(a), page 583; Staff is requiring Idaho Power to provide a copy of its Final Wildfire Mitigation Plan to the Department and each affected county.

1. There is no provision for the public to have an opportunity to review or comment, no matter where their property is located.

2. Idaho Power should include specific prevention items. Suggestions include cameras and procedures during Red Flag conditions which would provide alerts much more rapidly.

Proposed Condition 7(d), page 583; EFSC removes themselves from responsibility for a Wildfire Plan, no matter what the Oregon Public Utility Commission determines as their Transmission System Wildfire Plan. The Governor's Executive Order 19-01 has no reference to EFSC standards and does not apply to any specific Energy Project.

The Oregon Public Utility Commission has completed their first workshop on May 21, 2020 in what they call Wildfire Mitigation Plans. Idaho Power was present and made a presentation that included only State of Idaho.

I am requesting a contested case hearing due to the failure of the proposed order to comply with OAR 345-022-0110.
I commented on my concerns with fire hazards in person on June 26, 2019 and in writing August 2019.

Last Comments

There are many reasons why I think that the B2H line is not necessary. It benefits Idaho Power much more than the residents of Oregon. It will be unsightly, ruining farmland, cropland, forested areas, and our national treasure of the Oregon Trail. As a teacher, I instruct students about the significance of the Trail and how it knitted our country together. As a member of OCTA I continue that teaching with other students and adults. I also am a scout leader. At the end of July, I helped lead a scout troop and soon to be Eagle Scout in placing 4 T-Rail markers on the Oregon Trail in the La Grande area and 2 in Pendleton. Please see the article in the La Grande Observer from August 4, 2020. This education and preservation is vital for our future generations so they can appreciate their history and their

heritage. Please find a better way to provide power for Idaho Power that does not ruin our ways of life, our beautiful viewsheds, and our heritage.

Sincerely, Jennifer Miller
445 SE 9th Dr. Hermiston OR 97838

TARDAEWETHER Kellen * ODOE

From: rutnut@eoni.com
Sent: Thursday, August 27, 2020 4:21 PM
To: kellen.tardaewether@oregon.gov
Subject: [Fortimail Spam Detected] B2H
Attachments: B2H Contested Case Letter.docx

Ms. Tardaewether,
Please see attached letter concerning the B2H transmission line Sincerely, Jennifer Miller

TARDAEWETHER Kellen * ODOE

From: cndyrela@eoni.com
Sent: Tuesday, August 25, 2020 4:46 PM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Subject: [Fortimail Spam Detected] B2H Contested Case
Attachments: B2H Contested Case.pdf

August 25, 2020

Alison and Kellen,

I've attached my contested case letter.
Thank you for your attention to this matter.

Sincerely,
Kathryn Morello

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capital St. NE, Salem, Or 97301
email: OED OAH Referral@oregon,gov
Also send copies to :kellen.tardaewether@oregon,gov

CONTESTED CASE REQUEST REGARDING THE PROPOSED SUTE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

Kathryn Morello
P.O. Box 147
La Grande, Or 97850

I am requesting as a party a contested case.

Division 25 SITE CERTIFICATE CONDITIONS 469 503 Line 12

I wrote a letter in August of 2019 about the seismic events that might result from blasting and use of heavy equipment to install Idaho Powers transmission towers for the Boardman to Hemingway Transmission Project. Morgan Lake, on the route, has an earthen damn that could be compromised from the blasting and use of heavy equipment. If this were to occur water and debris would flood down Deal Canyon causing massive loss of life and homes. Idaho Power Transmission Line construction must meet safety issues which is compromised by blasting and use of heavy equipment. The Division 25 SITE CERTIFICATE CONDITIONS 469.503 line 12 states "The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site that are expected to result from all maximum probable seismic events, As used in this rule "seismic hazard" includes ground shaking, ground failure, and lateral spreading landslide, liquefaction triggering and consequences including flow failure settlement buoyancy, and lateral spreading, cyclic softening of clays and silts, fault rupture, directivity effects and soil-structure interaction." I don't feel my concerns were given the attention needed. To protect my community this issue must be addressed.

Also, I received a letter from Idaho Power in the spring of 2020 and they wrote "since your property is near the Mill Creek Route, you don't need to take any further action." This is misleading. The Mill Creek route has not been removed from the options and the "preferred" route, Morgan Lake Route. still presents the problem of the earthen damn that threatens city of La Grande, Or.

Respectfully,
Kathryn Morello
Kathryn Morello
P.O. Box 147
La Grande. Or. 97850
cndvrela@eoni.com 541-786-7224

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capital St. NE, Salem, Or 97301
email: OED OAH Referral@oregon,gov
Also send copies to :kellen.tardaewether@oregon,gov

CONTESTED CASE REQUEST REGARDING THE PROPOSED SUTE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

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Respectfully,
Kathryn Morello
Kathryn Morello
P.O. Box 147
La Grande. Or. 97850
cndyrela@eoni.com 541-786-7224

TARDAEWETHER Kellen * ODOE

From: Anne Morter <amorter79@gmail.com>
Sent: Thursday, August 27, 2020 4:42 PM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE; info@stopb2h.org
Subject: Contest Case Request Regarding proposed site certificate for B2H Line

Dear Ms. Green-Webster:

My name is Ralph Morter and my address is 66221 Dirt Road, Ione OR 97843. I am not represented by an attorney.

I request to file as a party.

My interest in this line is economic.

Farmland is not compatible with a power line due to erosion and removing land from production. Once land is out of production, the chances of it are returning are slim.

Building a powerline on property negates the possibilities of siting wind towers on that property in the future and a significant amount of property around it.

Most citizens are not in a position or have the resources to know what to ask for in a taking negotiation or even to negotiate effectively.

If Idaho Power is not willing to pay more than 50% of real market value for condemned property, they put landowners in a predicament. That is land they can never get back.

I have raised these concerns and attended meetings for the past ten or more years.

Thank you for your consideration.

Ralph Morter
phone 541-571-8237

TARDAEWETHER Kellen * ODOE

From: David Moyal <moyald@gmail.com>
Sent: Thursday, August 13, 2020 7:12 PM
To: TARDAEWETHER Kellen * ODOE
Subject: B2H
Attachments: B2Hcontestletterfinal.docx

Attached please find my contested case filing re: B2H. Thank you, David Moyal

David Moyal
1804 2nd St
La Grande, OR 97850
8/7/20

Subject:
Contested Case Request on B2H

I am contesting the ODOE Energy Facility Siting Council's permitting of the B2H project, and I am filing the request as a party to this matter.

My prior participation in the review process, both written and verbal, gives me standing as a party. I submitted written objections to the EFSC on 6/20/19, concurrent with verbal comments made at the EFSC meeting in La Grande.

The Proposed Order, unfortunately, does not specifically address the concerns that I raised in my comments on the Application: Idaho Power stated that the wording of Union County's Land Use Plan does not meet the requirements for protection. The PO continues to focus only on the narrowest interpretation of the Land Use Plan (pp R23 and R24), while ignoring the plan's overarching purpose: "The natural beauty of Union County is worthy of preservation and should be preserved consistent with the stated purposes of this Plan." (p9)

Furthermore, the PO's statement that "The Recommendations section of the plan (pp.46-47) contains a heading for Open Space, Scenic and Historical Areas, and Natural Resources, but none of the five recommendations under that heading address scenic resources" is erroneous. In fact, on pp 46-47, in section V B, the Plan states: "It is recommended:…that ordinance provisions be developed….to insure…protection of significant views and sites."

The PO's Conclusion with regard to scenic values (P 431) states:
"Based on the foregoing findings of fact, and subject to compliance with the recommended conditions of approval, the Department recommends the Council conclude that, taking into account mitigation, the design, construction and operation of the proposed facility, including proposed and alternative routes, is not likely to result in significant adverse impacts to any scenic resource, in compliance with Council's Scenic Resources standard." I think the Council's Scenic Resource Standard is being applied far too narrowly in this case. "Scenic Resources" can be described and defined in many different ways. It is unfortunate that ODOE chooses to base its conclusions on such exclusive and narrow terminology.

The PO flies in the face of our community's clear preference for maintaining our current viewsheds. That the EFSC can so blatantly disregard our multiple concerns about this project is a travesty of public process. It puts corporate profits above community values.

Legalese aside, I doubt anyone would claim that B2H is "not likely to result in significant adverse impacts to any scenic resource." My family and I moved the Grande Ronde Valley ten years ago largely because of its natural beauty. It is a breathtaking place to live. To have that beauty irretrievably marred by this uneccesary project is a tragedy for us. There's still time, before the bulldozers come, to turn this around. Please do so.

Thank you for your consideration,

David Moyal

David Moyal
1804 2nd St
La Grande, OR 97850
8/7/20

Subject:
Contested Case Request on B2H

I am contesting the ODOE Energy Facility Siting Council's permitting of the B2H project, and I am filing the request as a party to this matter.

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Furthermore, the PO's statement that "The Recommendations section of the plan (pp.46-47) contains a heading for Open Space, Scenic and Historical Areas, and Natural Resources, but none of the five recommendations under that heading address scenic resources" is erroneous. In fact, on pp 46-47, in section V B, the Plan states: "It is recommended:...that ordinance provisions be developed....to insure...protection of significant views and sites."

The PO's Conclusion with regard to scenic values (P 431) states:
"Based on the foregoing findings of fact, and subject to compliance with the recommended conditions of approval, the Department recommends the Council conclude that, taking into account mitigation, the design, construction and operation of the proposed facility, including proposed and alternative routes, is not likely to result in significant adverse impacts to any scenic resource, in compliance with Council's Scenic Resources standard." I think the Council's Scenic Resource Standard is being applied far too narrowly in this case. "Scenic Resources" can be described and defined in many different ways. It is unfortunate that ODOE chooses to base its conclusions on such exclusive and narrow terminology.

The PO flies in the face of our community's clear preference for maintaining our current viewsheds. That the EFSC can so blatantly disregard our multiple concerns about this project is a travesty of public process. It puts corporate profits above community values.

Legalese aside, I doubt anyone would claim that B2H is "not likely to result in significant adverse impacts to any scenic resource." My family and I moved the Grande Ronde Valley ten years ago largely because of its natural beauty. It is a breathtaking place to live. To have that beauty irretrievably marred by this uneccesary project is a tragedy for us. There's still time, before the bulldozers come, to turn this around. Please do so.

Thank you for your consideration,

David Moyal

David Moyal

TARDAEWETHER Kellen * ODOE

From: sam myers <sam.myers84@gmail.com>
Sent: Monday, August 24, 2020 9:44 AM
To: ODE-OAH-Referral@oregon.gov; TARDAEWETHER Kellen * ODOE; info@stopb2h.org
Subject: Contested case

Allison Green-Webster, Senior Administration Law Judge Oregon Department of Energy
500 Capital St. NE, OR. 97301

Emailed to; OED-OAH-Referral@oregon.gov, Kellen.taraewether@oregon.gov, Info@Stopb2h.org

CONTESTED CASE REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE.

Dear Mrs Greene-Webster:

My name is Sam Myers, my address is; 68453 Little Butter Creek Road, Heppner Oregon. I seek to contest this transmission line without being represented by an attorney.
I am requesting to file as a "party"! I am impacted by this transmission line in negative way; financially, agronomically, atheistically, wireless communication and health issues. I face a direct impact in the form of fire risk to our cropped fields!! It has become acutely obvious that i am the most qualified person to argue this case, no one should represent me on this issue!!
The proposed order does not contain sufficient information regarding the fire risk resulting from this transmission line. The risk of fire is most dangerous durning its operation!! The danger of fire from this high voltage line has not been completely resolved, we should not allow its construction only to watch it burn our crops and ruin our livelihood! I spoke about these risks during the in-person comment meetings at BOARDMAN, Or. last summer!! I also commented in the webinar phone call-in time earlier this spring!! At these occasions I discussed the devastation we would experience on a long term basis if our crops were burned by fire! We have "red flag" warnings issued by the Weather Service frequently this time of year! These warnings involve; high winds, low humidity and a fire load available to burn!! In the webinar call in-time, I also learned of the noise level waiver issued to Idaho Power for this Transmisson Line noise, this is extremely dangerous!! The excess noise is a discharge of static energy! This is so dangerous and should not be allowed over our environment!! Idaho Power seems to have gotten a noise waiver to exceed the noise levels set by the EPA, this is very disturbing and will impact those within 1/2 mile from the towers, sadly many residents were not informed of this health problem because they are not landowners!! This noise and static electricity issue is not resolved at all!!!
I currently maintain a private airstrip within 1/4 mile of the proposed line, this project will effectively ruin the potential use of our airstrip, once again no real recourse within the project guidelines for any compensation for the lost usage of our airstrip!
This project has become a obvious money grab via a right of way acquisition!! It's obvious that contractors and various players are setting up the make millions of dollars on this right of way acquisition while local residents / land owners are being paid pennies and shouldering the risks!! Again a Right a way should not have the potential of causing so many health concerns, fire risks and land use restrictions for the land owners to bear without a continued-long term compensation!!!
I urge the council to deny Idaho Power this project in its current form!!!

Sincerely
Sam Myers

Sent from my iPad

From: sam myers sam.myers84@gmail.com
Subject: Contested case
Date: Aug 24, 2020 at 9:43:30 AM
To: ODE-OAH-Referral@oregon.gov, Tardaewether Odoe kellen.tardaewether@oregon.gov, info@stopb2h.org

Allison Green-Webster, Senior Administration Law Judge
Oregon Department of Energy
500 Capital St. NE, OR. 97301

Emailed to; OED-OAH-Referral@oregon.gov,
Kellen.taraewether@oregon.gov,
Info@Stopb2h.org

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I urge the council to deny Idaho Power this project in its current form!!!

Sincerely
Sam Myers

Sent from my iPad

TARDAEWETHER Kellen * ODOE

From: timothy proesch <tranquilhorizonscooperative@gmail.com>
Sent: Thursday, August 27, 2020 2:42 PM
To: TARDAEWETHER Kellen * ODOE
Subject: Opuc contested hearing case against b2h

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE,Salem,OR 97301

This is a formal request for a contested case regarding the proposed site certification for the Boardman to Hemingway transmission line.

Dear Ms. Greene-Webster;

My name is Timothy C. Proesch I live at 2104 Owyhee Lake Road Nyssa,OR 97913

I am writing you today to request to file as a party to this contested case. I am not currently retaining legal council in this matter, but will do so if necessary which we hope does not become necessary after reviewing all of the information for this project.

Now I will discuss my interest in this particular situation. I have a vast interest in this project in many different faculties. One of the most important affects this will have is if you look at current siting maps this tentative route encompasses a huge area of our property and surrounds our home and property. It also will consume our building site with a giant 180 foot tall tower filled with electrical lines and guide wires. Also this project is wanting to utilize my access road to my irrigation water ways. Then as this enormous structure extends its lines they will then pass on the north side of our home within feet of our front door, thus essential circling our property with these lines and towers. We will have lines and towers to the south, west, and north then head east, there is no mitigating our exposure or view of these transmission lines. My wife and I have worked very hard to achieve our goals and dreams. This property at 2104 Owhyee lake road in Nyssa was our dream property, we saw the potential of such a property and its location. This property is located close to Owyhee lake and sits directly on the Owyhee river. This property contains a vast amount of things including 3 natural geo thermal wells, wildlife, river access, multiple recreational opportunities {including hiking, backpacking, camping, atv trail access, fishing, rock hounding, relaxing in the geothermal mineral water and the list goes on}. We followed this property on the market for four years and put our family in the position to be able to purchase this property, not just for us to enjoy but eventually for the whole community and other recreational seeking individuals to enjoy through our development of this land. There are a lot of natural, cultural, and biological aspects to consider in siting this transmission line and how it will impact this area. This portion of The Owyhee river is home to one of four blue ribbon fly fishing areas in the united states, this being the starting point and ending in Wyoming. I could discuss the importance of this in a lengthily email about my interest but I will move forward here. The impact of public interest and my neighbors who also reside in this canyon land also is a very important reason I am writing you today. The recreation in this area is a huge factor for a lot of people here, some rely on this area to keep food on the table by hunting and fishing these lands, others enjoy boating and camping in this area. So an enormous transmission line would prohibit this in many ways. The migration patterns and breading habitats for the animals in this area lay directly in the path of these transmission lines and towers. The agricultural impact of these transmission lines is just as vast as the other topics I have covered as well as, iron from irrigation and crop yields to inhibiting farmers from using cost effective operations like arial application of nutrients to possibly damaging all the GPS guided equipment for precision farming. Most self propelled irrigation systems will be affected by the EMF transmissions from this power line and cause them to malfunction and end up in the road causing harm to others or fail in operation. Bonneville power company has done studies regarding this }. So if this can affect irrigation equipment the same thing can apply to the tractors that are used in precision farming applications now which control tillage, bedding, seeding and harvesting of these crops. June 18 2019 was the verbal comment period for Malheur county in which I attended and gave my verbal statement. We were only made aware of what was transpiring two weeks prior to this meeting and it was not brought forth by any of the entities involved, not Idaho power, the siting commission or anyone who works for any of these companies. We found out from our neighbor who brought over a map and some limited information about this subject. This project brought forth minimal information to the residents of this area as well as the other communities involved. They minimized the impacts that it would have through their studies, as well deferred enough information for the inclusion of the general public having a right to participate in the process. Idaho Power has been found to have provided incorrect and incredible information during these processes.

There are a lot of Oregon ors numbers to site but I'm sure they have been included in numerous documents and without current legal council we are uncertain of which of these falls under this jurisdictional review of this project.

To summarize the things I've discussed in this letter, there are tremendous amount of things to consider. The impact to our lives, livelihood, way of life and how detrimental it will be to us and our community. Ms. Greene-Webster I ask you to consider everything everyone has had to say and also that this project has been trying to gain approval for 13 years and has failed in multiple areas to comply and mitigate concerns about this. We have many other options of renewable energy resources already being utilized for the purposes of this project. We need to really consider the impact versus the effectiveness of this particular project this entity wants to implement. They have made it very clear since we became involved that these things I have disused have no validity in there decisions to make a profit. This is a for profit project not a necessity to provide a public utilities service to benefit the people it impacts nor the longevity of its potential biological, cultural, or environmental impacts when these lines become unnecessary and have to be mitigated in the future. Also we are making a formal request that shall this project moved forward we are allowed due process in determining the value of our land encompassed in this as well as being able to have a third party liaison or be represented in a fashion to help better protect our interests and any compensation we may receive.This will have a financial negative impact on our livelihood that could financially devastate our investment into this property into the millions of dollars of the next 10 years of our lives and the future livelihood of even our children taking over this development. We have been working with the local planning and zoning, solid waste and environmental health department, and our engineering firm and are awaiting the opportunity to go in front go the county commission to finalize plans. We have had a wastewater ground soil saturation test to extend sewer services for 30 pull through RV camp sites

as well as the water features including 6 hot tubs an indoor pull and large pond with water slide that are already constructed on the property. We also ask that you take into consideration the blasting of the tower sites as our wells are not only geo thermal which is a unique feature but also that the depths of these wells in this area are shallower than other domestic wells and that the blasting could devastate ours and neighbors wells. Thank you for taking the time and effort to consider us and our concerns.

Best regards,
Timothy C. Proesch

TARDAEWETHER Kellen * ODOE

From: GARCIA Lucy M * OED on behalf of OED_OAH_REFERRAL * OED
Sent: Friday, August 28, 2020 8:34 AM
To: 'Kelly Skovlin'; TARDAEWETHER Kellen * ODOE
Cc: info@b2h.org
Subject: RE: CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THEBOARDMAN TO HEMINGWAY TRANSMISSION LINE

The Office of Administrative Hearings is in receipt of your email.

Thank you,

Lucy for
Anesia Valihov | Hearings Coordinator
Office of Administrative Hearings
4600 25th Ave. NE, Suite 140
Salem, OR 97303-4924

Phone: (503) 947-1510
Fax: (503) 947-1923
Email: OED_OAH_REFERRAL@oregon.gov

-----Original Message-----
From: Kelly Skovlin <kskovlin@gmail.com>
Sent: Thursday, August 27, 2020 11:22 PM
To: OED_OAH_REFERRAL * OED <REFERRAL.OED_OAH_REFERRAL@oregon.gov>; TARDAEWETHER Kellen * ODOE <Kellen.Tardaewether@oregon.gov>
Cc: info@b2h.org
Subject: CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THEBOARDMAN TO HEMINGWAY TRANSMISSION LINE

Allison Greene-Webster, Senior Administrative Law Judge Oregon Dept of Energy
500 Capitol St. NE
Salem, OR

Dear Ms Greene-Webster:

My name is Kelly Skovlin and I have lived in La Grande, OR for most of my life. I am not represented by a lawyer and I am requesting to file as a "party."

I am interested in the impact of noise on economics of my massage business as trucks drive by my practice and by the hospital on their way to the construction site. My street in a direct line from the freeway to Morgan Lake road so I am concerned there will be too much noise as large trucks drive by to the transmission line construction site. I am also concerned about the impact of noxious weeds introduced to our land in the area of the transmission lines due to the disturbing of the ground and the servicing of the lines in the future.

For my community, I am concerned about the view shed from La Grande and how it will effect the spirit of the people of La Grande. We live in a beautiful valley surrounded by mountains. I am concerned with this proposed transmission line on the hill, it will feel like we all just moved to the "wrong" side of tracks to where the community is forced to look at blaring power lines which dissect our landscape, reminding us that there are corporations out there who can come an inflict themselves on a community whenever they please.

I am the only person who can express my concerns.

I am specifically contesting the following:
a)The site boundary in exhibit F doesn't include all the receptors, nor did they include noise modeling.
b)The site plan does not comply with OAR 345 021-0010(1)(x) which states the exhibit x must include information about noise generated by construction and operation of project within 1/2 mile of the site. They failed noise modeling for all sensitive property as they failed to include churches, libraries, hospitals as required by definition in OAR 340 035-035-0015(38)
C) it failed to include noise identified in OAR 340 -035-0035(1)(b)(B)(I) as not being exempt from ambient statistical noise level indirectly caused by or attributed to that source including all its related activities. This section states " sources exempted from requirements of sections (5)(b)-(f),(j), and (k) of this rule, shall not be excluded from this ambient measurement." The application is not complete prior to the applicant finishing Exhibit X to include all sources by this rule as well as receptors within a 1/2 mile of the entire site boundary. No discussion s can be made absent an accurate accounting of the predicted noise impacts which has not occurred.

Sincerely,

Kelly Skovlin

I previously commented on this issue August 15, 2019

Sent from my iPad

TARDAEWETHER Kellen * ODOE

From: Kelly Skovlin <kskovlin@gmail.com>
Sent: Thursday, August 27, 2020 11:22 PM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Cc: info@b2h.org
Subject: CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THEBOARDMAN TO HEMINGWAY TRANSMISSION LINE

Allison Greene-Webster, Senior Administrative Law Judge Oregon Dept of Energy
500 Capitol St. NE
Salem, OR

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Sincerely,

Kelly Skovlin

I previously commented on this issue August 15, 2019

Sent from my iPad

TARDAEWETHER Kellen * ODOE

From: Louise Squire <squirel@eoni.com>
Sent: Thursday, August 27, 2020 4:14 PM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Subject: [Fortimail Spam Detected] Contested Case Request- Sage grouse
Attachments: contested case request sage grouse (Autosaved).docx

Date: August 27, 2020

Alison Greene-Webster, Senior Administrative Law Judge Oregon Department of Energy
500 Capitol St NE
Salem, Or 97301
Email: OED_OAH_Referral@oregon.gov

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster

My name is Louise Squire and I live at 2105 Oak St, La Grande, Oregon, 97850

I am not represented by an attorney.

I am requesting to file as a party.

My mental health is affected by the proposed B2H Transmission Line because I am greatly concerned about the fragile state of existence of the remaining sage grouse in Baker and Malheur counties. The Boardman to Hemmingway transmission line goes through the Baker and Cow Creek PACs.
Climate change and planetary warming are driving rapid environmental change and destabilizing eco-systems creating additional enormous strains and stressors on the habitat of the greater sage-grouse. (Haak, conservation-portfolio-04172019.pdf) IPC's B2H transmission line construction and maintenance, with its 250' wide clear cut of sage brush under the line, will add additional threats to their survival. These additional treats will negatively affect my mental health. The stress of knowing that ecosystems are failing worldwide and that the B2H line will promote the extirpation of the greater sage-grouse and the ecosystem they inhabit in the county next to me is very stressful!!! Especially since I know the B2H line does not have to be constructed to provide clean energy to SW Idaho

This issue is a public interest because the greater sage-grouse in Baker and Malheur counties can be interpreted as an indicator species of the health of the larger sage brush ecosystem.

I need to represent this issue myself.

I am dissatisfied with the Proposed Order (PO) because it has not updated/changed the numbers of decline of the sage-grouse population (#4 in my letter below) since the DPO was written. The PO, page 351, lines 23-24, states "ODFW's Sage-Grouse Conservation Strategy focuses primarily on preserving the species' habitat and not on impacts to individual birds."
The number of individual birds is direct evidence of how well a species'
habitat is being preserved. Thus the lack of adequate information regarding and analysis of the numbers of sage-grouse remaining in the Baker PAC, Cow Valley PAC, and overall in Oregon, and the implications of the location of the B2H transmission line within and adjacent to the Baker and Cow Valley PAC habitat is unacceptable. The 2011 ODFW sage-grouse Conservation Strategy addresses the number of birds, not only the amount of habitat. "Amount of habitat" alone is not a sufficient metric because the Conservation Strategy focuses on a specific goal for the number of birds (for example, for the Baker PAC, "maintain or enhance greater sage-grouse abundance and distribution at the 2003 spring breeding population level, approximately 2,000 birds" – 2011 ODFW conservation strategy at p. 35), yet as of 2020 there are fewer than 500 individual birds, and perhaps as few as
100 males, in the Baker PAC. Much of the habitat of the Baker PAC, for example, is unoccupied – as of 2018, ODFW counted only seven active leks (out of 34 total in the Baker PAC). As of 2018, 48.9% of the remaining males counted at leks in the Baker PAC (92 males total) attended the three leks within four miles of the transmission line route, which the B2H transmission line is likely to affect, leading to abandonment of these leks and the likely extirpation of the Baker sage-grouse population. The lack of information about the status of sage-grouse statewide also precludes meaningful analysis of the importance of the Baker and Cow Valley PACs as sage-grouse populations have crashed in Oregon over the past four years, to their lowest level since analysis began in 1981. Without knowing where the very few remaining birds are located within the Baker PAC (and Cow Valley PAC), there is no way to address whether the mitigation and avoidance measures proposed will be sufficient to meet the goal to "maintain or enhance" the Baker PAC's population to the 2,000 birds required under the Conservation Strategy.

I am also dissatisfied with the Proposed Order because it does not address issue #3 in my letter dated August 19, 2019. The PO, on page 362, lines
22-38 "Indirect Impacts To Sage-Grouse Habitat" has not changed from the DPO. It mentions the Habitat Qualification Tool (HQT). But the HQT only mentions traffic mitigation, page 366, not transmission line mitigation.
Issue 3. "The main direct threat to sage-grouse from transmission lines is the tendency of sage-grouse to avoid tall, and especially tall linear, structures -- they recognize these are potential locations of predators. (https://pubs.usgs.gov/of/2014/1239/pdf/ofr2014-1239.pdf, pg 8-9) The application, and the DPO, do not adequately account for the likely avoidance effects."
The PO lacks of adequate information regarding and analysis of the indirect effects from the B2H transmission line on sage-grouse and the likelihood that the B2H transmission line will lead to avoidance of the line at distances far greater than disclosed (up to four to seven miles away from the transmission line), and lead to the abandonment of sage-grouse leks, particularly in the Baker PAC, and to the likely extirpation of the Baker PAC. A report that evaluated 10 years' worth of observation of the effects from a new 185-mile long transmission line in Nevada on sage-grouse nesting and mating observed that nesting success was lower up to 7.7 miles from the new transmission line, largely due to predation from predators who could use the new line's towers to perch and nest. (Gibson, D., et al. 2018. Effects of power lines on habitat use and demography of Greater sage-grouse. Wildlife Monographs 200). The breadth of these indirect effects on sage-grouse are not adequately evaluated in the Proposed Order or Application, nor is their likely effect on persistence of sage-grouse leks (and the populations) within the Baker and Cow Valley PACs adequately analysed. Tall transmission towers and lines will lead sage-grouse to avoid areas up to four to seven miles away from the transmission lines, and new roads and clearance of vegetation underneath the line will also fragment habitat

and promote the spread of invasive weeds and non-native grasses that cause sage-grouse habitat to deteriorate and adversely affect sage-grouse feeding and nesting/hiding habitat.

I previously commented on this issue of the treat to the Greater Sage-Grouse in a letter emailed to B2H.DPOComments@Oregon.gov dated August 21, 2019 and sent to:

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst Oregon Department of Energy
550 Capitol St N.E.
Salem, OR 97301

Email: B2H.DPOComments@Oregon.gov

Idaho Power did not respond to my comment which is included below.

Date: August 21, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst Oregon Department of Energy
550 Capitol St N.E.
Salem, OR 97301

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Topic of my comment: Greater Sage-grouse

The future of Greater Sage-Grouse survival is unknown at this time for a number of reasons. Clearly things have changed since the filing of the application which already makes the biological surveys conducted and the mitigation plans outdated. Also it is likely that the Greater Sage-Grouse Comprehensive Conservation Strategy, 2006, ODFW's OAR 635-415-0025(7) and OAR 635-140-0000 to 0025, will be revised.

Climate change and planetary warming are driving rapid environmental change and destabilizing eco-systems creating additional enormous strains and stressors on the habitat of the greater sage-grouse. (Haak, conservation-portfolio-04172019.pdf) IPC's B2H transmission line construction and maintenance, with its 250' wide clear cut of sage brush under the line, will add additional threats to their survival. As noted in the DPO, page 314, lines 4-9: The proposed facility would include the following facility components within sage-grouse core area habitat:
20.77-line miles of transmission line; 12.85 miles of new access roads; and

12.34 miles of substantially modified existing roads. Habitat fragmentation and loss is a big concern for the overall survival of the species (Haak, conservation-portfolio-04172019.pdf). The Baker and Cow Creek PACs (Priority Areas of Concern), in particular, face extirpation (extinction) as this project creates another nail in their coffin.

There are additional threats to sage-grouse, a threatened species, from the B2H project. 1. Transmission lines and transmission towers cause sage-grouse mortality via bird collisions with the lines and facilitate raptor predation of sage-grouse (Wisdom et al. Sage-Grouse SAB Monograph 18.pdf Page 17).

2. The 250' clearance of vegetation under the transmission lines will create loss of habitat and the introduction of invasive weeds. Building new roads and substantially modifying existing roads exacerbates the spread of cheat grass. Cheat grass is taking over sage brush habitat which in turns threatens the sage-grouse because the sage-grouse needs large healthy expanses of sage brush to survive. Cheat grass also dries out early in the season and is thus more fire prone, also endangering the sage-grouse. (Haak, conservation-portfolio-04172019.pdf page 7)

3. The main direct threat to sage-grouse from transmission lines is the tendency of sage-grouse to avoid tall, and especially tall linear, structures -- they recognize these are potential locations of predators. (https://pubs.usgs.gov/of/2014/1239/pdf/ofr2014-1239.pdf, pg 8-9) The application, and the DPO, do not adequately account for the likely avoidance effects.
4. In its annual monitoring report in 2018, the ODFW concluded that sage-grouse populations throughout Oregon continue to decline (https://www.dfw.state.or.us/wildlife/sagegrouse/docs/ODFW_2018_Sage-Grouse_Population Report.pdf at p. 1, hereinafter "ODFW 2018"). The state agency estimated that the 2018 spring population in Oregon was 18,421 individuals. This was a 10% decline from 2017 (population estimated at 20,510 birds), following a 7.7% decline from 2016. The 2018 population had now dropped to 37% below the 2003 baseline population estimate of 29,237 individuals (ODFW 2018). We expect ODFW to announce ever more severe declines in its 2019 report later this year. Other states have reported similar declines[1] The Baker PAC, which will be affected by the B2H transmission line, has seen its population drop by 75.4% between 2003 and 2018, with a 10.9% decline from 2017 to 2018 alone. (ODFW 2018 at 32, 5).

The Draft Proposed Order and the application do not adequately address the enhanced danger that the B2H transmission line poses in light of the rapidly-decreasing populations. Neither the application nor the DPO actually cite the number of birds that will be affected, nor do they indicate that the sage-grouse populations in Oregon generally, and the Baker and Cow Valley PACs that will be affected by the B2H transmission line, are in serious and significant decline -- and that the addition of a significant habitat disruptor such as a linear transmission line could mark the death knell for these populations. Approval of a site certificate without considering the actual numbers of birds affected and the plummeting populations would be unlawful.

Sincerely,

Louise Squire

2105 Oak St
La Grande, Oregon
97850

squirel@eoni.com

[1] See, e.g., IdahoNews, Idaho male sage-grouse counts decline 25% in one year, available at https://idahonews.com/news/local/idaho-male-sage-grouse-counts-decline-25-in-one-year (last visited Aug. 1, 2019) (Idaho Fish & Game reporting 25% decline in male sage-grouse since 2018); Angus M. Thuermer Jr., WyoFile, Greater sage grouse counts show 3-year downward trend, available at https://www.wyofile.com/greater-sage-grouse-counts-show-3-year-downward-trend/ (last visited Aug. 6, 2019); Wyo. Game & Fish Dep't, Sage grouse counts likely to decline in coming year, available at https://wgfd.wyo.gov/News/Sage-grouse-chick-production-likely-to-decline-in (last visited Aug. 6, 2019) (Wyoming Game & Fish Department expected decline in 2018 based on an analysis of sage grouse wings provided by hunters); Nevada Department of Wildlife, Nevada Sage-grouse Lek Counts: Effort and Trends (2017), available at http://sagebrusheco.nv.gov/uploadedFiles/sagebrusheconvgov/content/Meetings/2017/2017_GSG_Lek_Counts.pdf (last visited Aug. 6, 2019) (reporting 10% decline in male lek attendance between 2016 and 2017).

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"Going completely vegetarian one day a week for a year is equivalent to not driving 1,160 miles."

Date: August 27, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St NE
Salem, Or 97301
Email: OED_OAH_Referral@oregon.gov

CONTESTED CASE REQUEST REQARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster

My name is Louise Squire and I live at 2105 Oak St, La Grande, Oregon, 97850

I am not represented by an attorney.

I am requesting to file as a party.

My mental health is affected by the proposed B2H Transmission Line because I am greatly concerned about the fragile state of existence of the remaining sage grouse in Baker and Malheur counties. The Boardman to Hemmingway transmission line goes through the Baker and Cow Creek PACs. Climate change and planetary warming are driving rapid environmental change and destabilizing eco-systems creating additional enormous strains and stressors on the habitat of the greater sage-grouse. (Haak, conservation-portfolio-04172019.pdf) IPC's B2H transmission line construction and maintenance, with its 250' wide clear cut of sage brush under the line, will add additional threats to their survival. These additional treats will negatively affect my mental health. The stress of knowing that ecosystems are failing worldwide and that the B2H line will promote the extirpation of the greater sage-grouse and the ecosystem they inhabit in the county next to me is very stressful!!! Especially since I know the B2H line does not have to be constructed to provide clean energy to SW Idaho

This issue is a public interest because the greater sage-grouse in Baker and Malheur counties can be interpreted as an indicator species of the health of the larger sage brush ecosystem.

I need to represent this issue myself.

I am dissatisfied with the Proposed Order (PO) because it has not updated/changed the numbers of decline of the sage-grouse population (*#4 in my letter below)* since the DPO was written. The PO, page 351, lines 23-24, states "ODFW's Sage-Grouse Conservation Strategy focuses primarily on preserving the species' habitat and not on impacts to individual birds." The number of individual birds is direct evidence of how well a species' habitat is being preserved. Thus the lack of adequate information regarding and analysis of the numbers of sage-grouse remaining in the Baker PAC, Cow Valley PAC, and overall in Oregon, and the implications of the location of the B2H transmission line within and adjacent to the Baker and Cow Valley PAC habitat is unacceptable. The 2011 ODFW sage-grouse Conservation Strategy addresses the number of birds, not only the amount of habitat. "Amount of habitat" alone is not a sufficient

metric because the Conservation Strategy focuses on a specific goal for the number of birds (for example, for the Baker PAC, "maintain or enhance greater sage-grouse abundance and distribution at the 2003 spring breeding population level, approximately 2,000 birds" – 2011 ODFW conservation strategy at p. 35), yet as of 2020 there are fewer than 500 individual birds, and perhaps as few as 100 males, in the Baker PAC. Much of the habitat of the Baker PAC, for example, is unoccupied – as of 2018, ODFW counted only seven active leks (out of 34 total in the Baker PAC). As of 2018, 48.9% of the remaining males counted at leks in the Baker PAC (92 males total) attended the three leks within four miles of the transmission line route, which the B2H transmission line is likely to affect, leading to abandonment of these leks and the likely extirpation of the Baker sage-grouse population. The lack of information about the status of sage-grouse statewide also precludes meaningful analysis of the importance of the Baker and Cow Valley PACs as sage-grouse populations have crashed in Oregon over the past four years, to their lowest level since analysis began in 1981. Without knowing where the very few remaining birds are located within the Baker PAC (and Cow Valley PAC), there is no way to address whether the mitigation and avoidance measures proposed will be sufficient to meet the goal to "maintain or enhance" the Baker PAC's population to the 2,000 birds required under the Conservation Strategy.

I am also dissatisfied with the Proposed Order because it does not address issue #3 in my letter dated August 19, 2019
Issue 3. "The main direct threat to sage-grouse from transmission lines is the tendency of sage-grouse to avoid tall, and especially tall linear, structures -- they recognize these are potential locations of predators. (https://pubs.usgs.gov/of/2014/1239/pdf/ofr2014-1239.pdf, pg 8-9) The application, and the DPO, do not adequately account for the likely avoidance effects."
The PO lacks of adequate information regarding and analysis of the indirect effects from the B2H transmission line on sage-grouse and the likelihood that the B2H transmission line will lead to avoidance of the line at distances far greater than disclosed (up to four to seven miles away from the transmission line), and lead to the abandonment of sage-grouse leks, particularly in the Baker PAC, and to the likely extirpation of the Baker PAC. A report that evaluated 10 years' worth of observation of the effects from a new 185-mile long transmission line in Nevada on sage-grouse nesting and mating observed that nesting success was lower up to 7.7 miles from the new transmission line, largely due to predation from predators who could use the new line's towers to perch and nest. (Gibson, D., *et al*. 2018. Effects of power lines on habitat use and demography of Greater sage-grouse. Wildlife Monographs 200). The breadth of these indirect effects on sage-grouse are not adequately evaluated in the Proposed Order or Application, nor is their likely effect on persistence of sage-grouse leks (and the populations) within the Baker and Cow Valley PACs adequately analysed. Tall transmission towers and lines will lead sage-grouse to avoid areas up to four to seven miles away from the transmission lines, and new roads and clearance of vegetation underneath the line will also fragment habitat and promote the spread of invasive weeds and non-native grasses that cause sage-grouse habitat to deteriorate and adversely affect sage-grouse feeding and nesting/hiding habitat.

I previously commented on this issue of the treat to the Greater Sage-Grouse in a letter emailed to B2H.DPOComments@Oregon.gov dated August 21, 2019 and sent to:

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy
550 Capitol St N.E.
Salem, OR 97301

Email: B2H.DPOComments@Oregon.gov

Idaho Power did not respond to my comment which is included below.

Date: August 21, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR 97301

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Topic of my comment: Greater Sage-grouse

The future of Greater Sage-Grouse survival is unknown at this time for a number of reasons. Clearly things have changed since the filing of the application which already makes the biological surveys conducted and the mitigation plans outdated. Also it is likely that the Greater Sage-Grouse Comprehensive Conservation Strategy, 2006, ODFW's OAR 635-415-0025(7) and OAR 635-140-0000 to 0025, will be revised.

Climate change and planetary warming are driving rapid environmental change and destabilizing eco-systems creating additional enormous strains and stressors on the habitat of the greater sage-grouse. (Haak, conservation-portfolio-04172019.pdf) IPC's B2H transmission line construction and maintenance, with its 250' wide clear cut of sage brush under the line, will add additional threats to their survival. As noted in the DPO, page 314, lines 4-9**: The proposed facility would include the following facility components within <u>sage-grouse</u> <u>core area habitat</u>: 20.77-line miles of transmission line; 12.85 miles of new access roads; and 12.34 miles of substantially modified existing roads**. Habitat fragmentation and loss is a big concern for the overall survival of the species (Haak, conservation-portfolio-04172019.pdf). The Baker and Cow Creek PACs (Priority Areas of Concern), in particular, face extirpation (extinction) as this project creates another nail in their coffin.

There are additional threats to sage-grouse, a threatened species, from the B2H project.
1. Transmission lines and transmission towers cause sage-grouse mortality via bird collisions with the lines and facilitate raptor predation of sage-grouse (Wisdom et al. Sage-Grouse SAB Monograph 18.pdf Page 17).

2. The 250' clearance of vegetation under the transmission lines will create loss of habitat and the introduction of invasive weeds. Building new roads and substantially modifying existing roads exacerbates the spread of cheat grass. Cheat grass is taking over sage brush habitat which in turns threatens the sage-grouse because the sage-grouse needs large healthy expanses of sage brush to survive. Cheat grass also dries out early in the season and is thus more fire prone, also endangering the sage-grouse. (Haak, HYPERLINK "https://bit.ly/2Tot45s"conservation-portfolio-04172019.pdf page 7)
3. The main direct threat to sage-grouse from transmission lines is the tendency of sage-grouse to avoid tall, and especially tall linear, structures -- they recognize these are potential locations of predators. (https://pubs.usgs.gov/of/2014/1239/pdf/ofr2014-1239.pdf, pg 8-9) The application, and the DPO, do not adequately account for the likely avoidance effects.
4. In its annual monitoring report in 2018, the ODFW concluded that sage-grouse populations throughout Oregon continue to decline (https://www.dfw.state.or.us/wildlife/sagegrouse/docs/ODFW_2018_Sage-Grouse_Population Report.pdf at p. 1, hereinafter "ODFW 2018"). The state agency estimated that the 2018 spring population in Oregon was 18,421 individuals. This was a 10% decline from 2017 (population estimated at 20,510 birds), following a 7.7% decline from 2016. The 2018 population had now dropped to 37% below the 2003 baseline population estimate of 29,237 individuals (ODFW 2018). We expect ODFW to announce ever more severe declines in its 2019 report later this year. Other states have reported similar declines[1]
The Baker PAC, which will be affected by the B2H transmission line, has seen its population drop by 75.4% between 2003 and 2018, with a 10.9% decline from 2017 to 2018 alone. (ODFW 2018 at 32, 5).

The Draft Proposed Order and the application do not adequately address the enhanced danger that the B2H transmission line poses in light of the rapidly-decreasing populations. Neither the application nor the DPO actually cite the number of birds that will be affected, nor do they indicate that the sage-grouse populations in Oregon generally, and the Baker and Cow Valley PACs that will be affected by the B2H transmission line, are in serious and significant decline -- and that the addition of a significant habitat disruptor such as a linear transmission line could mark the death knell for these populations. Approval of a site certificate without considering the actual numbers of birds affected and the plummeting populations would be unlawful.

Sincerely,

Louise Squire

2105 Oak St
La Grande, Oregon
97850

squirel@eoni.com

[1] *See, e.g.*, IdahoNews, Idaho male sage-grouse counts decline 25% in one year, *available at* https://idahonews.com/news/local/idaho-male-sage-grouse-counts-decline-25-in-one-year (last visited Aug. 1, 2019) (Idaho Fish & Game reporting 25% decline in male sage-grouse since 2018); Angus M. Thuermer Jr., WyoFile, Greater sage grouse counts show 3-year downward trend, *available at* https://www.wyofile.com/greater-sage-grouse-counts-show-3-year-downward-trend/ (last visited Aug. 6, 2019); Wyo. Game & Fish Dep't, Sage grouse counts likely to decline in coming year, *available at* https://wgfd.wyo.gov/News/Sage-grouse-chick-production-likely-to-decline-in (last visited Aug. 6, 2019) (Wyoming Game & Fish Department

expected decline in 2018 based on an analysis of sage grouse wings provided by hunters); Nevada Department of Wildlife, Nevada Sage-grouse Lek Counts: Effort and Trends (2017), *available at* http://sagebrusheco.nv.gov/uploadedFiles/sagebrusheconvgov/content/Meetings/2017/2017_GSG_Lek_Counts.pdf (last visited Aug. 6, 2019) (reporting 10% decline in male lek attendance between 2016 and 2017).

TARDAEWETHER Kellen * ODOE

From: Jeri Watson <lotusbsilly@eoni.com>
Sent: Wednesday, August 26, 2020 1:51 PM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE
Subject: [Fortimail Spam Detected] B2H Contested Case
Attachments: Contested Case Form B2H PDF.pdf

Alison Greene-Webster,

Your honor, please find attached a PDF of my contested case request.

Thank you,

Jeri Watson

cookieface@eoni.com

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301
email: OED-OAH-Referral@oregon.gov
also send copies to: Kellen.taraewether@oregon.gov and Stopb2h.org

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

My name is Jeri Watson. I live at 1906 Foley Street, La Grande, Oregon.
I have no one representing me in this case.
I wish to file as a party.
My interests are both personal and in the public interest. As one who feels deeply the situations of others, I cannot easily divide the public interest from my own. La Grande is a small town, as such, what happens to others, I experience as well.

And the first issues I wish to address as a former teacher, and public servant is the need for access to recreation (for those limited by income)This affects me since I use Morgan Lake, our city park, which has ,as the only access route, the same road which will be taken over by heavy equipment. Since we have a large amount of low-income residents, it is for many the only out of doors natural area they can afford to use. Unlike a state park it is free to use and a mere 4 miles from the town center. I submit that it is in the public interest to maintain free and easy access to this outdoor jewel. Not only is bodily health increased by having a an outdoor area in which to exercise, emotional and spiritual wellbeing are aided by exposure to nature. Access must not be made more difficult to achieve.

Fire safety has much been on my mind. I live on the boundary of the hillside and the city. This makes it a personal issue. I visited remains of Napa and Sonoma counties after the utility caused, Tubbs Fire of October 2017. The devastating results were witnessed first hand. The Oak Parkland surrounding those cities are no less dry, grassy and treed than our own in the Eastern Oregon counties the utility may cross. Somoma county is as windy as Union County. With climate disruption, dryness is expected to increase. Adequate care has not been demonstrated. More than 1500 fires have been started in

past 6 years by PG&E of California. Idaho power has not sufficiently addressed these concerns. Bearing this fire risk is too much, for a grassy, windy rural area.

I believe that because of my community focus, my emotional connection to students, and their life hardships, I will represent fairly the complexion of many residents of La Grande and Union County. Having witnessed the devastation suffered by Napa and Sonoma counties first hand allows me to speak to the unimaginable horror of these fires. Fire issues are common discussion in our household since my son is a USFS fire fighter of some years. My husband was a USFS smokejumper. Conversations often turn to fire risk. I am the best person to represent these issues.

My two issues are both personal and in the interest of the community. The first is likelihood of reduced access to recreation in our nature park, Morgan Lake Area because of on-going construction. The other problem is unmitigated fire risk.

1: Access will be severely restricted from 7 am to 7pm, 6 days a week. This leaves but one day per week to safely to access Morgan Lake Park. No significant road work is guaranteed to make it wider, less steep or safer when shared with behemoth equipment and trucks. Morgan Lake Road, although it will be used substantially, is not even included in the Site Boundary Review. I contest this case where no specificity regarding traffic safety specifically exists for this road in this report. Since this road is excluded from the report, the report fails to address the loss of access to Morgan Lake Park and the harm it causes our citizens. Neither does this report insure safety for local hikers, bicyclists cars and trucksMorgan Lake Road is used by walkers, bike riders, and cars and trucks when shared with construction crew and equipment 12 hours a day, 6 days a week.to access Morgan Lake Park. The proposal states "Prior to construction if it is determined, in consultation with the city and Union County, that the road would require substantial modifications, the applicant must submit a request to amend the site certificate to include the road in the site boundary governed by the site certificate. Based on the evidence, that determination has already been made. Yet the report states "…if it is determined…' with the city and the county. This is unacceptable. Morgan Lake Road must be included in the site boundary

2: As a property owner of land abutting the city limits in So. La Grande, and as

member of a family with a long interest in fire safety, having family members in association with the USFS wild land fire-fighters, I contest the vague way the responsibility for fire safety is made dependent on limited local forces. Furthermore, I have a greater comprehension of the loss encumbered by electrical fires in windy settings, from having seen first hand the devastation of large areas of Napa and Sonoma Counties. As a teacher of many ages, I understand the needs of families and the loss and disruption suffered when ones home is lost.

The second issue for which I pursue a contested case is the failure of the proposal to adequately address the cost of fire prevention which should be borne by the applicant. No where in the proposal is there a discussion of cost ,for what is clearly additional fire risk, to be born by the applicant. Fire protection in Oregon is paid for by a forest patrol assessment. That assessment should be paid by the applicant. The surrounding citizens should not bear that cost.

Both these issues were raised by me the many times I testified on b2h. In he last hearing, June 20th 2019, in La Grande,Oregon I restated these issues.

TARDAEWETHER Kellen * ODOE

From: Stacia Webster <staciajwebster@gmail.com>
Sent: Tuesday, August 25, 2020 4:49 PM
To: TARDAEWETHER Kellen * ODOE
Subject: Contested Case Request Regarding the Proposed Transmission Line of the Boardman to Hemingway Transmission Line
Attachments: B2H CONTESTED CASE REQUEST.doc

Kellen, I am sending a copy of my request to Ms. Greene-Webster, as I forgot to cc it to you

Date: August 24, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE, Salem, Or 97301

via Email: OED_OAH_Referral@oregon.gov

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

My name is Stacia Jo Webster. I reside at 65212 Webster Rd., La Grande, OR 97850, this is also my mailing address.

I am not represented by an attorney, but I would like to reserve the right to have one at a future date if necessary. I am requesting to file as a party requesting a **Contested Case regarding the Proposed Site Certificate for the Boardman to Hemingway Transmission Line.**

I represent the 5th generation of seven generations that have owned, maintained, and/or utilized the Webster property, which looking west from La Grande, is on the horizon behind what is referred to as Table Mountain.

In reviewing the decisions laid out in the Proposed Order, I was dissatisfied that the following concerns had not been sufficiently addressed:

1) The Potential Impacts to Historic, Cultural, and Archeological Resources, and the Potential Impacts to and Mitigation for Historic, Cultural, and Archeological Resources Sections

I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous times in the Draft Proposed Order, Exhibit S and the Historic Properties Management Plan and Programmatic Agreement. OCTA does NOT believe that Exhibit S Historic Properties Management Plan is complete in 7.2.3 Field Crew, and offers this additional condition.

> ADDITIONAL CONDITION #1 OCTA recommends that the Council add an Oregon Trail expert to the Cultural Resource Team. This Oregon Trail individual will have qualifications similar to Field crew members. For example, they will have an undergraduate degree in anthropology, archaeology, or in a field such as geology, engineering or history. It will not be necessary to have attended a field school. This individual will be recommended by the National OCTA President and agreed to by the Field Director.

The field surveys, even with SHPO and NPS data, have missed and/or mislabeled some sections of the emigrant trail. OCTA feels it is important that the public know where the Trails are located, and I couldn't agree more! OCTA over the years has marked the trail location with wooden signs, small triangles attached to trees, and more recently, carbonite posts and steel rails.

While a number of the recommendations made by OCTA (e.g.: credentialing of Cultural Resources Team) have been incorporated into the newly proposed Historic Properties Management Plan (Attachment S-9 in the DPO), nowhere is there a role for OCTA in recommending staffing or participating in monitoring the trail. I contest that this should be rectified. OCTA is the most trusted and experienced organization in this region – they know the trail intimately. I am not comfortable with other experts appointed by the developer (Idaho Power) and approved by ODOE to protect our national (and my personal) priceless resource.

Like most land owners, my family has always been proud to have the trail run through their property. The Oregon Trail is not only a historical site for Union County, but is a State historical site, and should be protected as a part of our heritage. My father guided many groups interested in history through our land, and after obtaining permission, allowed Boy Scout, Public School, and Historical Society Groups, to walk and hike on the trail. Amazingly, Idaho Power and their consultants have not acknowledged trail crossings shown on submitted Maps and do not acknowledge visual intrusion of the line for 10 miles per standards.

Once the ruts of the Oregon Trail are destroyed they **cannot** be reconstructed or mitigated back to life (as proposed in **Table HCA -10**); once gone, always gone.

2) Structural Standard

I take particular exception to the **Attachment G-5 Draft Framework Blasting Plan** which discusses the possible effects of blasting, which would result in the disruption of water flow, and compensation for repair or reconstruction.

> "Design Feature 32. If, based on landowner consultation, on parcels that contain a natural spring or well and on which blasting will be conducted, the certificate holder shall conduct pre-blasting flow measurements to establish a baseline for potential impacts to the spring or well. Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their predisturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available." (p. 8/p. 14-PDF)

Four generations ago, this land was purchased by my Great-Great Grandfather for use as summer pasture, and is still used as such today. Though we no longer run our own livestock in this pasture, the rent my 85 year-old mother collected from other ranchers (who now use this for summer pasture), supplemented her limited income. My mother passed away in April and now this income will help support other family members. If, in the process of blasting and construction, the natural mountain springs that run through this pasture are reduced or destroyed, this land will be rendered useless for summer grazing, and that income stream will cease to exist. In point of fact, the 424+ acres of land would become worthless. Even if the applicant were able to restore the natural springs on our property, there would be no guarantee that the flow of the springs would be the same as it had been before. Further, not restoring the springs, if they could in fact be restored, for 24 months would mean 2 years that we would not be able to rent this land out.

If this line is permitted, I am contesting that the proposed Design Feature 32 must be extended for the life of the project. There are just not enough protections for my family's summer pasture and the springs that make it productive land.

3) Wildfire

I am also very concerned about the risk of Wildfire to our community during construction of the proposed transmission line which is addressed in the **Public Services – Wildfire Plan Section** of the Proposed Order. I am contesting that the Fire Prevention and Suppression Plan (Attachment U-3) has insufficient specificity for me or anyone else to comment. It is completely inadequate and until it is really flushed out with details for public comment, I consider this aspect of the Proposed Order incomplete.

Table PS-9 In the Proposed Order shows La Grande Fire Department response time as 4-8 minutes. There is no way LGFD could reach the Transmission Line sight driving up a slow, windy Morgan Lake Road in even 15 minutes from their station house. Plus, with only 2 paid staff, you would need extra time to muster the additional 23 firefighters. North Powder Fire Department is listed as responding to the Union Co. site as well. North Powder would need time to muster their "*all volunteer"* force and then travel to La Grande, 27 minutes away. That does not include the time it would take them to traverse up Morgan Lake Rd. And finally, there is the Oregon Department of Forestry firefighters (8 permanent staff) who are listed as 30 minutes away; that is if they are not working another wildfire in the area during the summer months.

As we saw in the multiple fires that raged through California two years ago, forest fires can spread rapidly, (particularly when driven by dry, hot winds), destroying thousands of acres and homes, and costing billions of dollars.

In 1973 a wildfire began in the forested mountains west of La Grande. It was fueled by dry grasses and timber, and pushed by strong winds, and spread rapidly through our Deal Canyon pasture, threatening the western edge of La Grande. Homes stretching along the entire southwestern edge of La Grande were evacuated, along with the Grande Ronde Hospital, in fear that the fire would spread to La Grande proper. Homes along Morgan Lake road were set ablaze so fast that some residents literally ran out the front door as the back door was burning. The fire spread so fast that my Grandfather and Father did not have time to move cattle out of the pasture, but in a desperate attempt to save their animals, could only cut the fence line and hope for the best. Our increasingly warmer climate has made our forests a tinderbox during the summer months. Our local fire fighters' abilities would not be adequate, and additional fire fighting support would be slow in reaching our remote location, were a similar wildfire to be sparked at blast sites.

4) Misleading Information and Right to a Contested Case Hearing

I would also like to request party status in this contested case; or, a new contested case, due to the actions of Idaho Power to mislead and discourage my family's participation in this contested case process. In April we received a letter from Idaho Power telling us that we "don't need to take further action." My mother, who was still alive at the time, breathed a sigh of relief and we all cheered and moved on. However, we learned later that this was entirely NOT true! The Mill Creek route in Union County which directly affects me, my family, our pasture land leases, and all the people who enjoy the Oregon trail recreation on our land, are still at risk; hence, my request to be a party to the contested case. I object to Idaho Power's direct interference in the public process; and I object to the fact that

they nearly prevented me from making this request to become a party to the case. I would have lost all my rights to continue in this proceeding and this seems deliberate.

Additionally, per ORS 183.415 (l) Notice of right to hearing, it says: “The Legislative Assembly finds that persons affected by actions taken by state agencies have a right to be informed of their rights and remedies with respect to the actions.” This statute goes on to state specifically what must be communicated and how it is to be communicated. I have never received a certified letter from the Oregon Department of Energy and Idaho Power (who did send me this certified letter) interfered with the State Department of Energy and their attempts to adequately inform me. I feel entirely disadvantaged and confused by this situation and misleading actions.

I do not have the technological capabilities to scan a copy of the certified letter received by Bernice Webster (my mother) from Idaho Power to this request. However, I do have the original letter in my possession, and would be glad to produce a copy of it, if requested.

Although others may address water issues, the increased risk of fire during the construction of the Transmission Line, and the Preservation of the Oregon Trail and Historical Artifacts, as a designated representative of the Webster Property, no one else can address the issues that are specific to our property and the impact that the B2H transmission line will have on our property.

The concerns I have registered in this request were addressed in a written statement which was sent to the Oregon Department of Energy, Senior Siting Analyst at the Energy Facilities Siting Council, KellenTardaewether on August 12, 2019**.** I have appended these comments on the pages attached.

Thank you for your time, and careful consideration concerning this matter.
Respectfully,

Stacia Jo Webster
65212 Webster Rd.
La Grande, OR 97850
staciajwebster@gmail.com
541-963-6834

Date: August 12, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR. 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My name is Stacia Webster. I'm a resident of La Grande, and I represent the 5th generation of seven generations that have owned, maintained, and/or utilized the Webster property, which looking west from La Grande, is on the horizon behind what is referred to as Table Mountain. I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project.

As a child I loved to camp, and “help” my Grandfather, Lawson Webster and Father, Gary Webster work cattle on this land. As an adult I have come to appreciate this property as not only pristine pasture land, but also for the historical value it holds; not only family history, but as land through which the Oregon Trail passes. In fact, visible ruts and rock cairns are scattered throughout this property

I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous times in Exhibit S and the Historic Properties Management Plan and Programmatic Agreement. OCTA does NOT believe that Exhibit S Historic Properties Management Plan is complete in 7.2.3 Field Crew, and offers this additional condition.

ADDITIONAL CONDITION #1 OCTA recommends that the Council add an Oregon Trail expert to the Cultural Resource Team. This Oregon Trail individual will have qualifications similar to Field crew members. For example, they will have an undergraduate degree in anthropology, archaeology, or in a field such as geology, engineering or history. It will not be necessary to have attended a field school. This individual will be recommended by the National OCTA President and agreed to by the Field Director.

The field surveys, even with SHPO and NPS data, have missed and/or mislabeled some sections of the emigrant trail. OCTA feels it is important that the public know where the Trails are located, and I couldn’t agree more! OCTA over the years has marked the trail location with wooden signs, small triangles attached to trees, and more recently, carbonite posts and steel rails.

Like most land owners, my family has always been proud to have the trail run through their property. The Oregon Trail is not only a historical site for Union County, but is a State historical site, and should

be protected as a part of our heritage. My father guided many groups interested in history through our land, and after obtaining permission, allowed Boy Scout, Public School, and Historical Society Groups, to walk and hike on the trail. Amazingly, Idaho Power and their consultants have not acknowledged trail crossings shown on submitted Maps and do not acknowledge visual intrusion of the line for 10 miles per standards, and only upon ODOE's RAI's, put into documents some trail protections. This has been consistent from the BLM process to current day. In fact, one representation of the proposed power line actually shows a tower sitting directly on the trail.

Considering the points above, Idaho Power does not comply with the state standards for cultural resources OAR 354-022-0090, or 345-022-0080, Scenic resources. EFSC Must Deny the Site Certificate!

The Oregon National Historic Trail will be significantly affected by the B2H Transmission Line. The Draft Proposed Order identifies significant impacts to the Oregon Trail in several Exhibits, including Exhibit C:
Property Location and Maps; Exhibit L: Protected Areas; Exhibit R: Scenic Aesthetic Values; Exhibit S: Cultural Resources; Exhibit T: Recreational Facilities; and Exhibit X: Noise.
B2H crosses the Oregon Trail at least 8 times. EFSC has done a reasonable job of protecting the Trail during construction and operation, if the proposed requirements are followed, except at the Oregon Trail Interpretive Center at Flagstaff Hill. The B2H Transmission Line should be buried for approximately 2 to 2 ½ miles to comply with the exhibits indicated above. Idaho Power has from the early years refused to do any significant analysis for this option. IPC uses cost as
the reason for stating that undergrounding is not feasible. Cost is not a specific standard, and costs are the responsibility of the Oregon Public Utilities Commission during rate considerations. EFSC has determined that IPC has the Financial ability even if some partners choose Not to participate, so reasonable cost should not be a determining factor for EFSC.
EFSC should refuse to approve the Draft Project Order for the following reasons:

1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," in the context of residential sleeping areas; however, certainly for tourists and visitors to the Interpretive Center and hiking trails noise will be disturbing. Map 23 in Attachment X-1 does not even show the Oregon Trail.
2. Within OAR 345-022-0040 Protected Areas and ODEQ standards 340-035-0000-0100, this area should have been monitored and modeled as a Noise Sensitive Property and was not.
3. Does not comply with Scenic Values from the Blue Mountains Parkway and Oregon Trail Interpretive Center. The OR 86 encourages drivers to STOP and read interpretive signs, so viewer perception and resource change cause significant decrease of scenic vales. IPC says no significant impact.
4. The DPO does not comply with Exhibit L Protected Areas. The BLM ACEC at Flagstaff Hill has not considered undergrounding for the protection of the Oregon Trail. No analysis found the pristine, Class 1 swales of the Oregon Trail within the ACEC located at: Lat 44.813762 Long -117.750194 or 44º 48' 48.26"N 117º 75' 57.97"W. IPC proposes to build a new constructed road over the Oregon Trail in the area identified in the location above.

5. The DPO does not meet the standards required for Exhibit T Recreational Facilities, OAR 345-022-0100, especially at the Flagstaff Hill interpretive center, because of:
a. It is a BLM ACEC area managed for public tourism
b. It is the single most visited tourist facility in Baker County
c. The quality of the facility is outstanding
d. There is no other place where the Oregon Trail can be seen and interpreted.
6. The cost estimates of IPC do not compare with those of the Edison Electric Institute, January 2013 publication "Out of Sight, Out of Mind, An Updated Study of the Undergrounding of Power Lines." This article suggests that for 2.5 miles of rural undergrounding, the cost will be $67,500,000. This is almost half the IPC estimate. The Oregon Trail along the route of the B2H has the most damaging affects to its critical historic elements.

Once the ruts of the Oregon Trail are destroyed they cannot be reconstructed or mitigated back to life. Once gone, always gone. The only easily accessible public facility in Oregon is the Flagstaff Hill Interpretive Center near Baker City. The B2H must be buried to preserve this important site. Considering the reasons above and the unconscionable desecration of our national treasure, the Council Must Deny the site certificate for the Boardman to Hemingway Transmission project.

I am also very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development before issuance of the site certificate and commencement of construction."
On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available." The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells. Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Four generations ago, this land was purchased by my Great-Great Grandfather for use as summer pasture, and is still used as such today. Though we no longer run our own livestock in this pasture, the rent my 85 year-old mother collects from other ranchers (who now use this for summer pasture), supplements her limited income. If in the process of blasting and construction, the natural springs that run through this pasture are reduced or destroyed, this land will be rendered useless for summer grazing, and that income stream will cease to exist for my mother. In point of fact, the land would become worthless.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:
ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:
Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, “high-fire danger periods” and “extreme fire danger periods” without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a “watchman.” This is not only inadequate, but ridiculous!

As we saw in the multiple fires that raged through California last year, forest fires can spread rapidly, (particularly when driven by dry, hot winds), destroying thousands of acres and homes, and costing billions of dollars. In 1973 a wildfire began in the forested mountains west of La Grande. It was fueled by dry grasses and timber, and pushed by strong winds, and spread rapidly through our Deal Canyon pasture, threatening the western edge of La Grande. Homes stretching along the entire southwestern edge of La Grande were evacuated, along with the Grande Ronde Hospital, in fear that the fire would spread to La Grande proper. Homes along Morgan Lake road were set ablaze so fast that some residents literally ran out the front door as the back door was burning. The fire spread so fast that my Grandfather and Father did not have time to move cattle out of the pasture, but in a desperate attempt to save their animals, could only cut the fence line and hope for the best. Our increasingly warmer climate has made our forests a tinderbox during the summer months. Our local fire fighters abilities would not be adequate, and additional fire fighting support would be slow in reaching our remote location, were a similar wildfire to be sparked at blast sites.

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:
During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

In this letter I have sited historical, economic, and environmental reasons why the Boardman to Hemingway Transmission Project should NOT be allowed to proceed now, or in the future. There are many other reasons I could site at this time, but I have confidence that others will be addressing these issues. I implore you to consider each letter and testimonial carefully. Yes, many contain sentimental, emotional, and personal stories, but our feelings about this land SHOULD BE considered. No amount of mitigation can compensate for, or replace the dreams of John Van Blockland, my Great-Great Grandfather, when he arrived (via the Oregon Trail) in the Grande Ronde Valley and planted roots here. Nothing can compensate for, or replace the dreams the weary travelers had as they camped on our (future) land, overlooking the valley, and left us a heritage we dare not forget, or shall we say, blast out of existence.

Thank you for your careful consideration in this most significant matter.
Respectfully,

Stacia Jo Webster
65212 Webster Rd.
La Grande, OR 97850
staciajwebster@gmail.com
541-963-6834

TARDAEWETHER Kellen * ODOE

From: Dan White <danno@bighdesign.biz>
Sent: Wednesday, August 26, 2020 11:11 AM
To: TARDAEWETHER Kellen * ODOE
Subject: Fwd: B2H contested case request from Dan White
Attachments: PO_CC_viewshed_DanWhite.pdf

I was informed that I should have also CCd your address when I sent in my request.

-------- Forwarded Message --------
Subject:B2H contested case request from Dan White
Date: Tue, 25 Aug 2020 15:50:16 -0700
From: Dan White <danno@bighdesign.biz>
To:OED_OAH_Referral@oregon.gov
CC:info@stopb2h.org

Please accept my request to file a requested case as stated in the attachment.

Thank you, Dan White

Daniel L White
505 M Avenue
La Grande, OR 97850
August 25, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol Street NE, Salem, OR 97301
Email: OED_OAH_Referral@oregon.gov

Dear Judge Greene-Webster,
I am requesting to file a contested case as a party for the Proposed Order on site certificate for the B2H transmission line. I am not represented by an attorney but would like to reserve the right for representation in the future if necessary. My interest in the B2H project is that my home is within easy walking distance from the B2H site boundary at the west end of M Avenue in La Grande. My concern is about protecting the viewshed of the Grande Ronde valley. Even though other people may be requesting a contested case on the same issues, they are not able to represent my personal situation and interest in these issues.

In an email attachment sent to Chair Beyeler on August 20, 2019, I expressed concern that the DPO contained no provisions for adequately protecting the viewshed as required in OAR 345-022-0080 and the Union County Land Use Plan (1979) (Plan Policies > Resources section, page 33).

The PO takes a narrow view of what constitutes a scenic resource in Union County (see page 394) and therefore ignores any impact on the viewshed shared by the greatest concentration of population in the county. OAR 345-022-0080 references the importance of local land use plans, and the PO does not comply with Union County Land Use Plan (sections V.A, V.B.2 and V.B.6).

Sincerely,

Daniel L White

TARDAEWETHER Kellen * ODOE

From: Jon W <jondwhite418@gmail.com>
Sent: Wednesday, August 26, 2020 10:10 AM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE; info@stopb2h.org
Subject: application for contested case (B2H construction blasting)
Attachments: PO_CC_blasting.docx

Dear Judge Greene-Webster,
I am requesting to file a contested case as a party for the Proposed Order on site certificate for the B2H transmission line. Please see the attached.

Jonathan D White

Jonathan White
485 Modelaire Dr
La Grande, OR 97850
August 26, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol Street NE, Salem, OR 97301
Email: OED_OAH_Referral@oregon.gov

Dear Judge Greene-Webster,
I am requesting to file a contested case as a party for the Proposed Order on site certificate for the B2H transmission line. I am not represented by an attorney but would like to reserve the right for representation in the future if necessary. My interest in the B2H project is that my home is about 500 feet from the B2H site boundary at Hawthorne St in La Grande. My concerns have to do with damage to my home and access roads during construction. Even though other people may be requesting a contested case on the same issues, they are not able to represent my personal situation and interest in these issues.

In "B2HAPPDoc8-418 DPO Public Comment_White J 2019-06-20 to 08-22" I expressed concern that the DPO contained no specifics about where blasting might occur during the construction phase. The concern is that my home and many others in SE La Grande are built on a geologically unstable slope that is identified in the PO. In response to my comment and perhaps others, the PO has added this sentence:
"Department recommendations to the plan include requiring implementation of a seismic monitoring plan or application of scaled distance factors to monitor and ensure ground vibration at the nearest structures do not exceed NFPA established limits during blasting activities."

And this:
"The Blasting Plan would be updated after site-specific geotechnical surveys are completed and would avoid blasting in potential rockslide/landslide areas to the maximum extent possible."

These additions do not fill me with confidence that the applicant has met the 345-022-0020 Structural Standard: "(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;"

The applicant has not conducted a "site-specific study" of the slope above my home and has not "adequately characterized the potential geological and soils hazards of the site and its vicinity." The applicant has only provided the same vague assurances as before. ORS 183.415(1) states, "The Legislative Assembly finds that persons affected by actions taken by state agencies have a right to be informed of their rights and remedies with respect to the actions." I respectfully request a contested case because I have not been informed of my rights or remedies with respect to the applicant's actions.

Sincerely,
Jonathan D White

TARDAEWETHER Kellen * ODOE

From: Jon W <jondwhite418@gmail.com>
Sent: Wednesday, August 26, 2020 10:13 AM
To: OED_OAH_REFERRAL * OED
Cc: TARDAEWETHER Kellen * ODOE; info@stopb2h.org
Subject: application for contested case (B2H radon emissions)
Attachments: PO_CC_radon.docx

Dear Judge Greene-Webster,
I am requesting to file a contested case as a party for the Proposed Order on site certificate for the B2H transmission line. Please see the attached.

Jonathan D White

Jonathan D White
485 Modelaire Dr
La Grande, OR 97850
August 20, 2020

Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol Street NE, Salem, OR 97301
Email: OED_OAH_Referral@oregon.gov

Dear Judge Greene-Webster,
I am requesting to file a contested case as a party for the Proposed Order on site certificate for the B2H transmission line. I am not represented by an attorney but would like to reserve the right for representation in the future if necessary. My interest in the B2H project is that my home is about 500 feet from the B2H site boundary at Hawthorne St in La Grande. My concern is about increased radon emissions in my home and neighborhood due to blasting during construction. Even though other people may be requesting a contested case on the same issues, they are not able to represent my personal situation and interest in these issues.

In an email attachment sent to Chair Beyeler on August 20, 2019, I expressed concern that the DPO contained no mention of potential of increased radon emissions due to the blasting that will occur during the construction phase. As stated in my original DPO comment, the concerns are as follows:

- Data from the State of Oregon indicates that La Grande has a "high" risk of elevated radon.
  https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/HEALTHYNEIGHBORHOODS/RADONGAS/Documents/Oregon%20Radon%20Risk%20Level%20SummaryTable.pdf
- My home and many others in SE La Grande are built on a geologically unstable slope, as specified in the PO.
- Recent studies correlate fracking with high indoor radon levels, a situation similar to the proposed blasting.
  https://www.sciencedaily.com/releases/2019/06/190618083347.htm

The PO does not contain any response to my comment or any mention of radon at all, so it seems clear that the applicant has not met the 345-022-0020 Structural Standard: "(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;"

The applicant has not conducted a "site-specific study" of the slope above my home and has not "adequately characterized the potential geological and soils hazards of the site and its vicinity." The applicant has only provided the same vague assurances as before. Radon emission is a serious problem in our part of the state and deserves consideration by the applicant. ORS 183.415(1) states, "The Legislative Assembly finds that persons affected by actions taken by state agencies have a right to be informed of their rights and remedies with respect to the actions." I respectfully request a contested case because I have not been informed of my rights or remedies with respect to the applicant's actions.

Sincerely,

Jonathan D White

TARDAEWETHER Kellen * ODOE

From: Charlie Gillis <charlie@gillis-law.com>
Sent: Thursday, August 27, 2020 9:14 AM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE; Fuji Kreider
Subject: Second amended request for B2H party status
Attachments: 20200827120540914.pdf

Attached below is Mr. John C. Williams's second amended request for party status in the B2H Application for Site Certificate.

Sincerely

--
Charles H. Gillis
Attorney at Law
1306 Adams Ave.
La Grande, OR 97850
Ph: 541-963-2700
Fax: 541-963-2711
Cell: 541-910-8949

August 27, 2020

Ms. Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE
Salem, OR 97301

SENT BY EMAIL TO:
OED_OAH_Referral@oregon.gov
Kellen.Tardaewether@oregon.gov

Re: Second Amended Petition to Request Party Status re Proposed Order on Application for Site Certificate for Boardman to Hemingway Transmission Line

Dear Judge Greene-Webster:

This letter is a request for participation to file as a party in the above referenced matter. I own 2,582 acres of timber and grazing land west, north, and south of Morgan Lake. The proposed Mill Creek and Morgan Lake routes both cross my property.

My property feeds more elk than cattle. Commercial hunting, allows me to accommodate both, providing me an income stream, and, more importantly, is a key management tool. Either of the proposed routes would greatly diminish, if not eliminate entirely the commercial hunting on my land. Thus I am at risk of the loss of anywhere between $2,000 and $10,000 per year.

Also among the many features of my property, are the presence of historical sites. The threat of destruction to such sites that B2H poses, causes me great concern.

On August 21, 2019, I wrote to the Energy Facility Siting Council regarding my concerns about newly recorded archaeological resources in Parcel 03S37E01300 of which I am the property owner. In their November 7, 2019 response to public comments, Idaho Power alleges that, "Site 6B2H-MC-10 is 5.14 meters south of the direct analysis southern boundary. It is therefore not included in the direct effects APE. The scale of Figure 14 likely makes it appear that the site is on or at the boundary. However, based on recording the site with a sub-meter accurate GPS unit, it is outside."

I spoke with a survey staff member at Anderson Perry, a local engineering firm, regarding the accuracy of the "sub-meter accurate GPS unit." He informed me that it was not accurate enough to determine property boundaries. Therefore, I am respectfully requesting party status to assert my argument that Idaho Power has materially failed to precisely locate fragile, precious pre-contact archeological resources.

Because of my status as a directly affected landowner in this matter, and given the response to my concerns provided by Idaho Power, I need to represent my concerns personally as a party in a contested case in this matter.

I have a second concern for which I also am requesting party status in the above referenced matter. On August 22, 2019 your office received a letter from me regarding my concerns about the inaccurate siting study performed by Idaho Power and described in their Application for Site Certificate. I closed that letter by stating, "It is distressing to think that this is only one of many errors in Idaho Power's ASC. If the IPC [Idaho Power Corp.] surveying and engineering staffs are unable to detect a 27 acre lake within a 204 acre park, it's disquieting to imagine the difficulties in identifying and analyzing less obvious and life-threatening situations like fault zones, slide areas and other potential dangers to public safety."

In examining IPC's November, 2019 response to the public's comments on B2H there is no reference to my comments regarding their remarkably shoddy work in their siting study of Morgan Lake Park and the Morgan Lake Alternative Route. This failure on their part to achieve an accurate survey of the Morgan Lake area leads me to doubt that IPC has given adequate consideration to potential flooding of overland access routes on the Morgan Lake route west of Twin Lake and further downstream on Rock Creek. Such potential flooding poses a significant threat to the integrity of accessibility of the transmission corridor and structures of B2H. This is a threat to the public, and merits my status as a party to the Proposed Order in IPC's B2H application.

Sincerely,

John C. Williams
P.O. Box 1384
La Grande, OR 97850

TARDAEWETHER Kellen * ODOE

From: Charlie Gillis <charlie@gillis-law.com>
Sent: Wednesday, August 26, 2020 11:19 AM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE; Fuji Kreider
Subject: First amended request for party status
Attachments: 20200826141238632.pdf

Attached is the First Amended request for party status of Mr. John Williams of La Grande.

--
Charles H. Gillis
Attorney at Law
1306 Adams Ave.
La Grande, OR 97850
Ph: 541-963-2700
Fax: 541-963-2711
Cell: 541-910-8949

August 25, 2020

Ms. Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE
Salem, OR 97301

SENT BY EMAIL TO:
OED_OAH_Referral@oregon.gov
Kellen.Tardaewether@oregon.gov

Re: First Amended Petition to Request Party Status re Proposed Order on Application for Site Certificate for Boardman to Hemingway Transmission Line

Dear Judge Greene-Webster:

This letter is a request for participation to file as a party in the above referenced matter. I own 2,582 acres of timber and grazing land west, north, and south of Morgan Lake. The proposed Mill Creek and Morgan Lake routes both cross my property.

Among the many features of my property which give me reason to live, the presence of historical sites is a critical one. The threat of destruction to such sites that B2H poses causes me great concern.

On August 21, 2019, I wrote to the Energy Facility Siting Council regarding my concerns about newly recorded archaeological resources in Parcel 03S37E01300 of which I am the property owner. In their November 7, 2019 response to public comments, Idaho Power alleges that, "Site 6B2H-MC-10 is 5.14 meters south of the direct analysis southern boundary. It is therefore not included in the direct effects APE. The scale of Figure 14 likely makes it appear that the site is on or at the boundary. However, based on recording the site with a sub-meter accurate GPS unit, it is outside."

I spoke with a survey staff member at Anderson Perry, a local engineering firm, regarding the accuracy of the "sub-meter accurate GPS unit." He informed me that it was not accurate enough to determine property boundaries. Therefore, I am respectfully requesting party status to assert my argument that Idaho Power has materially failed to precisely locate fragile, precious pre-contact archeological resources.

Because of my status as a directly affected landowner in this matter, and given the response to my concerns provided by Idaho Power, I need to represent my concerns personally as a party in a contested case in this matter.

I have a second concern for which I also am requesting party status in the above referenced matter. On August 22, 2019 your office received a letter from me regarding my concerns about the inaccurate siting study performed by Idaho Power and described in their Application for Site Certificate. I closed that letter by stating, "It is distressing to think that this is only one of many errors in Idaho Power's ASC. If the IPC [Idaho Power Corp.] surveying and engineering staffs are unable to detect a 27 acre lake within a 204 acre park, it's disquieting to imagine the difficulties in identifying and analyzing less obvious and life-threatening situations like fault zones, slide areas and other potential dangers to public safety."

In examining IPC's November, 2019 response to the public's comments on B2H there is no reference to my comments regarding their remarkably shoddy work in their siting study of Morgan Lake Park and the Morgan Lake Alternative Route. This failure on their part to achieve an accurate survey of the Morgan Lake area leads me to doubt that IPC has given adequate consideration to potential flooding of overland access routes on the Morgan Lake route west of Twin Lake and further downstream on Rock Creek. Such potential flooding poses a significant threat to the integrity of accessibility of the transmission corridor and structures of B2H. This is a threat to the public, and merits my status as a party to the Proposed Order in IPC's B2H application.

Sincerely,

John C. Williams
P.O. Box 1384
La Grande, OR 97850

TARDAEWETHER Kellen * ODOE

From: Charlie Gillis <charlie@gillis-law.com>
Sent: Tuesday, August 25, 2020 3:48 PM
To: OED_OAH_REFERRAL * OED; TARDAEWETHER Kellen * ODOE
Subject: Request for B2H party status
Attachments: 20200825184028923.pdf

Attached is the request for B2H party status from Mr. John Williams of La Grande, Or.

--
Charles H. Gillis
Attorney at Law
1306 Adams Ave.
La Grande, OR 97850
Ph: 541-963-2700
Fax: 541-963-2711
Cell: 541-910-8949

August 25, 2020

Ms. Alison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
500 Capitol St. NE
Salem, OR 97301

SENT BY EMAIL TO:
OED_OAH_Referral@oregon.gov
Kellen.Tardaewether@oregon.gov

Re: Petition to Request Party Status re Proposed Order on Application for Site Certificate for Boardman to Hemingway Transmission Line

Dear Judge Greene-Webster:

This letter is a request for participation to file as a party in the above referenced matter. I own 2,582 acres of timber and grazing land west, north, and south of Morgan Lake. The proposed Mill Creek and Morgan Lake routes both cross my property.

Among the many features of my property which give me reason to live, the presence of historical sites is a critical one. The threat of destruction to such sites that B2H poses causes me great concern.

On August 21, 2019, I wrote to the Energy Facility Siting Council regarding my concerns about newly recorded archaeological resources in Parcel 03S37E01300 of which I am the property owner. In their November 7, 2019 response to public comments, Idaho Power alleges that, "Site 6B2H-MC-10 is 5.14 meters south of the direct analysis southern boundary. It is therefore not included in the direct effects APE. The scale of Figure 14 likely makes it appear that the site is on or at the boundary. However, based on recording the site with a sub-meter accurate GPS unit, it is outside."

I am extremely cautious about allowing others on my property. At no time after my August 21, 2019 letter to EFSC did I allow Idaho Power or its agents on my property. For them to assert that they recorded the site with a sub-meter accurate GPS unit after my concerns were addressed to EFSC in August, 2019 means either that Idaho Power unlawfully trespassed on my property, or that they are fabricating their response. Either of which requires my response via a contested case.

/////

/////

Because of my status as a directly affected landowner in this matter, and given the response to my concerns provided by Idaho Power, I need to represent my concerns personally as a party in a contested case in this matter.

Sincerely,

John C. Williams
P.O. Box 1384
La Grande, OR 97850

TARDAEWETHER Kellen * ODOE

From: JOHN WINTERS <wintersnd@gmail.com>
Sent: Wednesday, August 26, 2020 2:24 PM
To: TARDAEWETHER Kellen * ODOE
Subject: B2H letter
Attachments: B2H Fire Risk letter August 25, 2020. final!.doc

Hello. Please accept this letter. Thank you! John Winters ND

Date: August 25, 2020

To: Allison Greene-Webster, Senior Administrative Law Judge
Oregon Department of Energy
email: OED-OAH-Referral@oregon.gov
cc: Kellen.taraewether@oregon.gov and Stopb2h.org

CONTESTED CASE REQUEST REGARDING THE PROPOSED SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Dear Ms. Greene-Webster:

a. My name is John Winters and I reside at 60214 Morgan Lake Road, LaGrande, Oregon, 97850.

b. I am not represented by an attorney, but would prefer to keep that option available.

c. I am requesting to file as a party.

d. What is your interest and how will it be affected? (economic, recreation, health, etc.) The proposed route passes very close to my home. My interest is continuing to live a safe, peaceful life. This line would affect me adversely in a myriad ways. Depending upon exact location, the line will present increased risk of wildfire, environmental degradation and perhaps visual and auditory pollution- all will decrease property values, and all destroy the reasons I have loved living here the past 20 years. In there was a fire, the families here have only one escape- down Morgan Lake Road.

e. If it is a public interest, how will it be affected?

I have many concerns but will focus only on increased wildfire risk. This area gets scary-dry every summer. My neighbors and I go to lengths to reduce the risks of wildfire. We are acutely aware that our area is the #1 highest risk WUI in the state and any increase in risk is unwelcome. Add this to the line's proximity to La Grande, the regional hospital and schools and you have a very ominous situation.

f. I need to represent myself as I am a homeowner on the road to Morgan Lake, near the proposed line.

g. A short statement of my issue and why I am requesting a contested case.

I believe Idaho Power underestimates the risk of wildfire. Line 13, p. 238 "...the proposed use would not significantly increase the wildfire hazards, fire- suppression costs, or risk to fire suppression personnel within the surrounding area." True- in a perfect world, but tell that to CAL-Fire or any Paradise resident. Power lines DO increase fire risk; half of California's most destructive fires since 2015 have been caused by power lines- costing hundreds of lives, billions of dollars, destroying tens of thousands of buildings and requiring help from 17 other states and even Australia!

Concerning a 4-8 minute response time estimated by La Grande Rural Fire Protection District, Table PS-9, p. 573: WRONG. - A crew might make it up here in 8 minutes if: they were assembled in their truck idling at the edge of town- and drove recklessly up this steep, narrow road.

IPC's insistence to build this line, especially through Oregon's most at-risk WUI, right next to town defies logic. Paradise, California was about 8 miles away from the start of the Camp Fire, La Grande is about 2000 feet. Paradise and La Grande are at similar elevations, but La Grande gets a third as much precipitation.(La Grande: 2200 feet, 16-18 inches/year. Paradise: 1800 feet, 55 inches of rain/year) The Camp Fire often burned an acre or more per SECOND! My community wouldn't stand a chance.

This project gets riskier every year. Eastern Oregon is getting more, and hotter days according to John Punches, Oregon State University Extension Forester. Fuel loads are increasing as are extreme weather events and extreme fire behavior. The Oregon Governor's Council on Wildfire Response now will "Evaluate electric companies activities as they relate to public safety, decreased risks and system resilience, in the face of increased wildfire frequency and severity." (Gov's exec. Order p. 8at B4)

h. I brought up issues concerning wildfire in my letter to EFSC on August 11, 2019, and public comments on June 19, 2019.