



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

Gateway West 500-kV Transmission Line Project

Segments 8 and 9



**FINAL Environmental Assessment
and Proposed Land Use Plan Amendments, Idaho**

DOI-BLM-ID-0000-0002-EA

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ACRONYMS AND ABBREVIATIONS

BA	Biological Assessment
BLM	Bureau of Land Management
BMP	best management practice
CFR	Code of Federal Regulations
CIAA	cumulative impact analysis area
CO	Conference Opinion
EA	environmental assessment
EIS	Environmental Impact Statement
EPM	environmental protection measure
ESA	Endangered Species Act
FLPMA	Federal Land Policy and Management Act
Gateway West	Gateway West Transmission Line Project (10 segments)
HPTP	Historic Properties Treatment Plan
H.R.	House Resolution
IBLA	Interior Board of Land Appeals
kV	kilovolt
LUP	land use plan
Modification Act	Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act
MFP	Management Framework Plan
NCA	National Conservation Area
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NHT	National Historic Trail
NOI	Notice of Intent
NO _x	nitrogen oxide
PA	Programmatic Agreement
PM _{2.5}	particulate matter with a diameter less than 2.5 microns
PM ₁₀	particulate matter with a diameter less than 10 microns
POD	Plan of Development
Project	Gateway West Transmission Line Project
Proponents	PacifiCorp d/b/a Rocky Mountain Power and Idaho Power Company
RAC	Resource Advisory Council
RMP	Resource Management Plan
ROD	Record of Decision
ROW	right-of-way
SEIS	Supplemental Environmental Impact Statement
Solar Project	Simco Solar Project

TES	threatened, endangered, and sensitive
U.S.C.	United States Code
USFWS	U.S. Fish and Wildlife Service
VRM	Visual Resource Management

1.0 INTRODUCTION

On May 7, 2007, Idaho Power Company and PacifiCorp (doing business as Rocky Mountain Power), collectively known as the Proponents, applied to the Bureau of Land Management (BLM) for a right-of-way (ROW) grant to use the National System of Public Lands for portions of the Gateway West Transmission Line Project (Gateway West or Project). The original Project comprised 10 transmission line segments originating at the Windstar Substation near Glenrock, Wyoming, and terminating at the Hemingway Substation near Melba, Idaho with a total length of approximately 1,000 miles. The original application was revised in October 2007, August 2008, May 2009, and January 2010 to reflect changes and refinements in the proposed Project and in response to public feedback regarding routing alternatives. The BLM published the Final Environmental Impact Statement ([Final EIS](#)) for this Project on April 26, 2013 and a Record of Decision (ROD) on November 14, 2013. In the ROD, the BLM deferred a decision for 2 of the 10 segments (i.e., Segments 8 and 9) to allow additional time for federal, state, and local permitting agencies to examine additional routing options, as well as potential mitigation and enhancement measures for these segments, in part, because Segments 8 and 9 involve resources in and near the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA).

In August 2014, the Proponents submitted a revised ROW application to the BLM for Segments 8 and 9 and a revised Plan of Development for the Project, which the BLM determined required additional environmental analysis through a Supplemental Environmental Impact Statement ([Final SEIS](#)). A [Final SEIS](#) that analyzed seven alternative ROW routes for Segments 8 and 9 and the land use plan amendments needed to accommodate each alternative route pair was released on October 7, 2016. The BLM issued a ROD on January 19, 2017, selecting the route described as Alternative 5 in the [Final SEIS](#).

1.1 New Information Developed Since the Final SEIS ROD

Following the decision, the State of Idaho, Owyhee County, Idaho, and three environmental organizations appealed the ROW decision to the Interior Board of Land Appeals (IBLA). In a letter to the Secretary of the Department of Interior (Secretary), the Governor of Idaho requested that the BLM reconsider the January 19, 2017, decision and select an alternative with fewer impacts to State and county resources and communities. The Proponents also requested that the BLM reconsider the January decision and select the alternative proposed in their revised application, as more cost-effective and providing greater system reliability. On April 18, 2017, the IBLA granted the BLM's unopposed motions to remand the January 19, 2017, ROW decision for reconsideration.

On May 4, 2017, Congress passed the Consolidated Appropriations Act, 2017 (House Resolution [H.R.] 244), which incorporated the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act (Modification Act) by reference [Division G, Title IV, Sec. 431(a)]. President Donald Trump signed the Appropriations Act into law on May 5, 2017. The Modification Act (see Appendix D) directed the BLM to issue a ROW grant for the lands described in Sec. (b)(2) of the Modification Act for

portions of Gateway West Segments 8 and 9, which represent the portions of the Proposed Action from the [Final SEIS](#) within the boundaries of the NCA. Specifically, the Modification Act stated that the ROW grant “be in alignment with the revised proposed routes for Segments 8 and 9 identified as Alternative 1 in the Supplementary Final Environmental Impact Analysis released October 5, 2016.” The Modification Act also removed the lands affected by this ROW from NCA status and stipulated that the Mitigation Framework presented in the [Final SEIS](#) would apply to the authorized segments. Sec. 2(c)(1) of the Modification Act directed the BLM to issue the ROW within 90 days of enactment, or by August 3, 2017. BLM offered the statutory ROW grant authorized by the Modification Act to the Proponents on July 26, 2017.

1.2 Purpose and Need for Proposed Action

The purpose of the proposed action is to decide whether to grant in whole, grant with modifications, or deny the Proponents’ amended application to construct and operate a transmission line on public lands.

The need for the proposed action has been modified from the [Final SEIS](#) in response to the statutory direction of the Modification Act, which mandates the issuance of a ROW for certain portions of Segments 8 and 9 in alignment with Alternative 1 of the Final SEIS.

The need is now threefold:

1. The need for the federal action is to respond to the Proponents’ amended ROW application to use federally managed lands for a portion of the Gateway West transmission line pursuant to the Federal Land Policy and Management Act (FLPMA), 43 United States Code (U.S.C.) § 1701 et seq. In accordance with FLPMA and the BLM’s ROW regulations, 43 Code of Federal Regulations (CFR) Part 2800, the BLM must manage public lands for multiple uses that take into account the long-term needs of future generations for renewable and non-renewable resources. The Secretary is authorized to grant ROWs “over, upon, under, or through [public] lands” for “systems for generation, transmission, and distribution of electric energy” (43 U.S.C. 1761(a)(5)).
2. The Modification Act directed the BLM to issue, within 90 days, a ROW for the lands described in Sec. 2(b)(2) of the Modification Act for portions of Gateway West Segments 8 and 9. The BLM offered the ROW on July 26, 2017. The statutory ROW grant authorized by the Modification Act dictates the Proposed Action described in this environmental assessment (EA). The feasibility of the statutory ROW for these portions of Segments 8 and 9 is dependent on the Decision resulting from this EA.
3. The BLM’s need is also to reconsider its Decision of January 19, 2017. In light of the Modification Act’s non-discretionary direction to issue the ROW for portions of Gateway West Segments 8 and 9, the BLM’s reconsideration of the January 19, 2017, decision will involve only those certain portions of the alternative(s) from the [Final SEIS](#) that feasibly and reasonably connect with the ROW mandated by the Modification Act, so as to meet the agency’s purpose and need for action.

The Authorized Officer will issue a decision on this application and the associated plan amendments. In making its decision, the BLM must consider the environmental impacts of granting a ROW across public land. The BLM published a [Final SEIS](#) on October 7, 2016, analyzing the effects of seven pairs of possible route combinations for Gateway West Segments 8 and 9. The [Final SEIS](#) also identified the land use plan amendments associated with each alternative.

The analysis in this EA addresses only the portions of the Project related to Segments 8 and 9. Tiering (40 CFR 1508.28) uses the analysis in broader EIS documents to narrow the range of alternatives and concentrate on the issues not already addressed. This EA incorporates by reference and tiers to the analysis found in the 2013 [Final EIS](#) and 2016 [Final SEIS](#) regarding Project-wide impacts. It also incorporates by reference the 2017 Modification Act in its entirety. The BLM will, through a Decision Record supported by this EA, complete the necessary land use plan amendments needed to accommodate ROW segments defined by Alternative 1 in the [Final SEIS](#) that are beyond the extent of the statutory ROW created by the Modification Act. These amendments will allow a ROW grant that will 1) be in conformance with the corresponding land use plans and will 2) connect with the statutory ROW corridor through the NCA. The BLM will satisfy the requirements of the land use plan amendment process through this EA and the other public participation provisions as contemplated in 43 CFR 1610.5-5.

The BLM's discretionary authority is limited by the Modification Act, which directed the agency to issue a statutory ROW for a transmission line and mandated where the ROW would be located. As intended and directed by the legislation, the BLM has offered the statutory ROW to the Proponents. It would now be unreasonable for a BLM decision to deny a ROW for segments intended to connect to the statutory ROW or to offer a ROW that would not physically connect to the statutory segments. For additional ROW segments to connect to the statutory ROW, the BLM has no choice but to select the segments as defined by Alternative 1 in the [Final SEIS](#) and mandated in the legislation (Sec. 2(c)(1) of the Modification Act). Said another way, segments that would not align with and connect to the statutory ROW segments are not feasible or reasonable to select at this time.

The Modification Act also removed the statutory ROW from the NCA by redefining the NCA boundary. The statutory ROW created a public land corridor across the NCA that is not within the NCA and is therefore not subject to the Public Law 103-64 (16 U.S.C. 460iii-2; 107 Stat. 304) (Enabling Act) that created the NCA.

1.3 Conformance with BLM Land Use Plans

The BLM must consider existing land use plans (LUPs) in the decision to issue a ROW grant in accordance with 43 CFR 1610.0-5(b). The Proposed Action is within the area identified in the following BLM LUPs:

- Cassia Resource Management Plan (RMP) (1985)
- Twin Falls Management Framework Plan (MFP) (1988)
- Snake River Birds of Prey RMP (2008)
- Jarbidge RMP (1987)

- Jarbidge RMP (2015)
- Bennett Hills/Timmerman Hills MFP (1980)
- Kuna MFP (1983)

RMPs and MFPs allocate public land resource use and establish management objectives. Portions of the proposed transmission line are not in conformance with several BLM land management plans, and therefore amendments to these plans are analyzed as part of this EA.

The [Final SEIS](#) identified 17 amendments to BLM land use plans needed to authorize the Proposed Action. The January 2017 Decision approved two amendments to the Twin Falls MFP and one amendment to the Snake River Birds of Prey RMP that would also be necessary to authorize the Proposed Action. Although the IBLA agreed to remand the January Decision, these approved plan amendments remain in effect. In addition, the Modification Act superseded the need for seven plan amendments to the Snake River Birds of Prey RMP associated with the Proposed Action analyzed in the [Final SEIS](#). As a result, selecting the Proposed Action in a Decision on reconsideration would require seven plan amendments to three current BLM land use plans, as follows:

- Kuna MFP;
- Bennett Hills/Timmerman Hills MFP; and
- Jarbidge RMP 1987 (for areas not covered by the 2015 Jarbidge RMP).

In order to authorize Segment 8 in the Proposed Action, the Kuna MFP would need an amendment to allow the transmission line outside of existing corridors. An amendment to the Bennett Hills/Timmerman Hills MFP would be needed to allow the route near archeological sites and to change Visual Resource Management (VRM) classes. The 1987 Jarbidge RMP would need amendments to change VRM Classes, allow crossing of the Oregon National Historic Trail, and change a utility avoidance/restricted area designation.

In order to authorize Segment 9 in this alternative, the 1987 Jarbidge RMP would need an amendment to change VRM Class II to VRM Class III for areas still managed under that plan.

The BLM selected the route pairing identified in the [Final SEIS](#) as Alternative 5 (Route 8G and Route 9K) in the January Decision. The January 19, 2017, ROD approved one amendment to the Bruneau MFP, two amendments to the Twin Falls MFP, and one amendment to the Snake River Birds of Prey RMP needed to grant a ROW for Alternative 5. These plan amendments remain in effect. However, the alignment pairing in this alternative does not align with the ROW the BLM offered pursuant to the Modification Act.

1.4 Consistency with Laws, Regulations and Policies

Table 1.4-1 (Section 1.4) of the [Final EIS](#) and Table 1.5-1 (Section 1.5) of the [Final SEIS](#) lists the major federal, state, and local permits, approvals, and consultations identified for the construction and operations of the portion of the Gateway West Project

along Segments 8 and 9. The Proponents would be responsible for obtaining all permits and approvals required to implement the proposed Project regardless of whether they appear in the tables.

1.5 Scoping and Identification of Issues

The public scoping process for this EA began with the publication in the Federal Register of Notice of Intent (NOI) to Prepare an Environmental Assessment to Reconsider the January 19, 2017, Record of Decision Approving Segments 8 and 9 for the Gateway West Transmission Line Project, Idaho, 82 Fed. Reg. 165 (August 28, 2017), including associated land use plan amendments for the Jarbidge, Shoshone, and Four Rivers Field Offices. The NOI is on the Project website, <https://www.blm.gov/gatewaywest>. The BLM also published the Federal Register Notice on the agency's ePlanning website for public review to solicit comments as well as on the Project website noted above. On August 28, 2017, the BLM sent an electronic project newsletter to 2,650 interested publics to solicit comments on the Project. Appendix F contains a table with all the scoping comments and responses.

2.0 ALTERNATIVES

Alternatives were identified based upon the BLM's obligation to respond to the IBLA's remand of BLM's January 19, 2017 decision for reconsideration, and in response to the direction of the Modification Act, which mandated the issuance of a ROW for portions of Segments 8 and 9, formerly within the NCA.

2.1 Alternative 1 – Proposed Action

This Alternative would authorize a ROW to the Proponents for those portions of Segments 8 and 9 of the Gateway West Project that allows for physical connectivity to the segments of the transmission line authorized through the Modification Act ROW (see Appendix A). Alternative 1 is also the alternative recommended by the Boise Resource Advisory Committee (RAC) in its May 30, 2014 report.

The Proposed Action would include the Toana Road Variation 1 (as describe on pages 2-22 through 2-23 of the [Final SEIS](#)). This alternative would amend the applicable land use plans for the Jarbidge, Shoshone, and Four Rivers Field Offices, to accommodate the ROW segments described above. The routes addressed in the Proposed Action are identical to the routes analyzed in Alternative 1 in the [Final SEIS](#) for Segments 8 and 9. The legal descriptions for the proposed ROW for the long-term developments and temporary construction sites are presented in Appendices B and C, respectively.

2.2 Alternative 2 – No Action

This Alternative would continue the current condition that resulted from the ROD issued on January 19, 2017. That Decision selected Alternative 5 from the [Final SEIS](#). If the BLM were to reaffirm that Decision when this EA process is concluded, a ROW grant would be issued to the Proponents with the same routes as Alternative 5 in the [Final SEIS](#). A second element of the January 2017 Record of Decision approved land use plan amendments. These amendments will remain in place whether or not the Decision

selecting Alternative 5 is reaffirmed. Alternative 2 would be inconsistent with the intent of the Modification Act but still meet the need of the Proponents' amended ROW application.

2.3 Alternatives Analyzed in Detail in the Final EIS and Final SEIS but Eliminated from Consideration

As stated above in Section 1.1, with the passage of the Consolidated Appropriations Act, 2017 (H.R. 244), Congress directed BLM to issue a ROW grant for the lands described in Sec. (b)(2) of the Modification Act for portions of Gateway West Segments 8 and 9 (see Appendix A), which represent the portions of Alternative 1 from the [Final SEIS](#) within the boundaries of the NCA. The BLM had no discretion in issuing this statutory ROW because the Modification Act mandated it and thus, BLM offered the ROW to the Proponents on July 26, 2017. The BLM is now limited to selecting an alternative that will feasibly and reasonably connect to the route mandated by H.R. 244 otherwise the ROW offered in July would be isolated and provide no connectivity from the Midpoint and Cedar Hill substations to the Hemingway substations. The BLM now finds its discretion limited as a result of the mandates of the Modification Act and the clear intent of the legislation. However, the alternatives analyzed in the [Final EIS](#) and in the [Final SEIS](#) were the result of years of coordination, effort, and analysis of different alternatives/alignments all with varying types and degrees of impacts. In the end, given the mandates of the Modification Act, Alternative 1 from the [Final SEIS](#) and in this EA, the Proposed Action, remains the only action alternative that is feasible and reasonable.

2.3.1 Alternative 3 – No Development

A Decision selecting this Alternative would deny the Proponents' application for a ROW for those portions of Segments 8 and 9 outside the boundary of the NCA (the Modification Act mandated a ROW for these segments in the area within the NCA boundary). Selecting this Alternative would result in the ROW mandated by the Modification Act being isolated within the boundaries of the NCA with no connection between ROW Segments 6, 7, and 10 of the intended transmission line. A Decision selecting this Alternative would not amend the governing land use plans (RMPs and MFPs) mentioned above in the Proposed Action.

The [Final SEIS](#) analyzed seven pairs of route alternatives for Segments 8 and 9 of the Project. As shown on Appendix A, only Alternative 1, as described in the [Final SEIS](#), would feasibly and reasonably connect to the ROW issued in response to H.R. 244. Alternatives 2, 3, 4, 6, and 7 would not entirely connect to the mandated ROW thus, they would be inconsistent with the intent of the Modification Act. Alternatives 2, 3, 4, 6, and 7 are therefore eliminated from further consideration in this EA.

2.4 Land Management Plan Amendments

In several cases, the Proposed Action, which is equivalent to Alternative 1 analyzed in the [Final SEIS](#), would be incompatible with land allocation classifications. The [Final SEIS](#) identified 17 amendments to BLM land use plans needed to authorize Alternative 1. The January 2017 Decision approved two amendments to the Twin Falls MFP and one amendment to the Snake River Birds of Prey RMP that would also be necessary to

authorize Alternative 1. Although IBLA remanded the January Decision, these approved plan amendments remain in effect. In addition, the Modification Act, through its redefinition of NCA boundaries, eliminated the need for seven plan amendments to the Snake River Birds of Prey RMP associated with Alternative 1 analyzed in the [Final SEIS](#). As a result, selecting the Proposed Action in a Decision on reconsideration would require seven plan amendments to three current BLM land use plans as follows:

- Bennett Hills/Timmerman Hills MFP;
- Kuna MFP; and
- Jarbidge RMP (1987, for areas not covered by the 2015 Jarbidge RMP).

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL EFFECTS

This chapter presents the baseline information considered for the Project area by resource, and discloses the predicted effects of the Proposed Alternative and associate LUP amendments for Segments 8 and 9. BLM reviewed the affected environment information from the [Final EIS](#) and the [Final SEIS](#) for all resources and determined it to be valid for this EA because no substantive changes to the regulatory framework information or the resources have occurred since the publication of the documents.

The analysis in this EA is tiered to and incorporates by reference the analysis and discussion of potential effects from the [Final EIS](#) and the [Final SEIS](#) as per 40 CFR 1502.20 and 1508.28. The effects analysis of the [Final EIS](#) and [Final SEIS](#) discusses the direct and indirect effects. Direct effects are those caused by the Project, such as soil disturbance. Indirect effects are those effects caused by the Proposed Action but that are later in time or farther removed in distance, such as sedimentation from soil disturbance, yet still reasonably foreseeable. For each resource area, the effects of the No Action Alternative are discussed first in the [Final EIS](#) and [Final SEIS](#).

3.1 Mitigation Measures

As described in Chapter 3 of the [Final SEIS](#), mitigation are those measures that could reduce or avoid adverse impacts, and are measures that have *not* been incorporated into the Proposed Action or an alternative. Mitigation can include (40 CFR 1508.20):

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impact by limiting the degree of magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

The following Project-wide mitigation plans apply to the Proposed Action:

- The Greater Sage-Grouse Habitat Mitigation Plan ([Appendix J](#) in the 2013 Final EIS, also see Section 3.11 of the Final SEIS)
- The Migratory Bird Habitat Mitigation Plan ([Appendix D](#) to the 2013 ROD, also see Sections 3.10 and 3.11 of the Final SEIS)
- The Historic Properties Treatment Plan ([Appendix C-1](#) to the 2013 Final EIS)
- The Programmatic Agreement Regarding Compliance with the National Historic Preservation Act ([Appendix E](#) to the 2013 ROD; also see Sections 3.1 and 3.3 of the Final SEIS)
- The Framework for Compensatory Mitigation for and Monitoring of Unavoidable Impacts to Waters of the U.S ([Appendix C-2](#) in the 2013 Final EIS).

In addition to these Project-wide plans, the BLM has worked with the Proponents to develop the Mitigation Framework for the NCA (Appendix K to the [Final SEIS](#)). The Mitigation Framework for the NCA is intended to analyze and facilitate the development of a Mitigation Plan to offset reasonably foreseeable remaining residual effects from the Project within the NCA.

BLM offered the statutory ROW grant authorized by the Modification Act Sec. 2(c)(1) to the Proponents on July 26, 2017. In Sec. 2(c)(2)(A), the Modification Act also stipulated that the Mitigation Framework presented in the [Final SEIS](#) would apply to the authorized segments. For mitigating Gateway West Transmission Project impacts, the BLM will implement, as directed by Congress, all conditions in Sec. 2(c) of the Modification Act (see Appendix D).

3.2 Affected Environment

Table 3-1 provides the relevant [Final EIS](#) and [Final SEIS](#) affected environment sections and the geographical extent of the Analysis Area for each resource. The referenced sections in the [Final EIS](#) and [Final SEIS](#) include detailed discussions for each resource that may be impacted within the Project Area.

Table 3-1. Affected Environment Summary

Resource	FEIS Section	SEIS Section	Analysis Area		Resource Component Evaluated
			Transmission Line	Access Roads	
National Historic Trail	NA	3.1.1	5 miles on either side of centerline	NA	<ul style="list-style-type: none"> • Recreation • Natural • Visual • Cultural/historic
Visual Resources	3.2.1	3.2.1	5 to 15 miles on either side of centerline	NA	<ul style="list-style-type: none"> • Visual resources of foreground, middle ground, background, and seldom seen landscape areas

Table 3-1. Analysis Area (continued)

Resource	FEIS Section	SEIS Section	Analysis Area		Resource Component Evaluated
			Transmission Line	Access Roads	
Cultural Resources	3.3.2	3.3.1	See Appendix N (Programmatic Agreement) of the Final EIS	See Appendix N (Programmatic Agreement) of the Final EIS	<ul style="list-style-type: none"> • Prehistoric resources • Protohistoric period • Historic resources
Socioeconomics	3.4.1	3.4.1	Counties crossed by Project	NA	<ul style="list-style-type: none"> • Socioeconomic environment • Economic conditions • Housing • Property values • Education • Public services • Tax revenues
Environmental Justice	3.5.1	3.5.1	Counties crossed or potentially affected by Project	NA	<ul style="list-style-type: none"> • Minority populations • Low income populations
Vegetation Communities	3.6.1	3.6.1	250 to 500 feet on either side of centerline	13 feet on either side of road centerline	<ul style="list-style-type: none"> • Endangered Species Act (ESA) Threatened, Endangered, Proposed, and Candidate Species • BLM and USFS Sensitive Species • State Heritage Program Species of Concern
Special Status Plants	3.7.1	3.7.1	0.5 miles on either side of centerline	0.25 miles on either side of road centerline	<ul style="list-style-type: none"> • Threatened, endangered, and candidate species under ESA • Forest Service or BLM listed Sensitive • State Heritage Program species of concern
Invasive Plant Species	3.8.1	3.8.1	Counties crossed by Project	NA	<ul style="list-style-type: none"> • Invasive plants • Noxious weeds
Wetlands and Riparian Areas	3.9.1	3.9.1	Minimum of 250 feet either side centerline Minimum 50 feet around perimeter of Project site features	Minimum 25 feet either side of road centerline	<ul style="list-style-type: none"> • Herbaceous riparian • Shrub riparian • Mixed riparian • Forested riparian
General Wildlife and Fish	3.10.1	3.10.1	0.5 miles on either side of centerline	0.5 miles on either side of centerline	<ul style="list-style-type: none"> • Non-SSS terrestrial and aquatic wildlife

Table 3-1. Analysis Area (continued)

Resource	FEIS Section	SEIS Section	Analysis Area		Resource Component Evaluated
			Transmission Line	Access Roads	
Special Status Wildlife and Fish Species	3.11.1	3.11.1	Minimum 500 feet either side of centerline Various, depending on species	Minimum 50 feet of road centerline Various depending on species	<ul style="list-style-type: none"> Threatened and endangered Candidate species and those formally proposed for ESA listing Forest Service or BLM listed Sensitive Forest Service management indicator species
Minerals	3.12.1	3.12.1	0.5 miles on either side of centerline	NA	<ul style="list-style-type: none"> Locatable minerals Leasable minerals Saleable minerals
Paleontological Resources	3.13.1	3.13.1	0.5 miles on either side of centerline	Those outside transmission line corridor would be examined case-by-case	<ul style="list-style-type: none"> Fossilized remains, traces, or imprints of organisms preserved in or on the earth's crust
Geologic Hazards	3.14.1	3.14.1	For subsidence, landslides, and blasting - 0.5 miles on either side of centerline Earthquakes defined by a variable buffer distance around epicenters, or groups of epicenters, of historical earthquakes and extended out to 100 miles	NA	<ul style="list-style-type: none"> Earthquakes Subsidence Landslides Blasting
Soils	3.15.1	3.15.1	0.5 miles on either side of centerline	NA	<ul style="list-style-type: none"> Soil erosion Soil compaction Soil permanently removed from productivity
Water Resources	3.16.1	3.16.1	0.5 miles on either side of centerline	NA	<ul style="list-style-type: none"> Surface water Ground water

Table 3-1. Analysis Area (continued)

Resource	FEIS Section	SEIS Section	Analysis Area		Resource Component Evaluated
			Transmission Line	Access Roads	
Land Use and Recreation	3.17.1	3.17.1	250 feet on either side of centerline	25 feet on either side of road centerline	<ul style="list-style-type: none"> • Land ownership • Use of designated utility corridors • Commercial properties • Residential properties • Timber management • Fire management • Indian reservations • Recreational and public interest areas • Off-highway vehicle (OHV) use
Agriculture	3.18.1	3.18.1	250 feet on either side of centerline	25 feet on either side of road centerline	<ul style="list-style-type: none"> • Prime farmland • Livestock grazing • Crop production • Lands enrolled in the Conservation Reserve Program • Grassland Reserve Program • Wetlands Reserve Program • Dairy farms
Transportation	3.19.1	3.19.1	Existing transportation infrastructure	Existing transportation infrastructure	<ul style="list-style-type: none"> • Existing transportation and traffic system • Airports
Air Quality	3.20.1	3.20.1	Geographic areas defined by applicable state air quality plans, federal General Conformity thresholds, and local requirements within the geographic areas crossed by the Proposed Action	NA	<ul style="list-style-type: none"> • Emissions of air pollutants
Electrical Environment	3.21.1	3.21.1	300 feet on either side of centerline	NA	<ul style="list-style-type: none"> • Electric and magnetic fields • Audible noise • Radio noise
Public Safety	3.22.1	3.22.1	0.25 miles on either side of centerline	NA	<ul style="list-style-type: none"> • Public safety and inconveniences

Table 3-1. Analysis Area (continued)

Resource	FEIS Section	SEIS Section	Analysis Area		Resource Component Evaluated
			Transmission Line	Access Roads	
Noise	3.23.1	3.23.1	1000 feet from proposed edge of ROW	NA	<ul style="list-style-type: none"> Noise on human environment
Morley Nelson Snake River Birds of Prey NCA	NA	3.24.1	Entire NCA	NA	<ul style="list-style-type: none"> Raptors/upland wildlife, Upland habitat/vegetation Cultural resources/NHTs NHTs Recreation and visitor services

NA – not applicable

3.3 Environmental Effects

3.3.1 National Historic Trails (Final SEIS)

Section 3.1.2 of the [Final SEIS](#) describes the potential direct and indirect impacts to the Oregon NHT and North Alternate Study Trail from construction, operations, and decommissioning activities.

Construction of the Project and its ancillary facilities could directly impact segments of the Oregon National Historic Trail (NHT) and North Alternate Study Trail. Short-term impacts from construction would include the visual intrusion of construction vehicles, equipment, materials, and a work force in staging areas, along access roads, and along the new transmission line right-of-way. Long-term impacts from construction include ground-disturbing activities that could directly disturb ruts, swales, and previously recorded and/or undetected sites associated with the trails. Project crossings and access road construction and/or improvements are the most likely locations for this type of impact to occur.

Construction or improvement of roads may encourage unauthorized site access, artifact collection, and vandalism. Project construction is not expected to permanently preclude the use of or access to any existing trail-related recreation areas or activities. Some short-term impacts are expected. These include impacts to dispersed trail-related recreation activities that would likely diminish the quality of trail-related recreational activities or vicarious experiences for the duration of the construction phase of the Project. These impacts, caused by the presence of construction noises, visual disturbances, or other humans, would be localized and short-term in nature. Vegetation removal caused by construction activities has the potential for short and long-term impacts to natural resources, more specifically vegetation communities, within the Project area.

If the transmission line is constructed, the presence of large transmission structures would introduce long-term visual impacts. Periodic access to the transmission line ROW is required to maintain its operating function. Thus, access roads would be kept

open, at least at a two-track level, which would increase the potential for vandalism and illicit artifact collection.

Decommissioning Impacts from decommissioning would be similar to those for construction.

The extent of the effects on the Oregon NHT and North Alternate Study Trail are thoroughly analyzed and disclosed in the [Final SEIS](#) and no additional effects would occur from the Proposed Action. The necessary RMP amendments would remain the same as discussed in the [Final EIS](#) and [Final SEIS](#).

3.3.2 Visual Resources

The visual resources section of the [Final EIS](#) (Section 3.2.2) and [Final SEIS](#) (Section 3.2.2) addresses potential impacts on visual resources during construction, operations, and decommissioning activities.

Construction would result in the visual intrusion of construction vehicles, equipment, materials, and a work force in staging areas, along access roads, and along the new transmission line ROW. Vehicles, heavy equipment, tower components, and workers would be visible during substation construction and modification, access and spur road clearing and grading, structure erection, conductor stringing, and cleanup and restoration. However, disturbance from construction activities would be transient and of short duration as activities progress along the transmission line route. Affected viewers would be aware of the temporary nature of Project construction impacts, which would decrease their sensitivity to the impact. The towers and transmission lines would cause the major long-term change in scenery. In addition, there would be the alteration of topography, grading for access roads and work areas, dust generation, and clearing of vegetation along the ROW for structures and access roads that would be long-lasting in semi-arid and forested, mountain environments and would introduce some adverse visual change and contrast.

During operations, towers and transmission lines, as well as existing and new permanent access roads, would be used by maintenance crews and vehicles for inspection and maintenance activities. Visual impacts would result from inspection and maintenance activities producing traffic and dust on access roads; however, these impacts would be intermittent and temporary. Increased visual contrast from the clearing and grading of staging areas and construction yards, construction of new access and spur roads, and activities adjacent to construction sites and along the ROW could be long-lasting in semi-arid and forested, mountain environments where vegetation establishment and growth are slow. Views along linear land scars or newly constructed roads would introduce visual change and contrast by causing unnatural vegetative lines and soil color contrast. Vegetation clearing would occur during construction and in some instances would remain substantially cleared for the life of the Project while other areas would be allowed to revegetate or may be planted with native plant materials. The greatest impact would occur from the long-term presence and operations of the transmission line in sensitive visual resource areas due to the cleared ROW, large vertical structures, and multiple overhead conductors, and some access roads to the structures.

Environmental protection measures (EPMs) have been adopted in order to minimize impacts to the visual contrast of the transmission line in the landscape.

At the end of the operational life of the transmission line, conductors, structures, and related facilities would be removed. Foundations would be removed to below the ground surface level. There would be residual visual impacts for many years after the Project has been decommissioned and structures removed such as vegetative cutbacks, cut and fill scars from construction activities, and access roads, which all add to the visual impact, though these impacts would be at ground level. These areas would be apparent after the removal of structures but are expected to diminish over time.

The extent of the effects on visual resources are thoroughly analyzed and disclosed in the [Final EIS](#) and [Final SEIS](#) and no additional effects would occur from the Proposed Action. The necessary RMP amendments would remain the same as discussed in the [Final EIS](#) and [Final SEIS](#).

3.3.3 Cultural Resources

The [Final EIS](#) (Section 3.3.3) and [Final SEIS](#) (Section 3.3.2) discusses cultural resources in the Project area and the impact construction, operations, and maintenance activities of the alternatives would have on the resources. Transmission line construction disturbance is generally limited to construction of new service roads and pads for the transmission structures and can avoid many cultural resources. For the purposes of this EA, direct impacts to cultural resources are estimated based on preliminary locations of ground-disturbing activities. The agencies would require pedestrian surveys to be conducted for the entire Propose Action Alternative ROW, with a buffer, to allow for micro-siting within the ROW to avoid or minimize direct impacts to cultural resources where found. While direct and indirect impacts may be reduced in some limited individual cases by shifting tower locations, in general the visual impact of a very large high-voltage transmission line is perceptible across a broad extent of landscape, such that moving transmission structures along the centerline does not substantially reduce the indirect impact.

Construction of the transmission line and its ancillary facilities could directly impact existing cultural resources, such as prehistoric or historic archaeological sites, districts, buildings, trails, roads, and landscapes. Construction or other ground-disturbing activities could directly or indirectly impact previously undetected cultural resources, especially buried resources. Such impacts are likely to be adverse. Identification of new or previously recorded cultural resources and increased use of existing and new access roads may encourage unauthorized site access, artifact collection, and vandalism. Impacts on the setting and feeling for cultural resources may be introduced through the addition of structural elements to the landscape.

Construction of transmission line structures would introduce a long-term, indirect (visual) impact upon existing cultural resources, especially historic trails. Periodic access to the transmission line ROW is required to maintain its operating function. Thus, access roads would be kept open, at least at a two-track level, which increases the potential for vandalism and illicit collection.

Impacts from decommissioning would be similar to those for construction. No EPMs are provided by the Proponents to address decommissioning; however, the EPMs proposed by the Proponents for construction would be applicable and would be generally effective at reducing the potential for adverse impacts.

EPMs ([Appendix M of Final SEIS](#)) will be implemented project-wide should eligible resources be adversely impacted as well as to minimize impacts to cultural resources.

The extent of the effects on cultural resources are thoroughly analyzed and disclosed in the [Final EIS](#) and [Final SEIS](#) and no additional effects would occur from the Proposed Action. The necessary RMP amendments would remain the same as discussed in the [Final EIS](#) and [Final SEIS](#).

3.3.4 Socioeconomics

The potential impacts to socioeconomics during construction, operations, and decommissioning from the alternatives were analyzed in the [Final EIS](#) (Section 3.4.2) and [Final SEIS](#) (Section 3.4.2). The effects on the labor force and economic conditions is thoroughly discussed in these documents and no impacts to socioeconomics resulting from approving the Proposed Action, beyond the impacts disclosed in the [Final EIS](#) and [Final SEIS](#), are anticipated. The Proposed Action requires no changes to or additional RMP amendments than those identified in the [Final EIS](#) and [Final SEIS](#).

3.3.5 Environmental Justice

The potential impacts to environmental justice during construction, operations, and decommissioning from the alternatives were analyzed in the [Final EIS](#) (Section 3.5.2) and [Final SEIS](#) (Section 3.5.2). Construction or operations of the proposed Project is not expected to have high and adverse human health or environmental effects on nearby communities. Adverse construction-related impacts would likely include increases in local traffic and noise, as well as dust, and could result in temporary delays at some highway crossings. These impacts would be temporary and localized, and are not expected to be high. Overall impacts associated with decommissioning the proposed Project are expected to be similar to those that would occur under construction.

The effects are analyzed in detail in the [Final EIS](#) and [Final SEIS](#) and no impacts to environmental justice resulting from approving the Proposed Action beyond the impacts disclosed in the [Final EIS](#) and [Final SEIS](#) are anticipated. The Proposed Action requires no changes to or additional RMP amendments.

3.3.6 Vegetation Communities

Potential impacts to vegetation communities during construction, operations, and decommissioning activities are discussed in the [Final EIS](#) (Section 3.6.2) and [Final SEIS](#) (Section 3.6.2). The proposed Project would directly affect vegetation communities though the temporary trampling of herbaceous vegetation, the partial removal of aboveground plant cover, and the complete removal of vegetation in places due to construction of the transmission line structures, access roads, temporary work spaces, and other project facilities. Indirectly, vegetation removal can increase the potential for invasive plants and the introduction and spread of noxious weeds and would also

expose soil to potential wind and water erosion. This can result in further loss of soil and vegetation, as well as increase sediment input to water resources. Indirect effects would also result from the fragmentation of connected vegetation types. During operations, long-term vegetation loss would occur within the ROW, where only low growing vegetation would be maintained, and under permanent structures maintenance areas, substations, regeneration stations, and permanent access roads. Decommissioning activities would restore vegetation within the Project footprint. To minimize direct and indirect effects of vegetation removal under each alternative, the Proponents have proposed a Framework Reclamation Plan in the Plan of Development (POD) ([Appendix B of Final EIS](#)) that provides procedures for pre-construction treatment of noxious weeds and invasive plants, weed prevention and control, topsoil treatment, ROW restoration, stabilization of disturbed areas to minimize erosion and runoff, seedbed preparation, seeding methods, preliminary seed mixes, road reclamation, monitoring, and remedial actions. This plan would be implemented under the Proposed Action.

The extent of these effects are disclosed in the [Final EIS](#) and [Final SEIS](#) and no additional effects would occur from the Proposed Action. The necessary RMP amendments would remain the same as discussed in the [Final EIS](#) and [Final SEIS](#).

3.3.7 Special Status Plants

The effects on special status plants from construction, operation, and decommissioning activities are addressed in the [Final EIS](#) (Section 3.7.2) and [Final SEIS](#) (Section 3.7.2). Direct impacts from construction activities could result in crushing or removal of plants, as well as direct loss of habitat. Indirect impacts include fragmentation of suitable habitat; alteration of fire regimes; increased competition from early successional plant species; increased competition by herbivores in newly disturbed areas; introduction or spread of invasive exotic species; isolation of subpopulations due to physical separation by access roads or transmission infrastructure; increased erosion; and alteration of habitat microclimates or hydrology. There is less potential for adverse impacts to occur during operations than during construction, however, some disturbances could occur due to routine maintenance activities, including the potential for altered fire regimes resulting from the increased risk of fire starts associated with use of maintenance vehicles, and the continuing potential for spreading exotic plant species. Effects from decommissioning activities would be similar to those identified above. The Proponents have proposed a series of EPMs ([Appendix M of Final SEIS](#)) meant to reduce or prevent impacts to Endangered Species Act (ESA)-listed or candidate plant species. In many cases, EPMs that apply to general vegetation (see Section 3.6 – Vegetation of the [Final EIS](#)) are sufficient to protect sensitive plant resources. However, in some cases additional species-specific EPMs are warranted and have been implemented to reduce construction and operations effects on all threatened, endangered, and sensitive (TES) plant populations and their habitats on federally managed lands.

Slickspot peppergrass was reinstated as a threatened species on September 16, 2016, which was subsequent to the completion of the 2013 Biological Assessment (BA). We have determined that implementation of the Proposed Action for Segments 8 and 9 of the 2017 EA “may effect”, and is “likely to adversely affect” slickspot peppergrass in a

manner or to an extent similar to that which was analyzed in the original 2013 BA and for which the Service provided its 2013 Conference Opinion (CO). The BLM has requested U.S. Fish and Wildlife Service (USFWS) acknowledgement of this “may effect, likely to adversely affect” determination for slickspot peppergrass and its proposed critical habitat for the Proposed Action and further request USFWS confirm the conclusion of the 2013 CO as formal consultation and as the USFWS’s Biological Opinion.

The Proposed Action requires no changes to or additional RMP amendments than those identified in the [Final EIS](#) and [Final SEIS](#).

3.3.8 Invasive Plant Species

The analysis of the effects of construction, operations, and decommissioning activities on the spread and/or introduction of invasive plant species is found in the [Final EIS](#) (Section 3.8.2) and [Final SEIS](#) (Section 3.8.2). Table 2.7-1 in Chapter 2 of the [Final EIS](#) contains a list of the EPMS that have been developed as part of this Project to offset or reduce potential impacts related to non-native plant species, as well as a description of where these various measures would apply (e.g., on private, state, or federally managed lands). These measures also contain commitments by the Proponents to follow all existing federal Best Management Practices (BMPs) and restrictions that are applicable to the BLM Field Offices crossed by the Project, and the utilization of third-party environmental monitors who would ensure the Project complies with all environmental restrictions and requirements during construction. No impacts due to invasive plant species resulting from approving the Proposed Action, beyond the impacts disclosed in the [Final EIS](#) and [Final SEIS](#), are anticipated. The Proposed Action requires no changes to or additional RMP amendments than those identified in the [Final EIS](#) and [Final SEIS](#).

3.3.9 Wetlands and Riparian Areas

The effects on wetlands and riparian areas from construction, operation, and decommissioning activities are addressed in the [Final EIS](#) (Section 3.9.2) and [Final SEIS](#) (Section 3.9.2). The primary impact to wetland and riparian areas would result from the clearing of vegetation. Removal of vegetation could alter various functions provided by these areas, including their ability to serve as wildlife habitat, as well as their ability to trap sediment and nutrients. The Framework Reclamation Plan ([Appendix B of Final EIS](#)) provided by the Proponents addresses measures to be undertaken to ensure reclamation and revegetation of disturbed areas that are not occupied by permanent Project facilities, as well as to prevent the accidental introduction or transport of noxious weeds or exotic species in the Project Area along the ROW during and after construction. The effects from the Proposed Action would be the same as what was disclosed in the [Final EIS](#) and [Final SEIS](#). No changes to the proposed plan amendments are necessary.

3.3.10 General Wildlife and Fish

The effects on general wildlife and fish species from construction, operations, and decommissioning activities are addressed in the [Final EIS](#) (Section 3.10.2) and [Final SEIS](#) (Section 3.10.2). Direct and indirect effects on wildlife and fish species and their

habitat occurring in the area are discussed. The effects vary by species from differing sensitivity, mobility, and habitat requirements. Direct impacts to habitat and to species living in the immediate area of construction would occur at the actual footprint of disturbance during construction, which includes the clearing of vegetation and other activities at construction areas for each transmission structure, access roads, laydown yards, fly yards, and wire pulling/splicing areas. Indirect impacts would extend beyond the location of construction and operations activities and include noise and edge effects. These impacts included direct mortality and/or disturbance of individuals, loss or degradation of habitats (e.g., vegetation removal, habitat fragmentation, weeds, fire, reduced vegetation cover, and changes to stream temperatures or sedimentation levels), as well as indirect effects (e.g., alterations to predation rates, effects on migratory corridors, effects prey-base health or populations, creating increased access for recreationalists and hunter).

No additional effects would occur from the Proposed Action and no RMP amendments would be required in addition to the ones identified in the [Final EIS](#) and [Final SEIS](#).

3.3.11 Special Status Wildlife and Fish Species

The general impacts that would occur to TES wildlife and fish species as well as their habitats from construction, operations, and decommissioning of the Gateway West Project were analyzed in detail within Section 3.11.2.2 of the [Final EIS](#) and Section 3.11.2 of the [Final SEIS](#). These impacts included direct mortality and/or disturbance of individuals, loss or degradation of habitats (e.g., habitat fragmentation, weeds, fire, reduced vegetation cover, and changes to stream temperatures or sedimentation levels), as well as indirect effects (e.g., alterations to predation rates as well as prey base health or populations, effects on migratory corridors, creating increased access for recreationalists and hunters, increased avian predator presence and predation, potential decrease in survival and productivity, as well as a possible avoidance of transmission lines by sage-grouse).

The effects on the relevant ESA-listed species from Alternative 1 assessed in the 2016 SEIS and 2017 EA Proposed Action would be the same, reduced, or non-existent in comparison to the Agency Preferred Alternative routes assessed in the 2013 [Final EIS/BA](#). Additionally, all EPMs related to ESA-listed species and enumerated in the 2013 FEIS, 2016 SEIS, and required in the 2016 ROD would be implemented for the Proposed Action if the Project were approved. In addition, we have determined that implementation of the Proposed Action “may effect”, but is “not likely to adversely affect” the endangered Banbury Springs limpet and Snake River physa, and the threatened Bliss Rapids snail in a manner or to an extent similar to that which was analyzed in the original 2013 BA and for which the Service provided its 2013 CO. The EA Proposed Action will have no effect on Bruneau hot springsnail, bull trout critical habitat, and yellow-billed cuckoo and its proposed critical habitat.

Table 2.7-1 in Chapter 2 of the [Final EIS](#) contains a list of the EPMs that have been developed as part of this Project to offset or reduce potential impacts to wildlife species (including TES), as well as a description of where these various measures would apply (e.g., on private, state, or federally managed lands). These measures also contain commitments by the Proponents to follow all existing federal BMPs and restrictions that

are applicable to the BLM Field Office crossed by the Project and the utilization of third-party environmental monitors who would ensure the Project complies with all environmental restrictions and requirements during construction. These EMPs would still apply to the Proposed Action.

No additional effects would occur from the Proposed Action and no additional RMP amendments would be required other than those already identified in the [Final EIS](#) and [Final SEIS](#).

3.3.12 Minerals

The [Final EIS](#) (Section 3.12.2) and [Final SEIS](#) (Section 3.12.2) discusses the effects the project during construction, operation, and decommissioning activities on locatable, leasable, and saleable minerals. The presence of existing mineral claims and leases could interfere with plans to construct the Project. The construction of the Project could restrict exploration of mineral resources during the 2-year construction period. Construction activities could also restrict mining companies' ability to access land for mining or exploration. The extent of these effects are disclosed in the [Final EIS](#) and [Final SEIS](#) and no additional effects would occur from the Proposed Action. The necessary RMP amendments would remain the same as discussed in the [Final EIS](#) and [Final SEIS](#).

3.3.13 Paleontological Resources

The effects on paleontological resources from construction, operation, and decommissioning activities are presented in the [Final EIS](#) (Section 3.13.2) and the [Final SEIS](#) (Section 3.13.2). Direct effects due to construction common to the Alternatives include possible damage to paleontological specimens and possible loss of associated data. No direct effects on the paleontological resources due to operations are foreseen. Very limited effects due to decommissioning are foreseen because the activities would occur within the same footprint as construction. There are no additional effects from the Proposed Action than those already disclosed in the [Final EIS](#) and [Final SEIS](#). The necessary RMP amendments would remain the same as discussed in the [Final EIS](#) and [Final SEIS](#).

3.3.14 Geologic Hazards

The effects from geologic hazards on construction, operations, and decommissioning activities for the proposed project are discussed in the [Final EIS](#) (Section 3.14.2) and [Final SEIS](#) (Section 3.14.2). Transmission lines and associated facilities could be negatively affected by geologic hazards, including earthquakes, landslides, subsidence, and blast vibrations in shallow bedrock. Earthquakes could occur in any segment of the Project. Project construction, operations, or decommissioning would have no effect on earthquake risks. However, ground shaking and displacement related to earthquakes may damage human-made structures, including transmission lines and substations. The effects from the Proposed Action would be the same as what was disclosed in the [Final EIS](#) and [Final SEIS](#). No changes to the proposed plan amendments are necessary.

3.3.15 Soils

The potential impacts to soils from construction, operation, and decommissioning activities are discussed in the [Final EIS](#) (Section 3.15.2) and [Final SEIS](#) (Section 3.15.2). Project construction activities that could affect soils include clearing, grubbing, and grading along the ROW and at additional temporary workspaces; trenching; backfilling; excavating; and construction of permanent structures, such as transmission line towers, access and service roads, co-generation sites, and substations; and construction or improvement of access roads. Ground clearing during construction could increase the potential for erosion.

The amount of erosion from disturbances is a result of climate factors (precipitation, wind, etc.). Effective use of construction stormwater BMPs, and compliance with the soil EPMs stated in the [Final EIS](#), would reduce the effects of erosion. Service roads used for construction, operations and decommissioning would be reclaimed to minimize erosion potential.

Reclamation would be necessary in disturbed soil areas. The Proponents' POD ([Appendix B of Final EIS](#)) describes Project reclamation. The POD and the EPMs presented in [Appendix M of the Final SEIS](#) also contain many BMPs that would be used during Project construction, operations, and reclamation. Erosion in all areas could be exacerbated unless revegetation efforts are implemented as soon as possible following disturbance.

The analysis was reviewed and the potential impacts disclosed in the [Final EIS](#) and [Final SEIS](#) are not expected to change.

3.3.16 Water Resources

The potential impacts to surface water and groundwater from the alternatives were analyzed in the [Final EIS](#) (Section 3.16.2) and [Final SEIS](#) (Section 3.16.2). The effects on water resources that would occur as a result of construction, operation, and decommissioning of the project were disclosed. These impacts include increased erosion and surface water sedimentation from disturbed lands, temperature changes from vegetation removal, increased stream channel instability from construction of roads, and potential degradation of water quality due to potential spills from hazardous materials.

3.3.17 Land Use and Recreation

The land use and recreation Section of the [Final EIS](#) (3.17.2) and [Final SEIS](#) (Section 3.17.2) discusses the potential impacts of the route alternatives during construction, operation, and decommissioning. The analysis included land ownership affected by the Project's activities; use of designated utility corridors and existing ROWs; and the potential impacts of the Project on specific land uses including commercial and residential properties, timber and fire management, Indian reservation, recreational and public interest areas, and OHV use. The analysis was reviewed and the potential impacts disclosed in the [Final EIS](#) and [Final SEIS](#) are not expected to change.

3.3.18 Agriculture

The potential impacts to agriculture from the alternatives were analyzed in the [Final EIS](#) (Section 3.18.2) and [Final SEIS](#) (Section 3.18.2). Short-term disruption of farming activities along the ROW could occur locally during construction. However, EPMs will be implemented to reduce impacts. The effects disclosed would be a result of the construction, operation, and decommissioning activities. These effects have not changed since the publication of the [Final EIS](#) and [Final SEIS](#).

3.3.19 Transportation

The environmental effects on the existing transportation and traffic system and airports were analyzed in the [Final EIS](#) (Section 3.19.2) and [Final SEIS](#) (Section 3.19.2). The Proponents have committed to preparing a detailed transportation plan (including road maps) that would be developed to consider road conditions, wear and tear on roads, bridges, stream crossings, traffic control, and post-construction repair, reclamation, and access control. This plan would be approved by the appropriate federal, state, and local agencies prior to any Notice to Proceed to construction. The necessary RMP amendments would remain the same as discussed in the [Final EIS](#) and [Final SEIS](#).

3.3.20 Air Quality

The air quality section of the [Final EIS](#) (Section 3.20.2) and [Final SEIS](#) (Section 3.20.2) discusses the potential impacts the various alternatives would have on air quality during construction, operation, and decommissioning activities. For both construction and operations, there are sections summarizing emissions of criteria pollutants (nitrogen oxide [NO_x], carbon monoxide, sulfur oxide, volatile organic compounds, and particulate matter with diameters less than 10 and less than 2.5 microns [PM₁₀/PM_{2.5}]), and greenhouse gases (carbon dioxide, methane, and NO_x) for the route alternatives. The effects from the Proposed Action would be the same as what was disclosed in the [Final EIS](#) and [Final SEIS](#). No changes to the proposed LUP amendments are needed for the Proposed Action.

3.3.21 Electrical Environment

The electrical effects of the various alternatives are discussed in the [Final EIS](#) (Section 3.21.2) and [Final SEIS](#) (Section 3.21.2). Electrical effects would only occur when the transmission line is energized therefore, only the operations phase of the Project has been analyzed for the effects. The [Final EIS](#) and [Final SEIS](#) described the potential effects of audible and radio noise, electromagnetic interference with communication systems, induced currents and nuisance shocks, and effects on human and animal health. The electrical effects from the Proposed Action would be the same as what was disclosed in the [Final EIS](#) and [Final SEIS](#). The Proposed Action requires no changes to the proposed RMP amendments.

3.3.22 Public Safety

The effects on public safety are discussed in the [Final EIS](#) (Section 3.22.2) and [Final SEIS](#) (Section 3.22.2). According to the documents, there is no strong geographical distinction driven by public safety. If the protective measures proposed by the Proponents and additional measures identified by the BLM are incorporated into the

Project design, construction, operations, and decommissioning, the expected public safety impacts would be low among all alternatives. No new alternatives are proposed in this EA so the impacts would be the same as discussed in the [Final EIS](#) and [Final SEIS](#). The Proposed Action requires no changes to or additional RMP amendments as those identified in the [Final EIS](#) and [Final SEIS](#).

3.3.23 Noise

The analysis of noise from construction, operations, and decommissioning activities for the proposed Project is found in the [Final EIS](#) (Section 3.23.2) and [Final SEIS](#) (Section 3.23.2). No impacts to noise resulting from approving the Proposed Action beyond the impacts disclosed in the [Final EIS](#) and [Final SEIS](#) are anticipated. The Proposed Action requires no changes to or additional RMP amendments than those identified in the [Final EIS](#) and [Final SEIS](#).

3.3.24 Morley Nelson Snake River Birds of Prey National Conservation Area (Final SEIS)

The potential impacts to the NCA were discussed in the [Final SEIS](#) (Section 3.24.2). Although the transmission line corridor under consideration in this EA no longer includes those portions authorized within the NCA by the Modification Act, the effects of its construction, operation and decommissioning would be the same as analyzed in the Proposed Action of the [Final SEIS](#). The Modification Act (see Appendix D) superseded the need for seven plan amendments to the Snake River Birds of Prey RMP associated with the Proposed Action analyzed in the [Final SEIS](#). In Sec. 2(c)(2)(A), the Modification Act also mandated that the Mitigation Framework presented in the [Final SEIS](#) would apply to the authorized segments. For mitigating Gateway West Transmission Project impacts, the BLM will implement, as directed by Congress, all conditions in Sec. 2(c) of the Modification Act (see Appendix D). This action will meet the requirement of enhancement of resource conditions within the NCA as mandated by the Enabling Act that created the NCA.

3.4 Land Use Plan Amendments

3.4.1 Bennett Hills/Timmerman Hills Management Framework Plan

Segment 9 of the Proposed Action crosses the Oregon NHT and would impact visual resources and archeological resources; thus, the Project would not be in conformance with the Bennett Hills/Timmerman Hills MFP. One amendment would have an extent larger than the transmission line ROW itself because of reclassification of visual management areas.

The visual resource protection would be rewritten (SEIS-9) to allow development of this Project and would read (changes in italics):

“No management activity should be allowed to cause any evident changes in the form, line color or texture that is characteristic of the landscape within this Class II area. *The VRM Class II area within 3,000 feet to the north of the existing transmission line ROW will be reclassified from VRM II to VRM III (including the existing ROW).*”

The amendment changing the VRM Class II classification to VRM Class III would change the classification of lands within 3,000 feet of an existing transmission line. This may result in up to two additional transmission lines being located along this route, which would result in additional impacts to resources managed under the MFP. The cumulative effect of the plan amendment would not differ substantially from the effect of the Project itself, particularly given that no projects other than possible future transmission lines are proposed for the area. In addition, to allow the crossing of the Oregon NHT, the amendment (SEIS-10) would read (changes in italics):

“Prohibit all land disturbing developments and manage all cultural resources with applicable law and policy.”

Allowing land-disturbing developments up to 330 feet from the Oregon NHT could potentially affect the ability to conform to agency policy of protecting archaeological sites; however, stipulations for managing archeological sites as required by the National Historic Preservation Act (NHPA) should minimize this possibility. Additionally, EPMs (CR-1 through CR-8) as stated in [Appendix M](#) of the [Final SEIS](#) would be aimed at reducing these impacts and construction would occur in a manner that would avoid disturbing important historic resources.

The effects from approving the amendments to the Bennett Hills/Timmerman Hills MFP would be the same as what was disclosed in the [Final EIS](#) and [Final SEIS](#). See Figure 3-1 below for the locations of the proposed amendments.

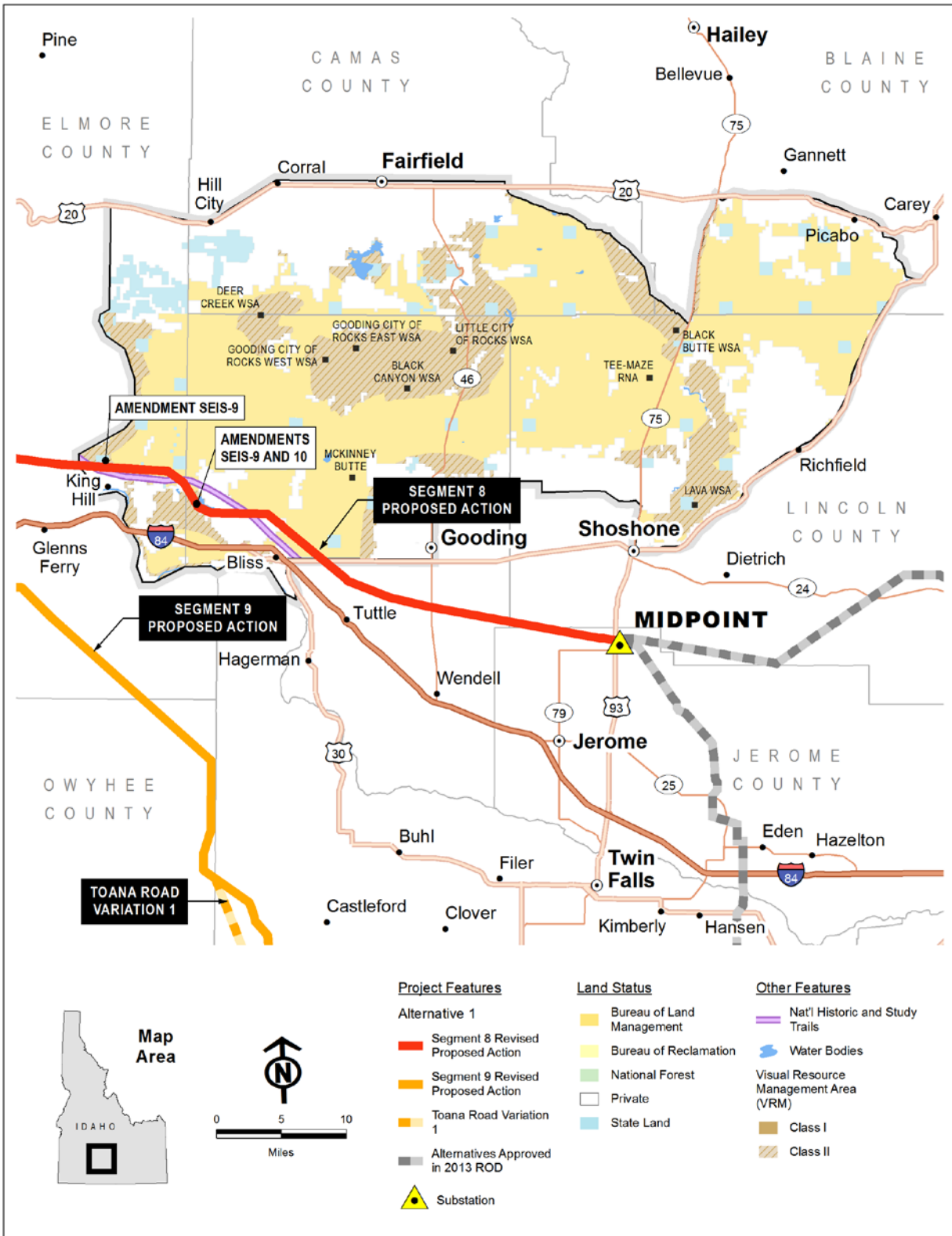


Figure 3-1. Bennett Hill/Timmerman Hills MFP Amendments for Alternative 1

3.4.2 Kuna Management Framework Plan

A portion of Segment 8 of the Proposed Action would cross through the Kuna Planning Area. Because the Project does not conform to the current direction provided in the Kuna MFP for cultural resources and following existing corridors, the land use plan would need to be amended (SEIS-11) to permit the Project in this area. The amended decision would read (changes in italics):

“L-4.1– Confine major new utility R/Ws (i.e., 500 KV or larger or 24-inch pipeline) to existing corridors as shown on Overlay L-4. The R/Ws will be subject to reasonable stipulations to protect other resource uses. *Amend Overlay L-4 to add a major transmission line (500-kV) right of way.*”

The effects from approving the amendment to the Kuna MFP would be the same as what were disclosed in the [Final EIS](#) and [Final SEIS](#). See Figure 3-2 below for the locations of the proposed amendments.

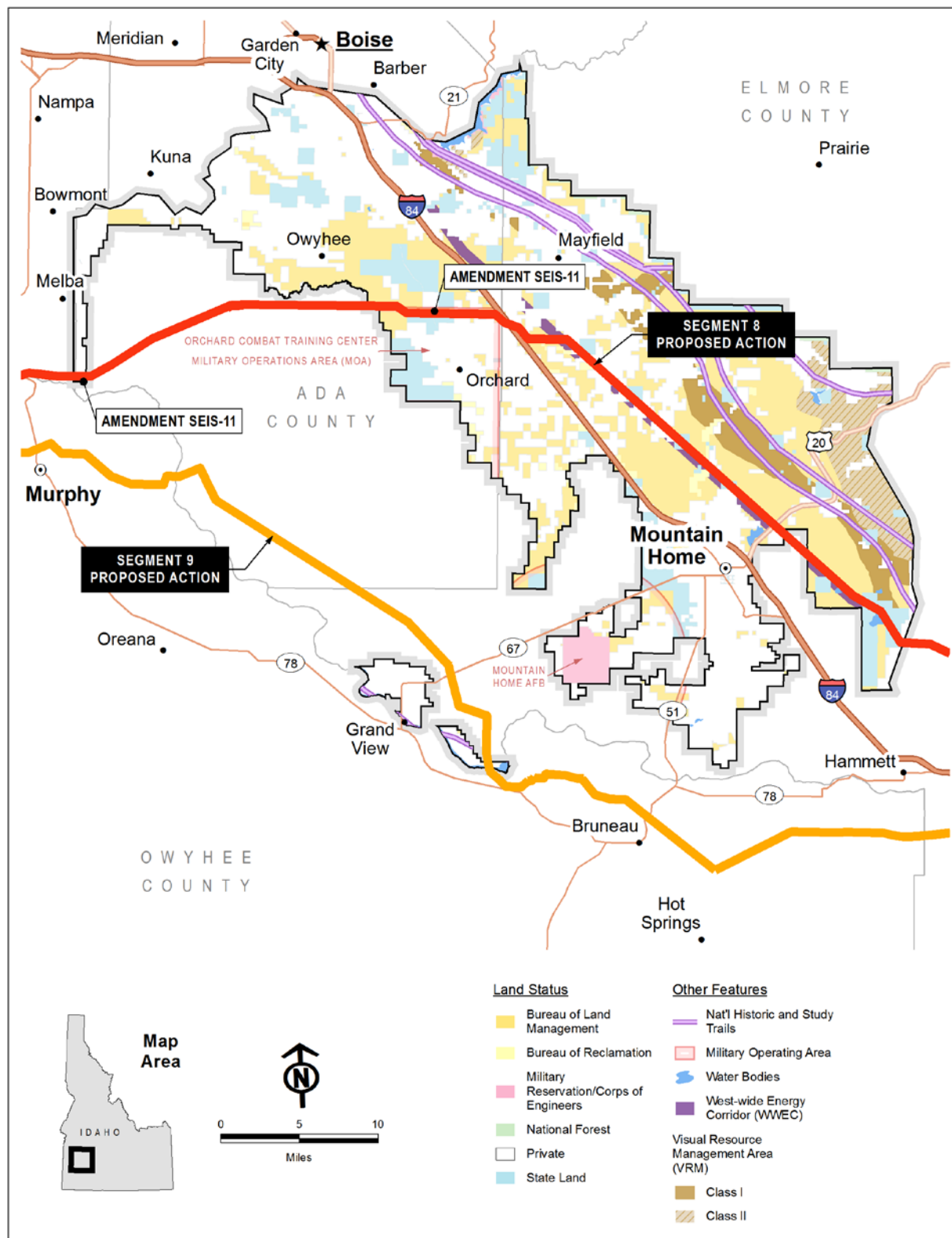


Figure 3-2. Kuna MFP Amendment for Alternative 1

3.4.3 1987 Jarbidge Resource Management Plan

A portion of Segment 8 of the Proposed Action would cross land managed as a utility restricted area. Because a powerline would not conform to this restriction, an amendment (SEIS-3) would be needed for the Lands decision to read (new language in italics):

“MUA-3 Utility avoidance/restricted area – three Paleontological areas (Sugar Bowl, Glens Ferry, & McGinnis Ranch) and Oregon Trail ruts (7,200 acres/22.5 miles) to overhead and surface disturbance and underground utilities. The current Lands decision is amended to reclassify the area identified as restricted in Section 35, T. 04 S., R. 09 E. to allow the overhead lines of a 500-kV powerline right of way, while protecting the Oregon Trail ruts.”

Portions of Segment 8 of the Proposed Action would cross lands managed to protect NHTs, which would not allow “incompatible uses to occur within a ½ mile corridor through which these routes pass.” Because a powerline would not conform to this restriction, an amendment (SEIS-4) would be needed for the Cultural Resources direction in the 1987 Jarbidge RMP. The amendment would read (revisions in italics):

“The existing ruts of the main route, north and south alternate routes of the Oregon Trail and Kelton Road will be protected by not allowing incompatible uses to occur within ½ mile corridor of ruts except where visual impacts are already compromised. Protect existing trail ruts from surface disturbance.”

Portions of Segment 8 of the Proposed Action would cross VRM Class I land associated with the Oregon NHT, which is not part of the west-wide energy corridor. As a powerline would not conform to the VRM Class I objectives, a new VRM decision (SEIS-5) would be needed and would read (new language in italics):

“The visual or scenic values of the public lands will be considered whenever any physical actions are proposed on BLM lands. The Degree of alterations to the natural landscape will be guided by the criteria established for the four Visual Resource Management Classes as outlined in BLM 8400. VRM Classes will be managed as shown on Map 9. The VRM decisions and Map 9 are amended to accommodate a major powerline R/W. These VRM boundaries are modified according to the new manual to reclassify the VRM Class I area associated with Oregon Trail and the Proposed 500-kV line as VRM Class IV.”

A portion of Segment 9 of the Proposed Action would cross VRM Class II just west of the NCA. An amendment (SEIS-14) would be needed to conform to the VRM designations in the 1987 Jarbidge RMP and would read (new language in italics):

“The VRM decision and Map 9 are amended to accommodate a major powerline R/W. The VRM Classification is amended to change the VRM Class II to VRM Class III, adjacent to the proposed line, where the towers would be visible and dominate the landscape.”

The effects from approving the amendments to the Jarbidge RMP would be the same as what were disclosed in the [Final EIS](#) and [Final SEIS](#). See Figure 3-3 below for the locations of the proposed amendments.

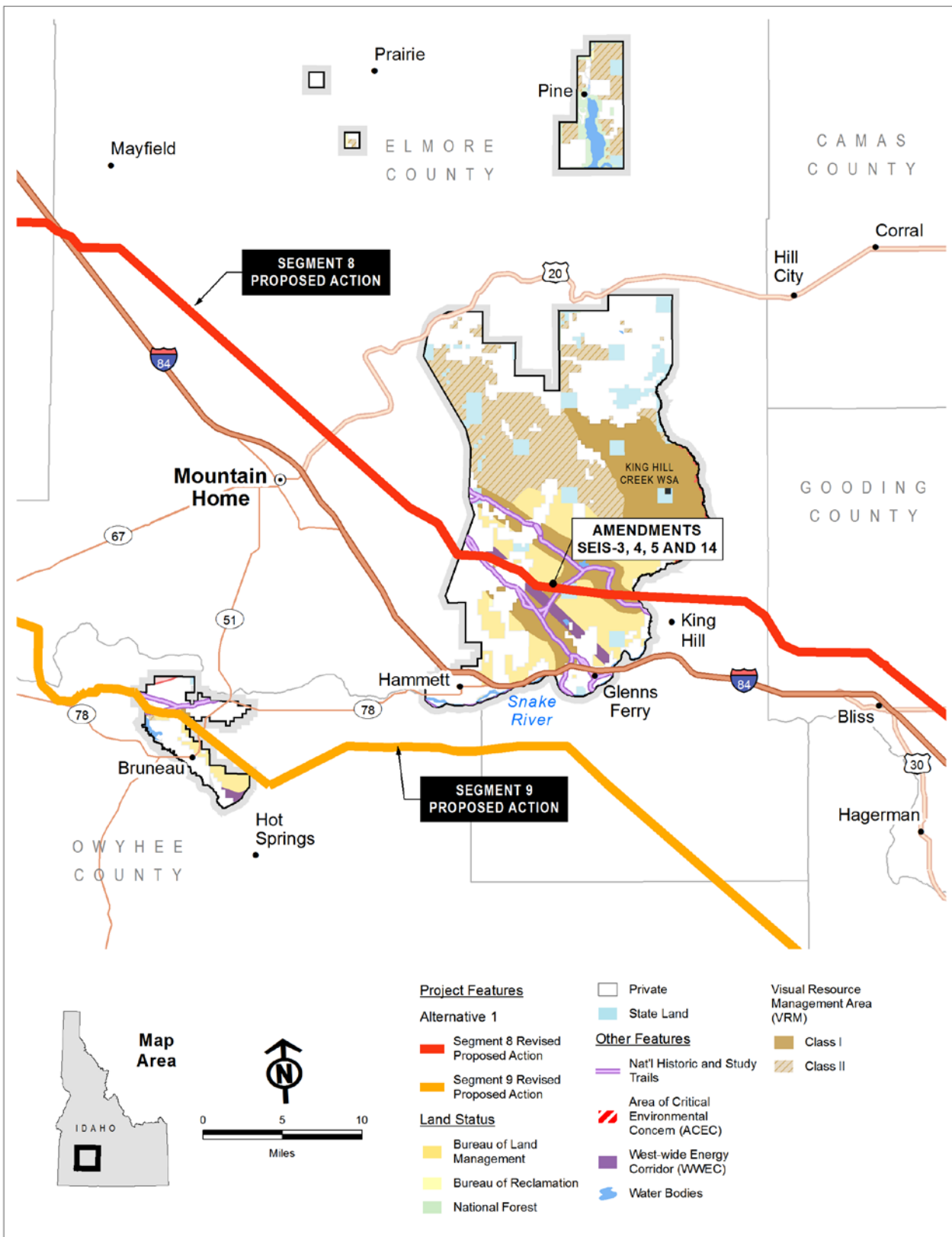


Figure 3-3. 1987 Jarbidge RMP Amendments for Alternative 1

4.0 CUMULATIVE EFFECTS

Cumulative effects are defined as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions” (40 CFR Part 1508.7). This section presents a discussion of the potential cumulative effects on the resources associated with the Proposed Action. This section summarizes what BLM disclosed in Section 4.4 of the [Final SEIS](#) as well as considers actions and reasonably foreseeable actions that BLM became aware of subsequent to the January 2017 Decision.

The BLM is aware of one constructed project within the area of the Gateway West statutory ROW. The Simco Solar Project (Solar Project), built by Swinerton Renewable Energy of San Diego, California is located on approximately 164 acres of private land adjacent to Interstate 84 in Elmore County.

An EA was completed and a Finding of No Significant Impact and Decision Record for a sustainable water supply for Mountain Home Air Force Base was signed December 4, 2017. The analysis found there would be no significant impacts to those resources of issue (cultural, visual, T&E/sensitive species) in the Gateway West Alternative 1 corridor. The project will consist of approximately 14.4 miles of underground pipeline connecting a pump station located along the C.J. Strike Reservoir to a water treatment facility on the Mountain Home Air Force Base.

Orchard Land Exchange is a proposed lease and subsequent land exchange of BLM-managed public lands and State of Idaho lands in Ada, Canyon, Elmore, and Owyhee Counties. This potential project involves modifications to the Idaho Army National Guard’s Orchard Combat Training Center south of Boise within the NCA. While the BLM considers this project a foreseeable event worth mentioning here, as of this writing, the lease/exchange is in the early stages of planning and has not been fully defined. Details of the scope and scale of the project and the effects resulting from it are not yet known. The anticipated environmental analysis process, most likely through an EIS, will be completed once the project is defined with more clarity and public scoping is conducted. The information in the likely EIS will contain a comprehensive Cumulative Effects Analysis and will consider the cumulative effects resulting from the Gateway West Project at that time.

The three above mentioned projects (see Appendix E) have been considered for their effects on the resources within the cumulative impact analysis area (CIAA) as defined by Alternative 1 of the [Final SEIS](#) using the same parameters and process as described in Section 4.4. The spatial extent of the CIAA is defined in Table 4.1-1 of the [Final SEIS](#). The temporal extent of the Proposed Action is the expected physical operational service life of the transmission line and ancillary facilities (approximately 50 years), plus the estimated 10 years needed for substantial site rehabilitation after decommissioning.

Because the water supply pipeline and the Orchard Training Center projects are located within the NCA, they are subject to the terms of Enabling Act that created the NCA. The Enabling Act requires that ground disturbing projects within the NCA must include enhancement of resource conditions. Thus, when considered together with the impacts

associated with the proposed action, these two proposed projects would not result in significant effects on the environment, and moreover would eventually lead to enhancement of resource conditions. Therefore, there would be no new significant effects from these two potential projects that would overlap with effects from the Proposed Action.

As mentioned above, the Solar Project is located on approximately 164 acres of private land adjacent to the highly disturbed Interstate 84 corridor. The Solar Project is located outside the NCA and approximately 35 miles from the impacts necessitating land use plan amendments for VRM reclassification from the Proposed Action. As such, there would be no new significant detrimental effects from the Solar Project that would overlap with effects from the Proposed Action.

To determine the cumulative impact of all the projects taken together, this analysis relies on the direct and indirect impacts disclosed in the Final SEIS and this EA, and considers the impacts in conjunction with the cumulative effects analysis completed in Section 4.4 of the [Final SEIS](#). The BLM anticipates that the direct or indirect effects on the resources listed below that result from building the Gateway West transmission line as identified in the Proposed Action, Segments 8 and 9, may overlap with the effects from the three projects listed above but will cause no new significant impacts or greater impacts than what the BLM analyzed in the [Final EIS](#) and [Final SEIS](#). With these considerations in mind, the BLM has determined that the Proposed Action would have no new significant effects beyond those already analyzed the [Final SEIS](#) Section 4.4.

4.1 National Historic Trails

As discussed in the [Final SEIS](#) (Section 4.4.3) Segments 8 and 9 of Gateway West and the other current and reasonably foreseeable actions would result in substantial cumulative adverse effects on NHTs. Construction of the Gateway West transmission line and its ancillary facilities could directly impact the existing Oregon NHT, North Alternate Study Trail, and indirectly impact its associated visual contexts, recreational values and settings, and associated cultural resources and landscapes. Construction or other ground-disturbing activities could directly or indirectly impact previously undetected components of the Oregon NHT. Such impacts are likely to be adverse. Impacts on the setting and feeling of the Oregon NHT may be introduced through the addition of structural elements to the landscape. Construction of transmission line structures introduces an indirect (visual) impact upon the visual contexts, recreational values, and historic/cultural settings of the Oregon NHT.

Other current and reasonably foreseeable activities with ground-disturbing activities (essentially all those listed in Section 4.2 of the [Final SEIS](#)) have the potential for additional effects on NHTs and associated resources. Visually prominent Gateway West activities associated with the Oregon Trail are included in [Appendix J](#) to the [Final SEIS](#), which includes maps of each analysis unit and the locations of existing transmission lines and wind farms. These projects have already affected the visual environments around the Oregon NHT and the North Alternate Study Trail and, in some areas, already degraded the visual, cultural, recreational, and natural resources, qualities, values, and settings related to the trails primary purpose and use. [Appendix J](#)

also provides an indication of how the Proposed Action either falls into the immediate foreground of trail-related settings, thus having a larger impact than the existing projects, or falls into the background, where it would largely be obscured by existing energy infrastructure.

The Proponents of Gateway West have committed to avoiding direct effects on National Register of Historic Places eligible features wherever feasible. Avoidance of indirect effects is not likely to be possible. Historic Properties Treatment Plans (HPTPs) would be prepared for areas that may experience direct or indirect effects. Treatment plans would be reviewed and approved by the BLM prior to issuance of a Notice to Proceed for that work element.

4.2 Visual Resources

The cumulative impacts of Segments 8 and 9 to visual resources were analyzed in Section 4.4.3 of the [Final EIS](#) and in Section 4.4.4 of the [Final SEIS](#). The Alternatives were designed to take advantage of existing utility corridors to minimize the introduction of a new transmission facility into a previously undisturbed landscape and reduce the visual impact on the landscape. However, even with careful siting and the implementation of mitigation measures, they are expected to have a substantial, unavoidable adverse visual impact on the landscape in certain locations. There are no known future projects or actions that would substantially add to the impacts of the Proposed Action.

4.3 Cultural Resources

The [Final EIS](#) (Section 4.4.4) and [Final SEIS](#) (Section 4.4.5) discusses the cumulative impacts to cultural resources. In some areas, the construction of Segments 8 and 9 of the Gateway West transmission line could lead to the establishment of a corridor in which other lines may be installed in the future. There is a potential that cumulative impacts to the visual settings for some cultural resources would occur due to the establishment of a corridor and the subsequent construction of additional transmission lines. An indirect effect of construction of the transmission line could result in increased use of existing and new access roads and may encourage unauthorized site access, artifact collection, and vandalism.

The Proponents of Gateway West have committed to avoiding historic properties wherever feasible. The programmatic agreement (PA) ([Appendix N of the Final EIS](#)) provides for site-specific HPTPs to be reviewed and approved by the BLM prior to issuance of a Notice to Proceed for that work element. Gateway West would introduce “visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features” (36 CFR 800.5(a)(2)(v)) with regard to the setting for historic trails where the Proposed Action crosses those trails. This would be considered an adverse effect. The creation of a corridor would introduce additional elements, from other projects that would further diminish a property’s historic setting.

Gateway West and the rest of the current and reasonably foreseeable actions would result in substantial cumulative adverse effects on known historic properties. All projects with a Section 106 nexus would complete surveys and record sites, contributing

to the knowledge base in the CIAA. Each project also has the potential for inadvertent damage to previously undetected resources during construction, though all reasonable precautions would be built into each PA or historic properties treatment plan governing monitoring of and compliance with avoidance, minimization, and reporting requirements.

4.4 Vegetation Communities

Section 4.4.8 of the [Final SEIS](#) describes the cumulative impacts to vegetation communities. The major ecological changes to vegetation that have occurred, and that continue to occur in the CIAA due to past and present actions include changes in vegetation composition and conditions due to fire, grazing, mining, agriculture, infrastructure development, and other forms of development. Of particular concern is the continuing degradation of shrub-steppe habitat, primarily due to increased abundance and dominance of non-native species.

Permanent vegetation removal and disturbance associated with Gateway West transmission line structures, access roads, and associated facilities, along with other infrastructure construction and expansion of residential development, would contribute to this overall loss of native vegetation, increase habitat for non-native plants and noxious weeds, and result in the potential loss of rare plant occurrences and habitat (see [Final SEIS](#), Sections 3.7 – Special Status Plants and 3.8 – Invasive Plant Species). Mechanisms for weed distribution would be minimized by implementing mitigation measures listed in the [Final SEIS](#), Section 3.6 – Vegetation Communities.

The cumulative impact of past and present land uses on native vegetation is considerable. While the impact of the Proposed Action would be minor compared to the much larger past events, when taken together with various proposed developments as specified in Section 4.2 of the [Final SEIS](#), and when added to the impacts from past and present land use changes, the overall cumulative impact would be substantial.

4.5 Special Status Plants

The cumulative affects to special status plants is discussed in Section 4.4.9 of the [Final SEIS](#). Ground-disturbing activities during construction and operations of the Proposed Action have the potential to impact special status plant species either directly or indirectly by disturbing habitat. Projects on federal lands or requiring federal permits would be required to conduct preconstruction surveys to identify and avoid the locations of sensitive plant populations. However, projects not requiring federal permits probably would not conduct surveys and might not avoid habitat or populations entirely. Slickspot peppergrass habitat would be surveyed and avoided to the extent practicable for Gateway West and for other projects with a federal nexus.

Several other special status plant species occur along Segments 8 and 9. The Proposed Action has the potential to impact individuals and habitat of these special status plants. Impacts to special status plants, however, do not differ substantially by Alternative. Therefore, cumulative effects of Gateway West would not vary substantially by Alternative. With implementation of survey and avoidance measures, the impact from the Proposed Action on special status plants would be minor, its impacts when

added to possibly substantial (but largely unknown) impacts from non-federally licensed activities on remnant habitat for these species, could contribute to a substantial impact.

4.6 Invasive Plant Species

The cumulative effect of Gateway West to invasive plant species are discussed in Section 4.4.10 of the [Final SEIS](#). Past, present and reasonably foreseeable actions that could add to the introduction or spread of weeds were included in the analysis.

Cumulative effects on the introduction and spread of noxious weeds and invasive plants do not differ substantially by Alternative, except by length of the route—longer routes have greater ground disturbance, more access roads, and therefore additional opportunity for introduction or spread of weeds. The No Action Alternative is longer by approximately 26 miles. Given concern for introduction and spread of noxious weeds and invasive plants on both public and private lands, and requirements for the prevention of introduction or spread of noxious weeds imposed on all projects, the cumulative impact of reasonably foreseeable projects, including Gateway West, is not anticipated to be substantial.

4.7 Morley Nelson Snake River Birds of Prey National Conservation Area

Past, present, and reasonably foreseeable activities that could combine with Gateway West and result in cumulative effects on the NCA are discussed in Section 4.4.26 of the [Final SEIS](#). This would include projects with the potential to affect the resources and values for which Congress established the NCA:

- Raptors/upland wildlife,
- Upland habitat/vegetation,
- Cultural resources/NHTs,
- NHTs, and
- Recreation and visitor services

The Modification Act also removed the lands affected by this ROW from NCA status; however, the effects of the transmission line would not change due to the de-designation. The effects from Gateway West would be the same as discussed in the [Final SEIS](#).

5.0 CONSULTATION AND COORDINATION

On August 28, 2017, BLM published a Notice of Intent to Prepare an Environmental Assessment to Reconsider the January 19, 2017, Record of Decision Approving Segments 8 and 9 for the Gateway West Transmission Line Project, Idaho.

The BLM has fulfilled its requirement to conduct Endangered Species Act Section 7 consultation with the U.S. Fish and Wildlife Service. In a memo to the U.S. Fish and Wildlife Service (Appendix G), the BLM concluded that the effects on the relevant ESA listed species from the Alternative 1 assessed in the [Final SEIS](#) and 2017 EA would be the same, reduced, or non-existent in comparison to the Agency Preferred Alternative

routes assessed in the 2013 [Final EIS/BA](#). Additionally, all EPMs related to ESA listed species and enumerated in the 2013 [Final EIS](#), 2016 [Final SEIS](#), and EA and required in the 2017 ROD and Decision Record would be implemented for Alternative 1 if the Proposed Action were to be approved.

In compliance with Section 106 of the NHPA, as amended and the Advisory Council Historic Properties' revised regulations (36 CFR 800), the BLM initiated government-to-government consultation in April 2008 at the beginning of the Gateway West Project. The BLM has maintained government to government consultation while preparing this EA. The consultation has been conducted to inform the Shoshone-Bannock and Shoshone-Paiute Tribes of the proposed undertaking and associated land use plan amendments in order to solicit their concerns and/or comments regarding the possible presence of Traditional Cultural Properties or places of cultural, traditional, or religious importance to the Tribes in the proposed Project area.

The BLM held three Project ad hoc meetings in 2017 discussing the preparation of the EA and associated land use plan amendments as a result of reconsidering the January 19, 2017, BLM decision. The BLM invited the Tribes to provide responses to the agenda items discussed in the September and December ad hoc meetings in consideration of the EA.

Cooperating Agencies participating:

- City of Kuna
- Federal Energy Regulatory Commission
- Governor's Office of Energy and Mineral Resources
- Idaho Army National Guard
- Idaho Fish and Game
- Idaho State Historic Preservation office
- National Park Service
- Twin Falls County, Idaho
- U.S. Fish and Wildlife Service
- U.S. Army Corps of Engineers

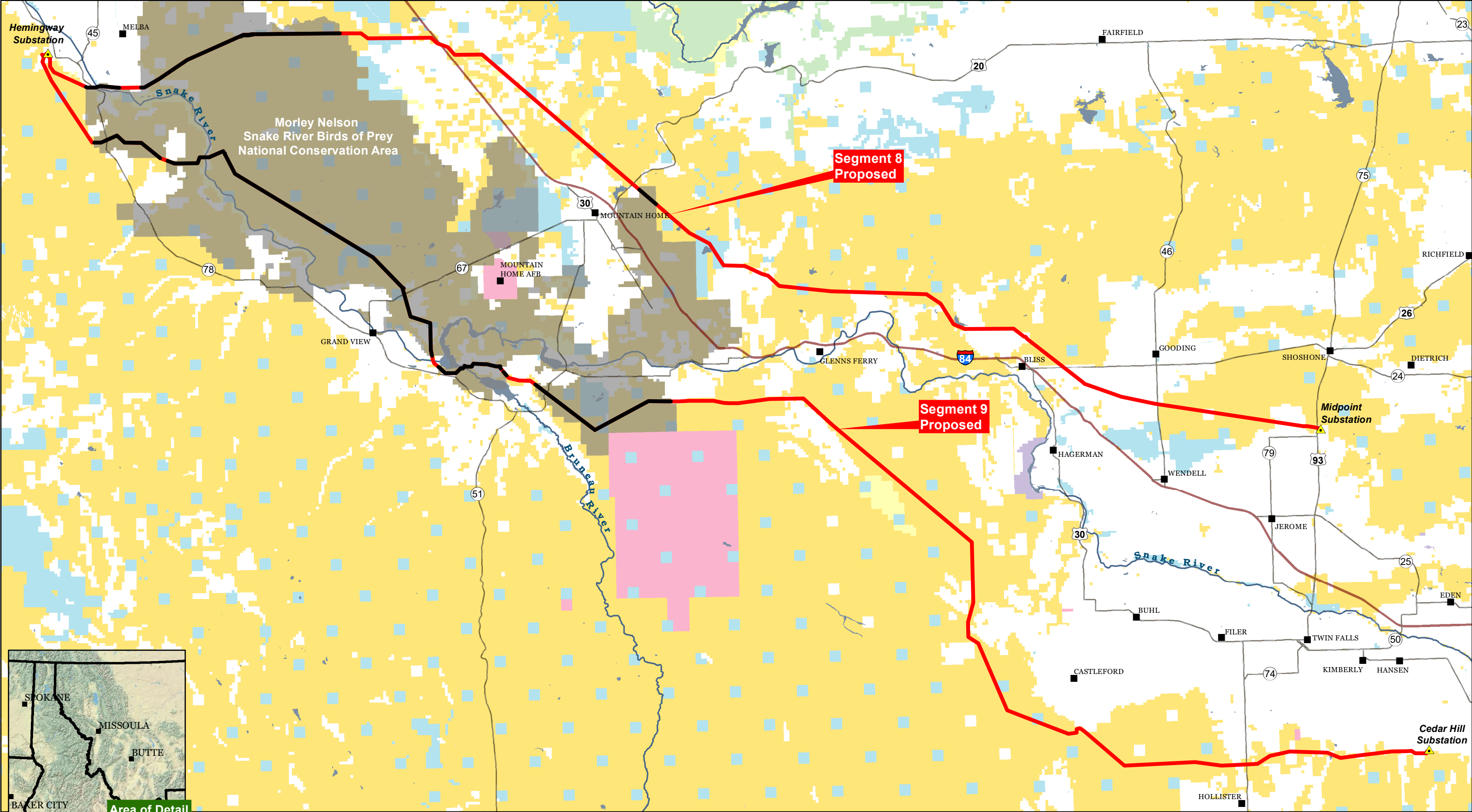
5.1 List of Preparers

Name	Title	Responsibility
Courtney Busse	Realty Specialist	NEPA compliance
Jeanette Gaston	Cultural Resource Specialist	Cultural resources
Eric Mayes	NEPA Specialist	NEPA compliance
James Stobaugh	National Project Manager	Project Manager
Jason Sutter	Wildlife Biologist	Biological resources

**Appendix A
Map of Proposed Action**



Gateway West Appendix A, Proposed Action - Alternative 1



- Segment 8 and 9 Proposed
- National Conservation Area
- Statutory ROW Authorized
- Interstate
- Highway
- Town/City
- Substations
- River
- Waterbody
- Bureau of Land Management
- Private
- US Forest Service
- State
- Bureau of Reclamation
- Department of Defense
- National Park Service

1:500,000

No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of these data for individual use or aggregate use with other data is not guaranteed.

10/31/2017

**Appendix B
Legal Descriptions for Proposed Right-of Way Grant IDI-35849-01
Long-Term Developments**

Appendix B

Legal Descriptions¹ for Proposed Right-of Way Grant IDI-35849-01

Gateway West Transmission Line

Long-Term Developments

The Gateway West Transmission Line Right-of-Way (ROW) located in Idaho, depicted in Appendix A.

This ROW is comprised of:

- 500-kV Transmission Line ROW, for two single circuit 500-kV electric transmission lines, 250 feet wide, being 125 feet on each side of the as-built centerline of the transmission line for segments 8 and 9.
- ROW for access roads, 50 feet wide, over and along existing roads and roads to be constructed, outside the 500-kV Transmission Line ROW.

¹ The legal description includes each surveyed government lot or 40-acre aliquot part crossed by a portion of the Gateway West transmission line right-of-way and associated developments.

Environmental Assessment – Proposed Action

**BUREAU OF LAND MANAGEMENT - Ada County
Boise Meridian – Idaho**

500-kV Transmission Line ROW (30-year term)

T. 1 N., R. 2 E.,

- sec. 31, lot 13, SE1/4SW1/4, and S1/2SE1/4;
- sec. 32, S1/2SW1/4 and S1/2SE1/4;
- sec. 33, S1/2SE1/4;
- sec. 34, S1/2SW1/4 and S1/2SE1/4;
- sec. 35, S1/2SW1/4 and S1/2SE1/4.

T. 1 N., R. 3 E.,

- sec. 31, lot 4, SE1/4SW1/4, and S1/2SE1/4;
- sec. 32, S1/2SW1/4 and S1/2SE1/4;
- sec. 33, S1/2SW1/4 and SW1/4SE1/4.

T. 1 S., R. 1 E.,

- sec. 2, lots 2, 3, and 4;
- sec. 3, lots 1 thru 4, and S1/2NW1/4;
- sec. 4, S1/2NE1/4, N1/2SW1/4, SW1/4SW1/4, and N1/2SE1/4;
- sec. 5, S1/2SE1/4;
- sec. 7, lot 3, NE1/4NE1/4, S1/2NE1/4, SE1/4NW1/4, NE1/4SW1/4, and NW1/4SE1/4;
- sec. 8, NW1/4NE1/4, N1/2NW1/4, and SW1/4NW1/4.

T. 1 S., R. 1 W.,

- sec. 12, SE1/4SW1/4, NE1/4SE1/4, and S1/2SE1/4;
- sec. 13, N1/2NW1/4;
- sec. 14, NE1/4NE1/4, S1/2NE1/4, SE1/4NW1/4, N1/2SW1/4, SW1/4SW1/4, and NW1/4SE1/4;
- sec. 15, S1/2SE1/4;
- sec. 21, SE1/4NE1/4, S1/2SW1/4, N1/2SE1/4, and SW1/4SE1/4;
- sec. 22, N1/2NE1/4, NE1/4NW1/4, S1/2NW1/4, and NW1/4SW1/4;
- sec. 28, lots 1 and 2;
- sec. 29, lots 1, 2, and 5.

T. 1 S., R. 3 E.,

- sec. 1, S1/2NE1/4 and S1/2NW1/4;
- sec. 2, S1/2NE1/4 and S1/2NW1/4;
- sec. 3, S1/2NE1/4 and S1/2NW1/4;
- sec. 4, lots 1, 2, and 3, and S1/2NE1/4.

T. 1 S., R. 4 E.,

- sec. 4, SW1/4NE1/4, S1/2NW1/4, N1/2SE1/4, and SE1/4SE1/4;
- sec. 5, S1/2NE1/4 and S1/2NW1/4.

- T. 2 S., R. 1 E.,
sec. 28, SW1/4NW1/4 and SW1/4;
sec. 29, S1/2NE1/4, N1/2SW1/4, SW1/4SW1/4, and NW1/4SE1/4;
sec. 30, E1/2SE1/4;
sec. 33, W1/2NE1/4, E1/2NW1/4, and SE1/4.
- T. 3 S., R. 1 E.,
sec. 3, SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
sec. 4, lot 1 and SE1/4NE1/4;
sec. 10, NE1/4NE1/4;
sec. 11, S1/2NE1/4, N1/2NW1/4, SE1/4NW1/4, and N1/2SE1/4;
sec. 12, NW1/4SW1/4, S1/2SW1/4, and SW1/4SE1/4;
sec. 13, N1/2NE1/4, SE1/4NE1/4, and NE1/4NW1/4.
- T. 3 S., R. 2 E.,
sec. 17, SW1/4SW1/4;
sec. 18, lot 2, SE1/4NW1/4, NE1/4SW1/4, and SE1/4;
sec. 20, NW1/4NE1/4, S1/2NE1/4, N1/2NW1/4, SE1/4NW1/4, and NE1/4SE1/4;
sec. 21, N1/2SW1/4, SE1/4SW1/4, and S1/2SE1/4;
sec. 26, S1/2SW1/4;
sec. 27, SW1/4NE1/4, NW1/4NW1/4, S1/2NW1/4, NE1/4SW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 28, N1/2NE1/4;
sec. 35, NE1/4 and NE1/4NW1/4.

Off Transmission Line ROW Access Roads (30-year term)

- T. 1 N., R. 2 E.,
sec. 31, lot 13, SE1/4SW1/4, and S1/2SE1/4;
sec. 32, S1/2SW1/4 and S1/2SE1/4;
sec. 33, S1/2SE1/4;
sec. 34, S1/2SW1/4 and S1/2SE1/4;
sec. 35, S1/2SW1/4 and S1/2SE1/4.
- T. 1 N., R. 3 E.,
sec. 31, lot 4, SE1/4SW1/4, and S1/2SE1/4;
sec. 32, S1/2SW1/4 and S1/2SE1/4;
sec. 33, S1/2SW1/4 and S1/2SE1/4;
sec. 34, S1/2SW1/4 and S1/2SE1/4.
- T. 1 N., R. 4 E.,
sec. 31, S1/2SE1/4.
- T. 1 S., R. 1 E.,
sec. 1, lots 1 thru 4;
sec. 2, lots 1 thru 4;
sec. 3, lots 1, 2, and 3, and S1/2NW1/4;
sec. 4, SE1/4NE1/4, SW1/4, and N1/2SE1/4;

- T. 1 S., R. 1 E.,
sec. 5, S1/2SE1/4;
sec. 7, lots 3 and 4, S1/2NE1/4, NE1/4SW1/4, and NW1/4SE1/4;
sec. 8, NW1/4NE1/4, N1/2NW1/4, and SW1/4NW1/4.
- T. 1 S., R. 1 W.,
sec. 12, SE1/4SW1/4 and S1/2SE1/4;
sec. 13, N1/2NW1/4;
sec. 14, NE1/4NE1/4, S1/2NE1/4, N1/2SW1/4, SW1/4SW1/4, and NW1/4SE1/4;
sec. 15, SE1/4SE1/4;
sec. 21, S1/2SW1/4, N1/2SE1/4, and SW1/4SE1/4;
sec. 22, N1/2NE1/4, NE1/4NW1/4, and S1/2NW1/4;
sec. 28, lots 1 and 2;
sec. 29, lots 1, 4, and 5.
- T. 1 S., R. 2 E.,
sec. 1, lots 2, 3, and 4;
sec. 2, lots 1 thru 4.
- T. 1 S., R. 3 E.,
sec. 1, SE1/4NE1/4;
sec. 2, lots 2, 3, and 4, S1/2NE1/4, and SW1/4NW1/4;
sec. 5, lot 4, S1/2NW1/4, N1/2SW1/4, SE1/4SW1/4, and SW1/4SE1/4;
sec. 6, lots 1, 3, and 4;
sec. 8, NE1/4NW1/4.
- T. 1 S., R. 4 E.,
sec. 4, SW1/4NE1/4, S1/2NW1/4, NW1/4SE1/4, and S1/2SE1/4;
sec. 5, S1/2NE1/4 and N1/2SE1/4.
- T. 2 S., R. 1 E.,
sec. 17, SW1/4SE1/4;
sec. 20, E1/2, E1/2NW1/4, and NE1/4SW1/4;
sec. 28, W1/2NW1/4 and NW1/4SW1/4;
sec. 29, NE1/4, SE1/4NW1/4, N1/2SW1/4, and NE1/4SE1/4;
sec. 30, E1/2SE1/4.
- T. 3 S., R. 1 E.,
sec. 3, SW1/4NW1/4.
- T. 3 S., R. 2 E.,
sec. 35, NW1/4NE1/4.

Permanent Off Transmission Line ROW Facilities

There are no aliquots in this county for this feature

BUREAU OF LAND MANAGEMENT - Canyon County
Boise Meridian – Idaho

500-kV Transmission Line ROW (30-year term)

T. 1 S., R. 2 W.,
sec. 25, lot 2.

Off Transmission Line ROW Access Roads (30-year term)

Permanent Off Transmission Line ROW Facilities

There are no aliquots in this county for this feature

BUREAU OF LAND MANAGEMENT - Cassia County
Boise Meridian – Idaho

500-kV Transmission Line ROW (30-year term)

T. 12 S., R. 19 E.,
sec. 5, SW1/4NE1/4 and SE1/4NW1/4.

Off Transmission Line ROW Access Roads (30-year term)

T. 12 S., R. 19 E.,
sec. 5, SW1/4NE1/4 and SE1/4NW1/4.

Permanent Off Transmission Line ROW Facilities

There are no aliquots in this county for this feature

BUREAU OF LAND MANAGEMENT - Elmore County
Boise Meridian – Idaho

500-kV Transmission Line ROW (30-year term)

T. 1 S., R. 4 E.,
sec. 3, SW1/4SW1/4;
sec. 11, S1/2NW1/4, N1/2SW1/4, SE1/4SW1/4, and SW1/4SE1/4;
sec. 13, lot 1, NW1/4NE1/4, and NW1/4NW1/4;
sec. 14, N1/2NE1/4.
T. 1 S., R. 5 E.,
sec. 17, N1/2NW1/4 and SE1/4NW1/4;
sec. 18, lot 1, N1/2NE1/4, and NE1/4NW1/4;
sec. 26, E1/2SW1/4;
sec. 35, NE1/4NW1/4.

- T. 2 S., R. 5 E.,
sec. 1, lots 1 and 2.
- T. 2 S., R. 6 E.,
sec. 6, SE1/4SW1/4 and S1/2SE1/4;
sec. 7, NW1/4NE1/4;
sec. 8, NW1/4SE1/4 and S1/2SE1/4;
sec. 15, SW1/4SW1/4;
sec. 21, NE1/4NE1/4;
sec. 22, SW1/4NE1/4, N1/2NW1/4, SE1/4NW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 25, NW1/4SW1/4 and S1/2SW1/4;
sec. 26, SW1/4NE1/4, N1/2SE1/4, and SE1/4SE1/4.
- T. 2 S., R. 7 E.,
sec. 31, lots 3 and 4, and SE1/4SW1/4.
- T. 3 S., R. 7 E.,
sec. 5, SW1/4 and SW1/4SE1/4;
sec. 6, lots 2 and 3, S1/2NE1/4, and NE1/4SE1/4;
sec. 8, N1/2NE1/4, SE1/4NE1/4, and NE1/4NW1/4;
sec. 9, SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, and SW1/4SE1/4;
sec. 15, S1/2NW1/4, N1/2SW1/4, SE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
sec. 22, NE1/4NE1/4;
sec. 23, NW1/4NW1/4, S1/2NW1/4, NE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
sec. 25, SW1/4NE1/4, NW1/4, NE1/4SW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 26, NE1/4NE1/4.
- T. 3 S., R. 8 E.,
sec. 30, lot 4;
sec. 31, lot 1, SW1/4NE1/4, E1/2NW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 32, S1/2SW1/4.
- T. 4 S., R. 2 E.,
sec. 1, lot 1.
- T. 4 S., R. 3 E.,
sec. 5, NW1/4SW1/4, S1/2SW1/4, and SW1/4SE1/4;
sec. 6, lot 1, S1/2NE1/4, E1/2NW1/4, and N1/2SE1/4;
sec. 14, SW1/4SW1/4;
sec. 15, W1/2NE1/4, N1/2NW1/4, SE1/4NW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 23, SW1/4NE1/4, N1/2NW1/4, SE1/4NW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 24, SW1/4SW1/4;
sec. 25, lots 3 and 7, SW1/4NE1/4, N1/2NW1/4, SE1/4NW1/4, and NW1/4SE1/4.
- T. 4 S., R. 4 E.,
sec. 31, lots 1 thru 4.
- T. 4 S., R. 8 E.,
sec. 5, lots 2, 3, and 4, S1/2NE1/4, SE1/4NW1/4, and NE1/4SE1/4.

- T. 4 S., R. 9 E.,
sec. 19, S1/2NE1/4, SE1/4NW1/4, and NE1/4SE1/4;
sec. 27, NW1/4SW1/4 and S1/2SW1/4;
sec. 34, N1/2NE1/4, SE1/4NE1/4, and N1/2NW1/4;
sec. 35, S1/2NE1/4 and NW1/4.
- T. 4 S., R. 10 E.,
sec. 31, lots 2 and 3, SE1/4NW1/4, NE1/4SW1/4, and N1/2SE1/4;
sec. 32, N1/2SW1/4 and N1/2SE1/4;
sec. 33, S1/2;
sec. 34, S1/2SW1/4;
sec. 35, S1/2SW1/4 and S1/2SE1/4.
- T. 4 S., R. 11 E.,
sec. 31, lots 4 thru 7;
sec. 32, lots 1 thru 4.
- T. 5 S., R. 4 E.,
sec. 6, lots 3, 4, and 5, SE1/4NW1/4, and E1/2SW1/4;
sec. 7, W1/2NE1/4, E1/2NW1/4, and N1/2SE1/4;
sec. 8, N1/2SW1/4, SE1/4SW1/4, and S1/2SE1/4;
sec. 9, SW1/4SW1/4;
sec. 28, E1/2NW1/4 and E1/2SW1/4;
sec. 33, lot 3 and NW1/4NE1/4.
- T. 5 S., R. 11 E.,
sec. 1, SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, and S1/2SE1/4;
sec. 2, lots 1 thru 4, and S1/2NE1/4;
sec. 3, lots 1 thru 4;
sec. 4, lots 1 thru 4;
sec. 5, lots 1 thru 4;
sec. 6, lot 1.
- T. 6 S., R. 9 E.,
sec. 19, lots 2 and 3, S1/2NE1/4, and SE1/4NW1/4;
sec. 20, NE1/4NE1/4, S1/2NE1/4, and S1/2NW1/4;
sec. 21, N1/2;
sec. 22, W1/2NE1/4 and NW1/4;
sec. 23, N1/2NE1/4 and SW1/4NE1/4;
sec. 24, SW1/4NE1/4, N1/2NW1/4, SE1/4NW1/4, N1/2SE1/4, and SE1/4SE1/4.
- T. 6 S., R. 10 E.,
sec. 19, lot 4;
sec. 29, S1/2SW1/4;
sec. 30, lot 1, SW1/4NE1/4, NE1/4NW1/4, and N1/2SE1/4;
sec. 32, NW1/4NE1/4, S1/2NE1/4, E1/2NW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 33, NW1/4SW1/4 and S1/2SW1/4.
- T. 7 S., R. 10 E.,
sec. 3, lots 3 and 4, NE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;

- T. 7 S., R. 10 E.,
sec. 10, NE1/4NE1/4;
sec. 11, SW1/4NE1/4, NW1/4NW1/4, S1/2NW1/4, NE1/4SW1/4, and SE1/4;
sec. 12, SW1/4SW1/4;
sec. 13, SW1/4NE1/4, N1/2NW1/4, SE1/4NW1/4, N1/2SE1/4, and SE1/4SE1/4.
- T. 7 S., R. 11 E.,
sec. 18, lot 4 and SE1/4SW1/4;
sec. 19, lot 1, NW1/4NE1/4, S1/2NE1/4, E1/2NW1/4, and NE1/4SE1/4;
sec. 20, NW1/4SW1/4 and S1/2SW1/4;
sec. 28, SW1/4 and SW1/4SE1/4;
sec. 29, NW1/4NE1/4, S1/2NE1/4, NE1/4NW1/4, and NE1/4SE1/4;
sec. 33, N1/2NE1/4, SE1/4NE1/4, and NE1/4NW1/4;
sec. 34, SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, and SW1/4SE1/4.

Off Transmission Line ROW Access Roads (30-year term)

- T. 1 S., R. 4 E.,
sec. 3, SW1/4SW1/4;
sec. 11, SW1/4NW1/4 and SW1/4SE1/4;
sec. 13, NW1/4NE1/4, S1/2NW1/4, N1/2SW1/4, SE1/4SW1/4, and W1/2SE1/4.
- T. 1 S., R. 5 E.,
sec. 7, E1/2SW1/4, NW1/4SE1/4, and SE1/4SE1/4;
sec. 17, N1/2NW1/4;
sec. 18, lots 1 and 2, NE1/4NE1/4, and NE1/4NW1/4;
sec. 20, W1/2NE1/4;
sec. 28, N1/2NW1/4;
sec. 35, NW1/4NW1/4.
- T. 2 S., R. 5 E.,
sec. 1, lots 2 and 3, and S1/2NW1/4;
sec. 2, lot 2 and S1/2NE1/4.
- T. 2 S., R. 6 E.,
sec. 8, NW1/4SE1/4;
sec. 15, SW1/4SW1/4;
sec. 22, NE1/4SW1/4 and SE1/4;
sec. 23, SE1/4SE1/4;
sec. 25, SW1/4SW1/4;
sec. 26, SE1/4SE1/4;
sec. 27, NE1/4NE1/4.
- T. 2 S., R. 7 E.,
sec. 31, lots 3 and 4, and SE1/4SW1/4.
- T. 3 S., R. 7 E.,
sec. 5, NW1/4SW1/4 and S1/2SW1/4;
sec. 6, lots 2 and 3, S1/2NE1/4, and NE1/4SE1/4;

- T. 3 S., R. 7 E.,
sec. 8, NW1/4NE1/4, S1/2NE1/4, NE1/4NW1/4, and NE1/4SE1/4;
sec. 9, SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, and SW1/4SE1/4;
sec. 15, SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, and S1/2SE1/4;
sec. 21, SE1/4NE1/4;
sec. 22, N1/2NE1/4, SW1/4NE1/4, and S1/2NW1/4;
sec. 23, NW1/4NW1/4, S1/2NW1/4, NE1/4SW1/4, NW1/4SE1/4, and SE1/4SE1/4;
sec. 25, N1/2NW1/4, SE1/4NW1/4, N1/2SW1/4, and SW1/4SW1/4;
sec. 26, N1/2NE1/4 and SW1/4NE1/4.
- T. 3 S., R. 8 E.,
sec. 30, lots 3 and 4, E1/2SW1/4, and SW1/4SE1/4;
sec. 31, lot 4, N1/2NE1/4, SE1/4NE1/4, and NE1/4NW1/4;
sec. 32, SW1/4NW1/4, SW1/4, and SW1/4SE1/4.
- T. 4 S., R. 3 E.,
sec. 25, lot 7.
- T. 4 S., R. 4 E.,
sec. 31, lots 1 and 4, E1/2SW1/4, and NW1/4SE1/4.
- T. 4 S., R. 8 E.,
sec. 5, lots 1, 2, and 4;
sec. 6, lots 1 thru 4, SW1/4NE1/4, and SE1/4NW1/4.
- T. 4 S., R. 9 E.,
sec. 19, NW1/4NE1/4, S1/2NE1/4, E1/2NW1/4, and NE1/4SE1/4;
sec. 27, SW1/4NW1/4 and NW1/4SW1/4.
- T. 4 S., R. 10 E.,
sec. 28, NW1/4SW1/4;
sec. 29, E1/2SE1/4;
sec. 32, NE1/4NE1/4, S1/2NE1/4, and NW1/4SE1/4;
sec. 33, NW1/4SW1/4;
sec. 34, SE1/4SW1/4;
sec. 35, S1/2SW1/4 and S1/2SE1/4.
- T. 4 S., R. 11 E.,
sec. 31, lots 6 and 7;
sec. 32, lot 2, SE1/4NE1/4, and N1/2SE1/4;
sec. 33, SW1/4NW1/4, NW1/4SW1/4, S1/2SW1/4, and SW1/4SE1/4.
- T. 5 S., R. 4 E.,
sec. 6, lot 3, SE1/4NW1/4, and E1/2SW1/4;
sec. 7, W1/2NE1/4 and E1/2NW1/4;
sec. 8, N1/2SW1/4 and SE1/4;
sec. 9, SW1/4NW1/4 and SW1/4;
sec. 27, SW1/4SW1/4;
sec. 28, S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, NW1/4SE1/4, and S1/2SE1/4;
sec. 33, NW1/4NE1/4.

T. 5 S., R. 11 E.,

- sec. 1, lot 4, S1/2NW1/4, and N1/2SW1/4;
- sec. 2, lots 1 thru 4, and SW1/4NE1/4;
- sec. 3, lots 1 thru 4, and SW1/4NW1/4;
- sec. 4, lots 1 thru 4, S1/2NE1/4, and S1/2NW1/4;
- sec. 5, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4, N1/2SE1/4, and SW1/4SE1/4;
- sec. 6, lot 1;
- sec. 8, NW1/4NE1/4 and NE1/4NW1/4.

T. 6 S., R. 9 E.,

- sec. 7, lot 3, NE1/4SW1/4, and SE1/4;
- sec. 14, S1/2SW1/4 and SW1/4SE1/4;
- sec. 15, S1/2SE1/4;
- sec. 17, N1/2NE1/4 and N1/2NW1/4;
- sec. 18, NE1/4NE1/4;
- sec. 19, lot 2, W1/2NE1/4, and SE1/4NW1/4;
- sec. 21, N1/2NE1/4 and N1/2NW1/4;
- sec. 22, NW1/4NE1/4, N1/2NW1/4, and SW1/4NW1/4;
- sec. 23, W1/2NE1/4;
- sec. 24, SW1/4NE1/4 and N1/2SE1/4.

T. 6 S., R. 10 E.,

- sec. 19, SE1/4SW1/4;
- sec. 29, W1/2SW1/4;
- sec. 30, lot 1, S1/2NE1/4, NE1/4NW1/4, and NE1/4SE1/4;
- sec. 32, NE1/4SE1/4.

T. 7 S., R. 10 E.,

- sec. 2, SW1/4SW1/4;
- sec. 3, lot 2, E1/2SW1/4, NW1/4SE1/4, and S1/2SE1/4;
- sec. 10, NE1/4NE1/4, SW1/4NE1/4, E1/2NW1/4, N1/2SE1/4, and SE1/4SE1/4;
- sec. 11, NW1/4NW1/4, NE1/4SW1/4, S1/2SW1/4, NW1/4SE1/4, and S1/2SE1/4;
- sec. 12, NE1/4NE1/4, S1/2NE1/4, SW1/4SW1/4, and W1/2SE1/4;
- sec. 13, NW1/4NE1/4, S1/2NE1/4, N1/2NW1/4, SE1/4NW1/4, SE1/4SW1/4, and SE1/4;
- sec. 14, N1/2NE1/4, NW1/4NW1/4, S1/2NW1/4, N1/2SW1/4, SE1/4SW1/4, and SW1/4SE1/4;
- sec. 15, NE1/4NE1/4;
- sec. 23, N1/2NE1/4 and SE1/4NE1/4;
- sec. 24, N1/2NE1/4, NE1/4NW1/4, S1/2NW1/4, and NW1/4SW1/4.

T. 7 S., R. 11 E.,

- sec. 7, lot 1, NW1/4NE1/4, S1/2NE1/4, and NE1/4NW1/4;
- sec. 18, lot 4;
- sec. 19, S1/2NE1/4;
- sec. 20, SW1/4NW1/4 and W1/2SW1/4;
- sec. 22, W1/2NE1/4, SE1/4NW1/4, SE1/4SW1/4, and W1/2SE1/4;

- T. 7 S., R. 11 E.,
sec. 27, N1/2NW1/4, SW1/4NW1/4, and W1/2SW1/4;
sec. 28, SW1/4NW1/4 and NW1/4SW1/4;
sec. 29, SE1/4NE1/4;
sec. 33, N1/2NE1/4;
sec. 34, NW1/4NW1/4, S1/2NW1/4, E1/2SW1/4, NW1/4SE1/4, and S1/2SE1/4;
sec. 35, SW1/4SW1/4.

Permanent Off Transmission Line ROW Facilities

- T. 4 S., R. 9 E.,
sec. 27, NW1/4SW1/4

BUREAU OF LAND MANAGEMENT - Gooding County Boise Meridian – Idaho

500-kV Transmission Line ROW (30-year term)

- T. 5 S., R. 12 E.,
sec. 7, lots 2, 3, and 4, and E1/2SW1/4;
sec. 17, S1/2SW1/4;
sec. 18, NW1/4NE1/4, S1/2NE1/4, NE1/4NW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 20, NE1/4 and N1/2NW1/4;
sec. 23, S1/2NE1/4 and SE1/4NW1/4;
sec. 24, S1/2NE1/4 and S1/2NW1/4.
- T. 5 S., R. 13 E.,
sec. 19, lot 2, SE1/4NW1/4, and NE1/4SE1/4;
sec. 28, NW1/4SW1/4 and S1/2SW1/4;
sec. 29, E1/2SE1/4;
sec. 33, NW1/4NE1/4, S1/2NE1/4, N1/2NW1/4, and NE1/4SE1/4;
sec. 34, NW1/4SW1/4, S1/2SW1/4, and SW1/4SE1/4.
- T. 6 S., R. 13 E.,
sec. 2, SW1/4NW1/4 and N1/2SW1/4;
sec. 3, lots 1, 2, and 3, and SE1/4NE1/4.
- T. 6 S., R. 15 E.,
sec. 26, SW1/4SW1/4;
sec. 27, S1/2SW1/4 and S1/2SE1/4;
sec. 28, N1/2SW1/4, SE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
sec. 29, N1/2SW1/4 and N1/2SE1/4;
sec. 34, NE1/4NE1/4;
sec. 35, N1/2NE1/4 and N1/2NW1/4.
- T. 6 S., R. 16 E.,
sec. 31, lot 2, S1/2NE1/4, SE1/4NW1/4, and N1/2SE1/4.

Off Transmission Line ROW Access Roads (30-year term)

T. 5 S., R. 12 E.,

- sec. 7, SE1/4SW1/4 and S1/2SE1/4;
- sec. 17, SW1/4SW1/4;
- sec. 18, SE1/4SE1/4;
- sec. 20, NW1/4NE1/4 and N1/2NW1/4.

T. 5 S., R. 13 E.,

- sec. 29, NE1/4SE1/4 and S1/2SE1/4;
- sec. 31, NE1/4SE1/4;
- sec. 32, W1/2NE1/4, SE1/4NW1/4, and N1/2SW1/4;
- sec. 33, NE1/4SW1/4, S1/2SW1/4, and N1/2SE1/4.

T. 6 S., R. 13 E.,

- sec. 2, SW1/4NW1/4 and NW1/4SW1/4.

T. 6 S., R. 15 E.,

- sec. 28, SE1/4SW1/4 and SE1/4SE1/4;
- sec. 35, N1/2NW1/4.

T. 6 S., R. 16 E.,

- sec. 31, lot 4, SW1/4NE1/4, SE1/4NW1/4, NW1/4SE1/4, and S1/2SE1/4.

Permanent Off Transmission Line ROW Facilities

There are no aliquots in this county for this feature

**BUREAU OF LAND MANAGEMENT - Jerome County
Boise Meridian – Idaho**

500-kV Transmission Line ROW (30-year term)

T. 7 S., R. 16 E.,

- sec. 1, lots 1 thru 4, and NE1/4SE1/4;
- sec. 2, lots 1, 2, and 3.

T. 7 S., R. 17 E.,

- sec. 6, lots 3 and 4, and NW1/4SE1/4;
- sec. 10, N1/2NE1/4 and NE1/4NW1/4;
- sec. 11, N1/2NW1/4.

Off Transmission Line ROW Access Roads (30-year term)

T. 7 S., R. 16 E.,

- sec. 1, lots 3 and 4, NE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
- sec. 4, lots 3 and 4, N1/2SW1/4, and SW1/4SW1/4;
- sec. 5, lots 1, 2, and 3;
- sec. 12, E1/2NE1/4.

T. 7 S., R. 17 E.,
sec. 6, lots 4 and 5.

Permanent Off Transmission Line ROW Facilities

There are no aliquots in this county for this feature

BUREAU OF LAND MANAGEMENT - Lincoln County Boise Meridian – Idaho

500-kV Transmission Line ROW (30-year term)

T. 6 S., R. 16 E.,
sec. 32, N1/2SW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 33, NW1/4SW1/4, S1/2SW1/4, and S1/2SE1/4;
sec. 34, S1/2SW1/4 and SW1/4SE1/4.

Off Transmission Line ROW Access Roads (30-year term)

T. 6 S., R. 16 E.,
sec. 32, S1/2SW1/4, NE1/4SE1/4, and S1/2SE1/4;
sec. 33, SW1/4NE1/4, SE1/4NW1/4, N1/2SW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 34, S1/2SW1/4 and S1/2SE1/4.

Permanent Off Transmission Line ROW Facilities

There are no aliquots in this county for this feature

BUREAU OF LAND MANAGEMENT - Owyhee County Boise Meridian – Idaho

500-kV Transmission Line ROW (30-year term)

T. 1 S., R. 2 W.,
sec. 19, lot 4 and SE1/4SW1/4;
sec. 29, W1/2NW1/4, NE1/4SW1/4, and N1/2SE1/4;
sec. 30, N1/2NE1/4, SE1/4NE1/4, and NE1/4NW1/4.
T. 1 S., R. 3 W.,
sec. 11, lots 1 thru 3;
sec. 14, SW1/4NE1/4, W1/2SW1/4, and W1/2SE1/4;
sec. 23, lots 1 thru 4, SE1/4NE1/4, S1/2NW1/4, E1/2SW1/4, and W1/2SE1/4;
sec. 24, lot 16, S1/2NW1/4, NE1/4SW1/4, and NW1/4SE1/4;
sec. 25, NW1/4SW1/4 and S1/2SW1/4;
sec. 26, NE1/4 and NE1/4SE1/4.

- T. 2 S., R. 1 E.,
sec. 30, lots 13 and 14.
- T. 2 S., R. 1 W.,
sec. 19, lot 3, NE1/4SW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 20, S1/2SW1/4;
sec. 25, lot 4;
sec. 28, NW1/4SW1/4, S1/2SW1/4, and SW1/4SE1/4;
sec. 29, NW1/4NE1/4, S1/2NE1/4, N1/2NW1/4, SE1/4NW1/4, and NE1/4SE1/4;
sec. 33, lots 5 thru 7;
sec. 34, lots 5 thru 11;
sec. 35, lots 5 thru 12;
sec. 36, lots 1, 2, and 3, SW1/4NE1/4, S1/2NW1/4, N1/2SW1/4, and NW1/4SE1/4.
- T. 2 S., R. 2 W.,
sec. 6, lots 4 and 5, SE1/4NW1/4, E1/2SW1/4, and SW1/4SE1/4;
sec. 7, N1/2NE1/4, SE1/4NE1/4, and NE1/4SE1/4;
sec. 8, NW1/4SW1/4 and S1/2SW1/4;
sec. 14, SE1/4SW1/4 and SW1/4SE1/4;
sec. 17, SW1/4NE1/4, E1/2NW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 20, NE1/4NE1/4;
sec. 21, NW1/4NW1/4, S1/2NW1/4, N1/2SW1/4, and N1/2SE1/4;
sec. 22, NE1/4NE1/4, S1/2NE1/4, S1/2NW1/4, and N1/2SW1/4;
sec. 23, N1/2NE1/4, SE1/4NE1/4, and N1/2NW1/4;
sec. 24, SW1/4NW1/4, N1/2SW1/4, and N1/2SE1/4.
- T. 2 S., R. 3 W.,
sec. 1, lot 1.
- T. 5 S., R. 4 E.,
sec. 33, S1/2SE1/4;
sec. 34, SW1/4SW1/4.
- T. 5 S., R. 5 E.,
sec. 31, lots 8, 9, and 10, and SE1/4SE1/4;
sec. 32, S1/2SW1/4;
sec. 33, S1/2SW1/4.
- T. 6 S., R. 4 E.,
sec. 1, lots 1 thru 4;
sec. 2, lot 1, S1/2NE1/4, SE1/4NW1/4, and NW1/4SE1/4;
sec. 3, lots 3 and 4, S1/2NE1/4, and SE1/4NW1/4.
- T. 6 S., R. 5 E.,
sec. 3, SW1/4SW1/4;
sec. 4, lots 5 thru 9 and lot 11;
sec. 10, NW1/4NE1/4, SE1/4NE1/4, and N1/2NW1/4;
sec. 11, S1/2NE1/4 and S1/2NW1/4;
sec. 12, S1/2NW1/4, NE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
sec. 13, NE1/4NE1/4.

- T. 6 S., R. 6 E.,
sec. 7, lot 4;
sec. 17, S1/2SW1/4;
sec. 18, lot 1, SW1/4NE1/4, E1/2NW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 20, NW1/4NE1/4, S1/2NE1/4, N1/2NW1/4, and NE1/4SE1/4;
sec. 21, SW1/4 and SW1/4SE1/4;
sec. 27, SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
sec. 28, N1/2NE1/4 and SE1/4NE1/4;
sec. 34, NE1/4NE1/4;
sec. 35, SW1/4NE1/4, NW1/4NW1/4, S1/2NW1/4, NE1/4SW1/4, and N1/2SE1/4.
- T. 6 S., R. 7 E.,
sec. 20, SE1/4SE1/4;
sec. 21, SE1/4NE1/4, NE1/4SW1/4, S1/2SW1/4, N1/2SE1/4, and SW1/4SE1/4;
sec. 22, NE1/4, NE1/4NW1/4, S1/2NW1/4, and NW1/4SW1/4;
sec. 23, N1/2;
sec. 24, NW1/4;
sec. 28, NW1/4NW1/4;
sec. 29, N1/2NE1/4, SW1/4NE1/4, NE1/4NW1/4, S1/2NW1/4, and NW1/4SW1/4;
sec. 30, lot 4, SE1/4NE1/4, E1/2SW1/4, N1/2SE1/4, and SW1/4SE1/4;
sec. 31, lot 1.
- T. 6 S., R. 8 E.,
sec. 19, S1/2NE1/4;
sec. 20, N1/2;
sec. 21, S1/2NE1/4 and S1/2NW1/4;
sec. 22, S1/2NE1/4 and S1/2NW1/4;
sec. 23, S1/2NW1/4, N1/2SW1/4, and N1/2SE1/4;
sec. 24, S1/2NE1/4, N1/2SW1/4, and N1/2SE1/4.
- T. 8 S., R. 11 E.,
sec. 2, SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
sec. 3, lots 1 and 2, and SE1/4NE1/4;
sec. 11, N1/2NE1/4;
sec. 12, NW1/4NW1/4, S1/2NW1/4, NE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
sec. 13, NE1/4NE1/4.
- T. 8 S., R. 12 E.,
sec. 17, SW1/4SW1/4;
sec. 18, lots 1 and 2, SW1/4NE1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 20, S1/2NE1/4, N1/2NW1/4, SE1/4NW1/4, N1/2SE1/4, and SE1/4SE1/4;
sec. 21, NW1/4SW1/4 and S1/2SW1/4;
sec. 27, W1/2SW1/4;
sec. 28, NW1/4NE1/4, S1/2NE1/4, NE1/4NW1/4, and NE1/4SE1/4;
sec. 34, W1/2NW1/4 and W1/2SW1/4.

- T. 9 S., R. 12 E.,
- sec. 3, lot 4, SW1/4NW1/4, and W1/2SW1/4;
 - sec. 4, lot 1, SE1/4NE1/4, and E1/2SE1/4;
 - sec. 9, E1/2NE1/4 and E1/2SE1/4;
 - sec. 10, W1/2NW1/4 and W1/2SW1/4;
 - sec. 15, W1/2NW1/4 and W1/2SW1/4;
 - sec. 21, E1/2SE1/4;
 - sec. 22, W1/2NW1/4 and W1/2SW1/4;
 - sec. 27, lot 3;
 - sec. 28, lot 1 and lots 4 thru 8;
 - sec. 33, W1/2NE1/4, E1/2SW1/4, and W1/2SE1/4.
- T. 10 S., R. 12 E.,
- sec. 4, lot 3, SE1/4NW1/4, and E1/2SW1/4;
 - sec. 9, NE1/4 and NE1/4NW1/4;
 - sec. 10, lot 3 and N1/2SW1/4.

Off Transmission Line ROW Access Roads (30-year term)

- T. 1 S., R. 2 W.,
- sec. 19, lot 4 and SE1/4SW1/4;
 - sec. 29, W1/2NW1/4, NE1/4SW1/4, and N1/2SE1/4;
 - sec. 30, N1/2NE1/4, SE1/4NE1/4, and NE1/4NW1/4.
- T. 1 S., R. 3 W.,
- sec. 3, SE1/4SW1/4 and SW1/4SE1/4;
 - sec. 10, W1/2NE1/4, SE1/4NW1/4, and NW1/4SE1/4;
 - sec. 11, lots 1 thru 3;
 - sec. 14, SW1/4NE1/4, W1/2SW1/4, and W1/2SE1/4;
 - sec. 22, lot 1;
 - sec. 23, lots 1 thru 4, SE1/4NE1/4, S1/2NW1/4, E1/2SW1/4, and SW1/4SE1/4;
 - sec. 24, lot 7, SW1/4NE1/4, S1/2NW1/4, and NW1/4SE1/4;
 - sec. 25, W1/2SW1/4;
 - sec. 26, NW1/4NE1/4, S1/2NE1/4, and E1/2SE1/4;
 - sec. 35, N1/2NE1/4, SE1/4NE1/4, NE1/4NW1/4, and NE1/4SE1/4.
- T. 2 S., R. 1 E.,
- sec. 30, lots 13 and 14;
 - sec. 31, lots 4 and 5.
- T. 2 S., R. 1 W.,
- sec. 19, lot 3 and E1/2SW1/4;
 - sec. 25, lot 4;
 - sec. 28, NW1/4SW1/4, S1/2SW1/4, and SW1/4SE1/4;
 - sec. 29, S1/2NE1/4, NE1/4NW1/4, S1/2NW1/4, NW1/4SW1/4, and E1/2SE1/4;
 - sec. 30, lots 3 and 4, E1/2NW1/4, NE1/4SW1/4, and N1/2SE1/4;

- T. 2 S., R. 1 W.,
 sec. 32, lots 5 and 7 and lots 10 thru 12;
 sec. 33, lots 5 thru 9 and lot 16;
 sec. 34, lots 5 thru 8, and lots 11, 16, and 17;
 sec. 35, lot 9;
 sec. 36, lots 1, 2, and 3, N1/2SW1/4, and NW1/4SE1/4.
- T. 2 S., R. 2 W.,
 sec. 4, lots 5 and 8, SE1/4SW1/4, and W1/2SE1/4;
 sec. 6, lots 4 thru 7 and E1/2SW1/4;
 sec. 8, S1/2;
 sec. 9, N1/2NW1/4, SW1/4NW1/4, and W1/2SW1/4;
 sec. 14, SW1/4SE1/4;
 sec. 17, NE1/4 and E1/2SE1/4;
 sec. 20, NE1/4NE1/4;
 sec. 21, SW1/4NE1/4, NW1/4, NE1/4SW1/4, and N1/2SE1/4;
 sec. 22, SE1/4NW1/4, N1/2SW1/4, and NW1/4SE1/4;
 sec. 23, N1/2NE1/4 and N1/2NW1/4;
 sec. 24, NE1/4SE1/4;
 sec. 25, S1/2SE1/4;
 sec. 35, NE1/4NW1/4.
- T. 2 S., R. 3 W.,
 sec. 1, lot 1, SE1/4NE1/4, and NE1/4SE1/4.
- T. 3 S., R. 1 W.,
 sec. 3, lot 5;
 sec. 5, lots 5 thru 9;
 sec. 6, SE1/4SE1/4;
 sec. 7, lot 5.
- T. 5 S., R. 4 E.,
 sec. 33, SE1/4SE1/4;
 sec. 34, SW1/4SW1/4.
- T. 5 S., R. 5 E.,
 sec. 31, SE1/4SE1/4;
 sec. 32, NW1/4SW1/4 and S1/2SW1/4;
 sec. 33, SE1/4SW1/4.
- T. 6 S., R. 4 E.,
 sec. 1, lot 4 and SW1/4NW1/4;
 sec. 2, lot 3, S1/2NE1/4, and SE1/4NW1/4;
 sec. 3, lots 1 thru 4, S1/2NE1/4, and SE1/4NW1/4.
- T. 6 S., R. 5 E.,
 sec. 1, SW1/4SW1/4;
 sec. 3, S1/2SW1/4;
 sec. 4, lots 5, 7, 8, and 9;

- T. 6 S., R. 5 E.,
 sec. 10, N1/2NW1/4;
 sec. 11, NE1/4NE1/4, S1/2NE1/4, and SW1/4NW1/4;
 sec. 12, NW1/4, NE1/4SW1/4, N1/2SE1/4, and SE1/4SE1/4.
- T. 6 S., R. 6 E.,
 sec. 7, lot 4 and SE1/4SW1/4;
 sec. 18, lots 1 and 2, SW1/4NE1/4, E1/2NW1/4, and N1/2SE1/4;
 sec. 20, S1/2NE1/4 and NE1/4SE1/4;
 sec. 21, NW1/4SW1/4, S1/2SW1/4, and SW1/4SE1/4;
 sec. 28, NW1/4NE1/4;
 sec. 34, NE1/4, SE1/4NW1/4, and S1/2SE1/4;
 sec. 35, NW1/4NW1/4, S1/2NW1/4, NE1/4SW1/4, S1/2SW1/4, and NW1/4SE1/4.
- T. 6 S., R. 7 E.,
 sec. 9, E1/2SE1/4;
 sec. 10, W1/2NW1/4 and SW1/4SW1/4;
 sec. 15, W1/2NW1/4, SW1/4, and SW1/4SE1/4;
 sec. 20, SE1/4SE1/4;
 sec. 21, NE1/4NE1/4, S1/2NE1/4, SE1/4NW1/4, N1/2SW1/4, and SW1/4SW1/4;
 sec. 22, N1/2NE1/4 and W1/2NW1/4;
 sec. 24, E1/2NW1/4;
 sec. 29, NE1/4, S1/2NW1/4, W1/2SW1/4, N1/2SE1/4, and SW1/4SE1/4;
 sec. 30, lot 4, SE1/4NE1/4, E1/2SW1/4, and SE1/4;
 sec. 31, lot 1, N1/2NE1/4, SE1/4NE1/4, NE1/4NW1/4, and NE1/4SE1/4;
 sec. 32, W1/2NE1/4, NW1/4SW1/4, S1/2SW1/4, and W1/2SE1/4.
- T. 6 S., R. 8 E.,
 sec. 11, S1/2NE1/4 and W1/2SE1/4;
 sec. 12, S1/2NE1/4, S1/2NW1/4, N1/2SW1/4, and NE1/4SE1/4;
 sec. 13, SW1/4SW1/4;
 sec. 14, NW1/4NE1/4, S1/2NE1/4, and E1/2SE1/4;
 sec. 20, N1/2NE1/4, SE1/4NE1/4, and N1/2NW1/4;
 sec. 21, NE1/4NE1/4;
 sec. 22, N1/2NW1/4 and SE1/4NW1/4;
 sec. 23, N1/2SE1/4 and SE1/4SE1/4;
 sec. 24, NW1/4NW1/4, S1/2NW1/4, NE1/4SW1/4, SW1/4SW1/4, and W1/2SE1/4;
 sec. 25, NW1/4NE1/4, S1/2NE1/4, N1/2NW1/4, SE1/4NW1/4, E1/2SW1/4,
 N1/2SE1/4, and SE1/4SE1/4.
- T. 7 S., R. 6 E.,
 sec. 1, lot 2, SW1/4NE1/4, S1/2NW1/4, NE1/4SW1/4, and N1/2SE1/4;
 sec. 2, lots 1, 2, and 3, and SE1/4NE1/4.
- T. 8 S., R. 11 E.,
 sec. 2, lots 2, 3, and 4, SW1/4NE1/4, SE1/4NW1/4, SW1/4, and S1/2SE1/4;
 sec. 11, N1/2NE1/4;
 sec. 12, W1/2NW1/4, E1/2SW1/4, NW1/4SE1/4, and S1/2SE1/4;

T. 8 S., R. 11 E.,

sec. 13, NE1/4NE1/4.

T. 8 S., R. 12 E.,

sec. 7, lot 4;

sec. 17, SW1/4NW1/4, N1/2SW1/4, and SE1/4SW1/4;

sec. 18, lots 1 and 2, NW1/4NE1/4, and S1/2NE1/4;

sec. 20, S1/2NE1/4, E1/2NW1/4, N1/2SE1/4, and SW1/4SE1/4;

sec. 21, SW1/4;

sec. 27, NW1/4SW1/4 and S1/2SW1/4;

sec. 28, NW1/4NE1/4, S1/2NE1/4, N1/2NW1/4, SE1/4NW1/4, and E1/2SE1/4;

sec. 33, NE1/4NE1/4, S1/2NE1/4, and NE1/4SE1/4;

sec. 34, N1/2NW1/4, SW1/4NW1/4, NW1/4SW1/4, and S1/2SW1/4.

T. 9 S., R. 12 E.,

sec. 3, lot 4, SW1/4NW1/4, and NW1/4SW1/4;

sec. 4, SE1/4SW1/4, NE1/4SE1/4, and S1/2SE1/4;

sec. 9, N1/2NE1/4 and NE1/4NW1/4;

sec. 10, SW1/4SW1/4;

sec. 15, W1/2NW1/4 and NW1/4SW1/4;

sec. 22, W1/2NW1/4 and NW1/4SW1/4;

sec. 27, lots 3, 4, 8, and 9;

sec. 28, lot 4;

sec. 33, NE1/4NE1/4, S1/2NE1/4, SE1/4NW1/4, NE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;

sec. 34, lot 1.

T. 10 S., R. 12 E.,

sec. 3, lots 5 and 6;

sec. 4, E1/2SW1/4 and SW1/4SE1/4;

sec. 9, N1/2NE1/4 and SE1/4NE1/4;

sec. 10, lots 1 thru 4, and N1/2SW1/4;

sec. 15, W1/2SW1/4;

sec. 21, E1/2NE1/4;

sec. 22, W1/2NW1/4.

Permanent Off Transmission Line ROW Facilities

T. 9 S., R. 12 E.,

sec. 22, SW1/4SW1/4

**BUREAU OF LAND MANAGEMENT – Twin Falls County
Boise Meridian – Idaho**

500-kV Transmission Line ROW (30-year term)

T. 10 S., R. 12 E.,

- sec. 10, lot 8 and SE1/4SW1/4;
- sec. 15, W1/2NE1/4, NE1/4NW1/4, N1/2SE1/4, and SE1/4SE1/4;
- sec. 22, E1/2NE1/4;
- sec. 23, W1/2NW1/4, NW1/4SW1/4, and S1/2SW1/4;
- sec. 26, SW1/4NE1/4, E1/2NW1/4, NE1/4SW1/4, and W1/2SE1/4;
- sec. 35, N1/2NE1/4, SE1/4NE1/4, and E1/2SE1/4.

T. 11 S., R. 12 E.,

- sec. 1, lots 3 and 4, S1/2NW1/4, E1/2SW1/4, and SW1/4SE1/4;
- sec. 12, NW1/4NE1/4, S1/2NE1/4, and N1/2SE1/4.

T. 11 S., R. 13 E.,

- sec. 7, lots 3 and 4, SE1/4SW1/4, and SW1/4SE1/4;
- sec. 15, SW1/4SW1/4;
- sec. 17, S1/2NE1/4, NW1/4, and NE1/4SE1/4;
- sec. 18, N1/2NE1/4;
- sec. 21, NE1/4NE1/4;
- sec. 22, NW1/4NE1/4, S1/2NE1/4, and N1/2NW1/4;
- sec. 23, S1/2NW1/4, N1/2SW1/4, N1/2SE1/4, and SE1/4SE1/4;
- sec. 24, SE1/4NE1/4, S1/2SW1/4, NE1/4SE1/4, and S1/2SE1/4.

T. 11 S., R. 14 E.,

- sec. 19, lot 2, SE1/4NW1/4, NE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
- sec. 28, SW1/4SW1/4;
- sec. 29, SW1/4NE1/4, NW1/4, NE1/4SW1/4, N1/2SE1/4, and SE1/4SE1/4;
- sec. 30, NE1/4NE1/4;
- sec. 33, SW1/4NE1/4, N1/2NW1/4, SE1/4NW1/4, N1/2SE1/4, and SE1/4SE1/4;
- sec. 34, SW1/4SW1/4.

T. 11 S., R. 17 E.,

- sec. 32, N1/2SW1/4SE1/4, SE1/4SW1/4SE1/4, and SE1/4SE1/4;
- sec. 33, SW1/4SW1/4.

T. 12 S., R. 14 E.,

- sec. 1, S1/2SW1/4 and S1/2SE1/4;
- sec. 2, NW1/4SW1/4, S1/2SW1/4, and S1/2SE1/4;
- sec. 3, lots 2, 3, and 4, S1/2NE1/4, SE1/4NW1/4, and N1/2SE1/4.

T. 12 S., R. 15 E.,

- sec. 1, S1/2SW1/4 and S1/2SE1/4;
- sec. 2, N1/2SW1/4 and SE1/4;
- sec. 3, N1/2SW1/4 and N1/2SE1/4;
- sec. 4, SW1/4, N1/2SE1/4, and SW1/4SE1/4;
- sec. 5, S1/2;
- sec. 6, lot 7, SE1/4SW1/4, and SE1/4.

T. 12 S., R. 16 E.,

- sec. 1, lots 1, 2, and 3, SW1/4NE1/4, and S1/2NW1/4;
- sec. 2, SE1/4NE1/4, NE1/4SW1/4, S1/2SW1/4, and N1/2SE1/4;
- sec. 3, S1/2SW1/4 and SE1/4SE1/4;
- sec. 4, SE1/4SE1/4;
- sec. 6, lot 7, SE1/4SW1/4, and SW1/4SE1/4;
- sec. 7, lot 1, N1/2NE1/4, and NE1/4NW1/4;
- sec. 8, N1/2NE1/4 and N1/2NW1/4;
- sec. 9, NE1/4NE1/4;
- sec. 10, N1/2NE1/4 and N1/2NW1/4;
- sec. 11, NW1/4NW1/4.

T. 12 S., R. 17 E.,

- sec. 1, S1/2NW1/4, N1/2SW1/4, and N1/2SE1/4;
- sec. 2, lots 3 and 4;
- sec. 3, lots 1, 2, and 3;
- sec. 4, lots 1 thru 4;
- sec. 5, lots 1 and 5;
- sec. 6, lots 3, 4, and 9.

T. 12 S., R. 18 E.,

- sec. 2, lots 1 thru 4;
- sec. 3, lots 1, 2, and 3, SE1/4NE1/4, and S1/2NW1/4;
- sec. 4, S1/2NE1/4 and S1/2NW1/4;
- sec. 5, SE1/4NE1/4;
- sec. 6, SE1/4NE1/4, NE1/4SW1/4, and N1/2SE1/4.

Off Transmission Line ROW Access Roads (30-year term)

T. 8 S., R. 12 E.,

- sec. 27, SW1/4SE1/4;
- sec. 34, NW1/4NE1/4, S1/2NE1/4, N1/2SE1/4, and SW1/4SE1/4;
- sec. 35, S1/2NE1/4, N1/2SW1/4, and NW1/4SE1/4.

T. 9 S., R. 12 E.,

- sec. 2, S1/2SW1/4;
- sec. 3, lot 3, SE1/4NW1/4, NE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
- sec. 10, S1/2SE1/4;
- sec. 11, NE1/4, N1/2NW1/4, SE1/4NW1/4, NE1/4SW1/4, S1/2SW1/4, and NW1/4SE1/4;
- sec. 12, S1/2NE1/4, S1/2NW1/4, and NE1/4SE1/4;
- sec. 15, NW1/4NE1/4, NE1/4NW1/4, and E1/2SW1/4;
- sec. 22, W1/2NE1/4, NE1/4NW1/4, E1/2SW1/4, and SE1/4.

T. 9 S., R. 13 E.,

- sec. 7, lots 2 and 3, NE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
- sec. 8, SW1/4SW1/4;

- T. 9 S., R. 13 E.,
 sec. 17, NW1/4NW1/4;
 sec. 18, NE1/4NE1/4.
- T. 10 S., R. 12 E.,
 sec. 11, SW1/4SW1/4;
 sec. 14, NW1/4NW1/4;
 sec. 15, NE1/4NE1/4, S1/2NE1/4, NE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
 sec. 22, N1/2NE1/4 and NE1/4NW1/4;
 sec. 25, SW1/4NW1/4 and NW1/4SW1/4;
 sec. 26, SE1/4NE1/4, N1/2SE1/4, and SW1/4SE1/4;
 sec. 35, NW1/4NE1/4, SE1/4NE1/4, and E1/2SE1/4.
- T. 11 S., R. 12 E.,
 sec. 1, lot 4, S1/2NW1/4, and E1/2SW1/4;
 sec. 12, NW1/4NE1/4, S1/2NE1/4, E1/2NW1/4, N1/2SW1/4, and N1/2SE1/4.
- T. 11 S., R. 13 E.,
 sec. 7, lot 3, E1/2SW1/4, and SW1/4SE1/4;
 sec. 17, S1/2NE1/4, NW1/4NW1/4, S1/2NW1/4, and NE1/4SE1/4;
 sec. 18, N1/2NE1/4 and SE1/4NE1/4;
 sec. 22, NW1/4NE1/4, SE1/4NE1/4, and N1/2NW1/4;
 sec. 23, SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, and SW1/4SE1/4;
 sec. 24, SE1/4NE1/4 and S1/2SE1/4;
 sec. 25, NE1/4, S1/2NW1/4, NE1/4SW1/4, and N1/2SE1/4;
 sec. 26, N1/2NE1/4 and SE1/4NE1/4.
- T. 11 S., R. 14 E.,
 sec. 19, lots 2 and 4, SE1/4NW1/4, NE1/4SW1/4, NW1/4SE1/4, and S1/2SE1/4;
 sec. 29, SW1/4NE1/4, N1/2NW1/4, and SE1/4NW1/4;
 sec. 30, lots 1 and 2, and NE1/4NE1/4;
 sec. 33, N1/2NW1/4 and N1/2SE1/4;
 sec. 34, S1/2SW1/4;
 sec. 35, SW1/4SE1/4.
- T. 11 S., R. 15 E.,
 sec. 31, lot 4.
- T. 11 S., R. 16 E.,
 sec. 35, SW1/4SW1/4.
- T. 11 S., R. 17 E.,
 sec. 31, SE1/4SW1/4;
 sec. 32, SE1/4SE1/4;
 sec. 33, S1/2SW1/4 and S1/2SE1/4.
- T. 12 S., R. 14 E.,
 sec. 1, lots 1, 3, and 4, S1/2NE1/4, SE1/4NW1/4, N1/2SE1/4, and SE1/4SE1/4;
 sec. 2, lot 2, SW1/4NE1/4, N1/2SW1/4, and W1/2SE1/4;
 sec. 3, lot 3, S1/2NE1/4, and NE1/4SE1/4.

T. 12 S., R. 15 E.,

- sec. 1, lot 4, SW1/4NE1/4, S1/2NW1/4, SE1/4SW1/4, and SE1/4;
- sec. 2, lots 1 and 2, SW1/4NE1/4, and NW1/4SE1/4;
- sec. 4, lots 1 and 2, S1/2NE1/4, N1/2SW1/4, and N1/2SE1/4;
- sec. 5, N1/2SW1/4 and N1/2SE1/4;
- sec. 6, lots 4 thru 7, NE1/4SW1/4, and N1/2SE1/4.

T. 12 S., R. 16 E.,

- sec. 1, lots 1 thru 4, SW1/4NW1/4, and SW1/4SW1/4;
- sec. 2, lots 1, 3, and 4, SE1/4NE1/4, SE1/4NW1/4, NE1/4SW1/4, S1/2SW1/4, NW1/4SE1/4, and S1/2SE1/4;
- sec. 3, S1/2SW1/4;
- sec. 6, lot 7, SE1/4SW1/4, and SW1/4SE1/4;
- sec. 7, NW1/4NE1/4;
- sec. 8, NE1/4NE1/4;
- sec. 11, N1/2NW1/4.

T. 12 S., R. 17 E.,

- sec. 1, lot 1, SE1/4NE1/4, SW1/4NW1/4, NW1/4SW1/4, and NE1/4SE1/4;
- sec. 2, lots 3 and 4, SE1/4NW1/4, and NE1/4SE1/4;
- sec. 3, lots 1, 2, and 3;
- sec. 4, lots 1 thru 4;
- sec. 6, lots 3 and 4;
- sec. 11, NW1/4NW1/4.

T. 12 S., R. 18 E.,

- sec. 2, lots 1 thru 4;
- sec. 3, lots 1 and 2, SE1/4NE1/4, and S1/2NW1/4;
- sec. 4, S1/2NE1/4, S1/2NW1/4, and N1/2SE1/4;
- sec. 6, SE1/4NE1/4 and NE1/4SE1/4.

Permanent Off Transmission Line ROW Facilities

There are no aliquots in this county for this feature

BUREAU OF RECLAMATION - Ada County
Boise Meridian – Idaho

500-kV Transmission Line ROW (30-year term)

There are no aliquots in this county for this feature

Off Transmission Line ROW Access Roads (30-year term)

There are no aliquots in this county for this feature

Permanent Off Transmission Line ROW Facilities

There are no aliquots in this county for this feature

BUREAU OF RECLAMATION - Canyon County
Boise Meridian – Idaho

500-kV Transmission Line ROW (30-year term)

T. 1 S., R. 2 W.,
sec. 26, N1/2SW1/4 and NW1/4SE1/4;
sec. 27, lots 3 and 4, and N1/2SE1/4.

Off Transmission Line ROW Access Roads (30-year term)

T. 1 S., R. 2 W.,
sec. 25, SW1/4SE1/4;
sec. 26, lot 1, N1/2SW1/4, and NW1/4SE1/4;
sec. 27, lots 3 and 4, and N1/2SE1/4.

Permanent Off Transmission Line ROW Facilities

There are no aliquots in this county for this feature

BUREAU OF RECLAMATION - Elmore County
Boise Meridian – Idaho

500-kV Transmission Line ROW (30-year term)

T. 1 S., R. 4 E.,
sec. 13, NE1/4NW1/4.
T. 1 S., R. 5 E.,
sec. 21, NE1/4SE1/4.
T. 2 S., R. 6 E.,
sec. 23, SW1/4SW1/4;
sec. 26, N1/2NW1/4 and SE1/4NW1/4.

Off Transmission Line ROW Access Roads (30-year term)

T. 1 S., R. 4 E.,
sec. 13, lot 3 and NE1/4NW1/4.
T. 1 S., R. 5 E.,
sec. 21, S1/2SW1/4 and SE1/4.
T. 2 S., R. 6 E.,
sec. 23, W1/2SW1/4;

T. 2 S., R. 6 E.,
sec. 26, N1/2NW1/4 and SE1/4NW1/4.

Permanent Off Transmission Line ROW Facilities

There are no aliquots in this county for this feature

BUREAU OF RECLAMATION - Owyhee County
Boise Meridian – Idaho

500-kV Transmission Line ROW (30-year term)

T. 1 S., R. 2 W.,
sec. 28, lots 9 and 10, and NW1/4SW1/4;
sec. 29, SE1/4NW1/4.
T. 1 S., R. 3 W.,
sec. 24, lot 15.
T. 2 S., R. 1 E.,
sec. 30, lot 15.

Off Transmission Line ROW Access Roads (30-year term)

T. 1 S., R. 2 W.,
sec. 28, lots 9 and 10, NW1/4SW1/4, S1/2SW1/4, and SW1/4SE1/4;
sec. 29, SE1/4NW1/4.
T. 1 S., R. 3 W.,
sec. 24, lot 15.

Permanent Off Transmission Line ROW Facilities

There are no aliquots in this county for this feature

**Appendix C
Legal Descriptions for Proposed Right-of Way Grant IDI-35849-01
Temporary Construction Sites**

Appendix C
Legal Descriptions¹ for Proposed Right-of Way Grant IDI-35849-01
Gateway West Transmission Line
Temporary Construction Sites

The Gateway West Transmission Line Right-of-Way (ROW) located in Idaho, depicted in Appendix A.

The Temporary Construction Sites are comprised of:

- 500-kV Transmission Line ROW located within the 500-kV Transmission Line Corridor, 2 miles wide, being 1 mile on each side of the centerline of the revised proposed routes for Segments 8 and 9 identified as Alternative 1 in the Final Supplemental Environmental Impact Statement.
- Temporary Construction Sites for assembly and erection of new transmission line towers of varying sizes.

¹ The legal description includes each surveyed government lot or 40 acre aliquot part crossed by a portion of the Gateway West transmission line right-of-way and associated developments.

Environmental Assessment – Proposed Action

**BUREAU OF LAND MANAGEMENT - Ada County
Boise Meridian – Idaho**

Temporary 2 Mile Wide 500-kV Transmission Line ROW

T. 1 N., R. 1 E.,

- sec. 32, SE1/4SW1/4, NE1/4SE1/4 and S1/2SE1/4;
- sec. 33, NW1/4SW1/4, S1/2SW1/4 and S1/2SE1/4.

T. 1 N., R. 2 E.,

- sec. 25, lots 8 and 10 and S1/2SW1/4;
- sec. 26, lot 8, SE1/4SW1/4 and S1/2SE1/4;
- sec. 27, lots 6, 8, 9 and 10;
- sec. 28, lot 5 and SW1/4SW1/4;
- sec. 29, S1/2SW1/4 and S1/2SE1/4;
- sec. 31, lots 5, 6, 10, 11 and 13, W1/2NE1/4, SE1/4SW1/4 and SE1/4;
- sec. 32, lots 1, 2, 3 and 4, SW1/4 and S1/2SE1/4;
- sec. 33, lots 1, 2, 3 and 4, E1/2 and S1/2NW1/4;
- secs. 34 and 35.

T. 1 N., R. 3 E.,

- sec. 28, SW1/4SE1/4;
- sec. 29, S1/2SW1/4 and S1/2SE1/4;
- sec. 30, lot 4 and SE1/4SW1/4 and S1/2SE1/4;
- sec. 31;
- sec. 32;
- sec. 33, NE1/4 and S1/2;
- sec. 34, S1/2NE1/4, NW1/4NW1/4, S1/2NW1/4 and S1/2.

T. 1 N., R. 4 E.,

- sec. 31, lot 2 and SW1/4NE1/4, SE1/4NW1/4 and SE1/4;
- sec. 32, S1/2NE1/4, N1/2SE1/4 and SE1/4SE1/4;
- sec. 33, S1/2SW1/4 and SW1/4SE1/4.

T. 1 S., R. 1 E.,

- sec. 1;
- sec. 2;
- sec. 3;
- sec. 4;
- sec. 5;
- sec. 6, lots 1, 6 and 7, S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4 and SE1/4;
- sec. 7;
- sec. 8;
- sec. 9, N1/2, SW1/4 and N1/2SE1/4;

T. 1 S., R. 1 E.,

- sec. 10, N1/2NE1/4 and NW1/4;
- sec. 11, NW1/4NE1/4 and N1/2NW1/4;
- sec. 17, N1/2NE1/4, N1/2NW1/4 and SW1/4NW1/4;
- sec. 18, lots 1 thru 4, NE1/4, E1/2NW1/4, NE1/4SW1/4 and NW1/4SE1/4.

T. 1 S., R. 1 W.,

- sec. 1, S1/2SW1/4 and SE1/4;
- sec. 10, SE1/4SW1/4, NE1/4SE1/4 and S1/2SE1/4;
- sec. 11, NE1/4, S1/2NW1/4 and S1/2;
- secs. 12 thru 15;
- sec. 17, SE1/4SE1/4;
- sec. 20, lots 1 thru 4;
- secs. 21 and 22
- sec. 23, N1/2, SW1/4 and N1/2SE1/4;
- sec. 24, NW1/4NE1/4, N1/2NW1/4 and SW1/4NW1/4;
- sec. 27, lots 2 and 3;
- sec. 28, lots 1 thru 12;
- sec. 29, lots 1 thru 7;
- sec. 32, SE1/4NE1/4.

T. 1 S., R. 2 E.,

- sec. 1;
- sec. 2;
- sec. 3;
- sec. 4;
- sec. 5;
- sec. 6.

T. 1 S., R. 3 E.,

- sec. 1, lots 1 thru 4, S1/2NE1/4 and S1/2NW1/4;
- sec. 2, lots 1 thru 4, S1/2NE1/4 and S1/2NW1/4;
- sec. 3, lots 1 thru 4, S1/2NE1/4 and S1/2NW1/4;
- sec. 4, lots 1 thru 4, S1/2NE1/4, E1/2NW1/4, S1/2;
- sec. 5, lots 1 thru 7, SW1/4NE1/4, E1/2NW1/4, SW1/4 and W1/2SE1/4;
- sec. 6;
- sec. 9, NE1/4, N1/2NW1/4 and SE1/4NW1/4.

T. 1 S., R. 4 E.,

- sec. 4, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4 and SE1/4;
- sec. 5, lots 1 and 2, S1/2NE1/4, S1/2NW1/4, W1/2SW1/4 and N1/2SE1/4.

T. 2 S., R. 1 E.,

- sec. 20, S1/2NE1/4, SE1/4NW1/4 and S1/2;
- sec. 21, SW1/4NE1/4, S1/2NW1/4 and S1/2;
- sec. 22, SW1/4SW1/4;
- sec. 27, NW1/4NW1/4, S1/2NW1/4, SW1/4 and SW1/4SE1/4;
- secs. 28 and 29;

T. 2 S., R. 1 E.,

- sec. 30, SE1/4NE1/4 and E1/2SE1/4;
- sec. 31, NE1/4NE1/4;
- sec. 32, N1/2, N1/2SW1/4, SW1/4SW1/4 and SE1/4;
- sec. 33;
- sec. 34, NW1/4NE1/4, S1/2NE1/4, NW1/4 and S1/2;
- sec. 35, NW1/4SW1/4 and S1/2SW1/4.

T. 3 S., R. 1 E.,

- sec. 1, SW1/4NW1/4, SW1/4 and S1/2SE1/4;
- sec. 2, lots 2, 3 and 4, S1/2NE1/4, S1/2NW1/4 and S1/2;
- sec. 3;
- sec. 4;
- sec. 5, lot 1, SE1/4NE1/4 and NE1/4SE1/4;
- sec. 6, lot 2;
- sec. 9, NE1/4, N1/2NW1/4, SE1/4NW1/4 and NE1/4SE1/4;
- secs. 10 thru 13;
- sec. 14, N1/2, NE1/4SW1/4, N1/2SE1/4 and SE1/4SE1/4;
- sec. 15, N1/2NE1/4;
- sec. 24, NE1/4 and N1/2NW1/4.

T. 3 S., R. 2 E.,

- sec. 7, lots 1 thru 4, SW1/4NE1/4, E1/2NW1/4, E1/2SW1/4 and SE1/4;
- sec. 8, NW1/4SW1/4 and S1/2SW1/4;
- sec. 15, SW1/4SW1/4;
- sec. 17;
- sec. 18;
- sec. 19, lots 1, 2 and 3, E1/2, NW1/4 and E1/2SW1/4;
- secs. 20 and 21;
- sec. 22, S1/2NE1/4, NW1/4 and S1/2;
- sec. 23, SW1/4 and SW1/4SE1/4;
- sec. 25, SW1/4NE1/4, NW1/4NW1/4, S1/2NW1/4 and S1/2;
- secs. 26, 27 and 28;
- sec. 29, N1/2 and N1/2SE1/4;
- sec. 30, NE1/4NE1/4;
- sec. 33, N1/2NE1/4, SE1/4NE1/4 and NE1/4NW1/4;
- sec. 34, N1/2, NE1/4SW1/4 and SE1/4;
- sec. 35.

T. 3 S., R. 3 E.,

- sec. 30, lot 4 and SE1/4SW1/4;
- sec. 31, lots 1 thru 4, NW1/4NE1/4, S1/2NE1/4, E1/2NW1/4, E1/2SW1/4 and SE1/4;
- sec. 32, SW1/4NW1/4, SW1/4 and S1/2SE1/4.

Temporary Construction Sites (5-year term)

- T. 1 N., R. 2 E.,
 sec. 32, SE1/4SW1/4 and S1/2SE1/4;
 sec. 34, SE1/4SW1/4;
 sec. 35, SE1/4SE1/4.
- T. 1 N., R. 3 E.,
 sec. 31, S1/2SE1/4;
 sec. 33, SE1/4SW1/4.
- T. 1 S., R. 1 E.,
 sec. 2, lots 2 and 3;
 sec. 3, lot 1;
 sec. 4, S1/2NE1/4, NE1/4SW1/4 and N1/2SE1/4;
 sec. 7, SW1/4NE1/4.
- T. 1 S., R. 1 W.,
 sec. 14, E1/2NE1/4 and W1/2SW1/4;
 sec. 15, E1/2SE1/4;
 sec. 22, E1/2NW1/4;
 sec. 28, lot 2 and NW1/4NW1/4.
- T. 1 S., R. 2 E.,
 sec. 5, lot 2.
- T. 1 S., R. 3 E.,
 sec. 1, SE1/4NW1/4;
 sec. 2, SE1/4NE1/4;
 sec. 3, SW1/4NE1/4 and S1/2NW1/4;
 sec. 4, SE1/4NE1/4;
 sec. 6, lot 2.
- T. 1 S., R. 4 E.,
 sec. 4, SW1/4NE1/4.
- T. 2 S., R. 1 E.,
 sec. 28, SW1/4NW1/4 and NW1/4SW1/4;
 sec. 29, SE1/4NE1/4;
 sec. 30, SE1/4SE1/4;
 sec. 33, NE1/4NW1/4.
- T. 3 S., R. 1 E.,
 sec. 3, lot 4, SW1/4NW1/4 and NW1/4SW1/4;
 sec. 4, lot 1 and SE1/4NE1/4;
 sec. 11, SE1/4NW1/4;
 sec. 13, NW1/4NE1/4.
- T. 3 S., R. 2 E.,
 sec. 17, SW1/4SW1/4;
 sec. 18, S1/2SE1/4;
 sec. 20, NW1/4NW1/4 and NE1/4SE1/4;

T. 3 S., R. 2 E.,
sec. 27, W1/2NW1/4;
sec. 35, NE1/4NW1/4.

**BUREAU OF LAND MANAGEMENT - Canyon County
Boise Meridian – Idaho**

Temporary 2 Mile Wide 500-kV Transmission Line ROW

There are no aliquots in this county for this feature

Temporary Construction Sites (5-year term)

T. 1 S., R. 2 W.,
sec. 36, NW1/4NE1/4.
sec. 25, lots 2, 3 and 4;
sec. 36, lots 11 and 12.

**BUREAU OF LAND MANAGEMENT - Cassia County
Boise Meridian – Idaho**

Temporary 2 Mile Wide 500-kV Transmission Line ROW

T. 12 S., R. 19 E.,
sec. 4, S1/2NW1/4, SW1/4 and NW1/4SE1/4;
sec. 5, S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4 and SE1/4;
sec. 6, lots 6 and 7;
sec. 7, lots 1 and 2 and SE1/4NE1/4;
sec. 8, N1/2;
sec. 9, N1/2NW1/4 and SW1/4NW1/4.

Temporary Construction Sites (5-year term)

T. 12 S., R. 19 E.,
sec. 5, SW1/4NE1/4 and SE1/4NW1/4.

**BUREAU OF LAND MANAGEMENT - Elmore County
Boise Meridian – Idaho**

Temporary 2 Mile Wide 500-kV Transmission Line ROW

T. 1 S., R. 4 E.,
sec. 2, S1/2NW1/4 and SE1/4SW1/4;
sec. 3, SW1/4NW1/4 and W1/2SW1/4;

- T. 1 S., R. 4 E.,
sec. 11, NE1/4NW1/4, S1/2NW1/4, SW1/4, NE1/4SE1/4 and S1/2SE1/4;
sec. 12, lots 1 thru 4, W1/2NE1/4, S1/2NW1/4, SW1/4 and W1/2SE1/4;
sec. 13, lots 1, 2 and 4, NW1/4NE1/4, NW1/4NW1/4, S1/2NW1/4, SW1/4 and W1/2SE1/4;
sec. 14, N1/2 and SE1/4;
sec. 24, lot 1 and NW1/4NE1/4.
- T. 1 S., R. 5 E.,
sec. 7, lots 1 thru 4, E1/2NW1/4, E1/2SW1/4 and SE1/4;
sec. 17, NW1/4 and N1/2SW1/4;
sec. 18, lots 1 and 2, NE1/4, E1/2NW1/4 and S1/2SE1/4;
sec. 20, N1/2NE1/4, SW1/4NE1/4, N1/2NW1/4 and SW1/4SE1/4;
sec. 25, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
sec. 26, E1/2NE1/4 and E1/2SW1/4;
sec. 28, NW1/4, NE1/4SW1/4 and SE1/4;
sec. 29, NE1/4NE1/4;
sec. 33, NE1/4NE1/4;
sec. 35, NW1/4.
- T. 1 S., R. 6 E.,
sec. 31, lot 1, SW1/4NE1/4, NE1/4NW1/4 and NW1/4SE1/4.
- T. 2 S., R. 5 E.,
sec. 1, lots 1 thru 4, S1/2NW1/4 and W1/2SW1/4;
sec. 2, lots 1 and 2, S1/2NE1/4, N1/2SE1/4 and SE1/4SE1/4;
sec. 12, W1/2NE1/4, N1/2NW1/4 and SE1/4NW1/4.
- T. 2 S., R. 6 E.,
sec. 4, SW1/4SW1/4;
sec. 5, lot 4, SW1/4NE1/4 and SW1/4NW1/4;
sec. 6, lots 1 and 2, SE1/4NE1/4, SE1/4SW1/4, NE1/4SE1/4 and S1/2SE1/4;
sec. 7, lots 1, 2 and 3, NW1/4NE1/4, E1/2NW1/4, E1/2SW1/4 and SW1/4SE1/4;
sec. 8, SE1/4;
sec. 9, NW1/4NE1/4, S1/2NE1/4, NW1/4 and S1/2;
sec. 10, NW1/4SW1/4 and S1/2SW1/4;
sec. 15, W1/2NE1/4, NW1/4 and S1/2;
sec. 17, S1/2NW1/4 and S1/2;
sec. 18, NE1/4NW1/4 and NE1/4SE1/4;
sec. 20, N1/2NE1/4, SE1/4NE1/4 and NE1/4NW1/4;
sec. 21, N1/2, N1/2SW1/4, SE1/4SW1/4 and SE1/4;
sec. 22;
sec. 23, E1/2NE1/4, E1/2NW1/4NE1/4, E1/2SW1/4NE1/4, E1/2SE1/4, NE1/4NW1/4SE1/4;
sec. 24, SW1/4NW1/4, SW1/4 and SW1/4SE1/4;
sec. 25;
sec. 26, NW1/4NE1/4, S1/2NE1/4, NE1/4SW1/4, S1/2SW1/4 and SE1/4;

T. 2 S., R. 6 E.,

- sec. 27, NE1/4NE1/4, N1/2NW1/4, SW1/4NW1/4 and NW1/4SW1/4;
- sec. 28, N1/2NE1/4 and SE1/4NE1/4;
- sec. 34, NE1/4NE1/4;
- sec. 35, N1/2, NE1/4SW1/4 and W1/2SE1/4.

T. 2 S., R. 7 E.,

- sec. 30, lots 2, 3 and 4, E1/2SW1/4 and SW1/4SE1/4;
- sec. 31, lots 1 thru 4, NE1/4, E1/2NW1/4, E1/2SW1/4 and SE1/4;
- sec. 32, NW1/4NW1/4, S1/2NW1/4, SW1/4, NW1/4SE1/4 and S1/2SE1/4.

T. 3 S., R. 7 E.,

- sec. 3, SW1/4SW1/4;
- sec. 4, lot 4, S1/2NW1/4, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- sec. 5;
- sec. 6, lots 1 thru 5, S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4 and SE1/4;
- sec. 7, N1/2NE1/4 and SE1/4NE1/4;
- sec. 8, N1/2 and SE1/4;
- sec. 9;
- sec. 10, W1/2NW1/4, NW1/4SW1/4, S1/2SW1/4, NE1/4SE1/4 and S1/2SE1/4;
- sec. 11, SW1/4SW1/4;
- sec. 13, NW1/4SW1/4 and S1/2SW1/4;
- sec. 14, SW1/4NE1/4, NW1/4 and S1/2;
- sec. 15;
- sec. 17, NE1/4, N1/2NW1/4, SE1/4NW1/4 and N1/2SE1/4;
- sec. 21, NE1/4, NE1/4NW1/4 and NE1/4SE1/4;
- secs. 22 and 23;
- sec. 24, NW1/4NE1/4, S1/2NE1/4, NW1/4 and S1/2;
- sec. 25;
- sec. 26, N1/2, N1/2SW1/4, SE1/4SW1/4 and SE1/4;
- sec. 27, NE1/4, NE1/4NW1/4 and NE1/4SE1/4;
- sec. 35, N1/2NE1/4 and SE1/4NE1/4.

T. 3 S., R. 8 E.,

- sec. 19, lots 3 and 4 and SE1/4SW1/4;
- sec. 29, SW1/4NW1/4, SW1/4 and SW1/4SE1/4;
- sec. 30;
- sec. 31;
- sec. 32;
- sec. 33, SW1/4NW1/4, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- sec. 34, SW1/4SW1/4.

T. 4 S., R. 2 E.,

- sec. 1;
- sec. 2, lots 1 thru 4, S1/2NE1/4, SE1/4NW1/4 and NE1/4SE1/4;
- sec. 12, N1/2NE1/4.

T. 4 S., R. 3 E.,

- sec. 3, NW1/4SW1/4 and S1/2SW1/4;
- sec. 4, SW1/4NE1/4, NW1/4 and S1/2;
- sec. 5;
- sec. 6;
- sec. 7, lots 1 and 2, N1/2NE1/4, SW1/4NE1/4, E1/2NW1/4 and NE1/4SW1/4;
- sec. 13, SW1/4NW1/4, SW1/4 and SW1/4SE1/4;
- secs. 14 and 15;
- sec. 17, NE1/4 and N1/2NW1/4;
- sec. 21, NE1/4NE1/4;
- sec. 22, N1/2, NE1/4SW1/4 and SE1/4;
- sec. 23;
- sec. 24;
- sec. 25;
- sec. 26, lots 1, 2 and 3, N1/2, N1/2SW1/4 and N1/2SE1/4;
- sec. 27, E1/2NE1/4;
- sec. 35, N1/2NE1/4 and SE1/4NE1/4.

T. 4 S., R. 4 E.,

- sec. 19, lots 2, 3 and 4, E1/2SW1/4;
- sec. 29, SW1/4SW1/4;
- sec. 30, lots 1, 2 and 3, W1/2NE1/4 and E1/2NW1/4;
- sec. 31, lots 1 thru 4, NE1/4, E1/2NW1/4, E1/2SW1/4 and NW1/4SE1/4;
- sec. 32, NW1/4NW1/4.

T. 4 S., R. 7 E.,

- sec. 1, lots 1 and 2 and SE1/4NE1/4.

T. 4 S., R. 8 E.,

- sec. 2, NW1/4SW1/4 and S1/2SW1/4;
- sec. 3, lots 2, 3 and 4, S1/2NE1/4 and S1/2NW1/4;
- sec. 5;
- sec. 6, lots 1 thru 5, S1/2NE1/4, SE1/4NW1/4, NE1/4SW1/4 and SE1/4;
- sec. 7, NE1/4NE1/4;
- sec. 8, N1/2 and N1/2SE1/4;
- sec. 15, W1/2;
- sec. 22, N1/2NW1/4, SE1/4NW1/4, NE1/4SW1/4 and W1/2SE1/4.

T. 4 S., R. 9 E.,

- sec. 17, SW1/4NW1/4, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- sec. 18, SE1/4NE1/4 and E1/2SE1/4;
- sec. 19, NE1/4, E1/2NW1/4 and E1/2SE1/4;
- sec. 20, W1/2NE1/4 and NW1/4;
- sec. 21, E1/2NE1/4, N1/2SW1/4 and SW1/4SW1/4;
- sec. 22, SW1/4NW1/4, E1/2SW1/4 and SW1/4SE1/4;
- sec. 25, S1/2NE1/4, S1/2NW1/4 and S1/2;
- sec. 26, S1/2NE1/4, NW1/4NW1/4, S1/2NW1/4 and S1/2;

T. 4 S., R. 9 E.,

sec. 27;
sec. 33, E1/2NE1/4 and E1/2SE1/4;
secs. 34 and 35.

T. 4 S., R. 10 E.,

sec. 25, S1/2SW1/4 and S1/2SE1/4;
sec. 26, S1/2SW1/4 and S1/2SE1/4;
sec. 27, S1/2SW1/4 and SE1/4SE1/4;
sec. 28, SW1/4 and S1/2SE1/4;
sec. 29, S1/2;
sec. 30, lots 2, 3 and 4, E1/2SW1/4 and SE1/4;
sec. 31;
secs. 32 and 33;
sec. 34, NE1/4NE1/4, S1/2NE1/4, W1/2 and NE1/4SE1/4;
sec. 35.

T. 4 S., R. 11 E.,

sec. 29, S1/2SW1/4 and SW1/4SE1/4;
sec. 30, lot 4, SE1/4SW1/4 and S1/2SE1/4;
sec. 31;
sec. 32;
sec. 33, N1/2, SW1/4, NE1/4SE1/4 and S1/2SE1/4;
secs. 34 and 35.

T. 5 S., R. 3 E.,

sec. 1, lots 1 thru 4, S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4 and SE1/4;
sec. 12, E1/2 and NE1/4NW1/4;
sec. 13, NE1/4NE1/4.

T. 5 S., R. 4 E.,

sec. 4, S1/2SW1/4;
sec. 6, lots 3 thru 7, SE1/4NW1/4 and E1/2SW1/4;
sec. 7, lots 1 thru 4, W1/2NE1/4, E1/2NW1/4, E1/2SW1/4 and SE1/4;
sec. 8, S1/2;
sec. 9;
sec. 10, SW1/4NW1/4 and SW1/4;
sec. 15, NW1/4, N1/2SW1/4 and SW1/4SW1/4;
sec. 17, NW1/4NE1/4, NE1/4NW1/4 and W1/2SW1/4;
sec. 18, lots 1 and 2, SW1/4NE1/4, E1/2NW1/4, NE1/4SW1/4 and N1/2SE1/4;
sec. 20, SE1/4NW1/4, NW1/4SE1/4 and S1/2SE1/4;
sec. 21, SE1/4NE1/4, N1/2SE1/4 and SE1/4SE1/4;
sec. 22, lot 4 and NW1/4NW1/4;
sec. 27, lots 1 and 2, SW1/4NW1/4 and SW1/4;
sec. 28, N1/2, N1/2SW1/4, SE1/4SW1/4 and SE1/4;
sec. 29, E1/2NE1/4;
sec. 33, lot 3 and NW1/4NE1/4;

- T. 5 S., R. 4 E.,
 sec. 34, lot 2.
- T. 5 S., R. 9 E.,
 sec. 1, lots 1 thru 4, S1/2NE1/4 and S1/2NW1/4;
 sec. 2, lots 1 thru 4, S1/2NE1/4 and S1/2NW1/4;
 sec. 3, lots 1 thru 4;
 sec. 4, lot 1.
- T. 5 S., R. 10 E.,
 sec. 2, SW1/4SW1/4;
 sec. 3, lots 2, 3 and 4, SW1/4NE1/4, S1/2NW1/4 and S1/2;
 sec. 4, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4, N1/2SW1/4, N1/2SE1/4 and SE1/4SE1/4;
 sec. 5, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4, N1/2SW1/4 and N1/2SE1/4;
 sec. 6, lots 1 thru 6, S1/2NE1/4, SE1/4NW1/4, NE1/4SW1/4 and N1/2SE1/4.
- T. 5 S., R. 11 E.,
 sec. 1;
 sec. 2;
 sec. 3;
 sec. 4, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4 and N1/2SE1/4;
 sec. 5, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4 and SE1/4;
 sec. 6, lot 1;
 sec. 8, N1/2NE1/4;
 sec. 10, N1/2NW1/4;
 sec. 11, NE1/4 and NE1/4SE1/4;
 sec. 12, N1/2NE1/4, NW1/4 and S1/2SE1/4;
 sec. 13, E1/2;
 sec. 24, E1/2NE1/4.
- T. 6 S., R. 9 E.,
 sec. 13, NW1/4NE1/4, S1/2NE1/4, NW1/4 and S1/2;
 sec. 14, E1/2, NW1/4, NE1/4SW1/4 and S1/2SW1/4;
 sec. 15, SE1/4;
 sec. 17, S1/2NE1/4, S1/2NW1/4 and S1/2;
 sec. 18, lots 2, 3 and 4, S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4 and SE1/4;
 sec. 19;
 secs. 20 and 21;
 sec. 22, W1/2NE1/4, W1/2 and W1/2SE1/4;
 sec. 23, N1/2NE1/4, SW1/4NE1/4 and W1/2SW1/4;
 sec. 24, E1/2, N1/2NW1/4 and SE1/4NW1/4;
 sec. 26, NW1/4NW1/4;
 sec. 27, N1/2NE1/4 and N1/2NW1/4;
 sec. 28, N1/2NE1/4, N1/2NW1/4 and SW1/4NW1/4;
 sec. 29, N1/2;
 sec. 30, lots 1 and 2, NE1/4 and E1/2NW1/4.

T. 6 S., R. 10 E.,

- sec. 18, lots 2, 3 and 4, E1/2SW1/4 and SW1/4SE1/4;
- sec. 19;
- sec. 20, SW1/4NW1/4, SW1/4 and SW1/4SE1/4;
- sec. 28, SW1/4NW1/4, SW1/4 and SW1/4SE1/4;
- sec. 29;
- sec. 30, lot 1, NE1/4, NE1/4NW1/4 and N1/2SE1/4;
- sec. 32, E1/2 and E1/2NW1/4;
- sec. 33;
- sec. 34, S1/2NW1/4, SW1/4, NW1/4SE1/4 and S1/2SE1/4.

T. 7 S., R. 10 E.,

- sec. 1, NW1/4SW1/4 and S1/2SW1/4;
- sec. 2;
- sec. 3;
- sec. 4, lots 1 and 2;
- sec. 10, E1/2 and E1/2NW1/4;
- sec. 11;
- sec. 12, NW1/4NE1/4, S1/2NE1/4, NW1/4 and S1/2;
- sec. 13;
- sec. 14, N1/2, N1/2SW1/4, SE1/4SW1/4 and SE1/4;
- sec. 15, E1/2NE1/4;
- sec. 23, N1/2NE1/4 and SE1/4NE1/4;
- sec. 24, N1/2, NE1/4SW1/4 and SE1/4;
- sec. 25, NE1/4NE1/4.

T. 7 S., R. 11 E.,

- sec. 7, lots 2, 3 and 4, E1/2SW1/4 and SW1/4SE1/4;
- sec. 17, SW1/4NW1/4, SW1/4 and SW1/4SE1/4;
- sec. 18;
- sec. 19;
- sec. 20;
- sec. 21, NW1/4NW1/4, S1/2NW1/4, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- sec. 26, SW1/4SW1/4;
- sec. 27, NW1/4NW1/4, S1/2NW1/4, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- secs. 28 and 29;
- sec. 30, lots 1 and 2, NE1/4 and E1/2NW1/4;
- secs. 33 and 34;
- sec. 35, SW1/4NE1/4, NW1/4 and S1/2.

Temporary Construction Sites (5-year term)

T. 1 S., R. 4 E.,

- sec. 3, SW1/4SW1/4;
- sec. 11, S1/2NW1/4, N1/2SW1/4 and SW1/4SE1/4;

- T. 1 S., R. 4 E.,
 sec. 12, SE1/4SW1/4;
 sec. 14, NW1/4NE1/4.
- T. 1 S., R. 5 E.,
 sec. 17, NW1/4NW1/4;
 sec. 35, W1/2NW1/4.
- T. 2 S., R. 6 E.,
 sec. 6, SW1/4SE1/4;
 sec. 22, SW1/4NE1/4, SE1/4NW1/4 and SE1/4;
 sec. 26, E1/2SE1/4.
- T. 2 S., R. 7 E.,
 sec. 31, SE1/4SW1/4.
- T. 3 S., R. 7 E.,
 sec. 5, NE1/4SW1/4 and S1/2SW1/4;
 sec. 6, lot 3;
 sec. 8, NE1/4;
 sec. 15, SW1/4NW1/4;
 sec. 23, W1/2SE1/4;
 sec. 25, SE1/4.
- T. 4 S., R. 3 E.,
 sec. 5, NW1/4SW1/4;
 sec. 14, SW1/4SW1/4;
 sec. 15, SW1/4NE1/4 and NE1/4NW1/4;
 sec. 23, SE1/4SE1/4;
 sec. 24, SW1/4SW1/4;
 sec. 25, lot 7.
- T. 4 S., R. 4 E.,
 sec. 31, lot 3.
- T. 4 S., R. 8 E.,
 sec. 5, lots 2 and 3, SW1/4NE1/4 and SE1/4NW1/4.
- T. 4 S., R. 9 E.,
 sec. 19, E1/2NW1/4;
 sec. 27, SW1/4NW1/4 and NW1/4SW1/4;
 sec. 34, NE1/4NW1/4.
- T. 4 S., R. 10 E.,
 sec. 32, NW1/4SW1/4;
 sec. 33, E1/2SE1/4;
 sec. 34, W1/2SW1/4 and NE1/4SE1/4;
 sec. 35, W1/2SW1/4 and SE1/4SE1/4.
- T. 4 S., R. 11 E.,
 sec. 31, lot 7.

T. 5 S., R. 4 E.,
 sec. 6, lots 5 and 6, SE1/4NW1/4 and NE1/4SW1/4;
 sec. 7, SW1/4NE1/4 and NW1/4SE1/4;
 sec. 28, E1/2NW1/4 and NE1/4SW1/4.

T. 5 S., R. 11 E.,
 sec. 1, SE1/4SE1/4;
 sec. 2, lots 2, 3 and 4;
 sec. 4, lot 2;
 sec. 6, lot 1.

T. 6 S., R. 9 E.,
 sec. 19, SW1/4NE1/4 and SE1/4NW1/4;
 sec. 20, W1/2NE1/4;
 sec. 21, E1/2NW1/4;
 sec. 22, W1/2NE1/4 and E1/2NW1/4;
 sec. 24, E1/2NW1/4.

T. 6 S., R. 10 E.,
 sec. 19, lot 4 and SE1/4SW1/4;
 sec. 30, lot 1 and NE1/4NW1/4.

T. 7 S., R. 10 E.,
 sec. 3, lots 3 and 4, NE1/4SW1/4 and NW1/4SE1/4;
 sec. 11, SE1/4SE1/4;
 sec. 12, SW1/4SW1/4.

T. 7 S., R. 11 E.,
 sec. 19, NE1/4NW1/4;
 sec. 28, SE1/4SW1/4 and SW1/4SE1/4;
 sec. 29, SE1/4NE1/4;
 sec. 33, NW1/4NE1/4 and NE1/4NW1/4;
 sec. 34, N1/2SW1/4.

BUREAU OF LAND MANAGEMENT - Gooding County
Boise Meridian – Idaho

Temporary 2 Mile Wide 500-kV Transmission Line ROW

T. 4 S., R. 12 E.,
 sec. 31, lot 4.

T. 5 S., R. 12 E.,
 sec. 6, lots 3 thru 7, SW1/4NE1/4, SE1/4NW1/4, E1/2SW1/4 and SE1/4;
 sec. 7, lots 1 thru 4, NE1/4, E1/2SW1/4 and SE1/4;
 sec. 8, SW1/4SW1/4;
 sec. 13, S1/2NE1/4, S1/2NW1/4 and S1/2;
 sec. 14, S1/2NE1/4, S1/2NW1/4 and S1/2;
 sec. 15, S1/2NE1/4, N1/2SE1/4 and SE1/4SE1/4;
 sec. 17, NW1/4NW1/4, S1/2NW1/4, SW1/4 and SW1/4SE1/4;

T. 5 S., R. 12 E.,

- sec. 19, lots 1, 2 and 3, E1/2, NW1/4 and E1/2SW1/4;
- sec. 20, NE1/4, N1/2NW1/4, SE1/4NW1/4, SW1/4 and SE1/4SE1/4;
- sec. 22, NE1/4NE1/4;
- sec. 23, NE1/4, N1/2NW1/4 and SE1/4NW1/4;
- sec. 24, N1/2;
- sec. 29, NE1/4 and N1/2NW1/4.

T. 5 S., R. 13 E.,

- sec. 17, NW1/4SW1/4 and S1/2SW1/4;
- sec. 18, lots 2, 3 and 4, SW1/4NE1/4, SE1/4NW1/4, E1/2SW1/4 and SE1/4;
- sec. 19, lots 1 and 2, NE1/4, E1/2NW1/4 and NE1/4SE1/4;
- sec. 20, N1/2, N1/2SW1/4, N1/2SE1/4 and SE1/4SE1/4;
- sec. 21, SW1/4NW1/4, SW1/4 and SW1/4SE1/4;
- sec. 27, SW1/4NW1/4, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- sec. 28;
- sec. 29, E1/2NE1/4, S1/2SW1/4, NE1/4SE1/4 and S1/2SE1/4;
- sec. 31, NE1/4NE1/4;
- sec. 32, N1/2, NE1/4SW1/4 and N1/2SE1/4;
- secs. 33 and 34;
- sec. 35, NW1/4NW1/4, S1/2NW1/4 and S1/2.

T. 6 S., R. 13 E.,

- sec. 1, lots 3 and 4, SW1/4NE1/4, S1/2NW1/4, N1/2SW1/4 and N1/2SE1/4;
- sec. 2, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4, N1/2SW1/4 and N1/2SE1/4;
- sec. 3, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4, N1/2SW1/4 and N1/2SE1/4;
- sec. 4, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4 and N1/2SE1/4;
- sec. 13, S1/2SE1/4;
- sec. 14, NW1/4NE1/4.

T. 6 S., R. 14 E.,

- sec. 6, lot 6;
- sec. 29, NE1/4NE1/4.

T. 6 S., R. 15 E.,

- sec. 20, SE1/4;
- sec. 21, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- sec. 22, S1/2SW1/4 and S1/2SE1/4;
- sec. 25, S1/2NE1/4, NW1/4 and S1/2;
- secs. 26, 27 and 28;
- sec. 29, NE1/4 and S1/2;
- sec. 32, N1/2, N1/2SW1/4 and N1/2SE1/4;
- sec. 33, N1/2, N1/2SW1/4, SE1/4SW1/4 and SE1/4;
- secs. 34 and 35.

- T. 6 S., R. 16 E.,
 sec. 30, lots 2, 3 and 4, S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4 and SE1/4;
 sec. 31;
- T. 7 S., R. 15 E.,
 sec. 1, lots 1 thru 4;
 sec. 2, lot 1.
- T. 7 S., R. 16 E.,
 sec. 6, lots 1 thru 4, NE1/4SW1/4 and N1/2SE1/4.

Temporary Construction Sites (5-year term)

- T. 5 S., R. 12 E.,
 sec. 7, lots 2 and 3;
 sec. 17, SW1/4SW1/4;
 sec. 18, S1/2NE1/4, N1/2SE1/4 and SE1/4SE1/4;
 sec. 20, SE1/4NE1/4;
 sec. 23, SE1/4NW1/4;
 sec. 24, S1/2NE1/4.
- T. 5 S., R. 13 E.,
 sec. 19, SE1/4NW1/4;
 sec. 28, NW1/4SW1/4;
 sec. 29, E1/2SE1/4;
 sec. 34, SE1/4SW1/4.
- T. 6 S., R. 13 E.,
 sec. 3, lot 1, SE1/4NE1/4 and N1/2SE1/4.
- T. 6 S., R. 15 E.,
 sec. 27, SW1/4SW1/4;
 sec. 28, SE1/4SE1/4;
 sec. 29, N1/2SW1/4;
 sec. 35, NE1/4NE1/4.
- T. 6 S., R. 16 E.,
 sec. 31, SW1/4NE1/4, SE1/4NW1/4, NE1/4SW1/4 and NW1/4SE1/4.

**BUREAU OF LAND MANAGEMENT - Jerome County
Boise Meridian – Idaho**

Temporary 2 Mile Wide 500-kV Transmission Line ROW

- T. 7 S., R. 16 E.,
 sec. 1, lots 1 thru 4 and S1/2;
 sec. 2, lots 1 thru 4 and S1/2;
 sec. 3, lots 1 thru 4 and S1/2;
 sec. 4, lots 1 thru 4 and S1/2;

T. 7 S., R. 16 E.,
 sec. 5, lots 1 thru 4, N1/2SW1/4 and SE1/4;
 sec. 10, N1/2NE1/4 and N1/2NW1/4;
 sec. 11, NE1/4 and N1/2NW1/4;
 sec. 12, NE1/4 and N1/2NW1/4.

T. 7 S., R. 17 E.,
 sec. 1, lots 3 and 4, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
 sec. 2, lots 1 thru 4 and S1/2;
 sec. 3, lots 1 and 2 and SE1/4;
 sec. 6, lots 2 thru 5 and W1/2SE1/4;
 sec. 7, lot 1 and NW1/4NE1/4;
 sec. 10, NE1/4, NE1/4NW1/4 and NE1/4SE1/4;
 sec. 11, NW1/4 and NW1/4SW1/4;
 sec. 12, NE1/4, N1/2SE1/4 and SW1/4SE1/4;
 sec. 13, NW1/4NE1/4.

Temporary Construction Sites (5-year term)

T. 7 S., R. 16 E.,
 sec. 1, lot 2.

**BUREAU OF LAND MANAGEMENT - Lincoln County
Boise Meridian – Idaho**

Temporary 2 Mile Wide 500-kV Transmission Line ROW

T. 6 S., R. 16 E.,
 sec. 27, S1/2SW1/4 and SW1/4SE1/4;
 sec. 28, NW1/4SW1/4, S1/2SW1/4 and S1/2SE1/4;
 sec. 29, S1/2;
 secs. 32 thru 35;

T. 6 S., R. 17 E.,
 sec. 33, S1/2SW1/4 and S1/2SE1/4;
 sec. 34, SW1/4SW1/4.

Temporary Construction Sites (5-year term)

T. 6 S., R. 16 E.,
 sec. 33, SW1/4SE1/4.

**BUREAU OF LAND MANAGEMENT - Owyhee County
Boise Meridian – Idaho**

Temporary 2 Mile Wide 500-kV Transmission Line ROW

T. 1 S., R. 2 W.,

- sec. 19, lots 2 and 4, SE1/4SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- sec. 20, SW1/4SW1/4;
- sec. 29, W1/2NW1/4 and S1/2;
- sec. 30;
- sec. 31;
- sec. 32, N1/2, NE1/4SW1/4, SW1/4SW1/4 and N1/2SE1/4;
- sec. 33, W1/2NE1/4, NW1/4, N1/2SW1/4 and NW1/4SE1/4.

T. 1 S., R. 3 W.,

- sec. 2, SW1/4;
- sec. 3, S1/2SW1/4 and SE1/4;
- sec. 9, lots 3 and 4;
- sec. 10, NE1/4, SE1/4NW1/4, SW1/4 and NW1/4SE1/4;
- sec. 11, lots 1 thru 3;
- sec. 13, SW1/4NW1/4, NW1/4SW1/4, S1/2SW1/4 and SW1/4SE1/4;
- sec. 14, S1/2NE1/4 and S1/2;
- sec. 15, NW1/4 and W1/2SW1/4;
- sec. 22, lots 1 and 2, S1/2NE1/4, S1/2NW1/4, E1/2SW1/4 and SE1/4;
- sec. 23;
- sec. 24, lots 11, 14 and 16, SW1/4NE1/4, W1/2SE1/4 and W1/2;
- sec. 25, lots 1 thru 4 and W1/2NE1/4, NW1/4, SW1/4 and W1/2SE1/4;
- sec. 26;
- sec. 27, NE1/4, NE1/4NW1/4, N1/2SE1/4 and SE1/4SE1/4;
- sec. 35, N1/2, NE1/4SW1/4 and SE1/4.

T. 2 S., R. 1 E.,

- sec. 19, lots 13 and 14 and SE1/4SW1/4;
- sec. 30, lots 3 thru 6 and lots 11 thru 14;
- sec. 31, lots 3 thru 6 and lots 11 and 12.

T. 2 S., R. 1 W.,

- sec. 17, SW1/4 and SW1/4SE1/4;
- sec. 18, lots 3 and 4, E1/2SW1/4 and SE1/4;
- sec. 19;
- sec. 20;
- sec. 21, lot 7, SW1/4NW1/4 and SW1/4;
- sec. 24, lot 4 and SW1/4SE1/4;
- sec. 25, lots 1 thru 4, W1/2NE1/4, NE1/4NW1/4, S1/2NW1/4, SW1/4, W1/2SE1/4;
- sec. 26;
- secs. 28 and 29;
- sec. 30, lots 1, 2 and 3, E1/2, E1/2NW1/4 and NE1/4SW1/4;
- sec. 31, NE1/4NE1/4;
- sec. 32, lots 5 thru 8, lot 12, NW1/4;
- sec. 33,

T. 2 S., R. 1 W.,

- sec. 34, lots 5 thru 17;
- sec. 35, lots 1 thru 14;
- sec. 36.

T. 2 S., R. 2 W.,

- sec. 5, lots 3 and 4, S1/2NW1/4, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- sec. 6;
- sec. 7;
- sec. 8, NW1/4 and S1/2;
- sec. 9, SW1/4NW1/4 and SW1/4;
- sec. 11, SE1/4SW1/4 and S1/2SE1/4;
- sec. 13, NW1/4NW1/4, S1/2NW1/4 and S1/2;
- sec. 14;
- sec. 15, NE1/4 and S1/2;
- sec. 17;
- sec. 18, lot 1, E1/2, E1/2NW1/4 and NE1/4SW1/4;
- sec. 19, E1/2NE1/4;
- secs. 20 thru 24;
- sec. 25, NE1/4, N1/2NW1/4 and N1/2SE1/4;
- sec. 26, N1/2NE1/4 and NW1/4NW1/4;
- sec. 27, N1/2, and N1/2SW1/4;
- sec. 28, N1/2, N1/2SW1/4 and N1/2SE1/4;
- sec. 29, NE1/4, NE1/4NW1/4 and NE1/4SE1/4.

T. 2 S., R. 3 W.,

- sec. 1;
- sec. 2, lots 1 and 2 and SE1/4NE1/4;
- sec. 12, NE1/4, NE1/4NW1/4, N1/2SE1/4 and SE1/4SE1/4.

T. 3 S., R. 1 W.,

- sec. 1, lots 1 thru 4, S1/2NE1/4 and S1/2NW1/4;
- sec. 2, lots 5, 6 and 7;
- sec. 3, lots 5 thru 11;
- sec. 4, lots 5, 6 and 7.

T. 5 S., R. 4 E.,

- sec. 25, SW1/4SW1/4;
- sec. 26, SE1/4SE1/4;
- sec. 32, lot 9;
- sec. 33, S1/2SW1/4 and S1/2SE1/4;
- sec. 34, lots 7 and 9, SW1/4SW1/4;
- sec. 35, NE1/4.

T. 5 S., R. 5 E.,

- sec. 28, lot 5;
- sec. 29, S1/2SW1/4 and S1/2SE1/4;

T. 5 S., R. 5 E.,

- sec. 30, lots 8, 9 and 12 and S1/2SE1/4;
- sec. 31, lots 4, 8, 9 and 10 and SE1/4SE1/4;
- sec. 32, SW1/4;
- sec. 33, NE1/4NE1/4, S1/2NE1/4, SE1/4NW1/4 and S1/2;
- sec. 34, NW1/4NW1/4 and S1/2NW1/4.

T. 6 S., R. 4 E.,

- sec. 1;
- sec. 2, lots 1 thru 4, S1/2NE1/4, SE1/4NW1/4 and SE1/4;
- sec. 3, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4 and NW1/4SW1/4;
- sec. 4, NW1/4SW1/4 and NE1/4SE1/4;
- sec. 11, NE1/4 and E1/2NW1/4;
- sec. 12, NW1/4NE1/4, N1/2NW1/4 and SW1/4NW1/4.

T. 6 S., R. 5 E.,

- sec. 1, SW1/4NE1/4, SW1/4SW1/4 and NE1/4SE1/4;
- sec. 3, S1/2SW1/4;
- sec. 4, lots 5 thru 11;
- sec. 5, S1/2SW1/4 and W1/2SE1/4;
- sec. 6, lots 5, 6 and 7, E1/2SW1/4 and S1/2SE1/4;
- sec. 9, lots 1 thru 4;
- sec. 10, NW1/4NE1/4, S1/2NE1/4, NW1/4, NE1/4SW1/4 and N1/2SE1/4;
- sec. 11, NE1/4NE1/4, S1/2NE1/4, S1/2NW1/4 and N1/2SW1/4;
- sec. 12, SW1/4NE1/4, NW1/4, E1/2SW1/4 and SE1/4;
- sec. 13, NE1/4, E1/2NW1/4, N1/2SE1/4 and SE1/4SE1/4;
- sec. 24, N1/2NE1/4 and SE1/4NE1/4.

T. 6 S., R. 6 E.,

- sec. 7, lot 4, SE1/4SW1/4 and SE1/4;
- sec. 8, S1/2SW1/4 and SW1/4SE1/4;
- sec. 17;

T. 6 S., R. 6 E.,

- sec. 18,
- sec. 19, lots 1 and 2, NE1/4, E1/2NW1/4, NE1/4SW1/4, NE1/4SE1/4 and S1/2SE1/4;
- secs. 20 and 21;
- sec. 22, NW1/4NW1/4, S1/2NW1/4 and SW1/4;
- sec. 25, SW1/4;
- sec. 26, S1/2;
- sec. 27, NW1/4 and S1/2;
- sec. 28;
- sec. 29, NE1/4, N1/2NW1/4, SE1/4NW1/4, N1/2SE1/4 and SE1/4SE1/4;
- sec. 30, NE1/4NE1/4;
- sec. 33, NE1/4, N1/2NW1/4 and NE1/4SE1/4;
- secs. 34 and 35.

T. 6 S., R. 7 E.,

- sec. 14, S1/2NE1/4, W1/2, N1/2SE1/4 and SW1/4SE1/4;
- sec. 15, NE1/4, NE1/4NW1/4, S1/2NW1/4 and S1/2;
- sec. 17, SE1/4SE1/4;
- sec. 19, lot 4, SE1/4NE1/4, E1/2SW1/4 and SE1/4;
- sec. 20, NE1/4, NE1/4NW1/4, S1/2NW1/4 and S1/2;
- sec. 21, 22 and 23;
- sec. 24, NW1/4 and S1/2;
- sec. 25, N1/2;
- sec. 26, NE1/4, N1/2NW1/4 and SE1/4NW1/4;
- sec. 27, N1/2NE1/4, SW1/4NE1/4, NW1/4 and NW1/4SW1/4;
- sec. 28, N1/2, SW1/4, N1/2SE1/4 and SW1/4SE1/4;
- sec. 29;
- sec. 30,
- sec. 31, lots 1 thru 4, NE1/4, E1/2NW1/4, E1/2SW1/4, N1/2SE1/4 and SW1/4SE1/4;
- sec. 32, N1/2NE1/4, SW1/4NE1/4, NW1/4 and NW1/4SW1/4;
- sec. 33, NW1/4NW1/4.

T. 6 S., R. 8 E.,

- sec. 13, SE1/4NE1/4 and S1/2;
- sec. 14, S1/2NW1/4 and S1/2;
- sec. 15, S1/2NE1/4 and SE1/4;
- sec. 19, lots 3 and 4, S1/2NE1/4, E1/2SW1/4 and SE1/4;
- secs. 20s thru 24;
- sec. 25, N1/2, N1/2SW1/4 and N1/2SE1/4;
- sec. 26, N1/2, N1/2SW1/4 and N1/2SE1/4;
- sec. 27, N1/2;
- sec. 28, N1/2;
- sec. 29, N1/2;
- sec. 30, lots 1 and 2, NE1/4 and E1/2NW1/4.

T. 7 S., R. 6 E.,

- sec. 1, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4 and N1/2SW1/4;
- sec. 2, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4, N1/2SW1/4 and N1/2SE1/4;
- sec. 3, lots 1 and 2 and SE1/4NE1/4.

T. 8 S., R. 11 E.,

- sec. 1, lots 3 and 4, SW1/4NE1/4, S1/2NW1/4 and S1/2;
- sec. 2;
- sec. 3;
- sec. 4, lots 1 and 2, S1/2NE1/4, N1/2SE1/4 and SE1/4SE1/4;
- sec. 10, NE1/4, NE1/4NW1/4 and NE1/4SE1/4;
- secs. 11, 12 and 13;
- sec. 14, NE1/4, NE1/4NW1/4 and NE1/4SE1/4;
- sec. 24, N1/2NE1/4 and SE1/4NE1/4.

T. 8 S., R. 12 E.,

- sec. 6, lot 6;
- sec. 7, lots 1 thru 4, NW1/4NE1/4, S1/2NE1/4 and SE1/4;
- sec. 8, SW1/4 and SW1/4SE1/4;
- sec. 17;
- sec. 18;
- sec. 19, lots 1, 2 and 3, and E1/2;
- secs. 20 and 21;
- sec. 22, SW1/4NW1/4 and SW1/4;
- sec. 27, W1/2;
- sec. 28;
- sec. 29, N1/2, NE1/4SW1/4 and SE1/4;
- sec. 30, NE1/4NE1/4;
- sec. 32, NE1/4NE1/4;
- sec. 33;
- sec. 34, W1/2.

T. 9 S., R. 12 E.,

- sec. 3, lot 4, SW1/4NW1/4 and W1/2SW1/4;
- sec. 4;
- sec. 5, lot 1, SE1/4NE1/4 and E1/2SE1/4;
- sec. 8, NE1/4NE1/4 and SE1/4SE1/4;
- sec. 9;
- sec. 10, W1/2NW1/4 and W1/2SW1/4;
- sec. 15, W1/2NW1/4 and W1/2SW1/4;
- sec. 17, E1/2NE1/4 and E1/2SE1/4;
- sec. 20, SE1/4SE1/4;
- sec. 21, SE1/4SW1/4, NE1/4SE1/4 and S1/2SE1/4;
- sec. 22, W1/2NW1/4 and W1/2SW1/4;
- sec. 27, lots 3, 4, 8 and 9;
- sec. 28, lots 1 thru 8;
- sec. 29, lots 5 and 6;
- sec. 32, lots 1 thru 4, E1/2SW1/4 and SE1/4;
- sec. 33;
- sec. 34, lots 1 and 2.

T. 10 S., R. 12 E.,

- sec. 3, lots 5 and 6;
- sec. 4, lots 3 and 4, S1/2NW1/4, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- sec. 5, lots 1, 2 and 3, S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4 and SE1/4;
- sec. 8, NE1/4 and E1/2NW1/4;
- sec. 9, N1/2;
- sec. 10, W1/2;
- sec. 15, W1/2NW1/4 and W1/2SW1/4;
- sec. 21, E1/2NE1/4;

T. 10 S., R. 12 E.,
sec. 22, W1/2NW1/4 and W1/2SW1/4;
sec. 27, NW1/4NW1/4 and NE1/4NW1/4.

Temporary Construction Sites (5-year term)

T. 1 S., R. 2 W.,
sec. 19, lot 4 and SE1/4SW1/4;
sec. 29, NE1/4SE1/4;
sec. 30, NE1/4NW1/4.

T. 1 S., R. 3 W.,
sec. 11, S1/2SW1/4 and SW1/4SE1/4;
sec. 14, W1/2SE1/4;
sec. 23, lots 1, 3 and 4 and SE1/4NE1/4;
sec. 25, NW1/4SW1/4 and S1/2SW1/4.

T. 2 S., R. 1 E.,
sec. 30, lots 13 and 14.

T. 2 S., R. 1 W.,
sec. 19, N1/2SE1/4 and SE1/4SE1/4;
sec. 20, W1/2SW1/4;
sec. 25, lot 4;
sec. 28, SE1/4SW1/4;
sec. 29, NW1/4NW1/4;
sec. 33, lot 7;
sec. 34, lots 8 thru 11;
sec. 36, lots 1, 2 and 3, SW1/4NE1/4 and NW1/4SE1/4.

T. 2 S., R. 2 W.,
sec. 6, lot 5 and SE1/4NW1/4;
sec. 14, SE1/4SW1/4 and SW1/4SE1/4;
sec. 21, SW1/4NE1/4, NE1/4SW1/4 and NW1/4SE1/4;
sec. 22, NW1/4SW1/4;
sec. 23, NW1/4NE1/4 and NE1/4NW1/4;
sec. 24, N1/2SW1/4.

T. 5 S., R. 5 E.,
sec. 31, lots 8, 9 and 10;
sec. 32, SW1/4SW1/4;
sec. 33, S1/2SW1/4.

T. 6 S., R. 4 E.,
sec. 1, lots 1 thru 4;
sec. 2, lot 1, SW1/4NE1/4, SE1/4NW1/4 and NW1/4SE1/4;
sec. 3, lot 4 and SW1/4NE1/4.

- T. 6 S., R. 5 E.,
 sec. 3, SW1/4SW1/4;
 sec. 4, lots 5, 6, 8 and 11;
 sec. 10, NW1/4NW1/4;
 sec. 12, W1/2NW1/4.
- T. 6 S., R. 6 E.,
 sec. 18, lots 1 and 2, NE1/4, E1/2NW1/4 and N1/2SE1/4;
 sec. 20, S1/2NE1/4;
 sec. 27, N1/2SW1/4;
 sec. 35, SE1/4.
- T. 6 S., R. 7 E.,
 sec. 22, NE1/4 and E1/2NW1/4;
 sec. 23, NW1/4;
 sec. 29, NE1/4NE1/4;
 sec. 30, lot 4.
- T. 6 S., R. 8 E.,
 sec. 20, W1/2NE1/4 and E1/2NW1/4;
 sec. 21, W1/2NE1/4;
 sec. 22, SE1/4NW1/4;
 sec. 23, S1/2NW1/4 and N1/2SW1/4;
 sec. 24, SW1/4NE1/4 and NW1/4SE1/4.
- T. 8 S., R. 11 E.,
 sec. 2, SW1/4SE1/4.
- T. 8 S., R. 12 E.,
 sec. 18, lots 1 and 2;
 sec. 20, SW1/4NE1/4;
 sec. 27, W1/2SW1/4.
- T. 9 S., R. 12 E.,
 sec. 3, lot 4;
 sec. 4, lot 1;
 sec. 15, NW1/4NW1/4;
 sec. 21, SE1/4SE1/4;
 sec. 22, SW1/4SW1/4;
 sec. 27, lot 3;
 sec. 28, lot 1 and lots 5 thru 8;
 sec. 33, E1/2SW1/4 and W1/2SE1/4.
- T. 10 S., R. 12 E.,
 sec. 4, SE1/4SW1/4 and SW1/4SE1/4;
 sec. 9, NW1/4NE1/4, SE1/4NE1/4 and NE1/4NW1/4;
 sec. 10, NE1/4SW1/4.

**BUREAU OF LAND MANAGEMENT – Twin Falls County
Boise Meridian – Idaho**

Temporary 2 Mile Wide 500-kV Transmission Line ROW

- T. 8 S., R. 12 E.,
 sec. 22, NW1/4SE1/4 and S1/2SE1/4;
 sec. 26, SW1/4NW1/4 and W1/2SW1/4;
 sec. 27, E1/2;
 sec. 34, E1/2;
 sec. 35, W1/2NW1/4 and W1/2SW1/4.
- T. 9 S., R. 12 E.,
 sec. 3, lots 1, 2 and 3, S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4 and SE1/4;
 sec. 10, E1/2, NW1/4 and E1/2SW1/4;
 sec. 15, E1/2, NW1/4 and E1/2SW1/4;
 sec. 22, E1/2, NW1/4 and E1/2SW1/4;
 sec. 27, lots 1, 2, 5, 6, 7, 10 and 11, and NE1/4NE1/4.
- T. 10 S., R. 12 E.,
 sec. 10, lots 1 and lots 4 thru 9 and SE1/4SW1/4;
 sec. 11, SW1/4SW1/4;
 sec. 14, NW1/4NE1/4, S1/2NE1/4, NW1/4 and S1/2;
 sec. 15, E1/2, NW1/4 and E1/2SW1/4;
 sec. 22, E1/2, NW1/4 and E1/2SW1/4;
 sec. 23;
 sec. 24, W1/2NW1/4 and SW1/4;
 sec. 25, SW1/4NE1/4, W1/2, NW1/4SE1/4 and S1/2SE1/4;
 sec. 26;
 sec. 27, E1/2, E1/2NW1/4 and NE1/4SW1/4;
- T. 10 S., R. 12 E.,
 sec. 34, NE1/4 and E1/2SE1/4;
 sec. 35.
- T. 10 S., R. 13 E.,
 sec. 31, lots 3 and 4.
- T. 11 S., R. 12 E.,
 sec. 1;
 sec. 2, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4, E1/2SW1/4 and SE1/4;
 sec. 11, NE1/4, NE1/4NW1/4, N1/2SE1/4 and SE1/4SE1/4;
 sec. 12;
 sec. 13, N1/2, NE1/4SW1/4, N1/2SE1/4 and SE1/4SE1/4;
 sec. 14, NE1/4NE1/4.
- T. 11 S., R. 13 E.,
 sec. 6, lots 3 thru 7, SE1/4NW1/4, E1/2SW1/4, NW1/4SE1/4 and S1/2SE1/4;
 sec. 7;

T. 11 S., R. 13 E.,

- sec. 8, S1/2NE1/4, NW1/4 and S1/2;
- sec. 9, SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- sec. 10, SW1/4SW1/4;
- sec. 13, NW1/4SW1/4, S1/2SW1/4 and SW1/4SE1/4;
- sec. 14, S1/2NW1/4 and S1/2;
- secs. 15 and 17;
- sec. 18, lots 1 thru 4, NE1/4, E1/2NW1/4, E1/2SW1/4 and SE1/4;
- sec. 19, N1/2NE1/4 and NE1/4NW1/4;
- sec. 20, N1/2 and N1/2SE1/4;
- secs. 21, 22 and 23;
- sec. 24, NW1/4NE1/4, S1/2NE1/4, NW1/4 and S1/2;
- sec. 25;
- sec. 26, N1/2, N1/2SW1/4 and SE1/4;
- sec. 27, NE1/4, N1/2NW1/4 and SE1/4NW1/4;
- sec. 28, NE1/4NE1/4.

T. 11 S., R. 14 E.,

- sec. 19, lots 2, 3 and 4, SE1/4NW1/4, E1/2SW1/4, NW1/4SE1/4 and S1/2SE1/4;
- sec. 20, lots 2 thru 7;
- sec. 21, NW1/4SW1/4 and S1/2SW1/4;
- sec. 27, SW1/4NW1/4, SW1/4 and SW1/4SE1/4;
- sec. 28, NW1/4NE1/4, S1/2NE1/4, NW1/4 and S1/2;
- sec. 29;
- sec. 30;
- sec. 31, N1/2NE1/4 and SE1/4NE1/4;
- sec. 32, N1/2, N1/2SW1/4, SE1/4SW1/4 and SE1/4;
- secs. 33 and 34;
- sec. 35, SW1/4NW1/4, SW1/4 and S1/2SE1/4.

T. 11 S., R. 15 E.,

- sec. 31, lot 4, SE1/4SW1/4 and S1/2SE1/4;
- sec. 32, S1/2SW1/4, NE1/4SE1/4 and S1/2SE1/4;
- sec. 33, S1/2;
- sec. 34, S1/2;
- sec. 35, S1/2.

T. 11 S., R. 16 E.,

- sec. 31, lot 4 and SE1/4SW1/4;
- sec. 34, SE1/4SE1/4;
- sec. 35, SW1/4 and W1/2SE1/4.

T. 11 S., R. 17 E.,

- sec. 29, S1/2SW1/4;
- sec. 30, SE1/4SE1/4;
- sec. 31, lots 1 thru 4, NE1/4, E1/2NW1/4, E1/2SW1/4 and N1/2SE1/4;

- T. 11 S., R. 17 E.,
sec. 32, E1/2;
sec. 33;
sec. 34, W1/2NE1/4, W1/2 and W1/2SE1/4;
sec. 35, NW1/4NE1/4, S1/2NE1/4, E1/2NW1/4, NE1/4SW1/4 and SE1/4.
- T. 11 S., R. 18 E.,
sec. 32, E1/2SE1/4;
sec. 33, E1/2SE1/4;
sec. 34, S1/2NW1/4 and SW1/4.
- T. 12 S., R. 14 E.,
sec. 1, lots 1 thru 4, S1/2NE1/4, E1/2NW1/4, S1/2;
sec. 2;
sec. 3;
sec. 4, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4, NE1/4SW1/4 and SE1/4;
sec. 5, lots 1 and 2 and SE1/4NE1/4;
sec. 9, NE1/4NE1/4;
sec. 10, N1/2, NE1/4SW1/4, N1/2SE1/4 and SE1/4SE1/4;
secs. 11 and 12;
- T. 12 S., R. 15 E.,
sec. 1;
sec. 2;
sec. 3;
sec. 4;
sec. 5;
sec. 6;
sec. 7;
sec. 8, N1/2, SW1/4 and N1/2SE1/4;
sec. 9, N1/2, N1/2SW1/4 and N1/2SE1/4;
sec. 10, N1/2, N1/2SW1/4 and N1/2SE1/4;
sec. 11, N1/2, N1/2SW1/4, N1/2SE1/4 and SE1/4SE1/4;
- T. 12 S., R. 15 E.,
sec. 12.
- T. 12 S., R. 16 E.,
sec. 1;
sec. 2;
sec. 3, S1/2NE1/4, SE1/4NW1/4, SW1/4 and E1/2SE1/4;
sec. 4, SE1/4;
sec. 5, lots 3 and 4, S1/2NW1/4, SW1/4 and W1/2SE1/4;
sec. 6;
sec. 7, lots 1 thru 4, NE1/4, E1/2NW1/4, E1/2SW1/4, N1/2SE1/4 and SW1/4SE1/4;
sec. 8;
sec. 9, E1/2NE1/4, W1/2SW1/4 and NE1/4SE1/4;
sec. 10;

T. 12 S., R. 16 E.,

- sec. 11, S1/2NE1/4, W1/2, N1/2SE1/4 and SW1/4SE1/4;
- sec. 14, NW1/4NW1/4;
- sec. 15, N1/2NE1/4 and N1/2NW1/4;
- sec. 17, N1/2NE1/4 and NE1/4NW1/4.

T. 12 S., R. 17 E.,

- sec. 1;
- sec. 2, lots 3 and 4, S1/2NW1/4, W1/2SW1/4 and E1/2SE1/4;
- sec. 3, lots 1, 2 and 3, SE1/4NW1/4 and S1/2;
- sec. 4, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4 and W1/2SW1/4;
- sec. 5, lot 1, SE1/4NE1/4 and E1/2SE1/4;
- sec. 6, lots 3 thru 7, SW1/4NE1/4, SE1/4NW1/4 and E1/2SW1/4;
- sec. 7, lot 1, N1/2NE1/4 and NE1/4NW1/4;
- sec. 8, N1/2NE1/4;
- sec. 9, N1/2NW1/4;
- sec. 10, N1/2NE1/4 and N1/2NW1/4;
- sec. 11, NE1/4, NW1/4NW1/4 and NE1/4SE1/4;
- sec. 12, N1/2, N1/2SW1/4 and N1/2SE1/4.

T. 12 S., R. 18 E.,

- sec. 1, SE1/4;
- sec. 2, lots 1 thru 4, S1/2NE1/4, S1/2NW1/4, SW1/4 and W1/2SE1/4;
- sec. 3, lots 1 thru 4, SE1/4NE1/4, S1/2NW1/4 and S1/2;
- sec. 4, lots 1 and 4, S1/2NE1/4, S1/2NW1/4 and S1/2;
- sec. 5, lot 1, SE1/4NE1/4, S1/2SW1/4, NE1/4SE1/4 and S1/2SE1/4;
- sec. 6, lot 7, S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4 and SE1/4;
- sec. 7, lots 1, 2 and 3, NE1/4, E1/2NW1/4, NE1/4SW1/4 and N1/2SE1/4;
- sec. 8, E1/2NE1/4, N1/2NW1/4, SW1/4NW1/4 and NW1/4SW1/4;
- sec. 9, N1/2;
- sec. 10, N1/2;
- sec. 11, NW1/4NE1/4 and N1/2NW1/4;
- sec. 12, NE1/4.

Temporary Construction Sites (5-year term)

T. 10 S., R. 12 E.,

- sec. 10, lot 6;
- sec. 15, NW1/4NE1/4 and SE1/4;
- sec. 26, NE1/4NW1/4.

T. 11 S., R. 12 E.,

- sec. 1, SW1/4SE1/4;
- sec. 12, NW1/4NE1/4, NE1/4NW1/4 and N1/2SE1/4.

T. 11 S., R. 13 E.,

- sec. 7, SE1/4SW1/4;

T. 11 S., R. 13 E.,
sec. 17, S1/2NE1/4 and NE1/4SE1/4;
sec. 22, W1/2NE1/4;
sec. 23, NE1/4SW1/4 and NW1/4SE1/4;
sec. 24, SE1/4NE1/4, S1/2SW1/4 and E1/2SE1/4.

T. 11 S., R. 14 E.,
sec. 19, lots 2 and 4 and SE1/4NW1/4;
sec. 29, NW1/4;
sec. 33, N1/2SE1/4.

T. 12 S., R. 14 E.,
sec. 2, SW1/4SW1/4 and S1/2SE1/4.

T. 12 S., R. 15 E.,
sec. 1, SE1/4SE1/4;
sec. 2, NE1/4SW1/4 and E1/2SE1/4;
sec. 4, E1/2SW1/4 and W1/2SE1/4;
sec. 6, SE1/4.

T. 12 S., R. 16 E.,
sec. 1, SW1/4NW1/4;
sec. 2, SW1/4SW1/4 and NW1/4SE1/4;
sec. 3, SE1/4SE1/4;
sec. 7, N1/2NE1/4;
sec. 10, NE1/4NE1/4;
sec. 11, NW1/4NW1/4.

T. 12 S., R. 17 E.,
sec. 1, NE1/4SW1/4 and NW1/4SE1/4;
sec. 2, lot 3;
sec. 3, lots 1 and 2;
sec. 4, lot 2.

T. 12 S., R. 18 E.,
sec. 2, lot 4;
sec. 4, SE1/4NW1/4;
sec. 5, SE1/4NE1/4;
sec. 6, NW1/4SE1/4.

BUREAU OF RECLAMATION - Ada County
Boise Meridian – Idaho

Temporary 2 Mile Wide 500-kV Transmission Line ROW

T. 1 S., R. 1 W.,
sec. 31, lots 1, 2 and 3, SE1/4NE1/4, SE1/4NW1/4, NE1/4SW1/4 and N1/2SE1/4;
sec. 32, lots 2, 3 and 4, N1/2NE1/4, SW1/4NE1/4, NE1/4NW1/4 and S1/2NW1/4;

- T. 1 S., R. 1 W.,
 sec. 33, NE1/4NW1/4.
T. 2 S., R. 1 E.,
 sec. 31, SE1/4NE1/4 and E1/2SE1/4.

Temporary Construction Sites (5-year term)

There are no aliquots in this county for this feature

BUREAU OF RECLAMATION - Canyon County
Boise Meridian – Idaho

Temporary 2 Mile Wide 500-kV Transmission Line ROW

- T. 1 S., R. 2 W.,
 sec. 25, lot 1, SE1/4SW1/4 and SW1/4SE1/4;
 sec. 26, lots 1 and 2, N1/2SW1/4 and NW1/4SE1/4;
 sec. 27, lots 3 and 4, NW1/4SE1/4, NE1/4SE1/4 and SW1/4NW1/4.

Temporary Construction Sites (5-year term)

- T. 1 S., R. 2 W.,
 sec. 26, N1/2SW1/4 and NW1/4SE1/4;
 sec. 27, lots 3 and 4 and N1/2SE1/4.

BUREAU OF RECLAMATION - Elmore County
Boise Meridian – Idaho

Temporary 2 Mile Wide 500-kV Transmission Line ROW

- T. 1 S., R. 4 E.,
 sec. 13, lot 3, SW1/4NE1/4 and NE1/4NW1/4.
T. 1 S., R. 5 E.,
 sec. 15, S1/2SE1/4;
 sec. 17, S1/2SW1/4;
 sec. 18, N1/2SE1/4;
 sec. 21, S1/2.
T. 2 S., R. 6 E.,
 sec. 14, SW1/4SW1/4;
 sec. 15, SE1/4NE1/4;
 sec. 23, W1/2NW1/4 and W1/2SW1/4;
 sec. 26, NW1/4 and NW1/4SW1/4;
 sec. 27, SE1/4NE1/4, E1/2SW1/4 and SE1/4.
T. 3 S., R. 7 E.,
 sec. 9, NW1/4SE1/4.

T. 7 S., R. 11 E.,
sec. 30, NE1/4SW1/4 and SE1/4;
sec. 32, NE1/4, N1/2NW1/4, SE1/4NW1/4, N1/2SE1/4 and SE1/4SE1/4.

Temporary Construction Sites (5-year term)

T. 1 S., R. 4 E.,
sec. 13, NE1/4NW1/4.
T. 1 S., R. 5 E.,
sec. 21, NE1/4SE1/4.
T. 2 S., R. 6 E.,
sec. 23, SW1/4SW1/4;
sec. 26, N1/2NW1/4 and SE1/4NW1/4.

**BUREAU OF RECLAMATION - Owyhee County
Boise Meridian – Idaho**

Temporary 2 Mile Wide 500-kV Transmission Line ROW

T. 1 S., R. 2 W.,
sec. 19, lot 3, SE1/4NE1/4, SE1/4NW1/4, NE1/4SW1/4 and NE1/4SE1/4;
sec. 28, lots 9 and 10, NW1/4SW1/4, S1/2SW1/4 and SW1/4SE1/4;
sec. 29, E1/2NW1/4;
sec. 33, E1/2NE1/4;
sec. 34, SE1/4NE1/4, NW1/4NW1/4 and NE1/4SE1/4;
sec. 35, SE1/4NE1/4, N1/2SW1/4 and N1/2SE1/4.
T. 1 S., R. 3 W.,
sec. 13, NW1/4NW1/4, SE1/4NW1/4 and NE1/4SW1/4;
sec. 24, lot 6.
T. 2 S., R. 1 E.,
sec. 19, lot 15;
sec. 30, lots 2, 7 and 15;
sec. 31, lots 2, 7, 10, 13, 15 and 15 .
T. 3 S., R. 1 E.,
sec. 6, lots 3, 4 and 5.
T. 8 S., R. 11 E.,
sec. 4, lots 3 and 4 and SE1/4NW1/4.

Temporary Construction Sites (5-year term)

T. 1 S., R. 2 W.,
sec. 28, lots 9 and 10 and NW1/4SW1/4;
sec. 29, SE1/4NW1/4.

T. 1 S., R. 3 W.,
 sec. 24, lot 15.
T. 2 S., R. 1 E.,
 sec. 30, lot 15.

**Appendix D
Morley Nelson Snake River Birds of Prey National Conservation Area
Boundary Modification Act of 2017**

115TH CONGRESS
1ST SESSION

H. R. 2104

To modify the boundaries of the Morley Nelson Snake River Birds of Prey
National Conservation Area, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

APRIL 20, 2017

Mr. SIMPSON (for himself and Mr. LABRADOR) introduced the following bill;
which was referred to the Committee on Natural Resources

A BILL

To modify the boundaries of the Morley Nelson Snake River
Birds of Prey National Conservation Area, and for other
purposes.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE.**

4 This Act may be cited as the “Morley Nelson Snake
5 River Birds of Prey National Conservation Area Boundary
6 Modification Act of 2017”.

7 **SEC. 2. BOUNDARY MODIFICATION, MORLEY NELSON**
8 **SNAKE RIVER BIRDS OF PREY NATIONAL**
9 **CONSERVATION AREA, IDAHO.**

10 (a) DEFINITIONS.—In this section:

1 (1) CONSERVATION AREA.—The term “Con-
2 servation Area” means the Morley Nelson Snake
3 River Birds of Prey National Conservation Area.

4 (2) GATEWAY WEST.—The term “Gateway
5 West” means the high-voltage transmission line
6 project in Idaho and Wyoming jointly proposed by
7 the entities Idaho Power Company, incorporated in
8 the State of Idaho, and Rocky Mountain Power, a
9 division of PacifiCorp, an Oregon Corporation.

10 (3) MAP.—The term “map” means the map ti-
11 tled “Proposed Snake River Birds of Prey NCA
12 Boundary Adjustment” and dated October 13, 2016.

13 (4) SAGE-GROUSE SPECIES.—The term “sage-
14 grouse species” means the greater sage-grouse
15 (*Centrocercus urophasianus*) (including all distinct
16 population segments).

17 (5) SECRETARY.—The term “Secretary” means
18 the Secretary of the Interior.

19 (b) AREAS TO BE ADDED TO AND REMOVED FROM
20 MORLEY NELSON SNAKE RIVER BIRDS OF PREY NA-
21 TIONAL CONSERVATION AREA.—The boundary of the
22 Conservation Area is hereby modified—

23 (1) to include—

24 (A) the approximately 4,726 acres of land
25 generally depicted as “BLM Administered

1 Lands” on the map, to the extent such lands
2 are part of the Lower Saylor Creek Allotment
3 those lands would continue to be managed by
4 the BLM Jarbidge Field Office until terms of
5 the No. CV-04-181-S-BLW Stipulated Settle-
6 ment Agreement are fully met, after which the
7 lands would be managed by the Morley Nelson
8 Snake River Birds of Prey National Conserva-
9 tion Area office; and

10 (B) the approximately 86 acres of land
11 generally depicted as “BOR Administered
12 Lands” on the map; and

13 (2) to exclude—

14 (A) the approximately 761 acres of land
15 generally depicted as “Segment 8 Revised Pro-
16 posed Route” on the map, including 125 feet on
17 either side of the center line of the Gateway
18 West Transmission line, the Gateway West
19 Transmission Line shall be sited so that the
20 center line of Segment 8 is no more than 500
21 feet from the center line of the existing Sum-
22 mer Lake Transmission Line as described in
23 the Summer Lake Transmission Line Right of
24 Way Grant per FLPMA, IDI-008875; and

1 (B) the approximately 1,845 acres of land
2 generally depicted as “Segment 9 Revised Pro-
3 posed Route” on the map including 125 feet on
4 either side of the center line of the Gateway
5 West Transmission line.

6 (c) RIGHT-OF-WAY AND CONDITIONS.—

7 (1) RIGHT-OF-WAY.—Notwithstanding any
8 other provision of law, not later than 90 days after
9 the date of the enactment of this section, the Sec-
10 retary shall issue to Gateway West a right-of-way
11 for the lands described in subsection (b)(2) to be
12 used for the construction and maintenance of trans-
13 mission lines, including access roads and activities
14 related to fire prevention and suppression. The
15 right-of-way issued under this paragraph shall con-
16 tain the conditions described in subsection (c)(2),
17 and be in alignment with the revised proposed routes
18 for segments 8 and 9 identified as Alternative 1 in
19 the Supplementary Final Environmental Impact
20 Analysis released October 5, 2016.

21 (2) CONDITIONS.—The conditions that the Sec-
22 retary shall include in the right-of-way described in
23 paragraph (1) shall be in accordance with section
24 505 of the Federal Land Policy and Management
25 Act of 1976 (43 U.S.C. 1765) and are as follows:

1 (A) MITIGATION.—During the time of con-
2 struction of each respective line segment, Gate-
3 way West shall mitigate for the impacts related
4 to the transmission lines in accordance with the
5 Compensatory Mitigation and Enhancement
6 framework described in the final Supplemental
7 Environmental Impact Statement with the stip-
8 ulation that Compensatory Mitigation and En-
9 hancement costs shall not exceed \$8,543,440.

10 (B) CONSERVATION.—Gateway West shall
11 contribute \$2,000 per acre of right-of-way in
12 the Conservation Area during the time of con-
13 struction of Segment 8 Revised Proposed Route
14 (comprising 761 acres) and during the con-
15 struction of Segment 9 Revised Proposed Route
16 (comprising 1,845 acres) to the Bureau of
17 Land Management Foundation that shall be
18 used for the purpose of conservation, including
19 enhancing National Landscape Conservation
20 System Units in Idaho, also known as National
21 Conservation Lands.

22 (C) COSTS.—Gateway West shall pay all
23 costs associated with the boundary modification,
24 including the costs of any surveys, recording
25 costs, and other reasonable costs.

1 (D) OTHER.—Standard terms and condi-
2 tions in accordance with section 505 of the
3 Federal Land Policy and Management Act of
4 1976 (43 U.S.C. 1765).

5 (d) ADMINISTRATION.—The Secretary shall—

6 (1) administer the lands described in subsection
7 (b)(1) as part of the Conservation Area in accord-
8 ance with Public Law 103–64 and as part of the
9 National Landscape Conservation System; and

10 (2) continue to administer lands described in
11 subsection (b)(2), but as lands that are not included
12 in a Conservation Area or subject to Public Law
13 103–64.

14 (e) TRANSFER OF ADMINISTRATIVE JURISDIC-
15 TION.—Administrative jurisdiction over the approximately
16 86 acres of land depicted as “BOR Administered Lands”
17 on the map is hereby transferred from the Bureau of Rec-
18 lamation to the Bureau of Land Management.

19 (f) AVAILABILITY OF MAP.—The map shall be on file
20 and available for public inspection in the appropriate of-
21 fices of the Bureau of Land Management.

22 (g) MANAGEMENT PLAN AMENDMENT.—Not later
23 than 18 months after the date of the enactment of this
24 Act, the Secretary shall amend the management plan for
25 the Conservation Area to address the long-term manage-

1 ment of the lands described in subsection (b)(1) in order
2 to—

3 (1) determine appropriate management activi-
4 ties and uses of the lands described in subsection
5 (b)(1) consistent with Public Law 103–64 and this
6 section;

7 (2) continue managing the grazing of livestock
8 on the lands described in subsection (b)(1) in which
9 grazing is established as of the date of the enact-
10 ment of this section such that the grazing shall be
11 allowed to continue, subject to such reasonable regu-
12 lations, policies, and practices that the Secretary
13 considers necessary;

14 (3) allow motorized access on roads existing on
15 the lands described in subsection (b)(1) on the date
16 of the enactment of this section, subject to such rea-
17 sonable regulations, policies, and practices that the
18 Secretary considers necessary; and

19 (4) allow hunting and fishing on the lands de-
20 scribed in subsection (b)(1) consistent with applica-
21 ble laws and regulations.

22 **SEC. 3. COTTEREL WIND POWER PROJECT.**

23 The approximately 203 acres of Federal land identi-
24 fied as “Project Area” on the map titled “Cotterel Wind

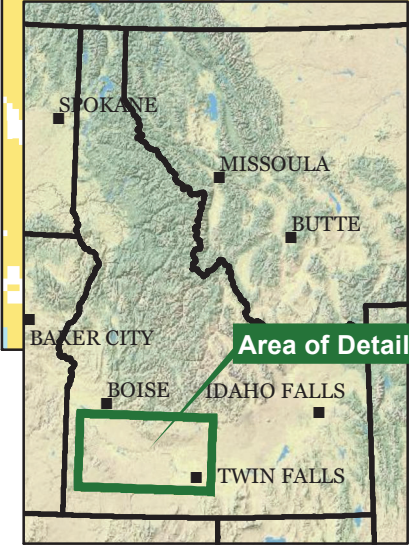
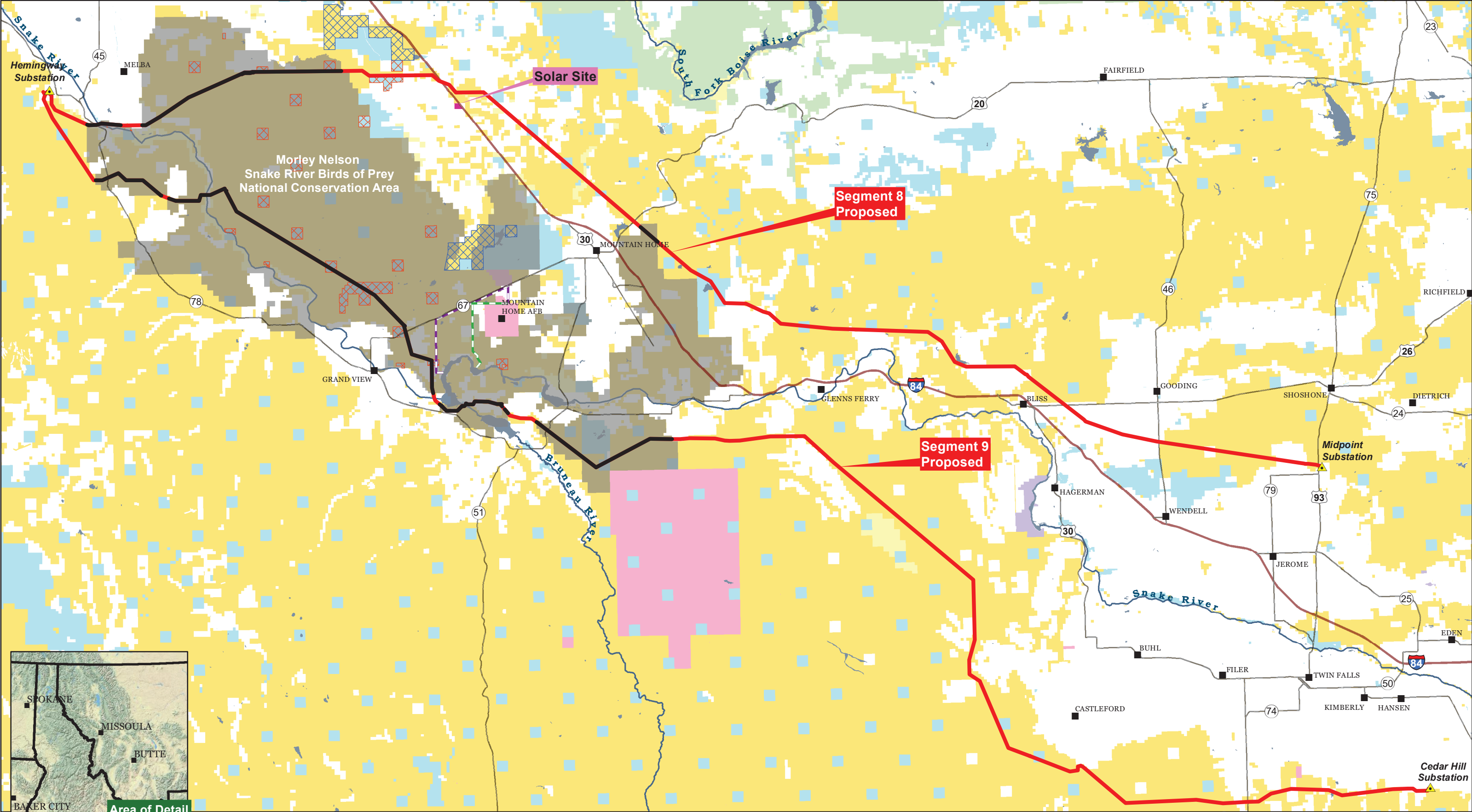
- 1 Power Project” and dated March 1, 2006, may not be
- 2 used for the production of electricity from wind.

○

**Appendix E
Cumulative Effects Analysis Map**



Gateway West Appendix E - Cumulative Effects Analysis, Proposed Action - Alternative 1



Segment 8 and 9 Proposed	Orchard Land Exchange Proposed Lease/BLM to IDL	Water Pipeline Routes Alternative B: Proposed Action	Interstate	Substations	Bureau of Land Management	Bureau of Reclamation
National Conservation Area	IDL to BLM	Alternative C: BLM Preferred	Highway	River	Private	Department of Defense
Statutory ROW Authorized	Solar Project Site		Town/City	Waterbody	US Forest Service	National Park Service
					State	

No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of these data for individual use or aggregate use with other data is not guaranteed.

1:500,000

11/1/2017

Appendix F Scoping Comments and Responses

Gateway West Environmental Assessment

Scoping Comments and Responses

COMMENT					RESPONSE
Letter #	Comment #	Date	Author	Comment	
EA-1	1	8-28-17	Sherry Penny	I live very close to the Hemingway Substation in Owyhee County. It can be very loud at different times of the day. I am concerned that once all the new lines etc come in, it will be even more obnoxious to the ears.	The BLM recognizes that this is a concern to residents in the vicinity of the substation. During the RAC process, an alternative was explored under which both segments would parallel the existing line to Hemingway, but that alternative was not recommended by the RAC and was not carried forward into the SEIS. An alternative alignment into Hemingway was discussed during the field trip mentioned in the letter. It was suggested that Segment 8 stop paralleling the existing 500-kV line south of Hemingway to join a common corridor with Segment 9 where both lines would enter Hemingway from the west to avoid additional impacts to the China Ditch subdivision. The Proponents considered this alignment impractical because it resulted in an additional crossing of the existing 500-kV line and created significant difficulties and crowding coming into the substation. This alignment was also not recommended by the RAC because of potential impacts to Reynolds Creek. See Section 3.23 of the FSEIS for a discussion of noise effects.
EA-2	1	8-30-17	B Ker	i am totally opposed to approval of this newest pipeline. the fact is america is being plagued by pipelines all over far above our national need for such pipelines. the fact is rich white men want to sell out america by ripping up america and selling out our energy on our national lands to china or other foreigners and make big money doing it. our national lands are all at risk from these development. we are opposed to rich white men being allowed to get away with this theft of our national lands and the devastation of those lands for unnecessary drilling and pipelines. these drilling and pipelines are far far above the needs of the usa.	This EA considers Segments 8 and 9 of the Gateway West transmission line, which is designed to provide electrical power to the applicants' customers in the United States.
EA-3	1	9-1-17	Union Pacific Railroad – Renay Robison	UPRR objects to any route that runs parallel within three hundred (300) feet of railroad right of way, measured from the centerline of our track.	Segment 8 of the Proposed Route crosses the railroad on BLM-managed land. Segment 9 does not cross the Union Pacific line on BLM-managed land. Neither of the routes parallel the railroads within 300 feet of the

COMMENT					RESPONSE
Letter #	Comment #	Date	Author	Comment	
				All parallel lines must be three hundred (300) feet off of track. UPRR also objects to any route that crosses its right-of-way. UPRR will only allow crossings of railroad right of way at a degree of ninety (90°), or as close to ninety degrees (90°) as possible without going beyond the degree range of forty-five (45°). UPRR does not allow for any structures to be erected on railroad right of way. All crossings and parallel lines will require a future agreement with UPRR as to how to construct and maintain.	railroad track. No structures would be placed within the railroad easement. Information regarding Project effects on railroads is included in Section 3.19 – Transportation of the 2016 FSEIS. The BLM recognizes that the railroad easements have established rights. The Proponents are responsible for coordinating with the railroad.
EA-3	2	9-1-17	Union Pacific Railroad – Renay Robison	This objection is based upon the lack of detailed information to fully understand the project and the impact this station and wirelines may have on Railroad property. If the above conditions cannot be met, all consideration of the project should be subject to a full mitigation study at the expense of Idaho Power and Rocky Mountain Power. Any concerns resulting from the mitigation study must be required to be addressed to avoid any damage to UPRR's signal and communication facilities.	See the response to the previous comment.
EA-3	3	9-1-17	Union Pacific Railroad – Renay Robison	Safety is the primary driver for this requested requirement. Unmitigated high voltage power lines in close proximity to railroad tracks can have an adverse affect upon railroad signals, especially grade crossing warning devices. For crossings in the vicinity of switches or signal facilities (especially when not crossing at a 90 degree angle), inductive interference has the potential to disrupt signal system in the track, causing failure in track signals, including highway grade crossing warning devices. In general, the more power that flows through the wires, the greater effect it has upon the railroad equipment. UPRR reviews proposed installations on or near its right of way by examining factors such as the distance between the wire and the rails and how far the power line parallels the tracks to evaluate the potential for the power lines to affect the safe operation of railroad signaling equipment.	The BLM recognizes that the railroad easements have established rights. The Proponents are responsible for coordinating with the railroad.

COMMENT					RESPONSE
Letter #	Comment #	Date	Author	Comment	
EA-3	4	9-1-17	Union Pacific Railroad – Renay Robison	Other adverse affects on railroad equipment come from ground fault events. These events cause a great deal of energy to flow through the ground from the power company's towers and/or substations, through the rails, and directly into signal equipment. Such events can cause tens or hundreds of thousands of dollars worth of damages during a single event. These occurrences can cause the destruction of railroad equipment for several miles. In one area, well documented events have repeatedly destroyed grade crossing warning devices for several miles. In addition to the potential to cause damage to railroad equipment, railroad personnel or anyone else touching the rails can be subject to injury from electrical shock.	The BLM recognizes that the railroad easements have established rights. The Proponents are responsible for coordinating with the railroad.
EA-3	5	9-1-17	Union Pacific Railroad – Renay Robison	Information and application forms concerning requests for wireline crossings across UPRR's property may be found on the internet at: http://www.up.co111/real estate/utilities/index.htm . Engineering specifications regarding crossings can be found as well at http://www.up.com/real estate/utilities/wireline/wirespecs/index.htm . Proposals that call for placement of improvements on or under our property require greater evaluation and tend to be more difficult to approve, particularly where wirelines parallel our tracks with voltage. Further information regarding requests for such encroachments may be found on our website at: www.uprr.com/reus/encroach/procedure.r.htm and www.uprr.com/reus/encroach/encguide.r.htm . In all instances, there must also be a meeting of the minds on compensation for the right to cross the property.	The BLM recognizes that the railroad easements have established rights. The Proponents are responsible for coordinating with the railroad.
EA-3	6	9-1-17	Union Pacific Railroad – Renay Robison	By this letter, UPRR requests Idaho Power and Rocky Mountain Power to abide by the conditions presented above. If it has questions on requirements, please encourage its representatives to reach out to me. UPRR reserves its rights to present additional comments on the proposal and to seek any legal, administrative, and other remedies that may be	The BLM recognizes that the railroad easements have established rights. The Proponents are responsible for coordinating with the railroad.

COMMENT					RESPONSE
Letter #	Comment #	Date	Author	Comment	
				necessary to preserve UPRR's franchise and property rights.	
EA-4	1	9-4-17	Oregon-California Trails Association (OCTA)– Jerry Eichhorst	If I understand the changes which have been required to the routing of the Gateway West transmission line across southwestern Idaho due to the Consolidated Appropriations Act of 2017, the remaining two possible routes are routes 8 and 9 as shown in red from the EIS map below. It is somewhat difficult to tell exact details due to the large scale of the map, but both of these routes appear to have several conflicts with alternative routes of the Oregon Trail in southwestern Idaho. This causes me and the Idaho chapter of the Oregon-California Trails Association a great deal of concern.	Effects on national historic trails are discussed in detail in Section 3.1 and Appendix J of the 2016 FSEIS. Also see the photo simulations in Appendix E.
EA-4	2	9-4-17	OCTA – Jerry Eichhorst	Route 8 Revised appears to closely follow the North Alternate Oregon Trail from the area north of Bliss towards its junction with the main Oregon Trail northeast of Mountain Home. At that point, the route appears to follow the Oregon Trail northwest until it turns west towards Melba. There are excellent trail remnants along this entire stretch. I am concerned about possible damage to the trail routes along this corridor and destruction of the emigrant view shed in this area by the addition of power line structures in close proximity to the North Alternate Oregon Trail and the main Oregon Trail. The North Alternate is going before Congress to be added to the inventory of National Historic Trails as the main Oregon Trail already is. This route has been well-documented and a detailed map of the North Alternate route is available from the National Park Service. I have attached a copy of this map for your convenience. More detailed maps of the proposed Gateway West route may provide enough detail to determine how close to the North Alternate and the main Oregon Trail this proposed route actually is.	Detailed maps of the routes in relation to national historic trails are included in Appendix J of the 2016 FSEIS. Also see the photo simulations in Appendix E.
EA-4	3	9-4-17	OCTA – Jerry Eichhorst	Route 9 Revised appears to cross and straddle the South Alternate Oregon Trail in the area of the Bruneau River arm of CJ Strike Reservoir.	Detailed maps of the routes in relation to national historic trails are included in Appendix J of the 2016 FSEIS.

COMMENT					RESPONSE
Letter #	Comment #	Date	Author	Comment	
				There are excellent remnants of the South Alternate Oregon Trail in this area and my concern would be possible damage to these trail remnants and destruction of the emigrant view shed in this area by the addition of power line structures in close proximity to the trail.	
EA-4	4	9-4-17	OCTA – Jerry Eichhorst	I am opposed to any routing of the power line parallel to and within close proximity to the Oregon Trail, North Alternate Oregon Trail, and South Alternate Oregon Trail in these areas. I trust that the utmost care will be utilized when crossing the emigrant trails along the Gateway West route and that the trail routes will not be used for construction equipment to travel on.	Comment noted.
EA-4	5	9-4-17	OCTA – Jerry Eichhorst	I would be happy to meet with the appropriate BLM personnel to discuss the routing on more detailed maps where trail route and proposed power line routes can be viewed in more detail.	Detailed maps of the routes in relation to national historic trails are included in Appendix J of the 2016 FSEIS.
EA-5	1	8-29-17	Kathryn Christie	The map is not clear enough for me to tell if Alternate 1 Revised Segment 8 goes over and/or near our 17 acres of property located at Simco Rd and I-84 freeway. The owner of record is shown as MAJIK LLC (although I think Elmore County property tax records have slight typo in this name).	As currently proposed, the line passes near but not across this property. This information was sent directly to you.
EA-6	1	9-14-17	Adrienne Patridge	I have lived in Idaho for most of my entire life. We have a beautiful, clean, state. The desert land of Idaho will continue to display its unique elegance if we preserve the land, the sage brush and water on the land, and the sky above the land. Consequently, the animals living in this area will continue to thrive.	Comment noted.
EA-6	2	9-14-17	Adrienne Patridge	I noticed there was an opportunity to leave public comment concerning the Gateway West Transmission Line Project. While I do deem it necessary to provide a proficient power source to the community, I hope we will consider the Birds of Prey in those decisions. They are a beautiful addition in the sky above us for anyone who chooses to look up. I see more and more, they are losing what they need most to thrive in their habitat. Less sagebrush, more cheat grass,	Comment noted.

COMMENT					RESPONSE
Letter #	Comment #	Date	Author	Comment	
				houses, power lines, etc. We need to consider how what we do matters when making decisions concerning the population growth of the human species. I don't have an answer except to say there are those trained and necessarily equipped to know how to best serve the community AND our natural environment. Please take this to heart in any decisions moving forward. Our future depends on it.	
EA-7	1	9-11-17	Robyn Thompson	Addresses impacts to stakeholders residing in Guffy, Idaho via the construction of Segment 8: Also known as Summer Lake Option 1 recommended by the Boise District Resource Advisory Council, May 30, 2014. Also known as Alternative 1: Draft Supplemental EIS, March 11-June 9, 2016. March 27, 2014 the BD RAC subcommittee participated in a Field Tour paid for by the Governor's Office, lead by Mr. John Chatburn, Administrator, Idaho Department of Energy. The subcommittee parked on the north side of Hwy 78 where the existing 500 kV line crosses Hwy 78. An Owyhee County Task Force member asked if it would be possible to site the new 500 kV line, which will be 250' north of the existing line, could the "new" line after crossing the Hwy cross over the existing line. Then parallel the existing line southwest to the substation. This needs to happen to minimize impacts to private property – homes – otherwise the "new" line would go right over the top of some homes. Mr. Chatburn explained the lines could not cross. However the "new" line could be connected to the first 200' tower south of Hwy 78 – that line would then become segment 8. The new towers constructed would then transmit the power that the existing line currently transmits.	During the RAC process, an alternative was explored that continued the DC 500/138-kV rebuild north to the existing 500-kV line where both segments then paralleled the existing line to Hemingway, but that alternative was not recommended by the RAC and was not carried forward into the SEIS. An alternative alignment into Hemingway was discussed during the field trip mentioned in the letter. It was suggested that Segment 8 stop paralleling the existing 500-kV line south of Hemingway to join a common corridor with Segment 9 where both lines would enter Hemingway from the west to avoid additional impacts to the China Ditch subdivision. The Proponents considered this alignment impractical because it resulted in an additional crossing of the existing 500-kV and created significant difficulties and crowding coming into the substation. This alignment was also not recommended by the RAC because of potential impacts to Reynolds Creek.
EA-7	2	9-11-17	Robyn Thompson	This technique is already utilized regarding Segment 8 to accommodate the Orchard Combat Training Center. We are enclosing a map for clarification.	The existing 500/138-kV line north of the training area is being rebuilt to avoid having the new 500-kV line cross over the existing line.
EA-7	3	9-11-17	Robyn Thompson	Addresses impacts to stakeholders residing in the China Ditch subdivision. These property owners	During the RAC process, an alternative was explored that continued the DC 500/138-kV rebuild north to the existing 500-kV line where both segments then

COMMENT					RESPONSE
Letter #	Comment #	Date	Author	Comment	
				<p>have been very vocal since the release of the DEIS, 2011. Idaho Power owns parcels for the purpose of siting Segment 8. These impacted stakeholders vehemently oppose siting Segment 8 on these parcels. Utilizing these parcels would sandwich some landowners between 500 kV lines.</p> <p>These Owhyee County residents ask that all lines; the existing 500 kV line, Segment 8 and Segment 9 enter on the south side of the Hemingway substation.</p> <p>Mr. Keith Georgeson, engineer, Idaho Power and member of the RAC subcommittee, confirmed with his superiors that indeed it is possible from an engineering standpoint to bring all of the 500 kV lines into the substation utilizing only the south side.</p>	<p>paralleled the existing line to Hemingway, but that alternative was not recommended by the RAC and was not carried forward into the SEIS. An alternative alignment into Hemingway was discussed during the field trip mentioned in the letter. It was suggested that Segment 8 stop paralleling the existing 500-kV line south of Hemingway to join a common corridor with Segment 9 where both lines would enter Hemingway from the west to avoid additional impacts to the China Ditch subdivision. The Proponents considered this alignment impractical because it resulted in an additional crossing of the existing 500-kV and created significant difficulties and crowding coming into the substation. This alignment was also not recommended by the RAC because of potential impacts to Reynolds Creek.</p>
EA-8	1	9-15-17	OCTA, Idaho Chapter – Walter Meyer	<p>Included are comments for the proposed routing of the Gateway West Transmission Line from C.J. Strike Reservoir, through the east side of the Birds of Prey Area, and to the Rabbit Creek area. Since the transmission line will be visible from and may cross remnants of the South Alternate of the Oregon National Historic Trail (NHT) in several locations, the following mitigating measures are recommended to minimize the adverse impacts.</p> <p>First, it is recommended that all NHT remnants on public land be closed by the BLM to all types of motorized use.</p>	<p>Mitigation of project effects to national historic trails would be implemented in accordance with Manual 6280 (see Appendix J of the FSEIS). Historic properties would have site-specific Historic Properties Treatment Plans (HPTPs) as discussed in Section 3.1.2.4 of the 2016 FSEIS. The BLM will collaborate with cooperators, agencies and other interested parties to develop appropriate mitigation.</p>
EA-8	2	9-15-17	OCTA, Idaho Chapter – Walter Meyer	<p>C.J. Strike Reservoir Area</p> <p>Since the transmission line will be visible from and may cross NHT remnants on the Bruneau Arm and near the Cove Recreation Site, it's recommended that a recreational trail head with vehicle parking and informational signing be provided on the north side of Hwy 78 in Sections 11 or 12, T.6S., R.4E. to encourage public access to nearby NHT remnants on BLM land.</p>	<p>Thank you for the comment; Developing trailheads is one possible mitigation measure that is being considered.</p>
EA-8	3	9-15-17	OCTA, Idaho Chapter – Walter Meyer	<p>Murphy Flat Area</p> <p>The transmission line should be located as far north of the south Alternate remnants as possible</p>	<p>Thank you for the comment; Developing trailheads is one possible mitigation measure that is being considered.</p>

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				to minimize visual impacts. Since the transmission line will still be visible from the NHT, it is recommended, to help in mitigating adverse impacts, that a recreational trail head be developed at the South Alternate Oregon Trail's crossing at the North-south county road in the SE ¼, Sec. 34, T.2S, R.1W. Here, a livestock fence will need to be relocated around the parking area and a gate provided for non-motorized NHT access.	
EA-8	4	9-15-17	OCTA, Idaho Chapter – Walter Meyer	Although, probably not a mitigating measure, the BLM should acquire a rights-of-way across, or acquire through a land exchange, the private land in the SW ¼, Sec. 35, T.2S., R.1W. to allow for public access from the trail head to 3 miles of NHT remnants on BLM land toward Sinker Creek.	Purchasing easements from willing sellers is one possible mitigation measure that is being considered.
EA-8	5	9-15-17	OCTA, Idaho Chapter – Walter Meyer	Rabbit Creek Area Since the transmission line will be visible from and may cross south Alternate Oregon Trail remnants down Rabbit Creek and, also, on a variant South Alternate route between Rabbit Creek and Hwy 78, it is recommended that recreational trail heads be provided along the road down Rabbit Creek and along Hwy 78, a mile north of Murphy.	Thank you for the comment; Developing trailheads is one possible mitigation measure that is being considered.
EA-8	6	9-15-17	OCTA, Idaho Chapter – Walter Meyer	Again, probably not to be considered as a mitigating measure, the BLM should consider developing trail access from a trail head on Rabbit Creek through the N ½, Sec. 25 & 26, T.2S., R.2W. to NHT remnants on public land on Murphy Flat.	Thank you for the comment; developing trailheads is one possible mitigation measure that is being considered.
EA-9	1	9-21-17	Cat Creek Energy LLC – James Carkulis	This submission is in response to the Bureau of Land Management Notice of Intent to Prepare an Environmental Assessment released 28-August-2016 requesting public input to determine the relevant issues that will influence the scope of the EA. We very much welcome the reconsideration of the BLM's 19-January-2017 Record of Decision selecting the route described as Alternative 5 in the Final Supplemental EIS and support, in company with Idaho Governor Otter and Idaho Congressional Representatives	Comment noted

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				Labrador and Simpson, a Gateway West preferred route incorporating Segment 8, Alternative 1 ("Alt 1").	
EA-9	2	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>Cat Creek Energy, LLC ("CCE")'s direct interest in the location of Gateway West is a function of the fact that Cat Creek will be constructing a 750 MW pump storage hydro, wind, and PV solar integrated renewable energy generation facility adjacent to Anderson Ranch Reservoir in Mountain Home, Idaho, that will interconnect with the series of transmission in the Mountain Home, ID transmission corridor including the anticipated new 500 kV Gateway West transmission line. This integrated renewable energy facility will be the largest generation facility of any kind in the state of Idaho producing up to 2,467,000 MWhr annually contributing to and making a profound impact on the East-West transmission flow. Gateway West becomes an essential intertie in CCE's generator efficiency and Segment 8, Alt 1 is the best adaptation of any route to accommodate new generation, the first primary justification for the Gateway West project.</p>	Your development plans are noted.
EA-9	3	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>This said, our reasons for favoring Segment 8, Alt 1 are principled, not only having to do with the technical-economics factors, but also the general environmental pragmatic factors of paralleling an existing transmission corridor. CCE opposed the Alt. 5 route selection on the basis of the following biological considerations:</p> <ul style="list-style-type: none"> • Concern about the effects of other routes that are contrary to the objective and values for which the Morley Nelson Snake River Birds of Prey (MNSRBP) National Conservation Area was designated. The MNSRBP boundary is static, the airspace is not, and birds move in and out of the designated borders with aplomb. • The Morley Nelson Snake River Birds of Prey area already contains multiple major transmission corridors well known to both local 	Alternative 5 is no longer considered reasonable.

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				<p>and migratory avian populations. Birds have acclimated to them.</p> <ul style="list-style-type: none"> • The selection of the Alt 5 corridor south of the MNSRBP National Conservation Area would have increased near-term avian mortalities owing to its intrusion into an area that does not have many significant vertical features at present. • The Alt 5 route would have displaced more potential sage-grouse habitat than Alt 1 will. • Federal policy has advocated for the last few years to co-locate infrastructure for all the reasons above. Paralleling the current 500 kV Midpoint/Summer Lake PacifiCorp transmission line for Segment 8 bolsters those federal guidelines. • BLM policy should embody a “least harm” principle, and not, at least not primarily, a respect for jurisdictional boundaries and federal designations. Paralleling the existing PacifiCorp Midpoint/Summer Lake 500 kV Transmission Line is the least geographically intrusive and most avian-compatible route for selection. The PacifiCorp existing route, even by expanding the existing corridor embracing two additional transmission lines, is still less impactful on avian populations, including those resident in and migrating through the Birds of Prey area, than Alt 5 would have been. 	
EA-9	4	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>On the basis of the same biological considerations, CCE favors Segment 8, Alternative 1. It will be adjacent to an existent transmission corridor, i.e., not, as Alt 5 would, create new corridors through the area not yet impacted by power structures. This consideration should override any concerns relating to siting on public versus private lands and should in fact mitigate rather than increase impacts on visual resources and existing view sheds. Cat Creek Energy also favors Segment 8 Alt 1 from both the largest single generator and, by many times over, the largest load in Idaho perspectives:</p>	Comment noted.

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EA-9	5	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>As noted above, the Cat Creek Energy Storage & Renewable Generation Station facility, 25 miles north of Mountain Home, Idaho, commences operation in 2020 and will be the largest generator in Idaho at 750 MW [larger than the 585 MW installed capacity of the Brownlee Dam and mirroring its generating capacity potential at 2,406,000 MWhrs) and becomes the largest industrial load in Idaho at 890 MW. Its components include:</p> <ul style="list-style-type: none"> • 12 – 50 MW hydro turbines in a pump/generator configuration • 30- 3.65 MW wind conversion turbine generators • 186,000 PV solar panels equivalent to 40 MW (AC) max. capacity output • 72,600 MWhrs of energy storage capacity by way of a 100,000 acre-ft Upper Reservoir • A A switch/substation at Mountain Home in the transmission corridor connecting to both the 230 kV and the 500 kV transmission level systems. 	Comment noted.
EA-9	6	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>CCE is taking extraordinary measures to ensure minimum environmental impacts in its design including, but not limited to co-locating the dual-circuit 230 kV transmission line for the project alongside the current BPA 115 kV Anderson Ranch/Mountain Home transmission corridor.</p>	Comment noted.
EA-9	7	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>The proposed Segment 8 Alt 1 route has several operational advantages that have to do with future needs and demands for existing or potential resource commodities and values, in particular for new renewable energy resources to curb carbon emissions in the WECC and western grid.</p> <ul style="list-style-type: none"> • Gateway West’s installation and function respond to a need for the expanded transmission of renewable energy resources. • PacifiCorp’s 1,280 MW proposed Wyoming wind farm generation will require such expansion, as will the next largest renewable generator on the system, the Cat Creek 	Comment noted.

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				<p>Energy facility. Segment 8, Alt 1 is the logical path to achieve the basic premise of why Gateway West is being proposed of providing new transmission for new generation in the most environmentally and prudent method. Segment 8, Alt 1 reduces the environmental impact for not only Gateway West, but also Cat Creek Energy and its interconnection route.</p> <ul style="list-style-type: none"> • There is at present no off-ramp or intertie from Midpoint to Hemingway substations on Gateway West. CCE would create an intertie between the 230 kV IPCo system, the current PacifiCorp 500 kV line, and Gateway West with the Alt 1 route. Given the increased use of crossing Idaho by PacifiCorp for energy transit and the continued growth in the Treasure Valley, this could prove invaluable in balancing transmission and provide for one more solution to any outage or constraint condition for those flows that will undoubtedly be present and stress the 230 kV system at some time in the near future. • Generation over-capacity, load following, and regulation are very real concerns for PacifiCorp's moving energy between its east and west control areas and to California, especially when there are constraints in individual entry points to CAISO. CCE is designed to serve as the indispensable storage and generator mechanism to balance supply and demand, thus alleviating these transmission side problems. Segment 8, Alt 1 paralleling the existing PacifiCorp 500 kV line, makes CCE a potential load and supply balancing facility for the majority of electricity flow across Idaho. 	
EA-9	8	9-21-17	Cat Creek Energy LLC – James Carkulis	For these reasons, one biological, the other technical/economic, the reconsideration of BLM's earlier decision is warranted and Cat Creek Energy enthusiastically and rationally supports (as do many others) Segment 8 Alt. 1 for the Gateway West Transmission Project. Having	Comment noted.

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				been in the business of developing renewable energy projects for years, and in the process, having earned a reputation for successfully completing environmentally-sensitive projects, I can attest that Segment 8 Alt. 1 is one that can be justified for its low environmental impact while reinforcing the basic reason why Gateway West is important; to promote and connect new generation.	
EA-10	1	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	Owyhee County has engaged in the Gateway West process since its onset and has provided numerous previous comments. We specifically reference our comments on the Draft SEIS as pertinent to this reconsideration action. During the tenure of Aden Seidlitz as Boise District Manager, BLM engaged Owyhee County under the FLPMA Coordination Provisions in resolving issues related to route segments crossing Owyhee County. That process led to the mutual agreement between Owyhee County and Idaho BLM on the preferred routing. Unfortunately, that mutual agreement was dismissed by officials in the BLM Washington DC office who selected routes that were unacceptable to both Owyhee County and the State of Idaho.	The BLM has coordinated with the County throughout the Gateway West Project. The BLM is aware of the County's preference for Alternative 1 and has noted this in the EIS and SEIS.
EA-10	2	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	We request that BLM engage Owyhee County in FLPMA Coordination as we work to select the route segments to complete the ROW mandated by the Morley Nelson Snake River Birds of Prey NCA Boundary Modification Act. We will make ourselves and our staffs available to meet with BLM as frequently as necessary to ensure that the routes selected are appropriate to the needs of the citizens of Owyhee County and the energy transmission companies.	The BLM will continue to coordinate with the County, as it has throughout the Gateway West Project process.
EA-10	3	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi,	Owyhee County supports the routes selected by the Boise District RAC Gateway West Subcommittee on the basis of the careful study they applied to the problems associated with the routing and on the basis of the final products minimized impacts.	The routes being considered in this EA are the routes recommended by the RAC.

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			Jerry Hoagland, Joe Merrick	We believe that the routes selected by the RAC Subcommittee, with slight modification in the vicinity of the Hemingway Substation, is still the most viable route in that it minimizes impacts to private property and to the economy of Owyhee County.	
EA-10	4	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	We recommend changes to the routing of the entry into the Hemingway Substation as were discussed at the March 27, 2014 Boise District RAC Subcommittee Field Tour hosted by Mr. John Chatburn of the Governor's Office of Energy Resources and in other conversations with Mr. Keith Georgeson, Idaho Power Engineer and member of the RAC Subcommittee.	See the response below.
EA-10	5	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	<p>During that field tour, the group proposed an alternative means of routing the new line segments so as to parallel the existing high voltage line where it crosses Highway 78 in Owyhee County. The discussion led to a solution which minimizes impacts to Owyhee County homes which, absent the change, would have lines cross over homes.</p> <p>Residents of the China Ditch Subdivision have voiced concerns about the addition of the new Gateway West Segments to the impact the subdivision already suffers from the existence of the old high voltage line in the area. Mr. Georgeson has confirmed that, from an engineering standpoint, it is feasible and viable to route the lines into the Hemingway Substation from the south so as to minimize the impacts to the China Ditch subdivision.</p>	During the RAC process, an alternative was explored that continued the DC 500/138-kV rebuild north to the existing 500-kV line where both segments then paralleled the existing line to Hemingway, but that alternative was not recommended by the RAC and was not carried forward into the SEIS. An alternative alignment into Hemingway was discussed during the field trip mentioned in the letter. It was suggested that Segment 8 stop paralleling the existing 500-kV line south of Hemingway to join a common corridor with Segment 9 where both lines would enter Hemingway from the west to avoid additional impacts to the China Ditch subdivision. The Proponents considered this alignment impractical because it resulted in an additional crossing of the existing 500-kV and created significant difficulties and crowding coming into the substation. This alignment was also not recommended by the RAC because of potential impacts to Reynolds Creek.
EA-10	6	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	In our previous comment documents on various stages of the project, we have noted the impacts to Owyhee County and have noted items where we pointed out shortcomings in BLM's assessments of either benefits or impacts, such as erroneous numbers of miles of road construction related to the former preferred alternative. Those comments remain valid as Owyhee County comments for consideration in	The County's comments were considered in the EIS and SEIS. The BLM's response to the County's specific comments on the NEPA analysis and the transmission line location are documented in Appendix L in the 2016 FSEIS and Appendix D to the 2017 Record of Decision (ROD), in addition to scoping reports and in the original Gateway West EIS and ROD.

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				this scoping process and are part of the existing record. If BLM is unable to locate those comment documents we will provide them again upon request.	
EA-10	7	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	<p>We remain committed to preventing harm to the citizens and economy of our county and remind BLM that any crossing of private property requires action by the landowner under the Owyhee County Planning and Zoning Commission's process for obtaining Condition Use Permits. We have previously submitted statements from more than 70 landowners who indicated that they will not apply for or allow for a condition use permit for transmission line across their property.</p> <p>We support the private property rights of our citizens and will work with them to prevent adverse impacts to their properties. As stated above, the best way for BLM to achieve a reasonable and successful routing for the segments which connect Hemingway Substation to the ROW mandated by the Morley Nelson Snake River Birds of Prey NCA Boundary Modification Act is to work with Owyhee County under FLPMA's Coordination provisions.</p>	Comment noted.
EA-11	1	9-25-17	Idaho Farm Bureau Federation – Bryan Searle	<p>On behalf of the more than 76,000 member families of the Idaho Farm Bureau Federation, I offer these comments for the scoping of the reconsideration of the record of decision (ROD) approving Segments 8 and 9 for the Gateway West Transmission Line Project (GWTLP). For more than 75 years, the Idaho Farm Bureau has been recognized as the leading advocate for private property rights and prosperity which comes through the wise use of and responsible stewardship of our natural resources. Our members own property and operate farms, ranches and business in all 44 counties of the state, including those where Segments 8 and 9 are proposed. We thank the Bureau of Land Management (BLM) for this opportunity.</p>	Comment noted.

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EA-11	2	9-25-17	Idaho Farm Bureau Federation – Bryan Searle	On June 9, 2016, the Idaho Farm Bureau submitted comments supporting the placement of Segments 8 and 9 of the GWTLP as presented in Alternative 1. We still support and take that same position today. Farm Bureau Policy supports the enhancement of electrical infrastructure in the state. We also support the GWTLP being routed through utility corridors on public land such as the Snake River Birds of Prey National Conservation Area (SRBOP).	The current EA includes the Alternative 1 routes. The BLM recognizes the Farm Bureau's position on this Project.
EA-11	3	9-25-17	Idaho Farm Bureau Federation – Bryan Searle	<p>Since the initiation of this project, Alternative 1 was largely supported by the local stakeholders. The Owyhee County Task Force (OCTF) proposed a carefully considered placement of the GWTLP that balanced the needs of the local economy with protection of resources. The OCTF proposed that the transmission lines only cross private property where landowners were willing to allow a right-of-way to be negotiated, and where much of the route paralleled existing lines through the SRBOP.</p> <p>The Boise District Resource Advisory Council also recommended these routes, which Rocky Mountain Power and Idaho Power have adopted as their proposed routes. With two confirmed National Energy Corridors included in the SRBOP Resource Management Plan (RMP), and whereas, the utilization of these corridors is encouraged by BLM national policy and the RMP, it is only logical that segment 8 and 9 be sited on these locations as outlined in Alternative 1.</p>	We recognize that the task force has worked hard to resolve issues within Owyhee County. The BLM must consider issues beyond just meeting the needs of the county. The BLM engaged the local community and the RAC in a process which it hoped would lead to a consensus. The BLM continues to work reaching this goal.
EA-11	4	9-25-17	Idaho Farm Bureau Federation – Bryan Searle	The Morley Nelson Snake River Birds of Prey NCA Boundary Modification Act, which was incorporated by reference in the Consolidation Appropriations Act of 2017, directs the BLM to issue a right-of-way grant for the lands described in Alternative 1 for Segments 8 and 9. Alternative 1 is the only alternative that meets the specified and specific criteria of the act. We understand that the proposed route of Alternative 1 would require amendments to three BLM land use plans. Our local members are supportive of these	Your support for the routes and the associated plan amendments is noted.

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				amendments to see these transmission lines sited and routed appropriately and according to the Modification Act.	
EA-11	5	9-25-17	Idaho Farm Bureau Federation – Bryan Searle	Idaho Farm Bureau appreciates Congress recognizing and honoring the desires of the local stakeholders through the passage of the Modification Act. We look forward to working with the BLM through this reconsideration process and seeing the GWTLP completed. On behalf of the entire membership at the Idaho Farm Bureau, I thank you for your consideration of these comments and we look forward to our further involvement in the ROD reconsideration. Please contact Braden Jensen at 208-342-2688 if you have any questions regarding this topic.	Comment noted.
EA-12	1	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	The fact that a large number of BLM RMPs across the project area have to be amended to accommodate Gateway is a red light for PFA. As we have stated before, these amendments do nothing to protect or enhance. They allow the of sacrifice important, irreplaceable, and sensitive areas; including important wildlife habitat and visual resources, etc., by reducing or removing protective restrictions to allow the project. Project proponents are aware of this too. “The amendment(s) allowing a new Right Of Way(ROW) outside the existing corridors could result in cumulative impacts from future development, such as additional impacts on visual, wildlife, plant, cultural, and vegetation resources” Final Eviromental Impact Statement(FEIS) “In some cases, large areas of public lands would be reclassified, possibly allowing for additional projects without additional plan amendments. These impacts to land use planning goal would be considerable, particularly when taken together with other transmission lines request similar consideration, which if granted along the same route would create a large utility corridor. “ (SEIS)	The FSEIS and ROD recognize that there would be adverse impacts due to this Project. The BLM must balance the need to protect habitat with other requirements, such as the need to upgrade the electrical grid. This statement does not come from the project Proponents; it comes from the EIS, which was prepared by the BLM, not the Proponents.

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EA-12	2	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>We believe amending RMPs for segments 8 & 9 will set a precedent for projects in the future. The very thing the older, more thoughtful, and protective RMPs protect.</p> <p>“If the amendments associated with the Proposed Route is approved, other transmission lines proposed for this general area could choose to follow this same route; however, any additional transmission lines will go through the amendment process for this RMP direction because the amendment only applies to the proposed Project.” (FEIS)</p> <p>The proponents objectives “which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs” FEIS Section 1.3, can be done within the confines of existing energy corridors to increase efficiency and reliability. With the Exception of wind energy which is essentially costly and if sited in the wrong area, deadly to wildlife. As referenced “In a Rational Look at Energy” by Kimball Rasmussen, President and CEO of Deseret Power.</p> <p>”The Proponents originally designed the the 162.2 mile long route as the Proposed Route in Segment 9 to follow existing utility corridors and avoid the SRBOP and other protected areas where feasible.” (FEIS)</p>	<p>The land management plans are meant to be flexible. The planning rules anticipate that conditions and public needs change over time. Therefore, the planning regulations provide for amending plans as conditions and public needs change. The FSEIS considered the direct, indirect, and cumulative impacts from the plan amendments.</p> <p>Alternative 1 follows existing transmission lines where feasible. However, following existing transmission lines or utility corridors is not without serious impacts. The analysis in the EIS and SEIS considered these impacts.</p> <p>The Project objectives include creating a more reliable grid, which requires spacing lines out in such a manner that an adverse event, such as a fire, would not shut down power transmission across the area.</p>
EA-12	3	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Maps of the project are vague and confusing. These are only general maps that don't show exactly where the lines within segments 8 and 9 will be sited. In talking to BLM representatives and others, we are not alone in this.</p>	<p>It is correct that the lines on these maps do not show the exact location of the proposed lines. As stated in both the EIS and the SEIS, the lines are based on indicative design. The final locations will not be known until a route is selected, surveyed, and designed. The intent is to show a reasonable representation of the location.</p> <p>Detailed maps and photo overlays at a scale that shows individual buildings have been provided on the Project web site, and printed maps were provided at numerous public meetings throughout the Project, including the routes considered in this EA.</p>

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EA-12	4	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Construction of this transmission line across Hagerman Valley would be detrimental to large numbers of waterfowl and other migrating birds, including the Trumpeter Swan (BLM: Regional/State imperiled, Type 3) using this flyway, the Hagerman Wildlife Refuge, the Snake River, as well as the surrounding valley.</p> <p>This is a unique area because of the large bodies of water that don't freeze during the winter months thus making it very attractive to waterfowl and other migratory birds. PFA members enjoy and make extensive use of the Hagerman WMA because it provides a unique opportunity to view the many and varied bird species that frequent the area including Bald Eagles, Trumpeter and Tundra Swans, and numerous species of other waterfowl, not only during the winter, but throughout the entire year. PFA members as well as many others utilize the WMA for birding, hiking, study, and other recreational and aesthetic pursuits.</p> <p>PFA has taken an active interest in the WMA. As part of the nationwide Christmas Bird Count program, our chapter has conducted a bird census at the Hagerman WMA for over 40 years (see Appendix A).</p> <p>Fifteen years ago, the Hagerman WMA was designated as an Important Bird Area (IBA) by the Idaho Department of Fish and Game and the National Audubon Society. http://iba.audubon.org/iba/viewSiteProfile.do?siteId=558&navSite=state</p>	<p>The BLM recognizes the importance of the area. Impacts to waterfowl and other birds in Hagerman Valley are disclosed in Section 3.10 of the EIS and SEIS. Effects to listed species are also disclosed in the USFWS Biological Opinion.</p>
EA-12	5	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>In addition, the WMA is part of the Idaho Birding Trail system. http://fishandgame.idaho.gov/ifwis/ibt/site.aspx?id=SW36</p> <p>Thousands of waterfowl are injured and killed each year throughout the United States because of collisions with transmission lines. This is well documented. Even the energy industry's own literature states that these lines need to be sited</p>	<p>Bird collisions are addressed in Section 3.10 of the EIS and FSEIS.</p>

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				<p>away from waterfowl flyways such as the one found in the Hagerman Valley.</p> <p>The Hagerman Valley also is a prominent part of the popular “Thousand Springs Byway” which has 11 priority resource sites, five of which are located in in this valley. Another mega transmission line would be a detriment to important scenic and recreational values found here.</p>	
EA-12	6	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>FLPMA (P.L. 94-579, Section 102(a)) states that it is the policy of the United States that: (8) “the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values.”(SEIS). BLM’s RMPs are documents written to uphold these protections for the public trust.</p>	All BLM decisions on this and other projects must be consistent with applicable laws, regulations, and land management plans, as amended.
EA-12	7	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>PFA believes the changes made to Bureau of Land Management (BLM) Field Offices’ Resource management Plan (RMP) amendments as stated in the SEIS in general and in particular, amendments to the Cassia RMP, Twin Falls Management Framework Plan (MFP), and the Jarbidge RMP are unwarranted, detrimental, and undermine the public trust.</p> <p>Importantly, instead of working within the confines set by the BLM F.O.s’ RMPs, for the protection of invaluable natural resources for the public good; Proponents seek to undermine it.</p>	PFA’s belief that amending plans undermines the public trust is noted. However, land management plans are meant to be flexible. The planning rules anticipate that conditions and public needs change over time. Therefore, the planning regulations provide for amending plans as conditions and public needs change. The SFEIS considered the direct, indirect, and cumulative impacts from the plan amendments.
EA-12	8	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>The SEIS states, “As with FEIS Proposed 9, the Segment 9 Revised Proposed Route would cross approximately 2.7 miles of the Salmon Falls Creek ACEC (Table 3.17-17).</p> <p>Note: Areas of Critical Environmental Concern (ACECs). These are areas the BLM identifies as part of the RMP in order to protect a variety of sensitive resources such as important habitat for imperiled wildlife, sensitive cultural resource areas such as archeological sites, rare geological features, or other unique attributes that deserve</p>	The EIS and SEIS acknowledge the importance of the ACEC. Effects due to permitting the line to cross the ACEC are disclosed in the SEIS. The BLM must balance completing public and environmental resource needs in managing public land.

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				some form of conservation and special management.	
EA-12	9	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	BLM Burley F.O. management arbitrarily decided, without public knowledge, input, or regard; to change the route, in segment 9, after the Draft EIS, and take the line along rim of and across the Salmon Falls Creek Canyon, including Lily Grade. This is an illegal move by the Burley FO management and the proponents of this project.	Revising routes between draft and final in response to information developed in preparing the Draft EIS, as well as in response to comments received on the draft, is a normal part of the NEPA process. The change in the route was disclosed to the public in the final SEIS. The BLM considered public comments on the FSEIS in the ROD. Changing a route between draft and final was not in any way illegal.
EA-12	10	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>The proponents were aware this area is designated as a Area of Critical Environmental Concern (ACEC) in both BLM's Jarbidge F.O. and Burley F.O.'s, Twin Fall District on both The sides of Salmon Falls Creek Canyon. The canyon is also designated as a ACEC as well as a Outstanding Natural Area(ONV), eligible Wilderness Study Area (WSR), and A Special Recreation Management Area (SRMA).</p> <p>There was a different publicly disclosed route, Alternative 9C, in the Draft EIS.</p> <p>The FEIS states, "No amendment for this area was proposed in the Draft EIS because it was thought that crossing the WSR at the proposed location would not be consistent with WSR management goals.", ..</p> <p>"An alternative crossing of the river (Alternative 9C) would avoid the eligible WSR and the ACEC (emphasis added)." ... "The Burley FO has stated that the WSR classification at this location is "Recreational" and that this crossing would not have a negative effect on the outstandingly remarkable values (ORVs) for that classification (emphasis added). Amendments for crossing the ACEC and VRM Class II lands are therefore provided in the Final EIS." FEIS F1-31</p> <p>At the time we couldn't find the above mentioned alternative 9c on the BLM's interactive project map, because the map doesn't show any of this part of the project. It was not included on the map in FEIS appendix F.1-34.</p>	<p>See the previous response. Also, note that a new Jarbidge Resource Management Plan was approved in 2015; this was a new plan, not an amendment to the existing plan as implied in the comment. The new plan includes a utility corridor in the area. The plan was revised through a public process as required under FLPMA. The fact that the plan was revised is disclosed in Chapter 1 of the FSEIS. The new plan is described in some detail in Appendix F of the FSEIS.</p> <p>The statement quoted—"Therefore, a transmission line crossing this portion of the eligible WSR segment would not affect the river's suitability as a Recreation River"—is correct. As explained in Appendix F of the SEIS, the route was revised to avoid crossing at a location that would affect the suitability of the river as either scenic or wild. A transmission line would not be consistent with those designations. However, a transmission line is permitted in a Recreation River. Note that this section of the river already includes a road, a bridge, and a 34.5-kV electric line (see Appendix F of the FSEIS).</p>

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				<p>Both Jarbidge RMP and Twin Falls MFP direction for Visual Resources gave explicit instructions on how the ACEC and Salmon Falls Creek Canyon should be managed.</p> <p>A amendment has already been made in the Jarbidge 2015 RMP changing a important designation of the ACEC along the west side Salmon Falls Creek Canyon allowing a 500-kV transmission line to cross Salmon Falls Canyon in anticipation of the east side Twin Falls F.O. RMP amendment to the illegal change of the FEIS route without public input that negated the NEPA process.</p> <p>Interested public was not given this information or the opportunity to comment. BLM and proponents of this project violated National Environment Policy Act (NEPA) when they knowingly introduced new and additional information in their final Environmental Impact Statement (FEIS) concerning where their transmission line will cross public land in the Burley BLM Field Office (F.O.) as described in our appeal. Gateway PFA Declaration Statement 12-21-2013, pgs: 1, 5, and 6. This information is still relevant as this appeal is still unresolved!</p> <p>In reading through the Special Management Areas section, the statement "Therefore, a transmission line crossing this portion of the eligible WSR segment would not affect the river's suitability as a Recreation River."</p> <p>The proponents through a amendment, want the BLM to reduce the important designation of the ACEC as well as WSR with ORVs. to a recreational designation. It's like redesignating a Classic Bentley luxury sedan, to a AMC Gemlin and then allowing it to be treated as such. Granted the ACEC has been beaten but it still retains it's unique OVR's and deserves to remain a ACEC. It's a classic and should be treated a such!</p> <p>The BLM has the discretion to disallow this amendment for the future enjoyment of wide open vistas in a natural setting not far from the City of</p>	

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				Twin Falls. This will be far more important in the future to the area.	
EA-12	11	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>PFA believes: proponents objectives “which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs” (FEIS) can be done within the confines of existing energy corridors to increase efficiency and reliability.</p> <p>”The Proponents originally designed the the 162.2 mile long route as the Proposed Route in Segment 9 to follow existing utility corridors and avoid the SRBOP and other protected areas where feasible.” (SEIS)</p> <p>There's still no reasonable explanation by proponents or BLM for the split line through Idaho. The huge cost and willingness to combat the controversy of the southern split, numbers 7,9, and 10, leads us to believe they have other plans, such as future development of proposed ill-sited wind farms: Cotteral Mountains, China Mountain, Simplot, and South Hills Important Bird Area,etc. Thereby further degrading sage-grouse and other wildlife's habitat</p> <p>“Other projects would continue, including other transmission line projects, wind farms. solar projects,.....The demand for electricity, especially for renewable energy would continue to grow in the Proponents' service territories.” This is a clue as to the who the customers would be in the project areas.(SEIS)</p>	The reason for the two lines following separate paths is explained in detail in the original EIS, which the SEIS supplements. One of the Proponents’ objectives is to improve the reliability of the grid by building transmission lines in widely separated areas, thus reducing the chance that a single event, such as a wildfire, could destroy both lines.
EA-12	12	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>PFA believes the reasoning behind the need for the amendments is very clear. BLM and Project Proponents believe energy companies takes precedent over anything that stands in the way of this project's construction across public land. Public land apparently has been set aside not for quality and sustainable use for future generations as stated in FLPMA (P.L. 94-579, Section 102(a)). An example of this is the changes already made to the Jarbidge RMP concerning the Salmon Falls Creek ACEC</p>	Comment noted. The BLM must balance completing public and environmental resource needs in managing public land.

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EA-12	13	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>“The EIS identifies opportunities to mitigate the impacts of siting and building Segments 8 and 9, if a ROW is granted, by incorporating avoidance, minimization, and compensation measures with consideration of local and regional conditions” Mitigation as portrayed will take care of most of the impact issues throughout the project, in reality when compared to the substantial negative impacts, the proponents mitigation strategys are not site specific and woefully small, inadequate, and apparently still in the development stage. When reading through the SEIS and FEIS we couldn't find where the above statement is true. There's no “avoidance, minimization, or compensation measures” for the important and unique areas such as the Salmon Falls Creek ACEC. If the statement above were true, there would be no need the change the RMPs. The only possible avoidance is to more convenient area to disturb such as the SRBOP, Golden Eagle Audubon stated, “Our simple conclusion was that a route through the Birds of Prey Area presents the lesser of two evils.” http://www.goldeneagleaudubon.org/Gateway-West-Transmission-Line</p> <p>“The MEP does not provide sufficient details or specifics for development of such mitigation actions related to habitat restoration. The lack of detail or specifics in the MEP makes it unclear how the MEP goals would be achieved.” (SEIS). Clearly there's a need for site specific data and analysis for this project.</p> <p>Under “Habitat Restoration we find, “ The goal for the Proponents’ habitat restoration proposal is to convert “non-native grasslands to native perennial plant communities” as well as to conduct “noxious weed control. Proposed funding to restore habitats within the SRBOP would have no effect on agricultural resources. Habitat restoration could occur in areas currently used as rangeland and pasture, but this potential reduction in rangeland and pasture would likely only affect a very small share of this type of land</p>	<p>Appendix M of the FSEIS includes nearly 50 pages of environmental protection measures. These are referenced throughout the FSEIS. Individual measures are evaluated in Chapter 3 of the EIS and the SEIS. In addition, see Appendix K, the BLM’s mitigation framework. As noted in the FSEIS, the BLM did not adopt the Proponents’ mitigation plan. The reasons why the BLM found the Proponents’ mitigation plan to be inadequate are described in the applicable sections of Chapter 3 of the SEIS.</p>

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				in the Analysis Area.”(emphasis added) (SEIS). In other words there will be little to nothing done to curb destructive land uses such as heavy grazing throughout the year.	
EA-12	14	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	The problems found in the SRBOP are due to very poor and shortsighted management by federal and state agencies that have allowed the spread of invasive weeds and grassed throughout the area without little to no protection of the native sage-steppe vegetation or it's wildlife, even allowing indiscriminate shooting of prey species throughout the area.	Comment noted.
EA-12	15	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>If BLM persists in allowing grazing to continue at it's present stocking rate and there's no changes as to when these areas slated for mitigation are grazed, e.g. destructive spring grazing; grazing new seedings, after only two growing seasons etc, based on 30 yrs. experience, we believe any mitigation will be short-lived and a waste of time and money.</p> <p>There's ways to truly mitigate these issues, but apparently the agencies lack the backbone to make the hard decisions it would take to make mitigate work in the long term. As natural undisturbed areas of public land become scarce, true mitigation becomes nearly impossible. How can the proponents mitigate visual values? They can't, they ask BLM to revise (downgrade) the RMP plans to fit their project.</p>	Comment noted. The decision to allow grazing following construction would be based on site-specific conditions.
EA-12	16	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Proponents consistently acknowledge their added adverse effects throughout the SEIS; direct, indirect, and cumulative impacts throughout the project area during all phases of the project yet at the same time they state the opposite. Below are just a few excerpts as examples:</p> <ul style="list-style-type: none"> • “surface disturbance from the Project within just a half a mile from occupied sensitive plant habitats”. • “Visual resource or scenic specifications for allowable levels of visual contrast would have to be altered” That is to say, blight visual 	The EIS and SEIS were prepared by the BLM not the proponents. The statement quoted (“Gateway West would not have measurable adverse effects on natural resources within the project area.”) is taken out of context. The EIS and SEIS disclose the adverse impacts of the project using the measures described in the EIS for each resource. Effects on scenery are disclosed in Section 3.2 of the SEIS and in greater detail in Appendix G. Also see Appendix E. Effects on migratory birds are disclosed in Section 3.10 and Appendix D.

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				<p>resources across unique western landscapes along it's routes for the foreseeable future.</p> <ul style="list-style-type: none"> “important migratory bird habitats and ecological conditions through vegetation removal, fragmentation of native habitats, and possible increased in predation pressure by predators.” To be adversely and permanently affected. <p>“Gateway West would not have measurable adverse effects on natural resources within the project area.”</p>	
EA-12	17	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Though the SEIS acknowledges the ongoing threats within their project area such as livestock overgrazing and invasive grasses and weeds, etc. They state that these threats would continue with or without their transmission line. In this they are correct, but the added effects of a mega transmission line do substantially add to these threats as mentioned above, especially when coupled with the destructive RMP amendments and the challenges they represent for future management.</p>	<p>The analysis in Chapter 4 of both the EIS and SEIS discloses the cumulative effects associated with the transmission line and other past, present, and foreseeable future activities.</p>
EA-12	18	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Again, instead of working within the confines set by the BLM FO.s' RMPs, for the protection of invaluable natural resources for the public trust, proponents seek to undermine it.</p> <p>Thus, many of the impacts throughout the project area can't be mitigated beyond a short time, especially for sagebrush-steppe obligations such as sage-grouse and pygmy rabbits, As undeveloped areas of public land are becoming scarce, true mitigation becomes nearly impossible. Also how can visual values be mitigated? Only by siting the project elsewhere.</p>	<p>Comment noted; please see the response above to your similar comment on amending plans.</p>
EA-12	19	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>We find in the SEIS the same types of general data and analysis found FEIS. It needs to be site-specific and detailed, “The NEPA analysis for Gateway, though a very thick stack of paper, does not provide the necessary site-specific details to fulfill NEPA’s hard look requirements at direct, indirect and cumulative impacts and mitigation actions. The still uncompleted surveys,</p>	<p>Both documents include detailed assessments of the existing condition and environmental effects. For example, see the detailed tables for vegetation and wildlife in Appendix D.</p>

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				reports and plans constitute avoidance, minimization and mitigation measures – ranging from cultural and historical resources to controlling project destruction and impairment actions that will seriously impact wildlife and sensitive species habitats and populations. These species include sage-grouse, pygmy rabbit, and migratory birds.” Appellants Response to Stoel Rives LLP, Council to Pacificorp and Idaho Powers’ (Respondent-Intervenors); Answer to Statement of Reasons, IBLA Docket No. 2014-55,WYW- 174598; IDI-35849. Dated: May 5, 2014	
EA-12	20	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	We found the SEIS to be confusing and difficult to navigate through.	Comment noted. The Project is not simple, crossing many different jurisdictions and habitats; therefore, the analysis is not simple either.
EA-12	21	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	We ask that the illegal section through the Salmon Falls Creek ACEC to Lily Grade be dropped as the proponents already had 9c set out for public comment. That is what was offered through NEPA and what the public was commenting on.	As explained above (as well as in the FSEIS), there is nothing illegal involved in the Lilly Grade crossing.
EA-12	22	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	As the SEIS is written, proposed project would substantially increase negative impacts, the proposed amendments would significantly downgrade protections to important and unique natural resources such as visual, wildlife, and special designated areas put in place for future generations. Again, FLPMA (P.L. 94-579, Section 102(a)) states that it is the policy of the United States that: (8) “the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values.”(SEIS). BLM's RMPs are documents written to uphold these protections for the public trust	The EIS and SEIS acknowledge that the Project would have substantial effects, which is why an EIS was prepared. It provides the public and the decision official the information needed to balance competing resources. The BLM must balance the need to protect habitat with other requirements, such as the need to upgrade the electrical grid.
EA-13	1	9-27-17	Idaho Conservation League – John Robison	We understand that the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act of 2017 directed the BLM to issue a ROW grant for portions of	Alternative 1 follows existing transmission lines where feasible. However, following existing transmission lines or utility corridors is not without serious impacts. The analysis in the EIS and SEIS considered these impacts.

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				<p>Gateway West Segments 8 and 9 consistent with Alternative 1 of the Final Supplemental EIS. We also understand that additional NEPA analysis is needed for the public lands affected by this decision that lay beyond the NCA boundaries. We believe that this EA is an important opportunity to address several issues not fully addressed in the legislation. We are particularly concerned about construction of transmission facilities within or adjacent to habitat for sage-grouse. We urge the BLM to site the ROW in previously developed areas or along existing corridors to avoid impacts to sage-grouse to the maximum extent practicable. Where there still may be impacts to sage-grouse, these impacts should be avoided through design features and mitigated by utilizing Idaho's mitigation framework for sage-grouse.</p>	<p>The Project includes an extensive analysis of sage-grouse habitat and Project effects on sage-grouse, See Section 3.11 and the Habitat Equivalency Analysis (HEA) in Appendix J of the 2013 FEIS.</p>
EA-13	2	9-27-17	Idaho Conservation League – John Robison	<p>Sage-grouse - Conservation Status As stated in our previous comments, there is significant concern regarding the long-term viability of greater sage-grouse populations. Greater sage-grouse suffer from the loss, degradation, and fragmentation of habitat throughout the west. It is estimated that only 50-60% of the original sagebrush steppe habitat remains in the west (West 2000), and in 2007, the American Bird Conservancy listed sagebrush as the most threatened bird habitat in the continental United States.</p>	<p>Comment noted.</p>
EA-13	3	9-27-17	Idaho Conservation League – John Robison	<p>Impacts of transmission lines on sage-grouse One of the top threats to sage-grouse is infrastructure projects: Disturbance to important seasonal habitats: Human activity and noise associated with machinery or heavy equipment in proximity to occupied leks or other important seasonal habitats may disturb sage-grouse. -Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-125 Depending on location and design specifics, the construction of transmission lines within sage-</p>	<p>Comment noted. These factors are addressed in the Section 3.11 of the SEIS. The comment includes many lines that are direct quotes from our analysis. The HEA addresses Project-effects on sage-grouse and proposes mitigation for direct and quantifiable indirect effects. See Appendix J of the 2013 FEIS.</p>

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				grouse habitat constitutes “nonlinear infrastructure” under the Conservation Plan for the Greater Sage-grouse in Idaho (Idaho Sage-Grouse Advisory Committee 2006). Nonlinear infrastructure is defined as “human-made features on the landscape that provide or facilitate transportation, energy, and communications activities...including wind energy facilities.” The Conservation Plan lists infrastructure such as this as the second greatest threat for sage grouse, with wildfires as the greatest risk. Road construction and use associated with transmission line maintenance represents high risk for loss of lek areas, nesting locations, and brood-rearing habitats (Braun 1986, Connelly et al. 2004). , In addition, sage-grouse have been shown to avoid transmission lines, presumably because of potential predation. Ellis (1985) found a 72% decline in the average of males on leks and a 65% increase in predation efforts involving raptors following the construction of a transmission line within 200 m of an active sage-grouse lek in northeastern Utah. Sage-grouse lek attendance dropped significantly following power line construction within 3 miles of leks in California. In a comprehensive study of ecological requirements, sage-grouse were extirpated in areas where power line densities were above 0.20 km/km2 and sage-grouse habitat was ranked highest where powerlines were less than 0.06 km/km2.	
EA-13	4	9-27-17	Idaho Conservation League – John Robison	Furthermore, the Governor of Idaho submitted the State of Idaho’s Alternative for incorporation into the National Greater Sage-Grouse Planning Strategy. This alternative describes additional restoration efforts and additional regulatory mechanisms to stabilize and restore sage-grouse populations, protect sage-grouse habitat and to preclude the need to list sage-grouse. The Idaho Conservation League served as a member of the Governor’s Sage-grouse Task Force which drafted this plan. A key component of this plan is to avoid placing large-scale infrastructure projects	Comment noted. The SEIS addresses the State’s sage-grouse plan in Section 3.11.

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				such as 500kV transmission lines within core and important sage-grouse habitat as defined by the plan due to the negative effects that transmission lines have on sage-grouse.	
EA-13	5	9-27-17	Idaho Conservation League – John Robison	<p>Regarding the spatial scale of proposed management activity effects on sage-grouse and habitat, the BLM should recognize that sage-grouse can require movements of tens of miles between required habitats. Thus, a significant challenge in managing and conserving sage-grouse populations is the fact that they depend upon different types of habitat for each stage of their annual cycle (Connelly et al. 2009), and upon the ability to move between the different habitats throughout the year. Each seasonal habitat must provide the necessary protection from predators, required food resources, and thermal needs for the specific stage of the annual cycle. Breeding-related events and season habitat needs are described below:</p> <ol style="list-style-type: none"> 1) Late brood-rearing period in July through September. Late brood-rearing is focused in wetter areas, especially riparian and spring-associated meadows closely associated with nearby sagebrush. 2) Movement to winter habitat. 3) Occupation of winter habitat from November through February. The primary requirement of winter habitat is sagebrush exposure above the snow, and is generally characterized by dense sagebrush, often including areas of wind-swept ridges. 4) Lekking, which may begin as early as late February, and may extend into May. Lekking requires open expanses of sagebrush within a large area of sagebrush cover. Lek persistence has been affected by disturbance activities within 3.1, 11.2, and 33.5 mile radii (Swenson et al. 1987, Johnson et al. 2009, Knick and Hanser 2009). 5) Female movement to nesting sites and nesting between March and June. Nesting females 	Comment noted. These factors were considered in the analysis. See Section 3.11 of the SEIS and the HEA.

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				<p>commonly move 3-5 miles or farther from the lekking site. Females select areas with more sagebrush canopy than is generally available in the surrounding landscape (Holloran et al 2005, Hagen et al. 2007)</p> <p>6) Hatching and early brood-rearing in May and June. Females continue to use relatively dense stands of sagebrush for earliest brood-rearing habitat if native forbs and insects are available. When vegetation desiccates, females and broods move to wetter areas in search of the native forbs and insects required by chicks.</p>	
EA-13	6	9-27-17	Idaho Conservation League – John Robison	<p>Given the considerations of year-round habitat use and known impacts of human activity on sage-grouse populations, particular care needs to be taken to avoid disturbance near lekking areas, disturbance and loss of sagebrush and native forbs used for early brood-rearing, and disturbance and impacts to hydrologic function of wet areas used for early to late brood-rearing. Avoiding human footprint at a 3.1 mile radius from leks is an important first step in protecting sage-grouse populations, but sage-grouse could be engaged in nesting and brood-rearing, in addition to lekking, for much of the planned construction activity period. Recent studies have shown that only 64% of nesting sites occur within 3.1 miles of leks, but 80% of nests are found within five miles, and 20% of nests occur at distances greater than five miles from leks. Nest success is also greater the farther a nest occurs from a lek, indicating a disproportionate potential importance of these more important nests for population recruitment. Based on the habitat guidelines for sage-grouse management presented in Connelly et al. (2000), and others, we recommend siting the transmission line far enough from leks and other sage-grouse habitat to avoid negative effects. Aldridge and Boyce (2007) and Doherty et al. (2010) identify a buffer of 6.2 miles to protect important nesting and brood-rearing habitats.</p>	Comment noted.

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EA-13	7	9-27-17	Idaho Conservation League – John Robison	<p>Minimizing impacts</p> <p>Once routes with major impacts have been avoided, the BLM should require design features to ensure that any side effects or minor impacts are minimized through design features. With regard to activities with the potential to disturb sage-grouse, the Conservation Plan offers this recommendation:</p> <p><i>Apply seasonal-use restrictions (see Human Disturbance Section 4.3.5) on activities associated with the exploration, operations, and maintenance of mines, gravel pits, or landfills, including those associated with supporting infrastructure.</i></p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p>	Comment noted.
EA-13	8	9-27-17	Idaho Conservation League – John Robison	<p>When considering design features to minimize adverse effect to sage-grouse, the BLM needs to consider both the appropriate spatial scale for considering effects of proposed management activities on sage-grouse and their habitat as well as the adverse impacts of invasive exotic plant species, and the increased threat of wildfire.</p> <p>Knick and Hansen (2009) analyzed factors in lek persistence of over 5,000 leks. They used three radii to test for landscape disturbance effects on lek persistence – radii of 3.1 miles, 11.2 miles, and 33.5 miles. Previous studies had shown behavioral effects on sage-grouse related to sagebrush disturbance at the 33.5 mile radius (Swenson et al. 1987, Leonard et al. 2000).</p> <p>Knick and Hansen’s study showed adverse effects on lek persistence from wildfire at the 33.5-mile radius. As such, the design features to minimize impacts should be based on both the quality of the habitat adjacent to the transmission line, the topography of that habitat, the impacts to that habitat and to sage-grouse, and the specific use of that habitat by sage-grouse (lekking, nesting and brood rearing, etc).</p>	Comment noted. Please see the extensive list of required design features (termed Environmental Protection Measures) in Appendix M of the SEIS.
EA-13	9	9-27-17	Idaho Conservation	Mitigation	Comment noted. The HEA addresses Project-effects on sage-grouse and proposes mitigation for direct and

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			League – John Robison	<p>Where impacts have already been avoided and minimized, the Conservation Plan also recommends developing off-site mitigation for any remaining impacts:</p> <p>Off-site mitigation should be employed to offset unavoidable alteration and losses of sage-grouse habitat. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should be designed to complement local sage-grouse conservation priorities.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>A key component of the Governor’s Sage-Grouse Conservation Plan is the use of a Mitigation Framework developed by the State Sage-Grouse Advisory Committee. This framework is based on the assumption that impacts will be first avoided, then minimized and finally mitigated.</p> <p>The mitigation framework requires the quantification of both direct and indirect impacts. The USFWS’s determined that transmission lines may cause a host of adverse indirect effects to sage-grouse, including increased predation, lower recruitment rates, habitat fragmentation, habitat degradation from invasive species, and impacts from electromagnetic fields. However, the Habitat Equivalency Analysis focused only on direct impacts when calculating the degree of mitigation needed. The BLM should utilize the phased decision approach to expand the analysis to include indirect effects when making mitigation calculations.</p>	quantifiable indirect effects. See Appendix J of the 2013 FEIS. In addition, the BLM will consider mitigation requirements based on direction in the applicable legislation, BLM regulations, and land management plans.
EA-13	10	9-27-17	Idaho Conservation League – John Robison	<p>The BLM should start by considering the indirect effects within a standard, conservative distance from the transmission line and adjust this distance depending on the quality of the habitat adjacent to the transmission line, the topography of that habitat, the impacts to that habitat and to sage-grouse, and the specific use of that habitat by sage-grouse (lekking, nesting and brood rearing, etc). The mitigation calculations need to factor in the success rate of vegetation</p>	Comment noted. See the above response.

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				<p>restoration efforts, the rate of habitat loss due to wildfire, the lag time before any actual mitigation is realized. In our determination, fence marking/modification, as described in the Habitat Equivalency Analysis, is not an appropriate form of mitigation for indirect effects related to this project.</p> <p>The BLM should base its mitigation program on the recently released Regional Mitigation Manual (see Instruction Memorandum No. 2013-142). The BLM has full authority to require mitigation for indirect effects to sage-grouse. Failure to do so would represent a notable lack of the regulatory mechanism needed to prevent the listing of this species.</p>	
EA-13	11	9-27-17	Idaho Conservation League – John Robison	<p>Depending on the nature and degree of these impacts, an offsite mitigation program could be available to direct funding from the project proponent to high-priority restoration areas. The Governor’s Plan calls for restoration within Core Habitat Areas where the habitat has been degraded but can be restored. This mitigation program should not be available for projects within Core Habitat Zones where infrastructure should not be located (allowing for limited exceptions).</p>	Comment noted.
EA-13	12	9-27-17	Idaho Conservation League – John Robison	<p>Other species Portions of the project area may also contain habitat that is crucial to sagebrush steppe obligate species such as sage-grouse, pygmy rabbits, sage thrasher, sage sparrow, and others. Such habitat has been severely fragmented and reduced through a variety of land management practices, including road construction and development of rights of way corridors. Big game may also be adversely affected by project development. As with sage-grouse, the BLM should minimize negative impacts by avoiding areas of critical habitat for species of concern, establishing siting criteria to minimize soil disturbance and erosion on steep slopes, utilizing visual resource management guidelines, avoiding</p>	Comment noted. Greater sage-grouse is an obligate sagebrush species. By mitigating effects to sage-grouse habitat the HEA mitigates effects on habitat for other sagebrush obligate species.

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				significant historic and cultural resource sites, and mitigating conflicts with other uses of the public lands.	
EA-13	13	9-27-17	Idaho Conservation League – John Robison	Roads and Right of Way Corridors Previous management activities have resulted in extensive road and right-of-way densities throughout our public lands. This density compromises the ability to support wildlife and fish by promoting further human disturbance, fragmenting habitat, accelerating sedimentation, spreading noxious weeds, and encouraging illegal Off Road Vehicle use. Furthermore, there is a positive correlation between roads, even temporary ones, and human-caused wildfire ignitions. We recommend that the BLM evaluate the road and transmission network to avoid impacts to important wildlife habitat where feasible, and close or decommission unneeded roads and corridors as part of the overall mitigation program.	Comment noted.
EA-13	14	9-27-17	Idaho Conservation League – John Robison	Off Road Vehicle Use The devastating impacts of improper Off Highway Vehicles (OHVs) on terrestrial and aquatic ecosystems are well established. Improper OHV use degrades water quality, spreads noxious weeds, fragments habitat, disturbs wildlife, increases fires, and displaces non-motorized recreationists. The BLM needs to take additional steps to manage and monitor OHV use along transmission corridors.	Off-road vehicle use is addressed in Section 3.17 of the SEIS.
EA-13	15	9-27-17	Idaho Conservation League – John Robison	Noxious Weeds The most cost-effective way to deal with noxious weeds is to protect strongholds of native vegetation from activities which either spread noxious weeds directly or create suitable habitat by removing native vegetation and disturbing the soil. BLM activities should limit road use and the exposure of mineral soils where weeds may become established. Roads, trails, and rivers serve as the primary routes for noxious weed species expansion. Special care should be taken	Noxious weeds and invasive plants are addressed in Section 3.8 of the SEIS. Also see the environmental protection measures in Appendix M.

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				to safeguard ecologically intact areas that are not currently infested.	
EA-13	16	9-27-17	Idaho Conservation League – John Robison	Coordinate, Minimize, and Mitigate Impacts to Sage-grouse and other resources As stated in our previous comments, we believe that an integral part of conserving and recovering sage-grouse and other native species will be relying on guidance from local and national stakeholder groups. As such, we recommend that the BLM consult with national, state and regional conservation organizations that have expressed interest in this project. In addition, we recommend that the BLM coordinate with the US Fish and Wildlife Service, local Sage-grouse Working Groups, the Idaho Department of Fish and Game, and the Governor's Office of Species Conservation, and, of course, the project proponents.	The BLM has consulted (and will continue to consult) the State, the USFWS, and other sage-grouse experts.
EA-13	17	9-27-17	Idaho Conservation League – John Robison	Additional comments on predation We are concerned that if a transmission line is constructed in sage-grouse habitat, increased numbers of raptors and corvids will adversely impact sage-grouse productivity. Sage-grouse have relatively low reproductive rates and populations can be affected by artificially increased predator numbers.	The EIS and SEIS address predation in Sections 3.10 and 3.11.
EA-13	18	9-27-17	Idaho Conservation League – John Robison	Mitigation for other impacts The BLM needs to examine the mitigation requirements for other affected resources. Mitigation measures should be in place for as long as the impacts persist. Mitigation measures may include habitat restoration, obliteration of user-created and redundant roads and trails, and removal of unneeded range management improvements, removal of trash, increased outreach, education and enforcement efforts.	The BLM will consider mitigation requirements based on direction in the applicable legislation, BLM regulations, and land management plans.
EA-13	19	9-27-17	Idaho Conservation League – John Robison	RMP Protest On May 28, 2013, the Idaho Conservation League submitted a protest regarding specific RMP amendments. The concerns expressed in this protest also apply to the FEIS and we reiterate them here.	Comment noted. Please refer to the Department's response to these protests.

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				Name of Resource Management Plan Amendments being protested: Pocatello RMP Cassia RMP Twin Falls RMP Jarbidge RMP Morley Nelson Snake River Birds of Prey RMP Bruneau RMP Kuna MFP Caribou-Targhee National Forest Sawtooth National Forest	
EA-13	20	9-27-17	Idaho Conservation League – John Robison	Pocatello RMP The current Pocatello RMP prohibits new transmission towers within 2 miles of occupied sage-grouse leks and an amendment is proposed that would waive this stipulation. Although the route through the Pocatello Resource Management Area attempts to minimize impacts by collocating the line with a preexisting project, these impacts still cannot fully be avoided. The BLM needs to craft the amendment such that any impacts to sage-grouse are also minimized through additional design features such as limits on the season and timing of construction activities and by developing a mitigation program to calculate and offset the impacts. The mitigation program needs to factor in high priority areas for restoration and conservation, the proper ratio of habitat improvements, the probability of success for restoration efforts, and the lag time before these habitat improvements are realized. We note that the Pocatello RMP is supposed to manage sage-grouse habitat consistent with the Conservation Plan for Greater Sage-grouse in Idaho. The Conservation Plan specifically recommends developing off-site mitigation for unavoidable impacts: Off-site mitigation should be employed to offset unavoidable alteration and losses of sage-grouse habitat. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should	Decisions on routes through the Pocatello area were decided in the 2013 ROD and are not open for consideration in this EA.

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				<p>be designed to complement local sage-grouse conservation priorities.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>Additional resources to be mitigated include other wildlife, winter range, bald eagle nests, sensitive areas and visual resources.</p>	
EA-13	21	9-27-17	Idaho Conservation League – John Robison	<p>Cassia RMP Amendments FEIS F.1-28</p> <p>We oppose the amendment because the scenic values in the Goose Creek Travel Zone are not being adequately protected or offset. While it is difficult to mitigate for impaired visual resources, the BLM should consider expanding and strengthening protections for other areas within the Cassia area so that other incursions will not be allowed.</p> <p>In addition, segments of the route through the BLM Burley Field Office are in an Important Bird Area for sage-grouse and the mitigation measures for such incursions are not adequately described.</p>	Decisions on routes through the Cassia area were decided in the 2013 ROD and are not open for consideration in this EA.
EA-13	22	9-27-17	Idaho Conservation League – John Robison	<p>Twin Falls MFP Amendments FEIS F. 1-31</p> <p>Jarbidge RMP FEIS F.1-37</p> <p>We oppose the Twin Falls MFP Amendments FEIS F.1-31 and the Jarbidge RMP, FEIS F.1-37 because of impacts to several sensitive environmental areas are not adequately avoided, minimized or mitigated. Specifically, the amendments would allow impacts to Salmon Falls Creek Canyon Area of Critical Environmental Concern (ACEC), eligible Wild and Scenic River, Outstanding Natural Area (ONA), Special Recreation Management Area (SRMA) and VRM direction without properly offsetting these impacts. Any amendments to these areas need additional strengthening to ensure that protections for these values will increase so there is no net loss in terms of protections. Options to consider include expanding these natural areas, increasing the level of protections within these natural areas and developing additional design features to minimize and mitigate for impacts.</p>	Comment noted. Resource issues are addressed in EA sections 3.2.3 Cultural Resources, 3.2.13 Paleontological Resources, and 3.2.14 Geologic Hazards.

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				We are also concerned about impacts to paleontological resources (Sugar Bowl, Glens Ferry and McGinnis Ranch) and Oregon Trail ruts by amending the RMP to allow the transmission line to be constructed in prohibited areas. F.1-43. If any amendment is considered here, the BLM needs to build additional sideboards so that the special geologic and historic resources of these area are awarded high protections from future incursions or that the BLM receive additional resources for research and interpretation.	
EA-13	23	9-27-17	Idaho Conservation League – John Robison	Snake River Birds of Prey National Conservation Area We are concerned about the amendments regarding the addition of new utility corridors, incursions into the few remaining non-motorized areas, the adverse impacts to visual resources such as Sinker Creek Canyon and negative effects to special status species such as slickspot peppergrass, and signature species such as prairie falcons, golden eagles and other raptors. SRBOP F.1-51. We are particularly concerned about allowing motorized intrusions into the Halverson Bar and Cover non-motorized areas. These amendments should either be struck or significantly modified to address these concerns. In addition, the BLM needs to ensure that the Gateway West Transmission line is actually compatible with the NCA and that the project will ultimately enhance raptor habitat. While we appreciate the concept of ratios of up to 5:1 for restoration of shrub and grasslands, the BLM needs to further develop this proposal to avoid, minimize and mitigate impacts. Any mitigation ratio needs to factor in the success rate of vegetation restoration efforts, the rate of habitat loss due to wildfire, the lag time before any actual mitigation is realized. The actual ratios may be much greater. Additional mitigation measures such as inventorying cultural resources, hiring additional law enforcement and enhancing scientific and education efforts need to be further developed before any amendments are	The routes being considered in this EA are no longer on land in the SRBOP NCA; therefore, the EA will not include amendments to the SRBOP RMP.

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				considered. As a form of partial mitigation, the BLM should examine the feasibility of permanently expanding the NCA in key areas by acquiring private property from willing sellers. We are also concerned that the southern routes will have substantive negative effects on sage-grouse and that developing these routes may not be feasible with sage-grouse protections.	
EA-13	24	9-27-17	Idaho Conservation League – John Robison	Snake River Special Resource Management Area Amendments are also being considered that would affect the Snake River Special Resource Management Area that would simply reduce the SRMA designation by 6,400 acres. F.1-56. The BLM somehow states that recreational goals for the Oregon National Historic Trail and C.J. Strike SRMAs would not be impacted because these lands would have been removed from designation, but certainly the amount of land emphasized for recreation and the quality of that recreation would be affected.	See the preceding response.
EA-13	25	9-27-17	Idaho Conservation League – John Robison	Bruneau RMP We are concerned about the cumulative effects of the lowering the visual standards for the Bruneau RMP because additional infrastructure elements could be considered and would have an improved ability to be permitted. F.1-65.	Comment noted.
EA-13	26	9-27-17	Idaho Conservation League – John Robison	Kuna MFP Allowing amendments to the Kuna MFP could adversely impact wildlife, vegetation, soils and cultural resources. F.1-71. We are particularly concerned about impacts to water quality, fisheries, elk winter range, and raptors. We believe that this amendment should be rewritten to ensure that these other resources are properly protected and not impaired.	Comment noted.
EA-13	27	9-27-17	Idaho Conservation League – John Robison	Caribou-Targhee National Forest The proposed Forest Plan amendments regarding snag protections for cavity nesters needs to be offset by increasing protections for cavity nesters in other areas. One possibility would be expanding the areas off-limits to firewood collectors where such trees are at risk.	Decisions on routes through the Caribou-Targhee NF were decided in the 2013 USDA Forest Service ROD.

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				F.2-13. Similarly, the amendment affecting goshawks, snags, visuals, Aquatic Influence Zones, woodpeckers, semi-primitive recreational should contain additional mitigation measures. F.2-14-18.	
EA-13	28	9-27-17	Idaho Conservation League – John Robison	Sawtooth National Forest The amendments for visual resources should also be balance with increased protections for other areas on the Forest. F.2-28	Decisions on routes through the Sawtooth NF were decided in the 2013 ROD. No routes through the Sawtooth Forest were approved. This EA is not considering any routes through national forest system lands.
EA-13	29	9-27-17	Idaho Conservation League – John Robison	NEPA analysis These amendments have not yet gone through the full NEPA process. The analysis of the effects of these amendments is tiered to the Gateway West Final Environmental Impact Statement which is open for public comment until June 28, 2013. The BLM is still accepting public comments, responding to comments, refining alternatives and no final Record of Decision has been issued. It is very helpful when assessing such projects to incorporate RMP amendments into the EIS process so the actual impacts are fully analyzed and disclosed. Closing the protest period on the RMP amendments before the completion of the full analysis is an inappropriate segmentation of NEPA. We are particularly concerned because several of these amendments were not proposed in the original DEIS so the public has not had an adequate opportunity to review them.	Comment noted. See the above responses. Any amendments proposed in this EA will be subject to a 30-day protest period, as required by BLM regulations.
EA-13	30	9-27-17	Idaho Conservation League – John Robison	Cumulative effects The BLM amendments underestimate the likelihood of additional infrastructure projects utilizing the same ROW, leading to increasing impacts to other resources. The BLM needs to adopt additional protections for these remaining resources to ensure that they are properly managed and maintained.	Comment noted. Please refer to Appendixes F and G in the SEIS for the analysis of direct and indirect effects and Chapter 4 for cumulative effects.
EA-13	31	9-27-17	Idaho Conservation League – John Robison	Sage-grouse We are particularly concerned about impacts to sage-grouse and ask that the BLM craft any amendments to avoid, minimize and mitigate	Please see the response to your detailed comments on these issues above. Mitigation for sage-grouse is based on the science-based HEA completed for this Project by

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				<p>impacts. Sage-grouse were recently determined to warrant full protections under the Endangered Species Act but were precluded by higher priorities. Infrastructure projects represent one of the top threats to sage-grouse:</p> <p>Disturbance to important seasonal habitats: Human activity and noise associated with machinery or heavy equipment in proximity to occupied leks or other important seasonal habitats may disturb sage-grouse.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-125</p> <p>The Conservation Plan also recommends developing off-site mitigation for unavoidable impacts:</p> <p>Off-site mitigation should be employed to offset unavoidable alteration and losses of sage-grouse habitat. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should be designed to complement local sage-grouse conservation priorities.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>With regard to activities with the potential to disturb sage-grouse, the Conservation Plan offers this recommendation:</p> <p>Apply seasonal-use restrictions (see Human Disturbance Section 4.3.5) on activities associated with the exploration, operations, and maintenance of mines, gravel pits, or landfills, including those associated with supporting infrastructure.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>The BLM should consult closely with the Idaho Department of Fish and Game and the Local Sage-grouse Working Group to determine appropriate measures to avoid, minimize and mitigate impacts.</p> <p>The BLM, when considering mitigation requirements for adverse sage-grouse effects,</p>	<p>an interagency taskforce. See Appendix J of the 2013 FEIS. See Appendix J of the 2013 FEIS.</p>

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				needs to consider both the appropriate spatial scale for considering effects of proposed management activities on sage-grouse and their habitat as well as the adverse impacts of invasive exotic plant species, and the increased threat of wildfire.	
EA-13	32	9-27-17	Idaho Conservation League – John Robison	<p>Regarding the spatial scale of proposed management activity effects on sage-grouse and habitat, the BLM should recognize that sage-grouse can require movements of tens of miles between required habitats. Thus, a significant challenge in managing and conserving sage-grouse populations is the fact that they depend upon different types of habitat for each stage of their annual cycle (Connelly et al. 2009), and upon the ability to move between the different habitats throughout the year. Each seasonal habitat must provide the necessary protection from predators, required food resources, and thermal needs for the specific stage of the annual cycle. Breeding-related events and season habitat needs are described below:</p> <ol style="list-style-type: none"> 1) Late brood-rearing period in July through September. Late brood-rearing is focused in wetter areas, especially riparian and spring-associated meadows closely associated with nearby sagebrush. 2) Movement to winter habitat. 3) Occupation of winter habitat from November through February. The primary requirement of winter habitat is sagebrush exposure above the snow, and is generally characterized by dense sagebrush, often including areas of wind-swept ridges. 4) Lekking, which may begin as early as late February, and may extend into May. Lekking requires open expanses of sagebrush within a large area of sagebrush cover. Lek persistence has been affected by disturbance activities within 3.1, 11.2, and 33.5 mile radii (Swenson et al. 1987, Johnson et al. 2009, Knick and Hanser 2009). 	Comment noted. In addition to the analysis in Section 3.11 of the SEIS, please see the detailed analysis in the HEA, which recognizes that the birds move through large areas as part of their lifecycle and proposes mitigation to compensate.

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				<p>5) Female movement to nesting sites and nesting between March and June. Nesting females commonly move 3-5 miles or farther from the lekking site. Females select areas with more sagebrush canopy than is generally available in the surrounding landscape (Holloran et al 2005, Hagen et al. 2007)</p> <p>6) Hatching and early brood-rearing in May and June. Females continue to use relatively dense stands of sagebrush for earliest brood-rearing habitat if native forbs and insects are available. When vegetation desiccates, females and broods move to wetter areas in search of the native forbs and insects required by chicks.</p> <p>Knick and Hansen (2009) analyzed factors in lek persistence of over 5,000 leks. They used three radii to test for landscape disturbance effects on lek persistence – radii of 3.1 miles, 11.2 miles, and 33.5 miles. Previous studies had shown behavioral effects on sage-grouse related to sagebrush disturbance at the 33.5 mile radius (Swenson et al. 1987, Leonard et al. 2000). Knick and Hansen’s study showed adverse effects on lek persistence from wildfire at the 33.5 mile radius.</p> <p>Avoiding and minimizing human footprint at a 3.1 mile radius from leks is an important first step in protecting sage-grouse populations, but sage-grouse could be engaged in nesting and brood-rearing, in addition to lekking, for much of the planned construction activity period. Recent studies have shown that only 64% of nesting sites occur within 3.1 miles of leks, but 80% of nests are found within five miles, and 20% of nests occur at distances greater than five miles from leks. Nest success is also greater the farther a nest occurs from a lek, indicating a disproportionate potential importance of these more important nests for population recruitment. Aldridge and Boyce (2007) and Doherty et al. (2010) identify a buffer of 6.2 miles to protect important nesting and brood-rearing habitats.</p>	

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EA-13	33	9-27-17		Given the considerations of year-round habitat use and known impacts of human activity on sage-grouse populations, additional mitigation efforts will be needed for disturbance to sagebrush near lekking areas; disturbance and loss of sagebrush and native forbs used for early brood-rearing; and disturbance and impacts to hydrologic function of wet areas used for early to late brood-rearing. A conservative estimate for the nesting and brood rearing area affected will include buffers with radii of 6.2 miles around known leks. Mitigation specifics could be based on a mitigation template recently created for the Lesser Prairie Chicken, a ground-nesting species facing similar threats (Horton et al. 2010).	Comment noted. Mitigation for sage-grouse is based on an extensive, science-based analysis of habitat, existing disturbances, and project impacts, the HEA, see Appendix J of the 2013 FEIS. The HEA addresses Project-effects on sage-grouse and proposes mitigation for direct and quantifiable indirect effects. In addition, the BLM will consider mitigation requirements based on direction in the applicable legislation, BLM regulations, and land management plans.
EA-13	34	9-27-17		Regarding adverse impacts from invasive exotic species, including increased wildfire risk, the BLM needs to address concerns about cheatgrass establishment and spread. Once cheatgrass becomes established in a sagebrush community, its effects cascade in synergistic feedbacks toward increasing dominance resulting from increased fire disturbance, loss of perennial species and their seed banks, and decreased stability and resilience to changes in the surrounding landscape (Miller 2009). Effective cheatgrass prevention after disturbance is most likely with the establishment of a healthy native vegetation community. The BLM needs to identify the baseline vegetation conditions and the desired post-reclamation plant community, and require post-project monitoring of the reclaimed areas and repeated revegetation treatments as necessary until the desired vegetation is established. The footprint for areas to be revegetated and monitored should include a 5m buffer around linear disturbances such as roads. Suggested monitoring protocols could include Interpreting Indicators of Rangeland Health (IIRH, Duniway 2010).	Comment noted. The SEIS in Section 3.11 discusses cheatgrass and other noxious weeds. Appendix M includes measures to avoid spreading noxious weeds.

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EA-14	1	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Scoping Process</p> <p>To a certain extent, WWP and the public are writing scoping comments in the dark. The Consolidated Appropriations Act, 2017 (H.R. 244), which incorporated the Morley Nelson Snake River Birds of Prey NCA Boundary Modification Act (Modification Act) by reference (Division G, Title IV, Sec. 431(a), required the BLM to issue a Right of Way (ROW) grant. The Modification Act directed the BLM to issue a ROW grant for the lands described in Sec. (b)(2) of the Modification Act for portions of Gateway West Segments 8 and 9. However, the BLM has not shared that ROW and its map with the public. In fact, when WWP asked the BLM to provide them, most especially a map, the BLM stated that we would have to FOIA for them. WWP has done so, but FOIA's 20 working day deadline for a final determination will end after this scoping period has ended. As a result, WWP anticipates that we may have additional scoping comments to provide once we receive the ROW and its map from the BLM. Depending on when the BLM fills our FOIA request, it may be after the end of the formal scoping period.</p>	Comment noted.
EA-14	2	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Impacts to Sensitive & Listed Species -- Fire & Weeds</p> <p>According to the Final Supplemental Environmental Assessment for Segments 8 and 9 (FSEIS), the Project will negatively impact habitat for greater sage-grouse, Slickspot peppergrass, and other sensitive species. Likely impacts include: "fragmentation of vegetation communities, increased potential for introduction and spread of invasive plant species," and "alteration of fire regime."</p> <p>USFWS has found that habitat fragmentation, invasive plants, and altered fire cycles threaten both sage-grouse and Slickspot peppergrass. See 81 FR 55084, 55058 (Slickspot peppergrass); 75 FR 13910, 13924 (sage-grouse). In addition, genetic isolation is a potential issue for Slickspot peppergrass, as</p>	The SEIS has analyzed the impacts to sage-grouse in Section 3.11 and in the extensive, science-based HEA, see Appendix J of the 2013 FEIS. Slickspot peppergrass is addressed in Section 3.8 of the SEIS. Also see the USFWS Biological Opinion/Conference Opinion including supplemental memoranda on slickspot peppergrass.

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				<p>several populations are already isolated due to habitat destruction. See 81 FR 55084, 55058. BLM must therefore fully analyze the potential for this Project to negatively impact these sensitive species. The agency must also take into account the cumulative effects of other projects, as well as natural occurrences such as wildfire. As the Final Supplemental EIS states, “there have been multiple large fires in the vicinity of the project.” Not only must BLM consider the cumulative impacts of the Project in light of these fires, but it must also take into account any current and future fire rehabilitation and vegetation treatment projects occurring in the vicinity of the Project route.</p>	
EA-14	3	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Consultation BLM must reinitiate consultation with USFWS regarding impacts to listed species if the project is “modified in a manner or to an extent not previously considered in the BO.” 50 C.F.R. § 402.16. USFWS appears not to have analyzed the impacts to listed species of the newly mandated route (Alternative 1 as described in the FSEIS). Furthermore, the FSEIS states that:</p> <ul style="list-style-type: none"> - “The Revised Proposed Route for Segment 8 would cross approximately 0.3 mile of known occurrences, 7.5 miles of occupied habitat, 31.1 miles of slickspot peppergrass habitat, 18.7 miles of potential habitat, and 0.8 mile of proposed critical habitat.” FSEIS at 3.7-3. - “The Revised Proposed Route and FEIS Proposed 9 would each cross approximately 0.4 mile of potential habitat for slickspot peppergrass. ...” FSEIS at 3.7-4. Existing management plans must be amended to allow construction in and near Slickspot peppergrass habitat. These documented impacts to Slickspot peppergrass seem to obviously contradict USFWS’s “no impact determination” (attached to the most recent Record of Decision). BLM must reinitiate consultation as part of this SEA process 	<p>The BLM continues to work with the USFWS to ensure that the Project complies with the ESA, in accordance with the Conference Opinion for the Gateway West Transmission Line which states the following:</p> <p>2.10 Reinitiation Notice</p> <p><i>This concludes formal conference on slickspot peppergrass and its proposed critical habitat. Because the “take” prohibitions detailed under section 9(a)(1) of the Act do not apply to listed plants, requirements for re-initiation of formal consultation associated with incidental “take” as described below are not applicable to listed plants, including slickspot peppergrass, should the species become listed in the future.</i></p> <p>As provided in 50 CFR §402.16, reinitiation of formal consultation is required where discretionary Federal agency involvement or control over the action has been maintained (or is authorized by law) and if:</p> <ol style="list-style-type: none"> 1. The amount or extent of incidental take is exceeded. 2. New information reveals effects of the agency action that may affect listed species or critical habitat in a manner or to an extent not considered in this CO.

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				to determine how the new route will affect slickspot peppergrass.	<p>3. The agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in this CO.</p> <p>4. A new species is listed or critical habitat designated that may be affected by the action.</p> <p>In instances where the amount or extent of incidental take is exceeded, any operations causing such take must cease pending re-initiation.</p>
EA-14	4	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Collision and Electrocution Risks to Migratory Birds</p> <p>The SEA should analyze in detail the Project's potential collision and electrocution impacts to birds paying special to mortality estimates and how they will change depending on route micrositing. Although the Project's FSEIS and Final Environmental Impact Statement (FEIS) discussed the potential for bird mortality resulting from transmission line collisions and electrocutions, they did not attempt to quantify bird losses. This omission should be remedied in the SEA. BLM must consider the direct, indirect, and cumulative impacts upon the various bird species most likely to be impacted.</p> <p>Loss et al's 2014 analysis of bird mortality at U.S. transmission lines estimated that between eight million and 57 million birds are killed annually in the United States by collisions with transmission lines and an additional 0.9 million to 11.6 million are killed by electrocution at distribution lines.¹ Loss et al at 6. The study found a median annual mortality of 29.6 transmission line collision deaths per kilometer/pole and 0.030 distribution line electrocution deaths per kilometer/pole. Loss et al at 7. This suggests that the Project's annual collision mortality for Segments 8 and 9 will be influenced by the final length of the Project, which is subject to change depending on route micrositing. However, the FSEIS's length estimate of approximately 474.76 kilometers for Segments 8 and 9 together suggests a reasonable estimate of the Project's bird collision deaths would be approximately 14,053 annually.²</p>	<p>Bird mortality, including birds covered by the MBTA, is analyzed in Sections 3.10 and 3.11 of the EIS and SEIS. Also see Section 5.2.3 of the 2017 ROD for a discussion of how the Project would comply with the MBTA.</p>

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				<p>Since the Project is estimated to have a working life of 50 years (FSEIS at 2-72), the BLM is making a decision that will foreseeably result in the collision deaths of an estimated 702,650 birds.</p> <p>Significantly, most of the bird species found in the Project Area are protected by the Migratory Bird Treaty Act (MBTA), which has been interpreted by USFWS, courts and others as prohibiting even unintentional take.³ Because increases or decreases in the Project's length will change the number of MBTA-protected birds the Project kills, it is important for the BLM to analyze bird mortality by micro-siting variant. According to the BLM's Memorandum of Understanding with USFWS, which guides BLM implementation of Executive Order 13186 ("Responsibilities of Federal agencies to Protect Migratory Birds"), the BLM shall "[a]t the project level, evaluate the effects of the BLM's actions on migratory birds during the NEPA process, if any, and identify where take reasonably attributable to agency actions may have a measurable negative effect on migratory bird populations, focusing first on species of concern, priority habitats, and key risk factors. In such situations, BLM will implement approaches lessening such take." MOU at 6.</p> <p>Since the route corridors the BLM has been analyzing are broad, without the current ROW and its map the public is in the dark as to which bird-sensitive locations would be crossed by the Project at the micro-siting level. Possibilities include sensitive areas crossed by FSEIS Alternative 1 routes, including the Ducks Unlimited Bruneau Conservation Area, at least one Idaho Power Wetland Conservation Area, a Ducks Unlimited Wetlands Conservation Area, the Malad and Snake Rivers, and Salmon Falls Creek. Bird-sensitive areas that would be crossed by or near to the Project and the types of bird species they host (e.g., waterfowl, raptors) should be discussed in the SEA because different types of birds have differing likelihoods of transmission</p>	

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				<p>line collision and electrocution. In addition, as Loss et al points out, “Furthermore, mortality at power lines may contribute to population declines for some species, as evidenced by studies documenting that power line-caused mortality can cause a large percentage of total mortality for species from several avian orders.” Loss et al 1. These impacts also affect the amount and type of mitigation the BLM should require.</p> <p>Moreover, because the reasonably anticipated bird mortality for this Project is so high and could well include BLM Sensitive Species and USFWS Birds of Conservation Concern, the BLM should require bird mortality monitoring throughout construction and for at least three years after operation begins. Since birds are a public trust resource, the results of the monitoring should be made publicly available. The SEA should also discuss how the monitoring will be conducted, so that the public can assess and comment on the proposed study methodology.</p>	
EA-14	5	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Mitigation</p> <p>Because portions of the Project route have been established by legislation, BLM’s alternatives are necessarily limited. The agency’s NEPA analysis will therefore focus heavily on mitigation. The agency may be tempted to dismiss environmental concerns on the ground that its hands are effectively tied. And it might, for the same reasons, attempt to rely heavily on future mitigation measures in its analysis.</p> <p>However, mitigation does not relieve the agency of its information gathering obligations under NEPA, and mitigation must be sufficiently specific and likely to occur. As one court put it, “even though an agency need not actually mitigate the identified harms, it must perform some assessment of whether the mitigation measures would be effective,” including an estimate of how effective mitigation measures would be if adopted or a reasoned explanation as to why such an estimate is not possible. High Sierra Hikers Ass’n v. U.S. Dep’t of Interior, 848 F.Supp 2d 1036,</p>	<p>The BLM will consider mitigation based on applicable legislation (including H. R. 2104 which includes mitigation guidelines for the portion Segments 8 and 9), BLM regulations, and approved planning use plans. Mitigation for impacts to the NCA will be covered by the conditions outlined in HR 2104.</p>

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				<p>1049-51 (N.D. Cal. 2012). "Mitigation measures may help alleviate impact after construction, but do not help to evaluate and understand the project before construction." Northern Plains Resource Council, Inc. v. Surface Transp. Bd., 668 F.3d 1067, 1084 (9th Cir. 2011). Put differently, an agency may not "assume ... there are mitigation measures that might counteract the effect without first understanding the extent of the problem." Id. at 1084-85.</p> <p>These obligations are especially relevant because in the previous Record of Decision (ROD) for segments 8 and 9, the BLM conditioned its decision on a complex mix of mitigation plans:</p> <p>This decision is conditioned on mitigation plans that can be monitored during implementation to ensure effectiveness and durability, as identified in the Final SEIS, and includes the final Project Plan of Development (POD), a Migratory Bird Habitat Conservation Plan, a Comprehensive Sage-Grouse Habitat Mitigation Framework Plan, Historic Property Treatment Plans (HPTPs) prepared under the guidelines in the PA, the Conservation Mitigation Framework and Plan for the SRBOP, and the issuance of all necessary local, state, and Federal approvals, authorizations and permits.</p>	
EA-14	6	9-27-17	Western Watersheds Project – Kelly Fuller	<p>FSEIS ROD at 15-16.</p> <p>However, at the time of the previous ROD, some of the mitigation plans for wildlife and habitat were merely frameworks and not fully developed. As we explained in our appeal to the Interior Board of Land Appeals, this was insufficient to meet the BLM's legal obligations. In addition, our appeal explained that the previous mitigation plans did not provide mitigation for sage-grouse outside the NCA. IBLA appeal at 4-5.4 This problem intensified when Congress removed the Project routes from the NCA by changing the NCA boundaries. While the Modification Act prescribed using the Compensatory Mitigation and Enhancement framework, BLM at a minimum</p>	As stated in the EIS and SEIS, mitigation plans cannot be finalized until the selected routes are fully surveyed and the design is complete. Micro-siting may allow the Project to avoid or reduce impacts.

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				must fulfill its obligations by providing a detailed, specific mitigation analysis in the SEA, using a completed version of the framework.	
EA-14	7	9-27-17	Western Watersheds Project – Kelly Fuller	The framework should include closing livestock grazing allotments in any area occupied by the same sage-grouse population affected by the transmission line. In addition to providing a conservation benefit for greater sage-grouse and other species, this would be a cost-effective use of mitigation funds.	Comment noted.
EA-14	8	9-27-17	Western Watersheds Project – Kelly Fuller	Net Conservation Gain for Greater Sage-Grouse and Cumulative Impacts The SEA and ROD for this reconsidered decision should make a firm commitment to a net conservation gain for sage-grouse mitigation standard. However, since Department of the Interior sage-grouse management may be changing, it is important that the SEA analyze direct, indirect, and cumulative impacts of the Project on greater sage-grouse both with and without a net conservation gain for sage-grouse mitigation standard. Furthermore, as we pointed out in our Interior Board of Land Appeal of the previous ROD, the BLM's analysis of cumulative impacts on sage-grouse was also inadequate, with BLM admitting that the cumulative impacts would be "substantial" but providing no actual analysis of how it would change the extinction probability of the affected sagegrouse populations at any scale. IBLA appeal at 1-2. This should be remedied in the SEA.	Comment noted.
EA-14	9	9-27-17	Western Watersheds Project – Kelly Fuller	Eagles The SEA should analyze the Project's impacts on bald and golden eagles in detail, including local eagle population numbers, numbers of nests and presence of foraging habitat. This is especially important because Appendix K of the FSEIS (Compensatory Mitigation Framework for the Morley Nelson Snake River Birds of Prey National Conservation Area) is silent on proposed mitigation for bald and golden eagles. Raptors in general are mentioned, but legal requirements for	The EIS and SEIS do analyze Project effects on eagles; see Section 3.11 and the tables in Appendix D.11. Also see the map of bald and golden eagle nests in Appendix E (Figure E.10-3).

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				<p>eagles are different than for raptors since eagles are protected by the Bald and Golden Eagle Protection Act (BGEPA), not just the MBTA that protects raptors. BGEPA prohibits even unintentional take without an eagle take permit, and programmatic eagle take permits are available through USFWS.</p> <p>Given that the Project would pass near eagle nests and through eagle foraging habitat, the SEA should also discuss the programmatic Eagle Take Permit that the Project will need in order to avoid legal liability for the eagle mortality that the Project will cause. Even with construction timing restrictions designed to avoid eagle nests, the Project has a high risk of eagle mortality because of collisions with the transmission lines that will occur over the Project's 50 year life span.⁵ USFWS acknowledges the risk transmission lines pose to eagles in the FPEIS for the recent eagle take permit regulation revisions: "Utilityscale wind energy facilities and electric transmission companies are likely to be the most frequent long-term permit applicants because of the known risk to eagles from collisions with wind turbines and electric power lines." Eagle Take Permit FPEIS at 143.</p>	
EA-14	120	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Resource Management Plan Amendments</p> <p>The NOI for the SEA states that this Project will require amendments to the Kuna, Bennett Hills/Timmerman Hills, and Jarbridge RMPs. Appendix F of the FSEIS supplied some analysis of amendments to the Kuna and Bennett Hills RMPs. However, Appendix F does not discuss amending the Jarbridge RMP, so it will need to be fully analyzed in the SEA</p>	<p>As stated in the SEIS, no amendments are proposed for the 2015 Jarbridge RMP. As discussed in Chapter 1 of the FSEIS and in Appendix F of that document, the 2015 Jarbridge RMP does not cover all of the area covered by the 1987 RMP. Amendments to the 1987 RMP were disclosed and analyzed in the SEIS. See Appendix F for details.</p>
EA-15	1	9-27-17	Coalition of Local Governments – Kent Connelly	<p>On August 28, 2017, the Bureau of Land Management ("BLM") published in the Federal Register a Notice of Intent to Prepare an Environmental Assessment ("EA") to Reconsider the January 19, 2017, Record of Decision Approving Segments 8 and 9 for the Gateway West Transmission Line Project ("Gateway West</p>	<p>Comment noted. Decisions on Segments 1 through 7 and 10 were made in the 2013 ROD. This EA does not reconsider those decisions.</p>

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				<p>Project”). 82 Fed. Reg. 40797. The Coalition of Local Governments’ (“Coalition”) members, Lincoln and Sweetwater Counties, were cooperating agencies on the Gateway West Project and participated throughout the environmental impact statement (“EIS”) process. Segments 1 through 4 of the transmission line travel through Wyoming.</p> <p>New information has developed regarding Segment 4 of the transmission line, including new Wyoming legislation that prevents the expansion of the Cokeville Meadows National Wildlife Refuge Acquisition Areas (“Cokeville Meadows NWR”), which requires reconsideration of the 2013 ROD similar to the BLM’s reconsideration of the 2017 ROD for Segments 8 and 9. Wyoming’s withdrawal of consent for any further expansion of the Cokeville Meadows NWR allows for Segment 4 of the transmission line to be located South of the town of Cokeville as proposed by Lincoln County during the EIS process.</p>	
EA-15	2	9-27-17	Coalition of Local Governments – Kent Connelly	<p>The Coalition objects to the BLM reconsidering its 2017 Record of Decision (“ROD”) for Segments 8 and 9 without also reconsidering its 2013 ROD with respect to Segment 4. The final route location for Segment 4 was decided in a closed door meeting after the FEIS was published and without involving the public, all of the cooperating agencies, or the newly-impacted private landowners. The route selected at this meeting had not been considered in the DEIS or FEIS. The BLM also failed to consider Lincoln County’s proposed cut-over route that would place the transmission line just South of Cokeville, avoiding most of the private lands and residential areas. The BLM gave little consideration to the County’s proposal because it was outside the area analyzed in the FEIS, was outside the designated Wyoming utility corridor, and would require additional permits where it crossed the Cokeville Meadows National Wildlife Refuge Acquisition Areas (“Cokeville Meadows NWR”).</p>	<p>Comment noted. The 2013 ROD did not select routes for Segments 8 and 9 for the reasons stated in that document; therefore, additional NEPA analysis is needed in order to make a decision on those two segments.</p>

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EA-15	3	9-27-17	Coalition of Local Governments – Kent Connelly	In March of 2017, the State of Wyoming passed legislation that prevents the expansion of the Cokeville Meadows NWR. This removes 20,000 acres of land from acquisition boundaries of the NWR and makes it available for location of Segment 4 of the transmission line. The line would then pass South of Cokeville as Lincoln County proposed several years ago. The Coalition strongly encourages the BLM to reconsider its 2013 ROD as it relates to Segment 4 of the transmission line as it is currently doing for the 2017 ROD for Segments 8 and 9.	Comment noted.
EA-15	4	9-27-17	Coalition of Local Governments – Kent Connelly	The route location for Segment 4 of the transmission line was contested throughout the EIS process by the Coalition members, including Lincoln County, and private landowners due the proposed routes that would run near or in the town of Cokeville. All of the routes would have affected a significant amount of private land and residential areas. To avoid the harm to landowners and lost property values, Lincoln County and Cokeville proposed to the BLM a cut-over route South of Cokeville before the FEIS was published. The BLM rejected this proposed route in the FEIS because it was outside the Wyoming Governor’s utility corridor and there was insufficient time to incorporate it into the FEIS.	Comment noted.
EA-15	5	9-27-17	Coalition of Local Governments – Kent Connelly	The Coalition protested the 2013 FEIS based on the impacts of the location of Segment 4 near the town of Cokeville and its impact on a significant amount of private land and residential areas. The Coalition also raised the issue that the location of Segment 4 of the transmission line on private lands and residential areas was inconsistent with local land use plans. The BLM denied the protest, but during this time, it also decided that new information impacting the transmission line route for Segment 4 required the consideration of new alternatives. The new information included a landslide area near Dempsey Ridge, the Teichert Brothers LLC wetland conservation easement, a proposed National Resource Conservation	Comment noted.

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				Easement, and Lincoln County's comment letter on the FEIS.	
EA-15	6	9-27-17	Coalition of Local Governments – Kent Connelly	The BLM held an invite only meeting. Of the local government cooperators, Lincoln County attended to discuss the reroute of Segment 4. The BLM considered three different reroutes of Segment 4, all located north of the preferred alternative identified in the FEIS. Lincoln County again proposed its cut-over route South of Cokeville. The BLM again rejected the County's proposal because it was outside the area analyzed in the FEIS, outside the designated Wyoming utility corridor, and would require additional permits where it crossed the Cokeville Meadows NWR area. Over the objections of Lincoln County and Cokeville, the BLM adopted a re-route of Segment 4 that placed the transmission line north of Cokeville across about 6.7 miles of private land and impacting new private landowners. This new route had never been considered in the DEIS or the FEIS.	Comment noted.
EA-15	7	9-27-17	Coalition of Local Governments – Kent Connelly	The Coalition also appealed the ROD to the Interior Board of Land Appeals ("IBLA") because the ROD adopted a new route location for Segment 4 based on three new alternatives that were identified in an invitation-only meeting held after the release of the FEIS. This new route impacted about 6.7 miles of rural residential land without notifying the newly impacted landowners of the significant change in the segment's right-of-way location and despite the strong objections from Lincoln County and the town of Cokeville. The IBLA affirmed the Bureau of Land Management's ("BLM") ROD on September 27, 2016.	Comment noted.
EA-15	8	9-27-17	Coalition of Local Governments – Kent Connelly	One of the main reasons for dismissing Lincoln County's proposed southerly reroute was because it would cross areas proposed for acquisition to expand the Cokeville Meadows NWR. The Cokeville Meadows NWR acquisition boundary was created by a record of decision in 1992 that authorized the U.S. Fish and Wildlife	Comment noted.

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				<p>Service ("FWS") to purchase a total of 26,657 acres of land for the refuge. 57 Fed. Reg. 45640 (Oct. 2, 1992); see Comprehensive Conservation Plan - Cokeville Meadows National Wildlife Refuge, Wyoming at 17 (Mar. 2014) ("Cokeville CCP"). The principal legislative authority for the land acquisitions was the Migratory Bird Conservation Act. Proposed Cokeville Meadows National Wildlife Refuge DEIS at 4 (Oct. 1990) ("Cokeville DEIS"). Under this Act, "[n]o deed or instrument of conveyance in fee shall be accepted by the Secretary of the Interior . . . unless the State in which the area lies shall have consented by law to the acquisition by the United States of lands in that State." 16 U.S.C. §715f (emphasis added). If land is acquired using funds from the migratory bird conservation fund, then approval of the State Governor or appropriate State agency is also required. 16 U.S.C. §715k-5 (Section 3 of the Wetlands Act of 1961 (Loan Act)).</p> <p>In February 1989, the Wyoming Legislature approved an act enabling the FWS to acquire about 27,000 acres of land south of Cokeville for the refuge. See Wyo Stat. §23-1-106(a) (2016). The consent was conditioned on acquisitions occurring between willing seller and willing buyer instead of condemnation, ability for landowners to reserve mineral rights, and executing agreements with the State Engineer regarding state water laws. Wyo. Stat. §23-1-106(b)-(d) (2016). On October 5, 1990, the FWS entered into a memorandum of understanding with the Wyoming State Engineer's Office for the proper administration, management, and development of the Cokeville Refuge consistent with Wyoming State laws governing water rights. Cokeville FEIS at Append. F. While some land was acquired, the refuge is not improved and is not open to the public. There is no formal management of the land acquired.</p> <p>On March 13, 2017, the Wyoming legislature passed a bill that prohibits the expansion of the</p>	

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				<p>Cokeville Meadows NWR. 2017 Wyo. Senate File No. 169 (amending Wyo. Stat. §23-1- 106). The bill revoked the State’s previous consent to the United States proposed land acquisition of about 27,000 acres along the Bear River or in the Bear River area to establish a migratory bird refuge pursuant to the Migratory Bird Conservation Act and the Migratory Bird Hunting Stamp Act. Id. (amending Wyo. Stat. §23-1-106(a)). The bill limited the State’s consent to those lands already acquired by the United States prior to January 1, 2017, which includes only about 7,000 acres. Id. (addition of Wyo. Stat. §23-1-106(f)). These lands are primarily located in the southern portion of the proposed acquisition boundary. Therefore, the Coalition’s proposed cut-over route for Segment 4 would no longer pass through lands set aside for the Cokeville Meadows NWR.</p> <p>Similar to the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act’s reduction of lands from the boundaries of the National Conservation Area where Segments 8 and 9 are now proposed to travel through (82 Fed. Reg. 40797), the Wyoming legislature essentially gutted the lands available for the Cokeville Meadows NWR. This law allows a portion of Segment 4 to be located within the previous NWR acquisition area boundaries. Without Wyoming’s consent, the FWS can no longer acquire any land for the Cokeville Meadows NWR. See 16 U.S.C. §§715f, 715k-5 (requiring State approval for refuges under the Migratory Bird Conservation Act); see also North Dakota v. United States, 460 U.S. 300, 311-16, 321-23 (1983) (A State may revoke its consent if the United States unreasonably delays land acquisition.) This new legislation, therefore, requires the BLM to reconsider its 2013 ROD for Segment 4 of the Gateway West Project. Locating Segment 4 South of Cokeville will impact fewer private landowners, would improve the National Environmental Policy Act compliance, and would be consistent with local</p>	

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				land use plans. Reconsidering the 2013 ROD for Segment 4 will also allow the BLM to restore confidence in its EIS process and involve the public and local land owners in the final decision for the route location near the town of Cokeville.	
EA-16	1	9-27-17	Karen Steenhof	Thank you for the opportunity to provide comments on issues, potential impacts, and mitigation measures that may not have been addressed in the 2016 Final Supplemental Environmental Impact Statement (EIS) about Segments 8 and 9 of the Gateway West Transmission Line Project. I am happy to see that the BLM is moving forward with plans to route the transmission lines within the corridor recommended by the Boise District Resource Advisory Council subcommittee. The BLM should anticipate that minor adjustments may be necessary within and adjacent to the recommended corridor to protect resources and private land. Specific and comprehensive mitigation measures should be clearly identified in the EA. In addition to restoring vegetation, mitigation should include artificial nesting platforms for raptors, particularly in the area between Con Shea Basin and the Hemmingway Substation, where Golden Eagle reproduction has been affected adversely by motorized and non-motorized recreation. Platforms like those designed by Morley Nelson for the PP&L line will provide more secure nesting locations for eagles in those areas. As the representative of the Raptor Research Foundation on the Boise District RAC, I look forward to providing additional input as the EA preparation process continues.	Comment noted. The BLM will consider mitigation based on applicable legislation (including H.R. 2104 which includes mitigation guidelines for the portion Segments 8 and 9), BLM regulations, and approved planning use plans.
EA-17	1	9-16-17	Wildlands Defense – Katie Fite	The 2017 Gateway Federal Register Notice states BLM is reconsidering the right of way approval for Gateway Segments 8 and 9 - as a result of the 2107 modification of the boundaries of the SRBOPA. ABLM also is: "including the potential amendment of several Resource Management Plans (RMPs) and Management Framework Plans (MFPs) in the project area". As we discuss later, the old, out-dated and deficient	Comment noted.

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				LUPs plus the gutting of regulations and even the GRSG ARMPA by Trump/Zinke must be fully analyzed in this current process. These are radically changed circumstances.	
EA-17	2	9-16-17	Wildlands Defense – Katie Fite	An EIS must be prepared to take a hard and thorough look at all direct, indirect and cumulative effects of this project. This is especially necessary since the project area includes lands managed under archaic old Land Use Plan documents so there is no current inventory of the lands; none of the existing LUPs adequately address climate change; Interior is rolling back GRSG protections – jeopardizing sage-grouse and other sensitive and imperiled species, there have been greatly inadequate current site-specific studies for the line and the exact course of all potential segments has not been adequately mapped and provided to the public, assaults on all facets of the environment are escalating enormously under Trump/Zinke – so environmental safeguards that might have been taken for granted (such as Clean water Act provisions and enforcement of environmental regulations including everything from sensitive species protections to controls on grazing damage to public lands in the affected landscape) under the Obama-era analysis no longer are valid.	The EIS and SEIS did take a hard look at the direct, indirect, and foreseeable cumulative effects of this Project. See the extensive tables, maps, and text in these documents and the appendices to these documents.
EA-17	3	9-16-17	Wildlands Defense – Katie Fite	Environmental issues in Idaho are highly politicized, and DEQ and other oversight bodies cannot be counted on to protect the public, the environmental human health, etc. If more oversight devolves to the state, outcomes will be less and less certain, and the mitigation bar must be much higher.	Comment noted.
EA-17	4	9-16-17	Wildlands Defense – Katie Fite	Further, the B2H project to which Gateway is very closely linked is facing even more citizen and local official opposition. People are alarmed at the lack of specificity of proposed paths of that line, failure to adequately inform landowners, impacts to the environment, lack of need for the line, inadequate and highly uncertain mitigation, failure	Comment noted. Please see the Chapter 4 section of the SEIS for a discussion of how the B2H project may contribute to cumulative effects of Gateway West.

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				to minimize adverse environmental footprint, etc. – and here as in Gateway the likelihood that other lines and energy sprawl will seriously degrade the environment following building of these unneeded transmission lines	
EA-17	5	9-16-17	Wildlands Defense – Katie Fite	BOTH these projects - Gateway and B2H - are unneeded out-moded dinosaurs that are destructive to the environment, and highly wasteful of materials and energy used to manufacture and transport the materials. The energy and transmission landscape has changed markedly since these musty projects were first scoped. Much of the environmental data and scientific information including research upon which the analyses rely is old or out-dated. Just how unnecessary these projects are is apparent to anyone driving on the Freeway between Boise and Mountain Home. More and more localized solar and other energy is being produced not just in Idaho, but across the region. Thus – there is no need for long distance transport of energy – as oppoeents of the line have been claiming all along. The times they are a –changin’. New technological changes (especially those related to renewable energy), and changes in the energy generation and use landscape must be fully assessed in an EIS here.	Comment noted.
EA-17	6	9-16-17	Wildlands Defense – Katie Fite	ALL Foreseeable Linked Projects Must be Assessed, and Development Sprawl Must Be Examined and Estimated We are greatly concerned about new military projects proposed and/or foreseeable in the area, and other proposed development that will harm public lands, the SRBOPA raptors, and other native biota and values of the public lands.	Please see Chapter 4 section of the SEIS for a discussion of how the B2H project may contribute to cumulative effects of Gateway West. The EA will consider if additional projects may need to be considered.
EA-17	7	9-16-17	Wildlands Defense – Katie Fite	BLM Has Never Adequately Considered Alternative the EA Seeks to Impose The Fed Reg Notice also states: "The BLM analyzed the impacts of the alternative that it is reconsidering in the 2016 Gateway West Final Supplemental Environmental Impact Statement (EIS)."	The EIS and SEIS took a hard look at the direct, indirect, and foreseeable cumulative effects of this Project. See the extensive tables, maps, and text in these documents and the appendices to these documents.

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				<p>WildLands Defense and Prairie Falcon Audubon have long been concerned about the inadequacies of the Gateway environmental analysis of direct, indirect and cumulative effects. For example, we have extensively commented (and Protested) the ways in which the preceding BLM EIS analyses failed to take a candid and hard look at the Gateway Project need and environmental footprint, and linked and foreseeable project sprawl's significant adverse environmental effects to waters, watersheds, native vegetation communities (and elevated invasive species problems), risk of elevated wild land fires, recreation, human residents, important, sensitive and listed species, national trails, other historic and cultural sites.</p> <p>BLM analyses to date have also failed to assess the significant adverse effects on natural values of the public lands and added stress from climate change - impacting rehab, mitigation associated with the line and linked disturbance, as well as the very significant stress these will exert on important, sensitive and imperiled native biota.</p> <p>We have long been concerned about the serious and significant adverse effects of Gateway on important and sensitive native biota across the region, and this has never been adequately examined in a serious hard look NEPA analysis. Adequate alternatives and mitigation have not been considered.</p> <p>BLM has also failed throughout this process to seriously address the dramatic decline in nearly all species of native biota in the regions impacted by the Gateway Line and the linked and inter-connected B2H transmission line. There is no candid analysis of the status local and regional wildlife, rare plant, and other populations, and threats to their persistence and viability.</p>	
EA-17	8	9-16-17	Wildlands Defense – Katie Fite	Increased Military Activity and Destructive Training Expansion Threatens Biota and Recreation in Gateway Landscape – OTA Expansion in SRBOPA, Saylor Creek, Others???	The EA will consider the expansion of the military training area in a proposed land exchange still under development in its assessment of cumulative effects.

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				<p>We are also concerned about potential increased military expansion activities impacting public lands, wildlife habitat (raptors, sensitive species, important species, migratory birds) and populations including through both disturbance and habitat loss, habitat fragmentation, and linked population declines, watersheds, recreation and many other values of the public land in this area. Right now, the BLM is scoping a proposal to issue rights-of-way to the National Guard so the Guard can tear up a whole new area - a block of state land in the SRBOPSA. This will further isolate and impinge on habitats and species occupying a northern area of the SRBOPA, and it will endanger residents,</p> <p>While the 2017 legislation expanded the Birds of Prey Area near the Snake River to the east, this is located in very close proximity to the Saylor Creek Bombing Range where all hazardous military "training" activity takes place. The fire frequency is off the charts. Gateway threads a very narrow needle here. We are concerned that the quality of habitat will be significantly degraded and compromised by the combination of incessant military noise, use of hazardous equipment and substances such as white phosphorus at Saylor Creek, and now a powerline right by the little extension of the SRBOPA. Saylor Creek activities are a never-ending cause of wild lands fires in the region, and the lands are vulnerable to increased fires with increased activities. White phosphorus (extremely flammable substance used in War Crimes) is increasing. We are concerned that potential new or expanded activities on Saylor Creek and for the USAF and/or National Guard across this area may be facilitated by Gateway. The USAF finalized an EA with very limited public circulation that greatly increases many activities and uses of hazardous substances. There is also public concern that a proposed land trade between BLM and the state of Idaho related to the Owyhee</p>	

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				<p>Initiative will result in military or other extensive development in the Big Hill area.</p> <p>The Project proponent throughout this process has refused to clearly lay out why this line is needed, and who and where the customers are, how much energy they require and/or will produce, and what activities the powerline will actually support. This is a very serious analysis void that has never been adequately addressed, despite thousands of pages of documents and reports. For example, how much energy does the USAF at Saylor creek or the OTA currently use? How much are they projected to use, and how is it related to a claimed "need" for Gateway?</p> <p>We are concerned that the adverse environmental effects of foreseeable and/or potentially linked and/or connected actions associated with military activity/training expansion and/or large-scale energy projects have not been revealed and analyzed in the Gateway and linked B2H documents to date. Thus, no hard look has been taken.</p>	
EA-17	9	9-16-17	Wildlands Defense – Katie Fite	<p>BLM Is Authorizing Increased Grazing in path of Gateway Line, and Purposeful Destruction of Recovering Native Vegetation by BLM</p> <p>To the east in lands managed by Burley BLM in proximity to Gateway, BLM is proposing a series of livestock grazing changes that are adverse to the public interest, and will adversely impact habitat for many sensitive species. BLM is renegeing on it conservation promises for many important and sensitive species, and also adversely impacting public recreation and use and enjoyment of public lands.</p> <p>In the Burley BLM Loughmiller and U2 tracts (see Attached Comments and Appeal), BLM proposes to increase cattle stocking for the brother of a powerful Idaho State Senator (Sen. Brackett). Gateway runs right through this area. We are very concerned that the cumulative effects of this have not been adequately analyzed. Native sensitive species will suffer increased habitat disturbance and degradation. BLM refuses to</p>	<p>Expanding or restricting grazing authorizations is beyond the scope of this EA. The SEIS discloses in Chapter 3 that grazing has affected habitat across the project area and considers in Chapter 4 how grazing adds to cumulative effects.</p>

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				<p>manage to recover native species, and instead stocks public lands to the gills based on exotic harmful crested wheatgrass, which is nearly devoid of any value for native biota.</p> <p>BLM is also relying on seriously flawed FRH Findings (Land Health) in its claims about the health these lands. It is imperative that the Gateway analyses examine and assess BLM management and constant concessions to the livestock industry. This constantly works to undermine protections for species, trails, cultural sites recreation, etc. This culture of concessions also adversely impacts any claimed rehab and recovery as well as effectiveness of mitigation and minimization actions from Gateway and associated development disturbance; the validity and effectiveness of any mitigation; and other measures that are supposed to somehow make up for the serious and significant gateway disturbance in this landscape.</p> <p>In other Burley lands, in a the large block of land comprising the Berger Tracts, an area of long-term concern with PFA and other local conservationists who have sought to conserve the wildlife habitats and species that have managed to hold on in this site, BLM is proposing to purposefully destroy native sagebrush and rabbitbrush - in order to promote livestock forage for a group of cow and sheep ranchers who have seriously abused these lands over many decades.</p> <p>The public lands permittees refuse to graze within the capacity of the land, and BLM accommodates them by killing native plants that are so vital in this area.</p> <p>It is also impossible to determine what is going on with stocking and use/management of livestock in BLM's confusing analysis – especially when actual Use is taken into account. The Proposed BLM action here impacts a very significant block of public land east of Salmon Falls Creek and the ACEC and other important lands. Raptors and other native biota will be adversely impacted by</p>	

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				further destruction of prey species habitats and other ramifications of the BLM's Berger Tract proposal. Not to mention the proposed military expansion onto a block of state land in the OTA. The documents associated with the Berger tract proposal also show the degree to which BLM is abdicating its conservation promises for greater sage-grouse.	
EA-17	10	9-16-17	Wildlands Defense – Katie Fite	BLM/Zinke Has Abandoned Sage-Grouse Plans, and Regulations Are Being Gutted BLM must also take a candid and hard look at Interior Sec. Zinke's gutting of the sage-grouse plans and RMP amendments. Many of the assumptions BLM made for GRSG (and other sensitive species) conservation, management and/or mitigation in the landscape impacted by Gateway and B2H are now going to be directly indirectly and/or cumulatively undermined. Now the whole set of assumptions that Gateway segment analysis was based on are invalid. We stress that that several of the Land Use Plans currently in place in this landscape are woefully out-dated – such as the Twin Falls MFP, Timmerman, and Kuna - as well as several others along the Gateway Route. The Berger and U2/Loughmiller lands are managed under 1970s paradigms. This is not a current	Mitigation for sage-grouse will be implemented in accordance with the science-based HEA prepared for the Project in 2013. See Appendix J of the 2013 FEIS.
EA-17	11	9-16-17	Wildlands Defense – Katie Fite	BLM Failures to Comply with Conservation Measures of More Recent LUPS Must Also Be Assessed In other areas, such as the SRBOPA, where BLM has a circa 2008 RMP, management was supposed to be based in significant part on large-scale restoration This has NEVER Taken place. This is because livestock interests resist efforts to rest lands for a time period sufficient to enable recovery of rehabbed lands. BLM is hamstrung by the livestock industry, and never is able to conduct effective rehab and/or restoration actions in lower and mid elevation communities as a result. The end result is this landscape that is to be torn apart by gateway disturbance and	The Project must be consistent with existing land use plans, as amended. See Appendix F of the EIS/SEIS.

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				associated and linked development sprawl is in a downward death spiral.	
EA-17	12	9-16-17	Wildlands Defense – Katie Fite	FULL new indirect and cumulative Effects Analysis and Analysis of Mitigation for the entire path of the line Must Be Re-examined and Updated, Since Trump Zinke Are Stripping GRSG and other Protections	Comment noted.
EA-17	13	9-16-17	Wildlands Defense – Katie Fite	<p>The Scoping Notice also states: “PacifiCorp, dba Rocky Mountain Power, and Idaho Power (Proponents) submitted an initial ROW application under FLPMA in 2007 to locate 500-kV electric transmission lines on Federal lands as part of the Project. The original Project comprised 10 transmission line segments originating at the Windstar Substation near Glenrock, Wyoming, and terminating at the Hemingway Substation near Melba, Idaho.</p> <p>After completing NEPA analysis in an EIS, the BLM issued a Record of Decision (ROD) in November 2013 that authorized routes and associated land use plan amendments on Federal lands for Segments 1 through 7, and Segment 10, but the BLM deferred a Decision for Segments 8 and 9 in southwestern Idaho”.</p> <p>Since there are now dramatically changed circumstances re: environmental regulations and controls, and mitigation for sage-grouse and other sensitive species and values of the public lands, BLM must use the current EIS process to provide for updated analysis and mitigation.</p>	Decisions on Segments 1 through 7 and 10 were made in the 2013 ROD. This EA is evaluating Segments 8 and 9 in accordance with H.R. 2104.
EA-17	14	9-16-17	Wildlands Defense – Katie Fite	<p>The Scoping Notice omits the fact that WLD and PFA also appealed the Segment 8 and 9 FEIS. ALL of the following were not adequately assessed in the FEIS process, including:</p> <p>issues and concerns in the Final Supplemental EIS for Segments 8 and 9 of the Project:</p> <p style="padding-left: 40px;">Effects to the objects and values for which the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA) was designated;</p> <p style="padding-left: 40px;">Land use conflicts and inconsistency with land use plans;</p>	Comment noted. For the record, an FEIS cannot be appealed; it is not a decision document. We apologize for not acknowledging in the NOI that your organization appealed the 2017 ROD.

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Letter #	Comment #	Date	Author	Comment	
				<p>Effects of the project on local and regional socioeconomic conditions;</p> <p>Effects on wildlife habitat, plants, and animals, including threatened, endangered, and sensitive species;</p> <p>Effects to visual resources and existing view-sheds;</p> <p>Effects to historic and cultural resources;</p> <p>Effects to Indian trust assets;</p> <p>Opportunities to apply mitigation strategies for on-site, regional, and compensatory mitigation; and</p> <p>Siting on private lands versus public lands.</p> <p>Moreover, as we have discussed elsewhere here, the sands are ever-shifting in regards to the following and the gutting of environmental laws and regulations:</p> <p>Existing laws, regulations, and BLM policies; Plans, programs and policies of other Federal, State, and local governments, and Indian tribe; national energy policy and plans; public welfare and safety.</p>	
EA-17	15	9-16-17	Wildlands Defense – Katie Fite	<p>Cost to Public</p> <p>There has still never been an honest accounting of the cost of this project to the public, to residents, to ratepayers. This includes both direct and indirect costs, losses over time as the dinosaur line becomes more and more out-moded, as well as losses of scenic viewsheds and trail settings, wildlife habitats and populations, recreational uses and enjoyment, property values, etc.</p>	<p>Comment noted. The EIS and SEIS disclosed costs and benefits based on what was known at the time. Your comment that costs and benefits change over time is correct; they do fluctuate over time, both up and down.</p>
EA-17	16	9-16-17	Wildlands Defense – Katie Fite	<p>Full Array of Threats to Raptors, SRBOPA Values, Sensitive Species Must Be Assessed</p> <p>It is vital that new baseline studies that take into account the serious threats that native raptors, sensitive species, SRBOPA values face – and a full assessment of all of these factors across the length of the line must be undertaken.</p>	<p>Please see the analysis in Sections 3.10 and 3.11 of both the EIS and SEIS; also see the figures in Appendix E and the tables in Appendix D of these documents.</p>

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EA-17	17	9-16-17	Wildlands Defense – Katie Fite	<p>Alternatives</p> <p>We again raise the issue of alternatives, as we have discussed in previously submitted comments, protests, etc.</p>	Comment noted. Please see the discussion in Section 2.5 of the SEIS. Over 50 alternative routes were considered for Segments 8 and 9.
EA-18	1	9-28-17	Wildlands Defense – Katie Fite	<p>We received NO acknowledgement that we submitted scoping comments earlier. Please confirm that you received those. AND that you have received these additionally submitted documents.</p> <p>Here are additional supporting documents to accompany WLD and PFAs Sept 2017 Scoping comments.</p> <p>Also, Please include Julie Randell's signature on our earlier submission. It was inadvertently omitted.</p>	The BLM does not typically send an acknowledgement to each person who submits a comment during scoping. However, the BLM did acknowledge your letter via email when asked.
COMMENTS FROM COOPERATING AGENCIES					
Cooperating Agency (CA)-1	1	9-13-17	City of Kuna, ID – Mayor Joe Stear	<p>I would like to thank you and BLM for your efforts in this project to keep the cooperating agencies up to date as well as addressing concerns. This has been huge undertaking for your office and the efforts to keep the public informed have been well received and appreciated.</p> <p>One of the first things that I did as Mayor was to work with former Mayor Greg Nelson to get a complete understanding of this project and his goals and objectives. Mine remain the same.</p>	Comment noted.
CA-1	2	9-13-17	City of Kuna, ID – Mayor Joe Stear	<p>The proposed segments remain in an area that does not impact the city of Kuna in any harmful manner and I appreciate that.</p> <p>I do offer my support for the proposed routes as presented.</p>	Comment noted.
CA-2	1	9-25-17	Idaho Governor's Office of Energy & Mineral Resources – John Chatburn	<p>The State has long advocated for the utilization of the common-sense, consensus routing alignment that is represented by Alternative 1 in the Final Supplemental Environmental Impact Statement (SEIS).¹ Despite objection by Idaho, BLM published its Record of Decision (ROD) on the last day of the previous administration, adopting an unacceptable route through the untouched canyon lands in Owyhee County, Idaho.² The State promptly filed a notice to appeal the ROD with the Interior Board of Land Appeals.³ IBLA</p>	Comment noted.

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				remanded the Project ROD to BLM.4 Congress later passed the FY 2017 Consolidated Appropriations Act, directing BLM to approve a right-of-way application for Segments 8 and 9 of the Project, and enabling the use of Alternative I routing within the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA).5	
CA-2	2	9-25-17	Idaho Governor's Office of Energy & Mineral Resources – John Chatburn	In response to these actions, BLM is preparing an Environmental Assessment (EA) for public lands identified in Alternative I which fall outside the NCA boundaries and is seeking scoping comments, to be submitted on or before September 27, 2017.1 While the majority of the State's concerns pertaining to Alternative I were thoroughly analyzed and addressed prior to the SEIS processes, the State of Idaho respectfully requests that BLM thoroughly analyze and address the following issue in the EA: Bruneau Sand Dunes State Park (Park) is undergoing "International Dark Sky Park" certification. Please assess any potential impact that the lighting requirements on Segment 9 of the Project, located near the Park, may have upon the night sky of the Park, and whether the lighting would prevent the Park from meeting "Dark Sky" requirements.	The State's request concerning the Bruneau Dunes State Park is noted. Infrared obstruction lights that incorporate both red and infrared light-emitting diodes (LEDs) in a single unit would be installed in specific areas of Segment 8 and 9 to ensure visibility for aircraft pilots. The system will use a universal, compact, and efficient obstruction light that has been Electrical Testing Laboratories (ETL) certified to Federal Aviation Administration (FAA) requirements. In order to ensure that the intensity of lighting is not so bright as to render the pilots' night vision goggles ineffective, the Proponents propose to use equipment with peak lighting intensities of 860 nanometers for the infrared lights and 30 to 50 candelas for red lighting. Lights of these intensities are not likely to adversely affect the Park's Dark Sky Certification. Guidelines allow parks to have unshielded lights that are less than 50 lumens and shielded light above 50 lumens are permitted. Lights outside the park are not prohibited. The 2016 Guidelines state: "Where necessary for basic safety and navigation: 1. Illumination should be to the minimum practical level, 2. The affected area of illumination should be as small as practical, 3. The duration of the illumination should be as short as practical, and 4. Illumination should minimize the amount of blue spectral components in the light (white light is not permitted)." The proposed red and infrared lights would appear to comply with these guidelines.
CA-3	1	9-27-17	USEPA – Erik Peterson	The EPA has been engaged in this project over time. We provided comments to the BLM on the Gateway West Transmission Line Project in	Comment noted.

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				2008, 2011, 2013, 2014, June 2016, August 2016, and November 2016. Our November 2016 Final Supplemental EIS (FSEIS) comments note our appreciation for the BLM's responsiveness on: Analyzing the impacts of the No Action Alternative; Compensatory mitigation for Nation Conservation Area Impacts; The application of Environmental Protection Measures on different land ownerships; and Clean Water Act mitigation activities.	
CA-3	2	9-27-17	USEPA – Erik Peterson	We appreciate the NOI's statement that the FSEIS mitigation framework "... will apply to authorized segments." The FSEIS's mitigation framework (Appendix K) is key to reducing the EPA's environmental concerns with Segments 8 and 9 of the Gateway West Transmission Line. EPA's concerns with this project were reduced at the Draft Supplemental EIS (DSEIS) and FSEIS stages because the DSEIS included BLM's concerns and recommendations for the Proponent-Proposed Mitigation Enhancement Portfolio (MEP), and because – for the FSEIS, "The BLM worked with the Proponents to develop a framework for compensatory mitigation (Appendix K) that replaces the MEP." Given our support for the FSEIS mitigation framework, we recommend that the EA include information on how this required mitigation will be fully implemented.	The EA will consider mitigation requirements based on direction in the applicable legislation, BLM regulations, and land management plans.
CA-4	1	10-4-17	NPS Pacific West Region – Lara Rozzell	The NPS appreciates the listing of federally protected areas and scenic quality rating units. Please provide a clear narrative of impacts to the Oregon National Historic Trail, and also tables that identify specific crossings and related impacts to the NHT.	Please see the detailed maps and analysis in Appendix J of the FSEIS.
CA-4	2	10-4-17	NPS Pacific West Region – Lara Rozzell	Please work directly with the National Park Service as a cooperating agency during alternative generation to identify possibilities for minimizing and mitigating impacts to the NHT.	Comment noted.

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CA-4	3	10-4-17	NPS Pacific West Region – Lara Rozzell	The NPS requests annual communication from the project proponent including a map of the buildout to date. The NPS also requests BLM provide an annual bulleted list summarizing construction progress and completed mitigation in relation to the NHT.	Comment noted.
CA-4	4	10-4-17	NPS Pacific West Region – Lara Rozzell	Please use standard and consistent nomenclature when referring to routes. In the SFEIS, routes are described in places by Alternative number and in other segments of the document as "Revised Proposed Routes" or other nomenclature that is difficult to relate to the Alternative numbers. For instance, Table 3.1-18 contains phrases rather than alternative numbers for routes.	The alternatives in the SEIS were combinations of routes; therefore, the alternatives did not have the same names as the routes. For example, Alternative 3 was composed of the Revised Proposed Route for Segment 8 and Alternative 9K for Segment 9. .
CA-4	5	10-4-17	NPS Pacific West Region – Lara Rozzell	Please clearly explain the relationship between the 1987 and the 2015 Jarbidge RMP's, and why land use plan amendments are proposed for the 1987 RMP if the 1987 RMP is superseded by the 2015 RMP.	This is explained in Chapter 1 of the FSEIS. "The BLM approved a new Jarbidge RMP in July 2015 (BLM 2015a). This new RMP revised the original 1987 Jarbidge RMP, but only applies to land within the current Jarbidge Field Office boundary. However, the planning area for the 1987 RMP included land within the adjacent Four Rivers Field Office. Therefore, the 1987 Jarbidge RMP (unrevised) still applies to these areas. Appendix F of this SEIS provides more detail regarding these and other applicable land use plans." Appendix F includes maps of the various management areas.
CA-4	6	10-4-17	NPS Pacific West Region – Lara Rozzell	If adopted in its entirety, the former "Alternative 1" alignment of the Gateway West transmission line will have 17 adverse impacts to the Oregon National Historic Trail (NHT), compared to three adverse impacts that would have resulted from BLM's preferred alignment. According to the Final Supplemental Environmental Impact Statement for the project, seven of the adverse impacts would be caused by trail crossings on BLM-managed land; eight of the impacts are associated with Segment 8 and nine are associated with Segment 9.	This information is disclosed in Table 2.7-3 of the SEIS, Effects on individual crossings are disclosed in Section 3.1 and Appendix J if the FSEIS.
CA-4	7	10-4-17	NPS Pacific West Region – Lara Rozzell	1. The Sinker Creek High Potential Route Segment is a several mile segment in the area of Murphy, Idaho, starting west of Sinker Butte. The Alternative 1 alignment parallels the historic trail	Comment noted.

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				in close proximity for about 9 miles, in some cases at a distance of a mile or less.	
CA-4	8	10-4-17	NPS Pacific West Region – Lara Rozzell	2. The Alternative 1 alignment would be within about 1.5 miles of the CJ Strike (Cove) Ruts High Potential Historic Site, and the alignment has three crossings of the historic trail within a few miles of the CJ Strike (Cove) site. The CJ Strike or Cove site is a BLM interpretive location for the National Historic Trail. One of the crossings appears to occur within the Sinker Creek High Potential Route Segment. A single crossing of the Bruneau River south of the CJ Strike Reservoir could avoid the need for two of the other crossings and diminish or avoid some visual impacts to the National Historic Trail. Please investigate a single crossing rather than three crossings.	Comment noted. H. R. 2104 directed the BLM to offer a ROW grant for those portions of the ROWs included in Alternative 1 that were within the SRBOP NCA prior to the legislation. Portions of the ROWs included in H.R. 2104 are not subject to change.
CA-4	9	10-4-17	NPS Pacific West Region – Lara Rozzell	3. Part of the Alternative 1 alignment passes within about three miles of the Three Island Crossing High Potential Historic Site (which itself is located within the North Trail High Potential Route Segment). Three Island Crossing is one of the most important crossings along the Oregon Trail and is highly important for maintaining trail integrity.	An analysis of the Three Island Crossing area is included in Section 3.1 and Appendix J of the FSEIS.
CA-4	10	10-4-17	NPS Pacific West Region – Lara Rozzell	4. An intact segment of the Oregon NHT, (part of the North Trail High Potential Segment) crosses Black Mesa on the south side of the river on the approach to Three Island Crossing. The Alternative 1 alignment runs parallel to the North Trail segment at distances of 1.5 to 5 miles, and is visible from almost 29 miles of the trail.	Comment noted. See the analysis of this area in Section 3.1 and Appendix J of the FSEIS.
CA-4	11	10-4-17	NPS Pacific West Region – Lara Rozzell	The BLM and Oregon NHT stakeholders worked extensively throughout project development to design low-impact siting of the transmission line to protect Congressionally designated National Historic Trail resources. The National Park Service asks that BLM and the project proponents work with stakeholders to analyze and incorporate the lower-impact alternatives and route variations into the former "Alternative 1" alternative to avoid or diminish the previously	Comment noted. H. R. 2104 directed the BLM to offer a ROW grant for the portions of the ROWs included in Alternative 1 that were within the SRBOP NCA prior to the legislation. This grant has been offered. Routes considered in the SEIS that do not connect to the offered portions would not be viable. Micrositing to reduce impacts to important resources within the ROW will be considered during final design. Minor changes to other portions of Alternative 1 can be also considered.

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				identified adverse impacts to high potential historic sites and high potential route segments of the Oregon National Historic Trail as described here. The NPS understands fully that a portion of the route within the Snake River Birds of Prey National Conservation Area (NCA) is fixed due to legislation, and sees the possibility for careful planning, siting, and impact avoidance in the portions of the route that are not legislated.	
CA-4	12	10-4-17	NPS Pacific West Region – Lara Rozzell	It is further our understanding that about nine miles of the Oregon NHT west of Three Island Crossing will be incorporated into the expanded NCA. This incorporation, which would help to protect any original remnants of the historic trail, could provide new opportunities for public interpretation and other actions to mitigate adverse impacts that this undertaking will incur to the Oregon National Historic Trail.	Comment noted.
CA-4	13	10-4-17	NPS Pacific West Region – Lara Rozzell	The proposed Land Use Plan Amendments (LUPA's) described below will generally remove or reduce Oregon Trail protections. Please analyze how removing trail protections will affect "resources, qualities, values or associated settings or the primary use or uses of the Oregon Trail." Please also describe actions "to eliminate or moderate, to the greatest extent possible, intensity and duration of the adverse impact to the nature and purposes; resources, qualities, values, and associated settings; and the primary use or uses of the National Trail from incompatible multiple-use activities." Specific proposed Land Use Plan Amendments are referenced below by their Numbers assigned in Appendix F of the Final SEIS.	Please see the detailed analysis of trail impacts in Appendix J of the SEIS. Mitigation for project effects to national historic trails would be implemented in accordance legislation, regulations, Manual 6280 (see Appendix J of the FSEIS) and land management plans as amended. Historic properties would have site-specific Historic Properties Treatment Plans (HPTPs) as discussed in Section 3.1.2.4 of the 2016 FSEIS. The BLM will collaborate with cooperators, agencies and other interested parties to develop appropriate mitigation.
CA-4	14	10-4-17	NPS Pacific West Region – Lara Rozzell	Proposed Amendment SEIS-3 to the 1987 Jarbidge RMP would remove a classification of "Utility Avoidance/Restricted Area" that was created to protect Oregon National Historic Trail ruts. How will overhead lines affect the associated setting? Even though placement of the line is overhead, ground travel will be required	Project effects on NHTs are discussed in Section 3.1 and in greater detail in Appendix J of the FSEIS. Please see Environmental protection Measures VIS-6, 7 and 11 and CR-5 and other measures in Appendix M of the SEIS. Note that the proposed plan amendment SEIS-3 states "...allow the overhead lines of a 500-kV powerline right-of-way while protecting the Oregon Trail route."

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				to install and maintain the lines. How will trail ruts be protected?	
CA-4	15	10-4-17	NPS Pacific West Region – Lara Rozzell	Proposed Amendment SEIS-4 to the 1987 Jarbidge RMP would remove protections from incompatible uses “where visual impacts are already compromised.” Please disclose the specific locations where visual impacts are compromised and these protections would be removed, as well as the process by which compromised visual impacts were identified. Please disclose and analyze the resulting cumulative impacts to the visual resources and the trail visitors.	See the previous response. Note that SEIS-4 states: “Protect existing trail ruts from surface disturbance.”
CA-4	16	10-4-17	NPS Pacific West Region – Lara Rozzell	Proposed Amendments SEIS-5 and SEIS-14 would modify VRM boundaries and reclassify VRM Class I areas to VRM Class III or IV areas. What “new manual” is referenced for the reclassification? What will be the impacts to the visual resources of the Oregon Trail and the visitor experience?	Affects to scenery associated with plan amendments are analyzed in Appendices F and G of the SEIS. Appendix G includes photo simulations of the areas.
CA-4	17	10-4-17	NPS Pacific West Region – Lara Rozzell	Proposed Amendments SEIS-15 and SEIS-18 would remove the VRM II protections for the Oregon Trail for a 500-foot wide corridor. How will removal of this protection impact the Trail visual resources and the visitor experience?	These two amendments are no longer being considered. The areas that these amendments applied to are included in H. R. 2104.
CA-4	18	10-4-17	NPS Pacific West Region – Lara Rozzell	Proposed Amendment SEIS-17 would remove SRMA Oregon Trail protection for the powerline corridor. How, specifically, would the Trail be protected from surface disturbance during transmission line construction and maintenance? What will be the impacts to the visual resources of the trail and the visitor experience?	This amendment is no longer being considered. The area that this amendment applied to is included in H. R. 2104.

**Appendix G
BLM and FWS Endangered Species Act [ESA] Compliance
Memoranda**



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

Idaho State Office
1387 S. Vinnell Way
Boise, Idaho 83709

DEC 15 2017

In Reply Refer To:
2800 (930)
WYW-174598/IDI-35849-01
Gateway West Transmission Line Project

EMS TRANSMISSION

Memorandum

To: Field Supervisor, U.S. Fish and Wildlife Service, Wyoming Field Office, Cheyenne, WY

From: June E. Shoemaker 
Deputy State Director, Bureau of Land Management, Idaho State Office

Subject: Endangered Species Act Section 7 Compliance Memorandum v. 2.0

Introduction

The Bureau of Land Management (BLM) is submitting this memorandum to the U.S. Fish and Wildlife Service (USFWS) to document changes in the Gateway West Transmission Line Project (Project) 2016 Final Supplemental Environmental Impact Statement (SEIS) and 2017 Environmental Assessment (EA) that have occurred to Segments 8 and 9 since the publication of the 2013 Final Environmental Impact Statement (FEIS) and 2013 Biological Assessment (BA). In our 2013 BA, BLM determined that the Project “may affect, but is not likely to adversely affect” the endangered Banbury Springs limpet (currently *Lanx* sp., technically now *Idaholanx fresti*; Campbell et al. 2017), Snake River physa (*Physa natricina*), and Bruneau hot springsnail (*Pyrgulopsis bruneauensis*); the threatened Bliss Rapids snail (*Taylorconcha serpenticola*); and designated critical habitat for the bull trout (*Salvelinus confluentus*). We also determined that the Project “may affect”, and was “likely to adversely affect” slickspot peppergrass (*Lepidium papilliferum*) and its proposed critical habitat.

This memorandum provides documentation of BLM’s determination that the changes to Segments 8 and 9 presented in the 2016 SEIS and 2017 EA do not modify the effects analyzed for the Banbury Springs limpet, Snake River physa, Bruneau hot springsnail, Bliss Rapids snail, designated critical habitat for the bull trout, and slickspot peppergrass and its proposed critical habitat in a manner or to an extent not previously considered as described through criteria¹ set forth in 50 CFR §402.16. In addition, current

¹ As provided in 50 Code of Federal Regulations §402.16, reinitiation of formal consultation is required where discretionary federal agency involvement or control over the action has been retained (or is authorized by law) and if (1) the amount or extent of incidental take is exceeded;(2) new information reveals effects of the agency action that may affect Endangered Species Act listed species or critical habitat in a manner or to an extent not considered in the Biological Opinion; (3) the agency action is subsequently modified in a manner that causes an effect to the ESA-listed species or critical habitat not considered in the Biological Opinion; or (4) a new species is listed or critical habitat designated that may be affected by the action.

environmental baseline conditions for the Project area in Segments 8 and 9 have not significantly changed from those included in our effects analyses addressed in the 2013 BA. Thus, we have concluded that there will be no significant increase in the intensity or duration of any potential beneficial or adverse effects of Segments 8 and 9 of the Project, inclusive of associated conservation measures, as described in our 2013 BA. Therefore, BLM has determined that the 2013 BA adequately addresses any effects of Segments 8 and 9 such that reinitiation of Endangered Species Act (ESA) section 7 consultation is not necessary. **We request USFWS acknowledgement that the existing section 7 consultation adequately addresses effects to listed species and bull trout critical habitat within Segments 8 and 9 as further described below in this memorandum.**

As described in detail below, BLM has determined that Alternative 1 for Segments 8 and 9 of the 2016 SEIS and 2017 EA “may affect” but are “not likely to adversely affect” Banbury Springs limpet, Snake River physa, and Bliss Rapids snail, and will have “no effect” on Bruneau hot springsnail and bull trout critical habitat. **We request USFWS acknowledgement of this “may affect, not likely to adversely affect” determination for Banbury Springs limpet, Snake River physa, and Bliss Rapids snail, and “no effect” determination for Bruneau hot springsnail and designated critical habitat for bull trout for Segments 8 and 9 as described below in this memorandum.**

Slickspot peppergrass was reinstated as a threatened species on September 16, 2016, which was subsequent to the completion of the 2013 BA. As described below, we have determined that implementation of Alternative 1 for Segments 8 and 9 of the 2016 SEIS and 2017 EA “may effect”, and is “likely to adversely affect” slickspot peppergrass in a manner or to an extent similar to that which was analyzed in the original 2013 BA and for which the Service provided its 2013 Conference Opinion (CO). **We request USFWS acknowledgement of this “may effect, likely to adversely affect” determination for slickspot peppergrass and its proposed critical habitat for Segments 8 and 9 and further request USFWS confirm the conclusion of the 2013 CO as formal consultation and as the USFWS’s Biological Opinion.**

In addition, the yellow-billed cuckoo (*Coccyzus americanus*) was designated as a threatened species on November 2, 2014, which was subsequent to the completion of the 2013 BA. As described below, we have determined that implementation of Alternative 1 for Segments 8 and 9 of the 2016 SEIS and 2017 EA will have “no effect” on the yellow-billed cuckoo or its proposed critical habitat. This analysis of Project-related effects on the yellow-billed cuckoo and its proposed critical habitat only addresses the 2016 SEIS and 2017 EA Alternative 1 for Segments 8 and 9 of the Project. **We further request USFWS acknowledgement of this “no effect” determination for the yellow-billed cuckoo and its proposed critical habitat for Segments 8 and 9.**

Project Summary and Background

The Project, as assessed in the 2013 FEIS and BA, included permanent and temporary access roads, laydown and staging areas, three substations, expansions or modifications of nine extant substations, and construction or installation of communications systems, optical fiber regeneration stations, and substation distribution supply lines. The design of the electric transmission line included self-supported steel H-frame 230-kilovolt (kV) structures and lattice steel 500-kV structures. The BA addressed only the routes selected as the Agency Preferred Alternative by the BLM in 2013, which included the construction and operations of about 990 miles of new 230-kV and 500-kV electric transmission lines in 10 segments, from the Windstar Substation at Glenrock, Wyoming, to the Hemingway Substation just west of Melba, Idaho.

The BLM published the FEIS for the Project on April 26, 2013 (BLM 2013a) and a Record of Decision (ROD) on November 14, 2013 (BLM 2013b). In that ROD, the BLM deferred a decision for two of the 10 segments (i.e., Segments 8 and 9) to allow additional time for federal, state, and local permitting agencies to examine additional routing options, compensatory mitigation measures, and the enhancement standard applicable to these segments where they intersect the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP).

A BA and a request for formal consultation were submitted to the USFWS in March 2013 and April 30, 2013, respectively. In September 2013, the BLM received a Biological Opinion (BO) from the USFWS [Ref#06E13000/WY13F0033] which contained (1) acknowledgement of “no effect” and concurrence for “not likely to adversely affect” determinations; (2) a BO for potential adverse effects associated with depletions from the Colorado and Platte River Basins; and (3) an attached Conference Opinion (CO) for effects of the Project on the proposed slickspot peppergrass and its proposed critical habitat. A summary of the ESA listed species analyzed in the 2013 BA and addressed in the 2013 BO and associated CO is provided in Attachment 1. The BO acknowledged that the Project would have “no effect” on an additional 14 ESA listed species that do not have the potential to occur in the Action Area (Attachment 2).

In November 2013, following publication of the FEIS and BA, the BLM requested that the Boise Resource Advisory Council (RAC) consider issues surrounding the siting of Segments 8 and 9 of the Project and examined a number of additional routing options. In August 2014, the Proponents of the Project (i.e., Idaho Power Company and PacifiCorp, doing business as Rocky Mountain Power) submitted a revised Project application for Segments 8 and 9 based on recommendations from the RAC. This new application for Segments 8 and 9 was assessed in the BLM’s 2016 SEIS and 2017 EA.

The BLM published the SEIS for the Project on October 7, 2016 (BLM 2016a) and a ROD on January 19, 2017 (BLM 2017a). In that ROD, the SEIS Agency Preferred Alternative (Alternative 5 – Route 8G and Route 9K) was selected. Because the SEIS Alternative 5 had the potential to generate different impacts to ESA listed species or critical habitat compared to the Agency Preferred Alternatives considered in the FEIS/BA, the BLM prepared an ESA Section 7 Compliance Memorandum that was submitted to the USFWS on December 13, 2016 (BLM 2016b). On December 16, 2016, the USFWS provided the BLM a memorandum (USFWS 2016a) acknowledging the BLM’s determinations outlined in the 2016 ESA Section 7 Compliance Memorandum.

The Proposed Action and proposed land use plan amendments assessed in the 2017 EA are different from those selected in the 2017 ROD. Therefore, the analysis and determinations documented in the 2016 ESA Section 7 Compliance Memorandum are no longer applicable.

The BLM’s 2016 SEIS and 2017 EA assesses the Proponents’ new Revised Proposed Action for Segments 8 and 9 (Alternative 1); new routes, variations, and alternatives for Segments 8 and 9; newly proposed design features and mitigation measures; as well as new information that has become available since the 2013 FEIS and ROD were published. The 2016 SEIS and 2017 EA supplement the analysis found in the 2013 FEIS. The relevant ESA listed species or critical habitats² that are addressed in this memorandum include:

² Although additional ESA listed species or critical habitat were analyzed in the 2013 FEIS and BA and addressed in USFWS’s 2013 BO and CO (Attachment 1 and 2), the impact assessment and effects determinations for those species remain unchanged because none of the species or critical habitat occur or have the potential to occur in the Action Areas of Segments 8 and 9.

- Banbury Springs limpet (currently *Lanx* sp., technically *Idaholanx fresti*; Campbell et al. 2017)
- Snake River physa (*Physa natricina*)
- Bruneau hot springsnail (*Pyrgulopsis bruneauensis*)
- Bliss Rapids snail (*Taylorconcha serpenticola*)
- bull trout (*Salvelinus confluentus*) critical habitat
- slickspot peppergrass (*Lepidium papilliferum*) and its proposed critical habitat
- yellow-billed cuckoo (*Coccyzus americanus*) and its proposed critical habitat

Section 1.2 of the 2016 SEIS and Section 1.1 of the 2017 EA list in detail the changes that have occurred between the 2013 FEIS/BA and the 2016 SEIS and 2017 EA. The major changes and differences between the 2013 FEIS/BA and the 2017 SEIS and 2017 EA that relate to ESA listed species or critical habitats include:

- The 2013 FEIS/BA addressed Segments 1 through 10 whereas the 2016 SEIS and 2017 EA only addresses Segments 8 and 9.
- The 2016 SEIS and 2017 EA Alternative 1 was selected from seven new alternatives that were composed of a combination of one route from Segment 8 and one from Segment 9. The 2016 SEIS and 2017 EA Alternative 1 has the potential to generate different impacts to ESA listed species or critical habitat compared to the Agency Preferred Alternatives considered in the 2013 FEIS/BA.
- A new mitigation framework for the SRBOP was developed for the 2016 SEIS (see Appendix K) and remains applicable to the 2017 EA.
- Several species have been listed since the 2013 FEIS/BA was published.

ESA Listed Species Updates

Since publication of the 2013 FEIS/BA, several changes have occurred to the status or distribution of ESA listed species and critical habitat along Segments 8 and 9 of the Project. These changes include:

- The yellow-billed cuckoo was considered a Candidate species under the ESA in the 2013 FEIS. Effective November 2, 2014, the western distinct population segment of the yellow-billed cuckoo was listed as Threatened under the ESA (USFWS Federal Register/Vol. 79, October 2, 2014).
- Slickspot peppergrass was a proposed species under the ESA in the 2013 FEIS. Effective September 16, 2016, slickspot peppergrass was reinstated as a Threatened species under the ESA (USFWS Federal Register/Vol. 81, August 17, 2016).
- The proposal to designate critical habitat for slickspot peppergrass was amended and proposed critical habitat for the plant was expanded by 4,261 acres on February 12, 2014.

ESA Listed Species Review

ESA listed species are addressed in Sections 3.7 (Special Status Plants) and 3.11 (Special Status Wildlife and Fish Species) of the 2013 FEIS, Sections 3.7 (Special Status Plants) and 3.11 (Special Status Wildlife and Fish Species) of the 2016 SEIS, and Section 3.2 and 3.3 of the 2017 EA.

Quantitative data was only available for several ESA listed species relevant to this memorandum (i.e., yellow-billed cuckoo and slickspot peppergrass). Impact tables for yellow-billed cuckoo are provided in Tables D.11-3, D.11-5, and D.11-7 in Appendix D of the 2016 SEIS and incorporated by reference in the 2017 EA. Impact tables for slickspot peppergrass are provided in Tables 3.7-1, 3.7-3, 3.7-4, 3.7-8, and 3.7-14 in Section 3.7 of the 2016 SEIS and incorporated by reference in the 2017 EA. Impacts for

the remaining ESA listed species or critical habitat relevant to this memorandum (i.e., Banbury Springs limpet, Bliss Rapids snail, Bruneau hot springsnail, Snake River physa, and bull trout critical habitat) are provided qualitatively in Section 3.11 of the 2016 SEIS and incorporated by reference in the 2017 EA.

The following subsections describe the extent of impacts that could occur to ESA listed species and critical habitat under Alternative 1 assessed in the 2016 SEIS and 2017 EA (Attachment 3: Figure 1; Section 3.11.2.3 in the 2016 SEIS and incorporated by reference in the 2017 EA) compared to the Agency Preferred Alternative (Proposed Routes for Segments 8 and 9) described in the 2013 FEIS/BA (Attachment 3: Figure 2). The Project Action Area analyzed in the FEIS, BA, SEIS, and EA, and discussed in this memorandum includes those areas where direct and indirect effects to ESA listed species could occur and comprises all areas within a 0.5-mile buffer around Project facilities. Areas directly impacted by the footprint of Project facilities are also included in this discussion.

Aquatic Invertebrate Species and Bull Trout Critical Habitat

Four ESA listed aquatic invertebrate species and bull trout critical habitat were originally analyzed in the 2013 FEIS/BA. Three ESA listed aquatic invertebrate species (Banbury Springs limpet, Bliss Rapids snail, and Snake River physa) occur in the Snake River or directly adjacent to the Snake River in springs or spring-fed streams. One ESA listed aquatic invertebrate species (Bruneau hot springsnail) and bull trout critical habitat occur in the Bruneau River. As reported in the BA, the Action Areas associated with the FEIS Agency Preferred Alternative routes for Segments 8 and 9 (hereafter FEIS Route 8 and FEIS Route 9) would intersect potential habitat and/or recovery areas of the ESA listed invertebrate species and/or bull trout critical habitat to some extent. Similarly, the Action Areas associated with Alternative 1 of the 2016 SEIS and 2017 EA (hereafter EA Route 8 and EA Route 9) would intersect potential habitat of Bliss Rapids snail and Snake River physa to a degree. However, in contrast the Action Areas associated with SEIS/EA Alternative 1 would not intersect potential habitat or recovery areas of the Banbury Springs limpet, Bruneau hot springsnail, or designated critical habitat for bull trout.

In regards to ESA listed aquatic species and critical habitat, EA Route 8 would have a similar alignment as FEIS Route 8 for most of its length but would cross the Snake River at a different location. In contrast, EA Route 9 would have a markedly different alignment than FEIS Route 9. Whereas FEIS Route 9 would not cross the Snake River, EA Route 9 would cross the Snake River twice. In addition, FEIS Route 9 would cross the Bruneau River but EA Route 9 would not. No potential habitat or recovery areas for any of the aquatic species or bull trout critical habitat would be intersected by the Action Area associated with the SEIS/EA Route 9 Toana Road Variation 1.

Banbury Springs limpet and Bliss Rapids snail

The Banbury Springs limpet and Bliss Rapids snail are associated with cold-water spring complexes along the Snake River. Although both species occur in these cold-water spring complexes, the Banbury Springs limpet is restricted to springs while the Bliss Rapids snail can also occur in the mainstem Snake River. The recovery area for these species includes tributary cold-water spring complexes within 5 miles of the river between river mile (rm) 547 to approximately rm 589 (rm 584.8 – 589.3 for Banbury Springs limpet and rm 547 – 585 for Bliss Rapids snail; USFWS 1995). Cold-water spring complexes are restricted to the north side of the Snake River.

As disclosed in the FEIS/BA and SEIS/EA, the Action Areas and Project facilities (e.g., transmission lines, structures and access roads) for FEIS Route 8 and EA Route 8 would intersect the recovery area of the Bliss Rapids snail (i.e., within 5 miles of the Snake River and/or cold-water spring complexes north of the river; Hopper and Burack 2016) but not the recovery area of the Banbury Springs limpet.

However, no Project facilities associated with FEIS Route 8 or EA Route 8 would cross through potential habitat of either of these species (Table 1). The nearest populations of Banbury Springs limpet (i.e., Thousand Springs) and Bliss Rapids snail (i.e., Malad River) are located approximately 140 miles and 103 miles upstream from the proposed EA Route 8 spanning of the Snake River, respectively. All Project facilities would be located over 10 miles and 1.6 miles from potential habitat of the Banbury Springs limpet and Bliss Rapids snail, respectively.

Additionally, the Action Areas and Project facilities for FEIS Route 9 and EA Route 9 are identical in this area and would not intersect or cross potential habitat or the recovery areas of these species. The nearest populations of Banbury Springs limpet (i.e., Thousand Springs) and Bliss Rapids snail (i.e., Malad River) are located approximately 92 miles and 55 miles upstream from the proposed EA Route 8 spanning of the Snake River, respectively. All Project facilities would be located over 8.2 miles and 2.5 miles from potential habitat of the Banbury Springs limpet and Bliss Rapids snail, respectively.

In summary, the impacts to these species are not substantively different between the FEIS Agency Preferred Alternative and the SEIS/EA Alternative 1 and are expected to result in similar impacts and the same effects determination reported in the BA (Attachment 1).

Table 1. Comparison of potential impacts that could occur to ESA listed aquatic invertebrate species under the Agency Preferred Alternative routes described in the FEIS/BA (Segments 8 and 9) and those assessed in the SEIS/EA (Alternative 1).

Analysis Unit	Species Management Unit	Project Route	Species			
			<i>Banbury Springs limpet</i>	<i>Bliss Rapids snail</i>	<i>Snake River physa</i>	<i>Bruneau hot springsnail</i>
Project Action Area	Potential Habitat	FEIS Route 8	N*	N*	Y	N
		SEIS/EA Route 8	N	N	Y	N
		FEIS Route 9	N	N	N	Y
		SEIS/EA Route 9	N	N	Y	N
	Recovery Area	FEIS Route 8	N*	Y	Y*	N
		SEIS/EA Route 8	N	Y	Y	N
		FEIS Route 9	N	N	N	Y
		SEIS/EA Route 9	N	N	N	N
Project Facilities	Potential Habitat	FEIS Route 8	N	N	Y	N
		SEIS/EA Route 8	N	N	Y	N
		FEIS Route 9	N	N	N	N
		SEIS/EA Route 9	N	N	N	N
	Recovery Area	FEIS Route 8	N	N	Y*	N
		SEIS/EA Route 8	N	N	Y	N
		FEIS Route 9	N	N	N	N
		SEIS/EA Route 9	N	N	N	N

Notes: Potential impacts to species are reported as Species Management Unit intersected by Analysis Unit (Y) and Species Management Unit not intersected by Analysis Unit (N). Cells with darker shading and bolded letters indicate a difference between the FEIS/BA and SEIS/EA routes. Cells with lighter shading and letters with asterisks indicate a difference between what was reported in the FEIS/BA and what was revealed from further analysis conducted as part of the preparation of this memorandum for the SEIS/EA routes.

Snake River physa

Since designation of the Snake River physa recovery area, surveys have revealed that the species occurs outside of the designated recovery area as far downstream as the Oregon border. As noted in the FEIS/BA, the Action Area associated with FEIS Route 8 would intersect the Snake River physa recovery area, but the Project facilities would not. However, the FEIS Route 8 Action Area and Project facilities would intersect but only span potential habitat of the species where the alignment would pass over the Snake River at rm ~441. The transmission line would span the Snake River and adjacent shrub riparian habitat in an area dominated by agricultural lands; as with any crossing considered, no in-water work would be conducted and no new roads would be constructed in riparian habitat.

Similarly, the EA Route 8 Action Area and Project facilities would intersect and span potential habitat where the alignment passes over the Snake River at rm ~445. Because the Action Areas and Project facilities for FEIS Route 8 and EA Route 8 are identical in the area, they would intersect the recovery area (e.g., within 5 miles of the Snake River) of the Snake River physa. However, all Project facilities would be located over 3.2 miles from the recovery area in the Snake River.

Similar to the previous discussion for Banbury Springs limpet and Bliss Rapids snail, the Action Areas and Project facilities for FEIS Route 9 and EA Route 9 are identical in the area and would not intersect or cross potential habitat or the recovery area of the Snake River physa. However, there could be minor differences in the extent of effects overall because FEIS Route 9 would not cross the Snake River

whereas EA Route 9 would cross the Snake River twice at rm ~460 and rm ~493; the nearest documented occurrences of Snake River physa from these crossings are over 7 miles upstream (rm ~467.7) and 4 miles downstream (rm ~489.5), respectively (USFWS, unpublished data). EA Route 9 would span the Snake River Canyon from rim to rim hundreds of feet above the river at rm 460. Although the rm ~493 crossing would occur within the canyon, the towers would be located at the periphery of agricultural fields. The shrub riparian habitat adjacent to the Snake River at this location would not be disturbed by the construction footprint, and therefore differences in effects from either spanning would be expected to be negligible. In summary, the impacts to this species are not substantively different between the FEIS Agency Preferred Alternative and the SEIS/EA Alternative 1 and are expected to result in similar impacts and the same effects determination reported in the BA (Attachment 1).

Bruneau hot springsnail

The Bruneau hot springsnail is endemic to the geothermal springs that discharge along a 5 miles stretch of the Bruneau River in southwest Idaho (USFWS 2007). The recovery area for the species begins at the point where the Bruneau River crosses the southern boundary of Township 08 South, Range 06 East, Section 12 and continues downstream (including Hot Creek from the confluence of the Bruneau River to the Indian Bathtub) to the point where the Bruneau River crosses the northern boundary of Township 07 South, Range 06 East, Section 35 (USFWS 2002).

Because the FEIS Route 8 and the EA Route 8 Action Area and Project facilities would be located north of the Snake River, they would not intersect or span the Bruneau River and would not affect potential habitat or the recovery area of the species. Because the FEIS Route 9 Action Area would intersect potential habitat and the recovery area of the Bruneau hot springsnail, the BLM determined in the 2013 BA that the Project “may affect” but is “not likely to adversely affect” the Bruneau hot springsnail (Attachment 1). However, EA Route 9 would not cross the Bruneau River and the Action Area and Project facilities would not intersect potential habitat or the recovery area of the species. In summary, because no direct or indirect impacts would occur on the Bruneau River from SEIS/EA Alternative 1, the BLM has now determined that the Project will have “no effect” on the Bruneau hot springsnail.

Bull trout Critical Habitat

The nearest bull trout occupied habitat in the Bruneau River system occurs far upstream in one of its largest tributaries, the Jarbidge River. Bull trout critical habitat extends approximately 90 miles downstream to the Buckaroo Ditch diversion dam on the Bruneau River (Matibag 2016).

Because the FEIS Route 8 Action Area and Project facilities would be located north of the Snake River, they would not intersect or span the Bruneau River and would not affect bull trout critical habitat. As disclosed in the FEIS/BA, the Action Area and Project facilities of FEIS Route 9 would intersect but span bull trout critical habitat. Due to these impacts, the BLM determined in the 2013 BA that the Project “may affect” but is “not likely to adversely affect” bull trout critical habitat (Attachment 1). However, as discussed in the Bruneau hot springsnail section above, EA Route 9 would not cross the Bruneau River and the Action Area and Project facilities would not intersect bull trout critical habitat. In summary, because no direct or indirect impacts would occur on the Bruneau River from SEIS/EA Alternative 1, the BLM has now determined that the Project will have “no effect” on bull trout critical habitat.

In summary, Alternative 1 of the SEIS/EA would result in effects on ESA listed aquatic invertebrates and bull trout critical habitat that are similar to or less than those disclosed in the FEIS/BA. In general,

SEIS/EA Alternative 1 would have spannings of the Snake River analogous to the Agency Preferred Alternative routes for Segment 8 and 9 assessed in the FEIS, and would incorporate the same Best Management Practices to avoid or minimize impacts to aquatic habitats as was required in the ROD and BO. Therefore, the impacts to ESA listed aquatic invertebrate species in and adjacent to the Snake River (i.e., Banbury Springs limpet, Bliss Rapids snail, and Snake River physa) would not substantively differ between the Agency Preferred Alternative of the FEIS and the SEIS/EA Alternative 1 and are expected to result in similar impacts and the same effects determination reported in the BA (Attachment 1). However, because SEIS/EA Alternative 1 would not cross the Bruneau River and the Action Area and Project facilities would not intersect potential habitat or the recovery area of the Bruneau hot springsnail or bull trout critical habitat, the BLM has now determined that the Project will have “no effect” on the Bruneau hot springsnail or bull trout critical habitat.

Terrestrial Species or Critical Habitat

As noted in the **ESA Listed Species Updates** above, the yellow-billed cuckoo and slickspot peppergrass have been listed (or reinstated) under the ESA since publication of the 2013 FEIS/BA. In addition, both species have proposed critical habitat pending designation. Because the yellow-billed cuckoo was considered a Candidate species at the time, it was not assessed in the 2013 BA. However, slickspot peppergrass and its proposed critical habitat were analyzed in the BA because the species was proposed for listing under the ESA. The Service subsequently provided a Conference Opinion for the Project because the 2013 FEIS Agency Preferred Alternative route for Segment 8 “may affect”, and was “likely to adversely affect” slickspot peppergrass and its proposed critical habitat.

Yellow-billed cuckoo

The western distinct population segment of the yellow-billed cuckoo prefers large patches of multi-layered riparian gallery forest comprised of cottonwoods (*Populus deltoids*, *P. fremontii*) and willows (*Salix* sp.) with an understory of dense, shrubby vegetation (Hughes 1999). In addition, cuckoos may require the relatively cool temperatures and high humidity that only larger patches of dense forest next to open water can provide. Nesting pairs are sensitive to patch size seldom using patches < 5 acres (Hughes 1999); habitat patches > 200 acres are considered ideal (Laymon 1998). In Idaho the yellow-billed cuckoo is at or near the limit of its range and is relatively unknown as the species is unlikely to have ever been numerous in the state (Reynolds and Hinckley 2005). Historic records and recent surveys suggest that the species is a rare migrant and summer resident most likely to occur in southeastern Idaho, particularly along the Snake River corridor (Reynolds and Hinckley 2005).

As reported in the 2016 SEIS and 2017 EA, Alternative 1 could potentially impact riparian habitats that, broadly speaking and without information on fine-scale characteristics of the habitat, could support yellow-billed cuckoo. According to Tables D.11-5 and D.11-7 of the 2016 SEIS and incorporated by reference in the 2017 EA, approximately 2 acres of riparian habitat may be impacted based on the disturbance model used for the NEPA analysis that assumes impacts to all habitat within the 250 foot Right-of-Way.

Although the SEIS/EA indicated that Alternative 1 would cross through riparian habitats that could support yellow-billed cuckoo (Table D.11-1), the very limited riparian habitats that occur along these routes do not have characteristics of habitat typically used by the species based on site-specific, fine-scale data sets that were reviewed during the preparation of this memorandum. An examination of National Wetlands Inventory (NWI) and high resolution aerial imagery (0.3 meter) data revealed that the overwhelming majority of locations where NWI polygons occurred along SEIS/EA Alternative 1 were

classified as Riverine, Intermittent, Streambed, Temporarily Flooded (R4SBA) systems which visually appeared to be sand washes or draws with adjacent upland shrub steppe vegetation. The remaining locations were classified as Riverine, Upper Perennial, Unconsolidated Bottom (R3UB) or Seasonally Flooded, Palustrine, Scrub-Shrub or Emergent, (PSSC and PEMC) systems and occurred adjacent to perennial rivers and creeks (i.e., Snake River, Clover Creek, Salmon Falls Creek, and Rock Creek). An inspection of imagery of these areas showed riparian/wetland habitat composed of low-statured herbaceous and shrub (most likely willows) vegetation with isolated trees (primarily Russian olive [*Elaeagnus angustifolia*]). No cottonwood stands were apparent at any locations. None of the riparian/wetland habitat areas appear to provide the structural complexity or patch size adequate for yellow-billed cuckoo breeding. In addition, based on the local topography adjacent to these areas, direct impacts such as clearing, manipulation, or modification of these riparian/wetland habitat is not likely to occur because they would be spanned by the transmission line and access roads would not be constructed through them.

In addition to the general unsuitability of the habitat, it is highly unlikely that yellow-billed cuckoos other than rare vagrants would occur with any regularity in southwest Idaho. First, no current or historical observations records exist within the Action Areas of SEIS/EA Alternative 1. Secondly, the three observations within the Snake River corridor in the vicinity of the Project occurred 15 to 32 years ago. The nearest observations of yellow-billed cuckoos to the SEIS/EA Alternative 1 crossings of the Snake River occurred 10 miles downstream from the Route 8 spanning (1991 sighting), 2 miles downstream from the northern Route 9 spanning (1985 sighting), and 34 miles upstream from the southern Route 9 spanning (2002 sighting). And Finally, the nearest proposed critical habitat for the species is found along the Big Wood River over 30 miles north (straight-line distance) of the Project; therefore, SEIS/EA Alternative 1 would have “no effect” on proposed critical habitat for the species.

Based on this assessment, it appears that the riparian/wetland habitats along SEIS/EA Alternative 1 do not have characteristics of adequate yellow-billed cuckoo habitat. In addition, direct and indirect impacts would not occur because, 1) riparian habitats would be spanned and 2) environmental protection measures would be implemented to avoid noise disturbing activities when migrating cuckoos may be present (2016 SEIS Appendix M, TESWL-7, WILD-9 and incorporated by reference in the 2017 EA). Because of these factors, Segments 8 and 9 of the Project are expected to have “no effect” on yellow-billed cuckoo and its proposed critical habitat (Attachment 4).

Slickspot peppergrass

Slickspot peppergrass occurs in semi-arid, sagebrush-steppe habitats of the Snake River Plain and adjacent foothills in southwestern Idaho and the Owyhee Plateau in south-central Idaho. It occurs only in slickspot microsites, which have soils much higher in clay content and significantly higher in sodium than adjacent areas. These areas have frequent ponding during winter and early spring, and stay moist a few weeks longer than surrounding soils.

As previously mentioned, the Service provided a Conference Opinion for the Project because the 2013 FEIS Agency Preferred Alternative “may affect” and was “likely to adversely affect” slickspot peppergrass and its proposed critical habitat. As detailed in the 2013 BA, 2016 SEIS and 2017 EA, impacts from the FEIS Agency Preferred Alternative and SEIS/EA Alternative 1 may occur to slickspot peppergrass known occurrences, occupied habitat, potential habitat, slickspot peppergrass habitat, and proposed critical habitat (Table 2).

Table 2. Comparison of potential impacts that could occur to slickspot peppergrass and its habitat under the Agency Preferred Alternative routes described in the FEIS/BA (Segments 8 and 9) and those assessed in the SEIS/EA (Alternative 1).

Project Route	Analysis Unit	Slickspot peppergrass Occurrence and Habitat Categories				
		Known Occurrence	Occupied Habitat	Potential Habitat	LEPA Habitat	Proposed Critical Habitat
FEIS Route 8	Action Area	X	X	X	X	X
	Project Facilities	X	X	X	X	X
SEIS/EA Route 8	Action Area	X	X	X	X	X
	Project Facilities	X	X	X	X	X
FEIS Route 9	Action Area	--	--	X	--	--
	Project Facilities	--	--	X	--	--
SEIS/EA Route 9	Action Area	--	--	X	--	--
	Project Facilities	--	--	X	--	--

X – Denotes potential impacts may occur.

In general the number, ranks, and acreage of known occurrences of slickspot peppergrass potentially impacted by the FEIS Agency Preferred Alternative and SEIS/EA Alternative 1 are similar (Tables 3 – 5). Although acres of known occurrences impacted within the SEIS/EA Alternative 1 Action Area would be 55 % fewer than those in the FEIS Agency Preferred Alternative (decreased from 508 acres to 230 acres), acres of known occurrences impacted by the SEIS/EA Alternative 1 Project facilities would be more than those in the FEIS Agency Preferred Alternative (Table 5; increased from about 3 acres to about 5 acres). Nonetheless, the impacts that have the potential to have the greatest adverse effect (i.e., direct impacts from the Project facilities to element occurrences) differ by less than two acres between the FEIS Agency Preferred Alternative and SEIS/EA Alternative 1 (Table 5).

Table 3. Acres of Known Occurrences¹ of slickspot peppergrass by Element Occurrence² within the Action Area and crossed by Project Facilities of FEIS Route 8.

EO Number	EO Rank ³	Action Area (acres)	Project Facilities (acres)
15	D→C	47.0	--
18	C→B	21.8	--
24	C	90.4	1.7
25	C→B	14.9	--
30	B→BC	156.8	<0.01
31	C→D	71.5	1.3
42	F→D	2.1	0.03
51	BC→D	3.6	--
54	F→D	0.5	--
72	C→B	19.4	--
104	C→B	80.6	0.2
	Total	508.6	3.24

¹ Known Occurrences are synonymous with Element Occurrence (EO).

² Source: BA Table 3-6.

³ EO rank definitions follow Colket et al. 2006 and Kinter and Miller 2016. An arrow (→) indicates a change in EO rank from Colket et al. 2006 and the current EO rank from Kinter and Miller 2016.

Table 4. Acres of Known Occurrences¹ of slickspot peppergrass by Element Occurrence² within the Action Area and crossed by Project Facilities of SEIS/EA Route 8.

EO Number	EO Rank ³	Action Area (acres)	Project Facilities (acres)
15	C	27.3	--
18	B	156.4	3.3
30	BC	--	<0.001
31	D	24.1	1.3
54	D	1.9	0.3
67	B	9.6	--
104	B	10.8	--
121	C	0.4	--
	Total	230.5	4.9

¹ Known Occurrences are synonymous with Element Occurrence (EO).

² Source: GIS acreage calculated for this memo.

³ EO rank definitions follow Colket et al. 2006 and Kinter and Miller 2016 and are based on the most current slickspot peppergrass assessment (Kinter and Miller 2016).

Table 5. Comparison of ranks, acreages, and number of Known Occurrences of slickspot peppergrass potentially impacted by the Agency Preferred Alternative described in the FEIS/BA and Alternative 1 assessed in the SEIS/EA.

Project Route	Analysis Unit	Acreages and Number of Known Occurrences by Rank ¹				
		B	BC	C	D	Total ²
FEIS Route 8	Action Area	136.7 (n=4)	156.8 (n=1)	137.4 (n=2)	77.7 (n=4)	508.6 (n=11)
	Project Facilities	0.20 (n=1)	<0.01 (n=1)	1.70 (n=1)	1.33 (n=2)	3.24 (n=5)
SEIS/EA Route 8	Action Area	176.8 (n=3)	--	27.7 (n=2)	26.0 (n=2)	230.5 (n=7)
	Project Facilities	3.3 (n=1)	<0.001 (n=1)	--	1.6 (n=2)	4.9 (n=4)

¹ Known Occurrences are synonymous with Element Occurrence (EO). EO rank definitions follow Colket et al. 2006 and Kinter and Miller 2016 and are based on the most current slickspot peppergrass assessment (Kinter and Miller 2016).

As identified in Table 2 above, impacts from Segment 8 of the FEIS Agency Preferred Alternative and SEIS/EA Alternative 1 may occur to all slickspot peppergrass habitat designations (i.e., known occurrences, occupied habitat, potential habitat, slickspot peppergrass habitat, and proposed critical habitat). Potential impacts from Segment 9 would be limited to potential habitat.

The majority of slickspot peppergrass habitat categories along Route 8 of SEIS/EA Alternative 1 would potentially impact fewer acres (both within the Action Area and by Project facilities) in comparison to Route 8 of the FEIS Agency Preferred Alternative (Table 6). The acreage of proposed critical habitat potentially impacted by Project facilities of SEIS/EA Alternative 1 would be 82 % less than the FEIS Agency Preferred Alternative and represents the largest proportional decrease.

The one exception to the general trend involves slickspot peppergrass habitat where the number of acres impacted by SEIS/EA Alternative 1 Route 8 is slightly higher than the number of acres impacted by FEIS Agency Preferred Alternative Route 8. One possible explanation for the difference may be that

since the BA was published in 2013 acreage of slickspot peppergrass habitat has increased and potential habitat has decreased substantially within the Four River Field Office (FRFO) due to systematic surveys conducted by BLM botanists. These surveys of potential habitat have resulted in the vast majority of BLM-administered lands being reclassified as either slickspot peppergrass habitat or non-habitat; the remaining potential habitat in the FRFO and traversed by Route 8 of SEIS/EA Alternative 1 occurs on private and state lands where suitability surveys have not been conducted.

Table 6. Comparison of potential impact acreages that could occur to slickspot peppergrass and its habitat under the Agency Preferred Alternative described in the FEIS/BA (FEIS Route 8) and those assessed in the SEIS/EA (Alternative 1: SEIS/EA Route 8).

Slickspot peppergrass Occurrence and Habitat Categories	Action Area (acres)		Project Facilities (acres)	
	FEIS Route 8	SEIS/EA Route 8	FEIS Route 8	SEIS/EA Route 8
Occupied Habitat	11,108.8 ^B	5,349.1 ^F	248.1 ^B	135.9 ^F (149 ^G)
Potential Habitat	20,034.0 ^C	11,061.3 ^F	382.6 ^C	279.8 ^F (356 ^G)
Slickspot peppergrass Habitat	20,878.5 ^C	21,581.2 ^F	515.4 ^C	573.4 ^F (512 ^G)
Proposed Critical Habitat	4,378.8 ^D	949.8 ^F	93.7 ^E	17.3 ^F (17 ^G)

Source of reported acreages include: ^A BA Table 3-6; ^B BA Table 3-7; ^C BA Table 3-8; ^D BA Table 3-14; ^E BA Table 3-15; ^F GIS acreage calculated for this memo; ^G Acreage from SEIS Table 3.7-4 is reported in parentheses for consistency and comparison although it differs from the present analysis based on updated information.

No slickspot peppergrass known occurrences, occupied habitat, slickspot peppergrass habitat or proposed critical habitat would be intersected by the Action Area or Project facilities along the Segment 9 routes associated with the FEIS Agency Preferred Alternative or SEIS/EA Alternative 1 (including the Route 9 Toana Road Variation 1; Table 2). However, impacts within the Action Area and by Project facilities could occur to potential habitat where FEIS Agency Preferred Alternative Route 9 and SEIS/EA Route 9 of the Project traverse the Jarbidge Field Office (JFO) and FRFO (Table 7).

Table 7. Comparison of potential impact acreages that could occur to slickspot peppergrass potential habitat under the Agency Preferred Alternative described in the FEIS/BA (FEIS Route 9) and those assessed in the SEIS/EA (Alternative 1: SEIS/EA Route 9).

Project Route	Analysis Route	Potential Habitat					
		JFO				FRFO	TOTAL
		High	Medium	Low	Subtotal	Subtotal	
FEIS Route 9 ^A	Action Area	--	--	--	--	--	29,380.8
	Project Facilities	--	--	--	--	--	433.0
SEIS/EA Route 9 ^B	Action Area	2,124	2,637	3,500	8,261	166	8,427
	Project Facilities	71.3	62.2	76.2	209.7	4.7	214.4

Source of reported acreages include: ^A BA Table 3-8 and ^B GIS acreage calculated for this memo. Because the FEIS/BA did not discriminate between nor provide information on the modeled classes for slickspot peppergrass potential habitat, double dashes (--) have been used in the table and only the totals for FEIS Route 9 have been presented.

Slickspot peppergrass habitat has not been identified in the JFO because systematic surveys of potential habitat have not been completed. However, a classification of potential habitat that identifies the possibility of finding slickspot peppergrass in relation to the modeled classes has been conducted (BLM JFO, unpublished data). The model categories do not predict the probability of finding slickspot peppergrass in a given area, but rather describe a hierarchy of suitability among the classes (e.g., habitat components in the High Potential class are more suitable than those in the Medium Potential class which are more suitable than those in the Low Potential class). The majority of potential habitat that may be impacted by Segment 9 of SEIS/EA Alternative 1 within the Action Area and by Project facilities in the JFO is classified as Low Potential (Table 7). Route 9 of the FEIS Agency Preferred Alternative would impact more than twice as many acres of potential habitat than Route 9 of SEIS/EA Alternative 1 (Table 7).

In summary, Alternative 1 of the 2016 SEIS and 2017 EA would result in impacts to slickspot peppergrass and its proposed critical habitat that are similar to or less than those disclosed in the 2013 FEIS/BA. Because the effects to this species would not substantively differ between the FEIS Agency Preferred Alternative and the SEIS/EA Alternative 1, Project impacts will result in the same “may affect, likely to adversely affect” determination reported in the 2013 BA (Attachment 1). However, since the overall acreage where effects may occur would be reduced for SEIS/EA Alternative 1, potential impacts from implementing SEIS/EA Alternative 1 would be reduced relative to potential impacts described in the 2013 FEIS/BA.

Conclusion

The effects to the relevant ESA listed species from the Alternative 1 assessed in the 2016 SEIS and 2017 EA would be the same, reduced, or non-existent in comparison to the Agency Preferred Alternative routes assessed in the 2013 FEIS/BA. Additionally, all EPMs related to ESA listed species and enumerated in the 2013 FEIS, 2016 SEIS, and 2017 EA and required in the 2016 ROD and 2017 Decision Record would be implemented for Alternative 1 if the Project were approved. Therefore, we conclude that any potential impacts to ESA listed species from the SEIS/EA Alternative 1 (including the Toana Road Variation 1) do not meet the threshold for reinitiation of section 7 consultation. We respectfully request acknowledgement from the USFWS regarding this conclusion and request continued acceptance of the original BO prepared for the Gateway West Transmission Line Project. In addition, we have determined that implementation of Alternative 1 “may effect”, and is “likely to adversely affect” slickspot peppergrass in a manner or to an extent similar to that which was analyzed in the original 2013 BA and for which the Service provided its 2013 CO. Therefore, we request USFWS acknowledgement of this “may effect, likely to adversely affect” determination for slickspot peppergrass and its proposed critical habitat for SEIS/EA Alternative 1 and further request USFWS confirm the conclusion of the 2013 CO as formal consultation and as the USFWS’s Biological Opinion for the species. As we have determined that SEIS/EA Alternative 1 will have no effect on Bruneau hot springsnail, bull trout critical habitat, and yellow-billed cuckoo and its proposed critical habitat, we also request USFWS acknowledgement of these “no effect” determinations.

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Attachment 1. Federally Threatened and Endangered Wildlife and Plant Species Occurring in the vicinity of the Gateway West Project (Idaho and Wyoming), Their Effect Determinations, Results, and Rationale from the 2013 BA and BO.

Species	Status	Effect Determination	Result	Rationale
Colorado River Species				
Colorado pikeminnow (<i>Ptychocheilus lucius</i>)	Endangered	May affect, likely to adversely affect	Formal Consultation: Biological Opinion	It is estimated that annual depletions would be 0.3 acre feet from the Colorado River basin for use by the Project. The Proponents have committed to purchasing enough water to cover the extent of estimated water withdrawals from the Colorado River system for which consultation has already occurred; however, because the Proponents cannot yet identify the exact location for sources or precise amount of water per location that they plan to purchase until these water source locations and amounts have been fully identified, current project estimates for water usage lead to a threat determination for this Project of "may affect, likely to adversely affect" for the Colorado River endangered fishes, and a "may affect, not likely to adversely affect" their designated critical habitat.
Razorback sucker (<i>Xyrauchen texanus</i>)	Endangered			
Bonytail chub (<i>Gila elegans</i>)	Endangered			
Humpback chub (<i>Gila cypha</i>)	Endangered			
Colorado pikeminnow critical habitat	Designated	May affect, not likely to adversely affect critical habitat	Formal Consultation: Biological Opinion	
Razorback sucker critical habitat	Designated			
Bonytail chub Critical habitat	Designated			
Humpback chub critical habitat	Designated			
Platte River Species				
Interior least tern (<i>Sterna antillarum athalassos</i>)	Endangered	May affect, likely to adversely affect	Formal Consultation: Biological Opinion	
Piping plover (<i>Charadrius melodus</i>)	Threatened		Formal Consultation: Biological Opinion	
Whooping crane (<i>Grus americana</i>)	Endangered			
Pallid sturgeon (<i>Scaphirhynchus albus</i>)	Endangered			
Western prairie fringed orchid (<i>Platanthera praeclara</i>)	Threatened			
Whooping crane critical habitat	Designated	May affect, not likely to adversely affect critical habitat	Formal Consultation: Biological Opinion	

Species	Status	Effect Determination	Result	Rationale
Mammals				
Black-footed ferret (<i>Mustela nigripes</i>)	Endangered	No effect	Informal Consultation: Acknowledged	Based on recent determination by the U.S. Fish and Wildlife Service (USFWS March 6 Letter to Scott Talbott, Director - Wyoming Game and Fish Department), the entire State of Wyoming has been block cleared, relaxing the requirements of section 7 Consultation. No surveys would be required based on the agreement for block clearance, and it is determined that because wild endangered black-footed ferret populations are no longer present outside of the reintroduced populations ferrets, wild, free-ranging endangered ferrets would not be impacted by this project
	10(j) Nonessential, experimental population	May affect, not likely to adversely affect	Informal Consultation: Concurrence	Unlikely to be encountered, and agency- required Environmental Protection Measures (EPMs) would be implemented. This species is included for agency coordination purposes.
Canada lynx (<i>Lynx canadensis</i>)	Threatened	May affect, not likely to adversely affect	Informal Consultation: Concurrence	Unlikely to be encountered, no critical habitat or LAUs impacted; however, two linkage areas would be crossed.
Grizzly bear (<i>Ursus arctos</i>)	Threatened	May affect, not likely to adversely affect	Informal Consultation: Concurrence	Unlikely to be encountered, species is highly mobile, and the Project would affect only small portion of any individual's home range which is located adjacent to an existing freeway.
Preble's meadow jumping mouse (<i>Zapus hudsonius preblei</i>)	Threatened	May affect, not likely to adversely affect	Informal Consultation: Concurrence	Unlikely to be encountered; however, surveys would be conducted in suitable habitat and occupied areas would be avoided during construction.
Fish				
Bull trout critical habitat	Designated	May affect, not likely to adversely affect	Informal Consultation: Concurrence	Critical habitat would be spanned by the transmission line, but no habitat disturbance would occur within the river and only limited disturbance in the riparian area (i.e., individual trees may be removed).
Invertebrates				
Banbury Springs limpet (<i>Lanx</i> sp.)	Endangered	May affect, not likely to adversely affect	Informal Consultation: Concurrence	A recovery area is located within the Action Area; however, this area would not be crossed by the line or any roads.
Bliss Rapids snail (<i>Taylorconcha serpenticola</i>)	Threatened	May affect, not likely to adversely affect	Informal Consultation: Concurrence	A recovery area is located within the Action Area; however, it would be spanned, with no road crossings proposed.

Species	Status	Effect Determination	Result	Rationale
Bruneau hot springsnail (<i>Pyrgulopsis bruneauensis</i>)	Endangered	May affect, not likely to adversely affect	Informal Consultation: Concurrence	A recovery area is located within the Action Area; however, this area would not be crossed by the line or any roads, and no water withdrawals would occur from hot-springs in the Bruneau River.
Snake River physa snail (<i>Physa natricina</i>)	Endangered	May affect, not likely to adversely affect	Informal Consultation: Concurrence	A recovery area is located within the Action Area; however, it would be spanned, with no road crossings proposed.
Plants				
Blowout penstemon (<i>Penstemon haydenii</i>)	Endangered	No Effect	Informal Consultation: Acknowledged	The Action Area does not intercept this species' current distribution.
Ute ladies'-tresses (<i>Spiranthes diluvialis</i>)	Threatened	May affect; not likely to adversely affect	Informal Consultation: Concurrence	The Action Area does not intercept any known occurrences of this species; however, it would cross this species known range. Surveys would be conducted and all occupied areas would be avoided during construction.
Slickspot peppergrass (<i>Lepidium papilliferum</i>)	Proposed Endangered	May affect, likely to adversely affect	Conference Opinion	Action Area intersects occupied habitat, slickspot peppergrass habitat, and potential habitat for this species, and some impacts to the species and its habitat are anticipated.
Slickspot peppergrass critical habitat	Proposed	May affect, likely to adversely affect critical habitat	Conference Opinion	Action Area intersects proposed critical habitat for this species, and some impacts to PCEs are anticipated.

Attachment 2. Federally Threatened and Endangered Wildlife and Plant Species in Idaho and Wyoming that were determined from the 2013 BA and BO to not have the Potential to Occur in the Action Area.

Species	Status	Effect Determination	Result	Rationale
Mammals				
Northern Idaho ground squirrel (<i>Spermophilus brunneus brunneus</i>)	Threatened	Not fully analyzed in the BA	Informal Consultation: Acknowledged	This species has a very restricted range, and is only found in Adams and Valley Counties in west-central Idaho. The Project is not located in either one of these counties, and so does not overlap this species' current range. The closest known occurrence of this species is located about 60 miles north of the Project's Segment 8. As a result, the Project is not expected to impact Northern Idaho ground squirrel.
Selkirk Mountains woodland caribou (<i>Rangifer tarandus caribou</i>)	Endangered	Not fully analyzed in the BA	Informal Consultation: Acknowledged	This population of caribou is found in extreme northeastern Washington, northern Idaho, and southern British Columbia (48 <i>Federal Register</i> 1722). The closest this subspecies is found to the Project is along the Pend Oreille River in northern Idaho, approximately 300 miles to the north. As a result, the Project is not expected to impact Selkirk Mountains woodland caribou.
Fish				
Bull trout (<i>Salvelinus confluentus</i>)	Threatened	Not fully analyzed in the BA	Informal Consultation: Acknowledged	The Project crosses the Bruneau River, which has the potential to be used for foraging, migration, and overwintering by the Jarbidge River DPS of bull trout (USFWS 2004). At this time, bull trout have not been documented to use the Bruneau River, although the Bruneau River has been designated as bull trout critical habitat. Use of the Bruneau River by bull trout remains unconfirmed; therefore, the Project is not expected to impact bull trout.

Species	Status	Effect Determination	Result	Rationale
Chinook salmon (<i>Oncorhynchus tshawytscha</i>)	Threatened	Not fully analyzed in the BA	Informal Consultation: Acknowledged	Two evolutionarily significant units (ESUs) of Chinook salmon occur in the vicinity of the Action Area: Snake River fall Chinook, and Snake River spring/summer Chinook. Snake River fall Chinook occur along the mainstem Snake River from the mouth in Washington to Hells Canyon Dam on the Oregon-Idaho border, and in the first few river miles of certain large tributaries, including the Tucannon, Grande Ronde, and Clearwater Rivers (Waples et al. 1991). Adult fall Chinook migrate past Bonneville Dam on the Columbia River from August to October (Waples et al. 1991). Adult spring/summer Chinook migrate past Bonneville Dam from early March through August (Good et al. 2005). Passage for both of these ESUs is blocked at Hells Canyon Dam on the Snake River, over 100 miles north of the Action Area. Hells Canyon Dam is the closest location of Snake River fall Chinook, while the Salmon River basin, approximately 70 miles to the north of the Action Area, is the closest occurrence of Snake River spring/summer Chinook.; therefore, the Project is not expected to impact Chinook salmon.
Kendall warm springs dace (<i>Rhinichthys osculus thermalis</i>)	Endangered	Not fully analyzed in the BA	Informal Consultation: Acknowledged	This species is restricted to Kendall Warm Springs, which is approximately 80 miles north of Segment 4 of the Project, and no Project activities would be taking place upstream of this species' range. Therefore, the Project is not expected to impact Kendall Warm Springs dace.
Sockeye salmon (<i>Oncorhynchus nerka</i>)	Endangered	Not fully analyzed in the BA	Informal Consultation: Acknowledged	The closest ESU of sockeye salmon to the Action Area is Snake River sockeye. The only extant population in this ESU is in Redfish Lake, approximately 80 miles to the north of Segment 8. Passage for this fish into the Action Area from the ocean is blocked by Hells Canyon Dam, approximately 100 miles north of the Action Area. Therefore, this Project is not expected to impact sockeye salmon.

Species	Status	Effect Determination	Result	Rationale
Steelhead (<i>Oncorhynchus mykiss</i>)	Threatened	Not fully analyzed in the BA	Informal Consultation: Acknowledged	The closest ESU of steelhead to the Action Area is Snake River steelhead. The passage of Snake River steelhead from the ocean into the Action Area is blocked by Hells Canyon Dam, approximately 100 miles to the north. The closest these fish can be found to the Action Area as the crow flies is in the Salmon River basin, approximately 70 miles north of Segment 8. Therefore, the Project is not expected to impact steelhead.
White sturgeon (Kootenai River population) (<i>Acipenser transmontanus</i>)	Endangered	Not fully analyzed in the BA	Informal Consultation: Acknowledged	The closest area (in comparison to the Action Area) known to contain the Kootenai River population of white sturgeon is in the northern panhandle of Idaho, over 350 miles to the north. Therefore, the Project is not expected to impact white sturgeon.
Amphibians				
Wyoming toad (<i>Bufo baxteri</i>)	Endangered	Not fully analyzed in the BA	Informal Consultation: Acknowledged	This species is known only from Mortenson Lake (NatureServe 2011), which is approximately 60 miles southeast of Segment 2 in Albany County. Therefore, the Project is not expected to impact the Wyoming toad.
Plants				
Colorado butterfly plant (<i>Guara neomexicana</i> ssp. <i>coloradoensis</i>)	Threatened	Not fully analyzed in the BA	Informal Consultation: Acknowledged	This plant's range is limited to Laramie and Platte Counties in Wyoming, western Kimball County in Nebraska, and Weld County in Colorado. It is only known to occur in approximately 17 locations located in a small geographic area, measuring approximately 60 miles by 60 miles. The Action Area does not lie in either one of the Wyoming counties from which this plant is known; therefore, the Project is not expected to impact Colorado butterfly plant.
Desert yellowhead (<i>Yermo xanthocephalus</i>)	Threatened	Not fully analyzed in the BA	Informal Consultation: Acknowledged	The desert yellowhead is sparsely distributed across an area of only 50 acres in southeastern Fremont County, Wyoming (67 <i>Federal Register</i> 11442). The only known location where this species occurs, despite intensive survey efforts, is one small area of southeastern Fremont County, which is not in the Action Area. Therefore, the Project is not expected to impact desert yellowhead.

Species	Status	Effect Determination	Result	Rationale
MacFarlane's four-o'clock (<i>Mirabilis macfarlanei</i>)	Threatened	Not fully analyzed in the BA	Informal Consultation: Acknowledged	This plant occurs in Idaho and Oregon only at three sites: along the Snake River in Idaho County, Idaho; along the Salmon River in Idaho County, Idaho, and along the Imnaha River in Wallowa County, Oregon. The closest of these to the Action Area is about 130 miles to the north, and therefore the Project is not expected to impact MacFarlane's four-o'clock.
Spalding's catchfly (<i>Silene spaldingii</i>)	Threatened	Not fully analyzed in the BA	Informal Consultation: Acknowledged	The closest known occurrence of Spalding's catchfly to the Project is approximately 120 miles to the north, and therefore the Project is not expected to impact Spalding's catchfly.
Water howellia (<i>Howellia aquatilis</i>)	Threatened	Not fully analyzed in the BA	Informal Consultation: Acknowledged	Water howellia is known from Latah County, Idaho; Spokane, Clark, and Pierce Counties, Washington; and Lake and Missoula Counties, Montana (USFWS 1996b). The closest known occurrence of this plant to the Project is over 150 miles to the north, and therefore the Project is not expected to impact water howellia.

Attachment 3. Figures

Figure 1. FEIS Agency Preferred Alternative Routes for Segments 8 and 9 in Idaho Analyzed in the Biological Assessment.

Figure 2. Alternative 1 for Segments 8 and 9 (including Toana Road Variation 1) Analyzed in the 2016 SEIS and 2017 EA.

Figure 3. Slickspot Peppergrass Habitat Categories in relation to Alternative 1 (Revised Proposed Routes for Segment 8 and 9 including Toana Road Variation 1) Analyzed in the 2016 SEIS and 2017 EA.

Figure 1. FEIS Agency Preferred Alternative Routes for Segments 8 and 9 in Idaho Analyzed in the Biological Assessment.

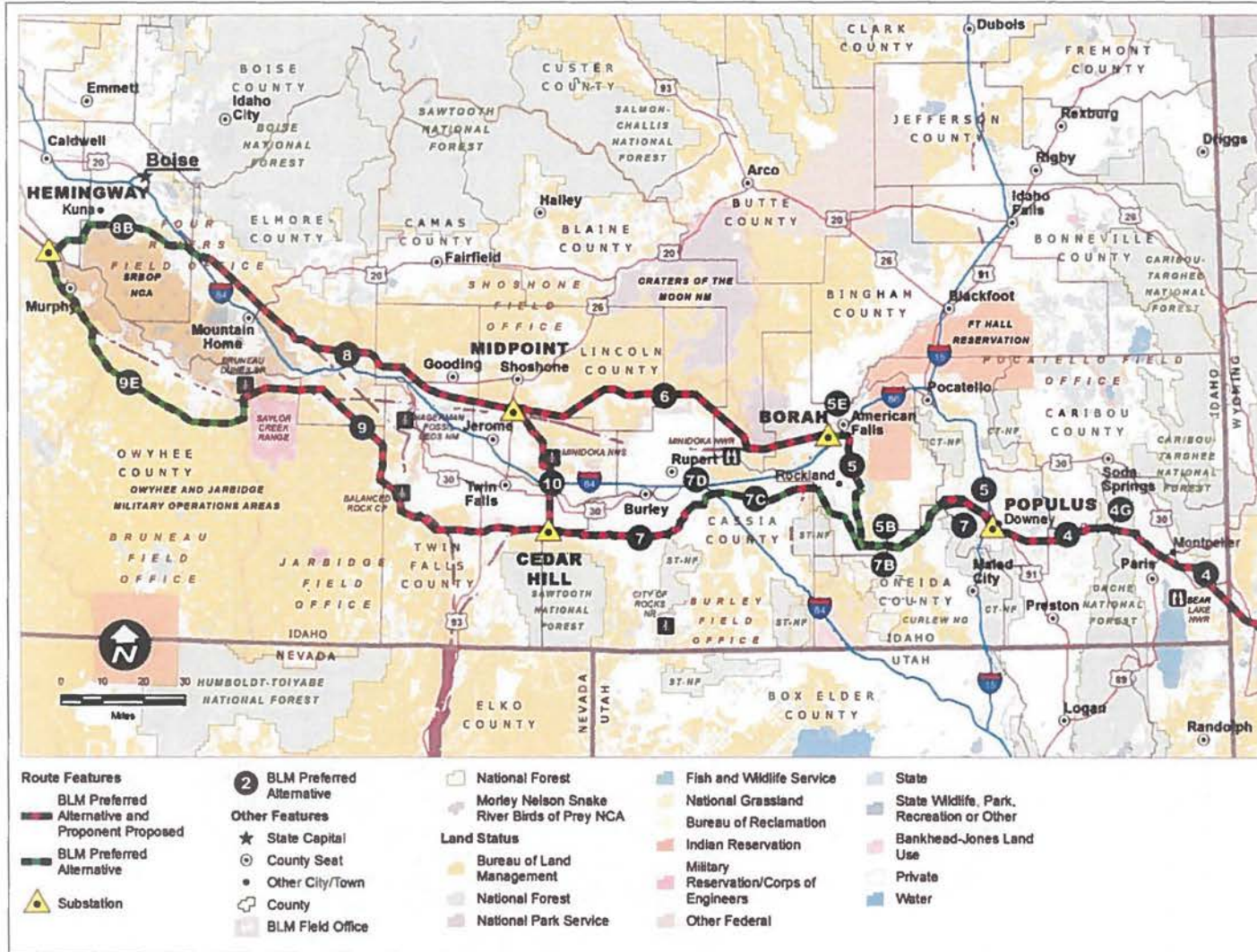


Figure 2. Alternative 1 for Segments 8 and 9 (including Toana Road Variation 1) Analyzed in the 2016 SEIS and 2017 EA.

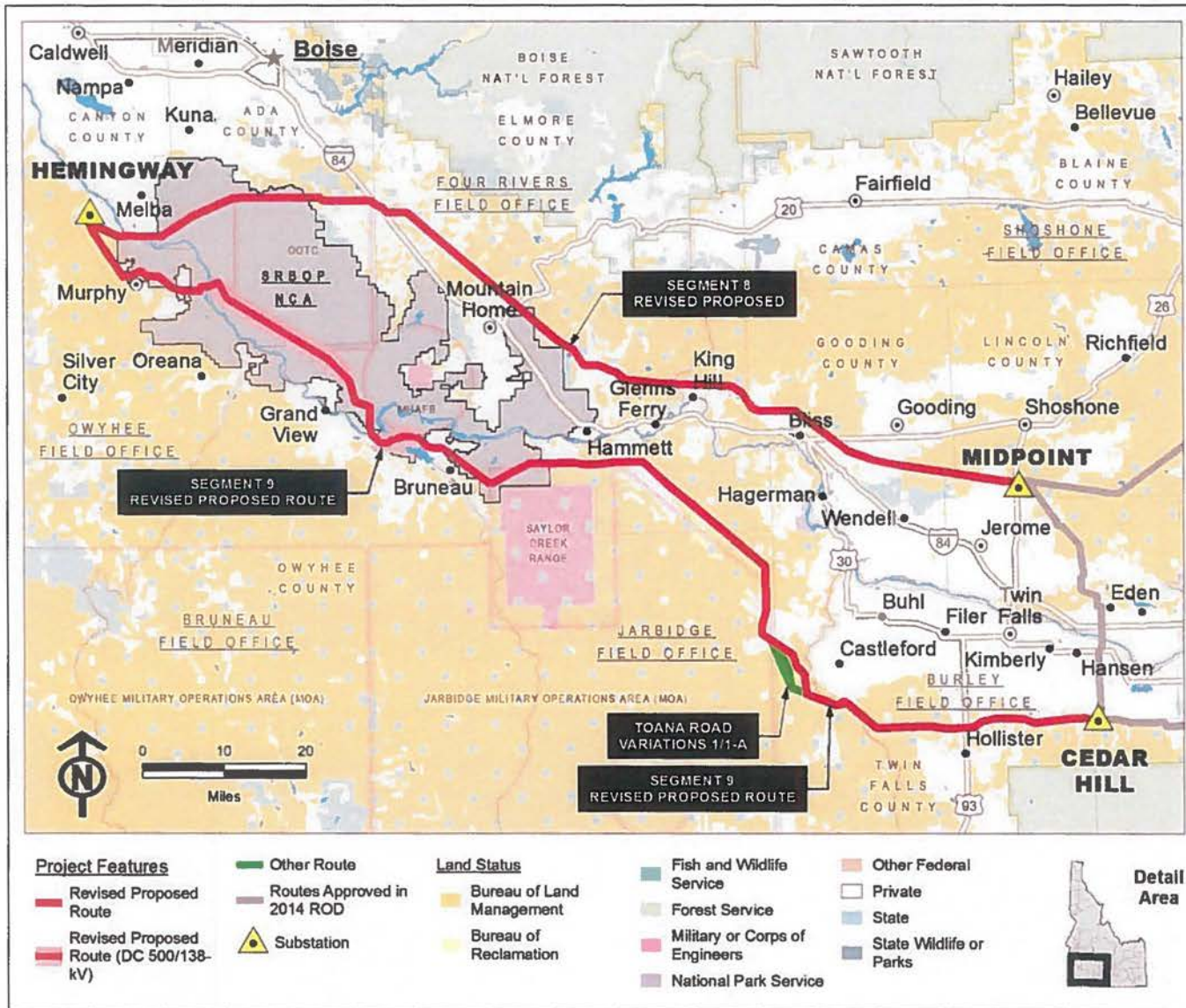
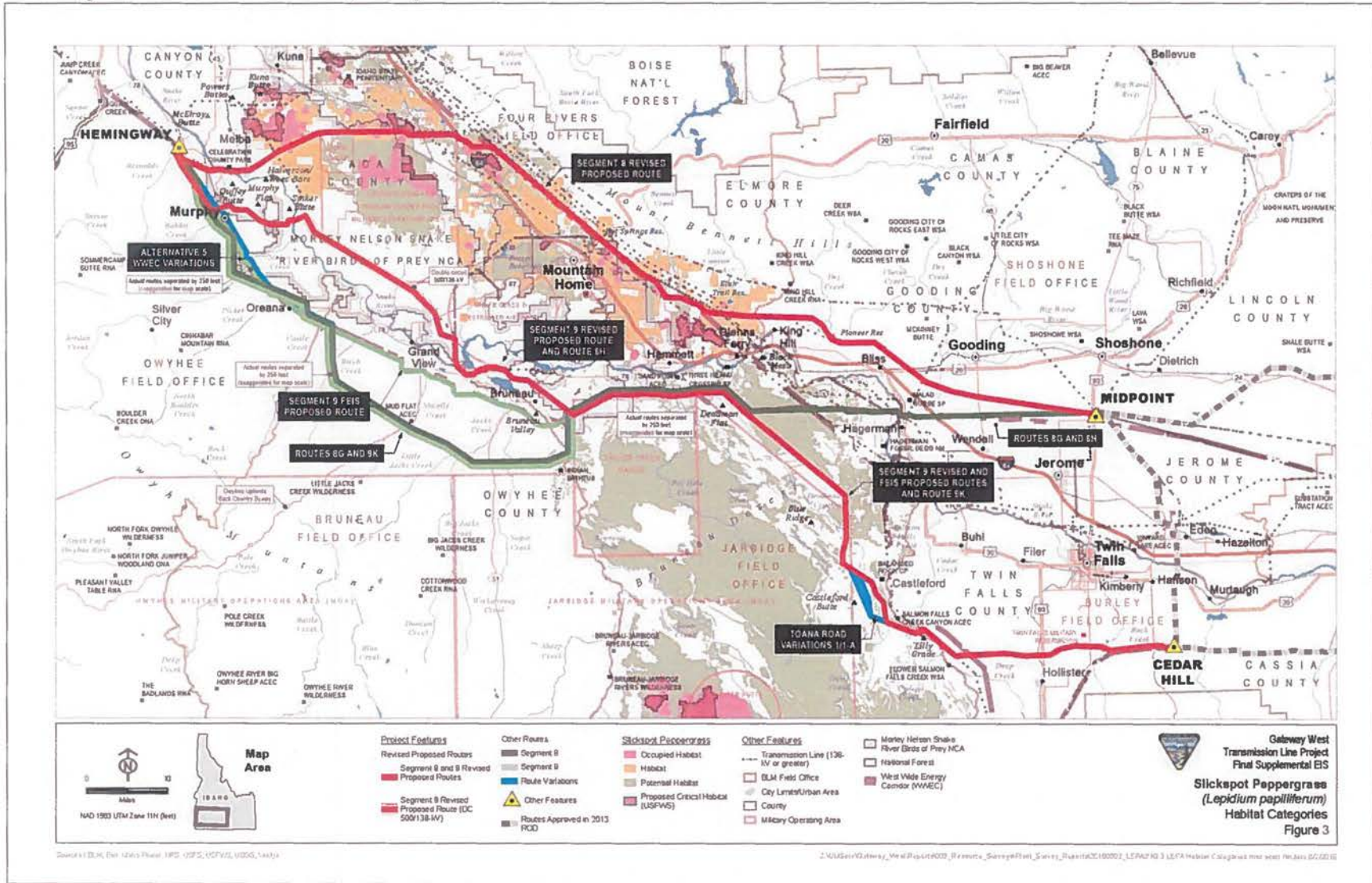


Figure 3. Slickspot Peppergrass Habitat Categories in relation to Alternative 1 (Revised Proposed Routes for Segment 8 and 9 including Toana Road Variation 1) Analyzed in the 2016 SEIS and 2017 EA.



Attachment 4. Yellow-billed Cuckoo (*Coccyzus americanus*) Western DPS: Impact Evaluation of an Idaho BLM Proposed or Ongoing Action.

Yellow-billed Cuckoo (*Coccyzus americanus*) Western DPS: Impact Evaluation of an Idaho BLM Proposed or Ongoing Action

January 14, 2015

Answer the questions in Table 1 as part of the process to evaluate whether a BLM proposed or ongoing action is likely to impact yellow-billed cuckoos or their habitat. These answers should be used to support a BLM effects determination. Provide a description of the federal action and a rationale for the determination below.

If all of the answers to questions 1-6 are “no” the federal action will have no impacts on yellow-billed cuckoo or their habitat and it is not necessary to answer question 7-10. In addition, the proposed action will have no impacts if any answer to questions 1-7 is “yes” but answers to 7-10 are “no.” In either case, a “No Effect” determination should be made by the BLM, and a copy of this completed form should be placed in the project file to document the “No Effect” determination. However, if any question 8-10 is answered “yes” it will be necessary to contact the U.S. Fish and Wildlife Service.

Table 1. Yellow-billed Cuckoo Impact Evaluation. If the response to any question 1-6 is “yes” then answer questions 7-10.

Criteria	Yes or No
1. Will the action occur within yellow-billed cuckoo proposed critical habitat?	No
2. Will the action occur outside the boundaries of proposed critical habitat but within a riparian zone that contains suitable habitat for yellow-billed cuckoo nesting or foraging? (See Hughes 1999; Federal Register vol. 79, no. 192 for suitable habitat characteristics)	No
3. Will the action occur outside the boundaries of proposed critical habitat but within a riparian area that may provide yellow-billed cuckoos with a corridor for movement between patches of suitable nesting or associated foraging habitat?	No
4. Are yellow-billed cuckoo likely to be present in habitat directly or indirectly affected by the action? This question should be answered by reviewing historic occurrence data, and it may be necessary to conduct presence/absence surveys to determine whether yellow-billed cuckoos currently occupy the footprint of the action.	No
5. Will the action alter hydrology within proposed critical habitat?	No
6. Will the action occur in areas adjacent (within 1 km) to yellow-billed cuckoo proposed critical habitat? (See Saab 1999).	No

7. Is the action likely to involve pesticides, herbicides, or other hazardous materials which may impact proposed critical habitat or yellow-billed cuckoo foraging?	NA
8. Does the action have measurable impact on vegetation within yellow-billed cuckoo suitable or proposed critical habitat? (see FR vol. 79, no. 192)	NA
9. Is the action likely to impact or inhibit processes that would expand or improve suitable vegetation characteristics within suitable or proposed critical habitat?	NA
10. Is the action likely to “take” individual yellow-billed cuckoos? (See http://www.fws.gov/midwest/endangered/glossary/index.html for a definition of take). Consider sub-lethal effects such as elevated noise or light levels.	NA

Briefly describe the federal action and provide a rationale for the effects determination. In addition, attach a map of the location of the federal action. The rationale should be based largely on answers provided in the impacts analysis, and additional features of the action that could influence the determination.

Description of Proposed or Ongoing Action:

See Section 2.0 of the Final Supplemental Environmental Impact Statement and Proposed Land Use Plan Amendments for Segments 8 and 9 of the Gateway West 500-kV Transmission Line, Idaho and Section 2.0 of the Environmental Assessment and Proposed Land Use Plan Amendments, Idaho for the Gateway West 500-kV Transmission Line Project Segments 8 and 9.

Rationale for Determination:

No suitable habitat will be directly or indirectly impacted by Alternative 1 of the Supplemental Environmental Impact Statement and Environmental Assessment.

Construction timing restrictions (SEIS Appendix M, Environmental Protection Measure WILD-9, TESWL-7) will prevent disturbance (indirect effects of noise and human activity) near potential migration corridors (i.e., Snake River) during the time period YBCU may be present.

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United States Department of the Interior



FISH AND WILDLIFE SERVICE

Ecological Services
5353 Yellowstone Road, Suite 308A
Cheyenne, Wyoming 82009

DEC 21 2017

In Reply Refer To:
06E13000-2013-F-0033b

Memorandum

To: Deputy State Director, U.S. Bureau of Land Management, Idaho State Office,
Boise, Idaho

From: Field Supervisor, U.S. Fish and Wildlife Service, Wyoming Field Office,
Cheyenne, Wyoming

Subject: Gateway West Transmission Line Project 2016 Supplemental Environmental Impact
Statement / 2017 Environmental Assessment—Cassia, Elmore, Gooding, Jerome,
Owyhee, and Twin Falls Counties, Idaho—Technical Assistance

This memorandum is provided in response to the Bureau of Land Management's (Bureau's) correspondence to the U.S. Fish and Wildlife Service (Service) dated December 15, 2017, and received by the Service on the same day, documenting changes in the 2016 Gateway West Transmission Line Project (Project) Supplemental Environmental Impact Statement (SEIS; USBLM 2016, entire) and 2017 Environmental Assessment (EA; USBLM 2017, entire) that have occurred to Segments 8 and 9 since the publication of the 2013 Final Environmental Impact Statement (FEIS; USBLM 2013a, entire) and Bureau's 2013 Biological Assessment (Assessment; USBLM 2013b, entire). The Bureau's 2017 EA Segments 8 and 9 preferred alternative routes, which are described as Alternative 1 in the 2016 SEIS, are located in Cassia, Elmore, Gooding, Jerome, Owyhee, and Twin Falls Counties, Idaho.

In September of 2013, the Service provided the Bureau with a Biological Opinion (BO) and attached Conference Opinion (CO) [Ref#06E13000/WY13F0033] for the 2013 FEIS preferred alternative for the Project. In the Bureau's December 15, 2017, memorandum, Service acknowledgement was requested for Bureau determinations that changes to the Project Segments 8 and 9 routes between the 2013 FEIS and the 2016 SEIS and the 2017 EA do not modify effects analyzed for the Banbury Springs limpet (*Idaholanx fresti*)¹, the Bliss Rapids snail

¹ The Banbury Springs limpet was described as *Lanx* spp. in the Bureau's 2013 FEIS, 2013 Assessment, and 2016 SEIS and the Service's 2013 BO. However, the taxonomic status of the Banbury Springs limpet has recently been evaluated through genetic analyses, and the species is now recognized as a distinct genus and species, *Idaholanx fresti*.

(*Taylorconcha serpenticola*), the Snake River physa (*Physa natricina*), and *Lepidium papilliferum* (slickspot peppergrass) and its proposed critical habitat in a manner or to an extent not previously considered in the Bureau's 2013 Assessment. The Bureau also requested acknowledgement that Alternative 1 routes for Segments 8 and 9 of the 2016 SEIS and the 2017 EA would have "no effect" on the Bruneau hot springsnail (*Pyrgulopsis bruneauensis*) and designated critical habitat for the bull trout (*Salvelinus confluentus*). In addition, the Bureau requested acknowledgement that Alternative 1 routes for Segments 8 and 9 of the 2016 SEIS and the 2017 EA will have no effect on the yellow-billed cuckoo (*Coccyzus americanus*) and its proposed critical habitat.

This memorandum provides Service acknowledgement of the Bureau's continued "may affect, not likely to adversely affect" determinations for the Banbury Springs limpet, the Bliss Rapids snail, and the Snake River physa; and the Bureau's updated "no effect" determinations for the Bruneau hot springsnail and designated critical habitat for the bull trout. This memorandum also provides Service acknowledgement of the Bureau's continued "may affect, likely to adversely affect" determinations for slickspot peppergrass and its proposed critical habitat. The Service's conclusions that Segments 8 and 9 of the 2013 FEIS "is not likely to jeopardize the continued existence of slickspot peppergrass," and "will not destroy or adversely modify proposed critical habitat for slickspot peppergrass" continue to be valid for Alternative 1 Segments 8 and 9 routes as described in the 2016 SEIS and the 2017 EA. In addition, this memorandum provides Service acknowledgement of the Bureau's "no effect" determinations for the yellow-billed cuckoo and its proposed critical habitat for the Alternative 1 Segments 8 and 9 routes.

Segments 8 and 9 Background Information

In November 2017, the Bureau published a draft EA (USBLM 2017b, entire) with a preferred alternative and associated proposed land use plan amendments different from those selected and proposed in both the January 2017 Record of Decision for the 2016 SEIS (which was remanded in April 2017) and the 2013 FEIS for Segments 8 and 9 of the Project. Because the 2017 EA has a different Agency Preferred Alternative (Alternative 1 from the 2016 SEIS) for Segments 8 and 9 routes, the analyses and determinations documented in the Bureau's 2016 Section 7 Compliance Memorandum and the Service's 2016 response are no longer applicable to Segments 8 and 9 of the Project. However, the Bureau's 2016 SEIS and 2017 EA assessed the Project Proponents' new Revised Proposed Action for Segments 8 and 9 (Alternative 1); new routes, variations, and alternatives for Segments 8 and 9; newly proposed design features and mitigation measures; as well as new information that has become available since the 2013 FEIS and associated 2013 Record of Decision were published. The 2016 SEIS and 2017 EA supplement the analysis found in the 2013 FEIS.

The Bureau has provided additional analyses on the effects of the Alternative 1 Segments 8 and 9 routes in the 2016 SEIS, the 2017 EA, and the December 15, 2017, memorandum requesting Service technical assistance on compliance under section 7 of the Endangered Species Act of 1973 (Act), as amended, 16 U.S.C. 1531 *et seq.* By reference, the Service amends the proposed action in our 2013 BO and CO for Segments 8 and 9 to include the 2016 SEIS Alternative 1 and 2017 EA preferred alternative routes and variations; newly proposed design features and mitigation measures; as well as new information that has become available since the 2013 FEIS

and the 2013 Record of Decision were published. Please refer to the Bureau's the 2017 EA for additional background information regarding Segments 8 and 9 of the Gateway West Transmission Line Project.

Banbury Springs Limpet, Bliss Rapids Snail, and Snake River Physa

The Service's acknowledgement of the Bureau's "may affect, not likely to adversely affect" determinations for the Banbury Springs limpet, the Bliss Rapids snail, and the Snake River physa, is based in part on the Bureau's determination that current environmental baseline conditions for the Project area in the Alternative 1 Segments 8 and 9 routes as described in the 2016 SEIS and the 2017 EA have not significantly changed from those considered in the effects analyses completed in the 2013 Assessment. The Bureau also concluded that implementation of Alternative 1 routes of the 2016 SEIS and 2017 EA will not result in a significant increase in the intensity or duration of any potential beneficial or adverse effects of Segments 8 and 9 of the Project, inclusive of associated conservation measures, as described in the 2013 Assessment (USBLM 2013b, entire). Therefore, the Bureau has determined that the 2013 Assessment adequately addresses any effects of the SEIS Segments 8 and 9 preferred alternative routes. The Service acknowledges that the existing section 7 consultation adequately addresses the effects of the Alternative 1 Segments 8 and 9 routes as described in the 2016 SEIS and the 2017 EA on these three listed snail species. Further section 7 consultation on the effects of Alternative 1 Segment 8 and 9 routes as described in the 2016 SEIS and 2017 EA on the Banbury Springs limpet, the Bliss Rapids snail, and the Snake River physa is not necessary because no thresholds for reinitiation have been met.

Bruneau Hot Springsnail and Bull Trout Critical Habitat

The Bruneau hot springsnail and critical habitat for bull trout are located on the Bruneau River, which occurs in the vicinity of the preferred Project routes considered in the Bureau's 2013 FEIS and 2013 Assessment. While the 2013 FEIS preferred alternative for Segment 8 did not intersect the Bruneau River, Segment 9 spanned the Bruneau River in one location that crossed both the recovery area for the Bruneau hot springsnail and bull trout critical habitat. In the 2013 BO, the Service concurred with the Bureau's 2013 Assessment that the Project "may affect, but is not likely to adversely affect" the Bruneau hot springsnail and bull trout critical habitat based on project design features and environmental protection measures that avoided potential adverse effects. However, Alternative 1 Segment 8 and 9 routes as described in the 2016 SEIS and 2017 EA do not cross the Bruneau River and Project facilities will not intersect with habitat for the Bruneau hot springsnail or with bull trout critical habitat. Therefore, the Bureau has determined that Alternative 1 Segment 8 and 9 routes as described in the 2016 SEIS and 2017 EA will have no effect on the Bruneau hot springsnail and on bull trout critical habitat.

The Service acknowledges the Bureau's Alternative 1 no effect determinations for the Bruneau hot springsnail and on bull trout critical habitat. Service acknowledgement of the Bureau's no effect determinations is based on the lack of Bruneau hot springsnail presence and habitat as well as the lack of bull trout critical habitat in the vicinity of the Alternative 1 Segment 8 and 9 routes as described in the 2016 SEIS and the 2017 EA. Please note that, with the replacement of the

preferred Segment 8 and 9 routes as described in the 2013 FEIS with the Alternative 1 Segment 8 and 9 routes from the 2016 SEIS and the 2017 EA, the Service's 2013 concurrence with the Bureau's "may affect, not likely to adversely affect" determinations for the Bruneau hot springsnail and bull trout critical habitat is no longer applicable to Segments 8 and 9 of the Project.

Yellow-billed Cuckoo and Its Proposed Critical Habitat

The Service's acknowledgement of the Bureau's "no effect" determination for the yellow-billed cuckoo for Alternative 1 Segment 8 and 9 routes as described in the 2016 SEIS and the 2017 EA is based on the Bureau's documentation that cuckoos have rarely been observed in southwestern Idaho, and that riparian/wetland habitats along SEIS Alternative 1 routes do not have characteristics of suitable yellow-billed cuckoo nesting habitat. In addition, direct and indirect impacts to the species will not occur because:

- Direct impacts to riparian/wetland habitats crossed by Alternative 1 Segment 8 and 9 routes will not occur. Project-related clearing, manipulation, or modification of riparian habitats will be avoided as local topography adjacent to the approximately 2 acres of riparian/wetland areas crossed by Alternative 1 routes will cause riparian areas to be spanned by transmission lines. In addition, no Project access roads will be constructed through riparian habitats in Segments 8 and 9.
- Environmental protection measures will be implemented to avoid noise disturbing activities when migratory birds, including individual migrating cuckoos, may be present.

Because of these factors, the Bureau has concluded that the Project is expected to have "no effect" on the yellow-billed cuckoo. The Service acknowledges the Bureau's "no effect" determination for yellow-billed cuckoo within Alternative 1 Segments 8 and 9 routes as described in the 2016 SEIS and the 2017 EA.

The Bureau also determined that Alternative 1 Segments 8 and 9 routes as described in the 2016 SEIS and the 2017 EA will have "no effect" on proposed critical habitat for the yellow-billed cuckoo because the nearest proposed critical habitat for the species is found along the Big Wood River over 30 miles north (straight-line distance) of the Project. The Service acknowledges the Bureau's "no effect" determination for proposed critical habitat for the yellow-billed cuckoo within Alternative 1 Segments 8 and 9 routes as described in the 2016 SEIS and the 2017 EA. Service acknowledgement of the Bureau's "no effect" determination for Alternative 1 Segments 8 and 9 routes as described in the 2016 SEIS and the 2017 EA is based on the geographic distance between proposed critical habitat and Alternative 1 routes.

Slickspot Peppergrass and Its Proposed Critical Habitat

At the time the 2013 FEIS was completed, slickspot peppergrass was proposed for listing as endangered under the Act. Slickspot peppergrass was subsequently reinstated as a threatened species under the Act effective September 16, 2016 (81 FR 55058). The Service's 2013 CO determined that, while the 2013 FEIS preferred alternative route for Segment 8 "may affect" and was "likely to adversely affect" slickspot peppergrass and its proposed critical habitat, the Project

overall extent of potential adverse effects to both the species and its proposed critical habitat will be reduced from those levels analyzed within the original 2013 CO.

Following review of the original 2013 Assessment, as well as the 2013 CO, the Service agrees with the Bureau's conclusion that no significant changes have occurred that would necessitate a reanalysis of effects on slickspot peppergrass for Segments 8 and 9 of the Project. Furthermore, we affirm our original conclusions of the 2013 CO (that the proposed action is not likely to jeopardize the continued existence of slickspot peppergrass, or destroy or adversely modify its proposed critical habitat) are valid for the Alternative 1 Segment 8 and 9 routes as described in the 2016 SEIS and the 2017 EA. The Service also acknowledges that no additional section 7 consultation is necessary at this time relative to the action or baseline conditions for slickspot peppergrass or its proposed critical habitat because no thresholds for reinitiation have been met.

Confirmation of Conference as Consultation Under Section 7 of the Act

The Bureau has also requested in writing that the Service confirm the conclusion of the 2013 CO as the Biological Opinion for effects of the proposed action on the slickspot peppergrass. As described above, following review of the Bureau's 2013 FEIS and 2013 Assessment, the 2016 SEIS, and the 2017 EA as well as the Service's 2013 CO, the Service agrees with the Bureau's conclusions that no significant changes have occurred since the 2013 CO was developed that would necessitate an reanalysis of effects on slickspot peppergrass. Although the Segment 8 and 9 routes as described in the 2013 CO have been modified, the Service maintains that all effects associated with the Alternative 1 routes for Segments 8 and 9 of the 2016 SEIS and the 2017 EA will essentially be the same as effects on slickspot peppergrass previously analyzed in the 2013 CO. Potential effects to the species will occur over a significantly reduced area through implementation of Alternative 1 than were analyzed in the 2013 Assessment. As stated above, through this memorandum, the Service incorporates Alternative 1 routes for Segments 8 and 9 of the 2016 SEIS and the 2017 EA by reference into the 2013 CO for the Gateway West Transmission Line Project. We have concluded that no reinitiation thresholds have been met relative to the proposed action or baseline conditions; thus further section 7 consultation under the Act for slickspot peppergrass is not necessary at this time. Therefore, through this memorandum, the Service confirms the conclusion of the 2013 CO as the Biological Opinion on the effects of Segments 8 and 9 of the Gateway West Transmission Line Project on slickspot peppergrass.

As critical habitat has not yet been designated for the species, the Bureau has not requested confirmation of the 2013 CO determination for slickspot peppergrass critical habitat. Should critical habitat for the species become designated in the future, the Bureau may request that the Service also confirm the conclusions of the 2013 CO as the Biological Opinion for slickspot peppergrass critical habitat. This request must be in writing. If the Service finds that there have been no significant changes warranting a reanalysis of effects of Segments 8 and 9 of the Gateway West Transmission Line Project on critical habitat, the Service may confirm the conclusions of the 2013 CO as the Biological Opinion for critical habitat, and no further consultation under section 7 of the Act would be necessary.

would not jeopardize the continued existence of the species or destroy or adversely modify its proposed critical habitat. Adverse effects to slickspot peppergrass addressed in the 2013 CO included:

- Occasional damage to or loss of individual slickspot peppergrass plants (including seeds) that cannot be avoided,
- Damage to or loss of some individual slick spot microsites that cannot be avoided,
- Unintentional fire ignition,
- Project-generated dust and soil movement impacts on slick spot microsites, native plants, and insect pollinators,
- Removal of remnant native vegetation, and
- Potential introduction or spread of invasive nonnative plants.

While Alternative 1 routes for Segments 8 and 9 as described in the 2016 SEIS and the 2017 EA were not specifically addressed in the 2013 Assessment and the associated 2013 CO, the Service acknowledges that all effects associated with the Alternative 1 routes for Segments 8 and 9 of the 2016 SEIS and the 2017 EA will be the same as those effects previously analyzed in the 2013 CO for both slickspot peppergrass and its proposed critical habitat. The Bureau has also determined that current environmental baseline conditions for the Project area in the Alternative 1 Segments 8 and 9 routes as described in the 2016 SEIS and 2017 EA are similar to those considered in the effects analyses completed in the 2013 Assessment (USBLM 2013b, entire). In addition, with the implementation of Alternative 1 routes of the 2016 SEIS and 2017 EA, the Bureau determined that there will be no significant increase in the intensity or duration of any potential adverse effects from Segments 8 and 9 of the Project, inclusive of associated conservation measures, as described in the 2013 Assessment (USBLM 2013b, entire). For example, with the exception of the “Slickspot Peppergrass Habitat” category (which will increase by about 58 acres), all acreages of habitat categories for slickspot peppergrass as well as acreages of proposed critical habitat that are crossed by Alternative 1 routes for Segments 8 and 9 as described in the 2016 SEIS and the 2017 EA will be similar to or lower than those acreages crossed as described and analyzed in the 2013 Assessment and the 2013 CO. The additional 58 acres of “Slickspot Peppergrass Habitat” crossed by the Alternative 1 Segment 8 route of the 2016 SEIS and the 2017 EA will not result in significant changes to the Bureau’s 2013 Assessment’s “may affect, likely to adversely affect” determination for slickspot peppergrass as overall acreage of all habitat categories for slickspot peppergrass that overlap with Alternative 1 Segments 8 and 9 routes are significantly reduced when compared to the total acreages impacted by the 2013 FEIS preferred alternative.

The Bureau has also determined that acreages of proposed critical habitat that will be affected by the Segment 8 Alternative 1 route as described in the 2016 SEIS and the 2017 EA are substantially lower than the critical habitat acreages crossed by Segment 8 in the 2013 FEIS preferred alternative. As was the case in the 2013 FEIS, no proposed critical habitat is located within the action area or Project facilities of the Segment 9 Alternative 1 route as described in the 2016 SEIS and the 2017 EA. As fewer acres of species habitat and proposed critical habitat will be affected by Alternative 1 Segment 8 and 9 routes of the 2016 SEIS and the 2017 EA, the

Conclusion

This concludes the Service's technical assistance to the Bureau regarding compliance for the Gateway West Transmission Line Project Alternative 1 for Segments 8 and 9 of the 2016 SEIS and the 2017 EA under section 7 of the Act. If the action addressed in this memorandum is modified, environmental conditions change, or additional information becomes available regarding potential effects on listed species not already considered, the Bureau should verify with the Service that effects determination conclusions are still valid. The Service also recommends that this memorandum be included in the Bureau's Project file to ensure compliance with section 7 of the Act for this action will be appropriately documented.

Thank you for your continued interest in threatened and endangered species conservation. Please contact Barbara Schmidt of the Idaho Fish and Wildlife Office at (208) 378-5259 if you require additional information regarding this memorandum.

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References Cited

- U.S. Bureau of Land Management (USBLM). 2013a. Final Environmental Impact Statement for the Gateway West Transmission Line Project. Wyoming and Idaho. BLM Wyoming State Office. April 2013. 1,294 pp. + appendices.
- U.S. Bureau of Land Management (USBLM). 2013b. Biological Assessment of Threatened and Endangered Wildlife, Fish, and Plant Species for the Gateway West Transmission Line Project. March 2013. Prepared for the Bureau of Land Management by Tetra Tech EC, Bothell, Washington. 124 pp. + appendices.
- U.S. Bureau of Land Management (USBLM). 2016a. Final Supplemental Environmental Impact Statement and Proposed Land Use Plan Amendments for Segments 8 and 9 of the Gateway West 500-kV Transmission Line Project, Idaho. BLM Idaho State Office. October 2016. 1,063 pp. + appendices.
- U.S. Bureau of Land Management (USBLM). 2016b. Memorandum from Bureau of Land Management, Idaho State Office to Wyoming Fish and Wildlife Office requesting acknowledgement that existing section 7 consultation continues to adequately address effects to listed species and critical habitat for Segments 8 and 9 of the Gateway West Transmission Line Project. December 13, 2016. 10 pp. + attachments.
- U.S. Bureau of Land Management (USBLM). 2017a. Draft Environmental Assessment and Proposed Land Use Plan Amendments, Idaho. Gateway West 500-kV Transmission Line Project Segments 8 and 9. DOI-BLM-ID-0000-0002-EA. BLM Idaho State Office. November 3, 2017. 30 pp. + appendices.
- U.S. Bureau of Land Management (USBLM). 2017b. Memorandum from Bureau of Land Management, Idaho State Office, Boise, Idaho to Wyoming Fish and Wildlife Office, Cheyenne, Wyoming requesting acknowledgement that existing section 7 consultation continues to adequately address effects to listed species and critical habitat for Segments 8 and 9 of the Gateway West Transmission Line Project. December 15, 2016. 16 pp. + attachments.
- U.S. Fish and Wildlife Service (USFWS). 2013. Final Biological and Conference Opinion for the Gateway West Transmission Line Right-of-Way Project. Wyoming Fish and Wildlife Office. U.S. Fish and Wildlife Service. September 12, 2013. 18 pp. + attached Conference Opinion (84 pp. + appendices).
- U.S. Fish and Wildlife Service (USFWS). 2016. Memorandum from the Wyoming Fish and Wildlife Office, Cheyenne, Wyoming to the Bureau of Land Management, Idaho State Office, Boise, Idaho acknowledging that existing section 7 consultation adequately addresses effects to listed species and critical habitat for Segments 8 and 9 of the Gateway West Transmission Line Project Supplemental Environmental Impact Statement. December 16, 2016. 4 pp.

**Appendix H
Public Comments and Responses to Draft EA**

Gateway West Environmental Assessment Public Comments and Responses to Draft EA

COMMENT					RESPONSE
Letter Number	Comment Number	Date	Author	Comment	
1	1	11/14/17	Aaron Scheff, Idaho DEQ	Thank you for the opportunity to respond to your request for comment. While DEQ does not review projects on a project-specific basis, we attempt to provide the best review of the information provided. DEQ encourages agencies to review and utilize the Idaho Environmental Guide to assist in addressing project-specific conditions that may apply. This guide can be found at http://www.deq.idaho.gov/ieg/ .	Comment noted. The Project Proponents are responsible for meeting all State requirements. See Section 1.5.1 of the Final Supplemental Environmental Impact Statement (SEIS).
1	2	11/14/17	Aaron Scheff, Idaho DEQ	Please review IDAPA 58.01.01 for all rules on Air Quality, especially those regarding fugitive dust (58.01.01.651), trade waste burning (58.01.01.600-617), and odor control plans (58.01.01.776). For questions, contact David Luft, Air Quality Manager, at 373-0550.	Dust suppression requirements are addressed in Section 3.20 of the SEIS, and environmental protection measure (EPM) AIR-5 addresses dust. EPM FIRE-7 prohibits burning debris unless authorized by the appropriate agency.
1	3	11/14/17	Aaron Scheff, Idaho DEQ	IDAPA 58.01.01.201 requires an owner or operator of a facility to obtain an air quality permit to construct prior to the commencement of construction or modification of any facility that will be a source of air pollution in quantities above established levels. DEQ asks that cities and counties require a proposed facility to contact DEQ for an applicability determination on their proposal to ensure they remain in compliance with the rules. For questions, contact the DEQ Air Quality Permitting Hotline at 1-877-573-7648.	The Project Proponents are responsible for meeting all State requirements. See Section 1.5.1 of the SEIS.
1	4	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends verifying that there is adequate sewer to serve this project prior to approval. Please contact the sewer provider for a capacity statement, declining balance report, and willingness to serve this project.	Comment noted. The Project Proponents are responsible for coordinating with the State prior to construction.
1	5	11/14/17	Aaron Scheff, Idaho DEQ	IDAPA 58.01.16 and IDAPA 58.01.17 are the sections of Idaho rules regarding wastewater and recycled water. Please review these rules to determine whether this or future projects will require DEQ approval. IDAPA 58.01.03 is the section of Idaho rules regarding subsurface disposal of wastewater. Please review this rule to determine whether this or future projects will require permitting by the district health department. All projects for construction or modification of wastewater systems require preconstruction approval. Recycled water	Wastewater treatment is discussed in Section 3.16 of the SEIS; see the EMPs requiring permits and an approved pollution prevention plan. See Section 1.5.1 of the SEIS.

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COMMENT					RESPONSE
Letter Number	Comment Number	Date	Author	Comment	
				projects and subsurface disposal projects require separate permits as well.	
1	6	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends that projects be served by existing approved wastewater collection systems or a centralized community wastewater system whenever possible. Please contact DEQ to discuss potential for development of a community treatment system along with best management practices for communities to protect ground water.	Comment noted.
1	7	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends that cities and counties develop and use a comprehensive land use management plan, which includes the impacts of present and future wastewater management in this area. Please schedule a meeting with DEQ for further discussion and recommendations for plan development and implementation. For questions, contact Todd Crutcher, Engineering Manager, at 373-0550.	Comment noted. The Project Proponents are responsible for coordinating with the local governments prior to construction. See Section 1.5.1 of the SEIS.
1	8	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends verifying that there is adequate water to serve this project prior to approval. Please contact the water provider for a capacity statement, declining balance report, and willingness to serve this project.	Comment noted. The Project Proponents are responsible for meeting State requirements prior to construction. See Section 1.5.1 of the SEIS.
1	9	11/14/17	Aaron Scheff, Idaho DEQ	IDAPA 58.01.08 is the section of Idaho rules regarding public drinking water systems. Please review these rules to determine whether this or future projects will require DEQ approval. All projects for construction or modification of public drinking water systems require preconstruction approval.	The Project does not involve building public drinking water systems.
1	10	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends verifying if the current and/or proposed drinking water system is a regulated public drinking water system (refer to the DEQ website at http://www.deq.idaho.gov/water-quality/drinking-water.aspx). For non-regulated systems, DEQ recommends annual testing for total coliform bacteria, nitrate, and nitrite.	The Project does not involve building public drinking water systems.
1	11	11/14/17	Aaron Scheff, Idaho DEQ	If any private wells will be included in this project, we recommend that they be tested for total coliform bacteria, nitrate, and nitrite prior to use and retested annually thereafter.	Comment noted.

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COMMENT					RESPONSE
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1	12	11/14/17	Aaron Scheff, Idaho DEQ	<input type="checkbox"/> DEQ recommends using an existing drinking water system whenever possible or construction of a new community drinking water system. Please contact DEQ to discuss this project and to explore options to both best serve the future residents of this development and provide for protection of ground water resources..	Comment noted.
1	13	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends cities and counties develop and use a comprehensive land use management plan which addresses the present and future needs of this area for adequate, safe, and sustainable drinking water. Please schedule a meeting with DEQ for further discussion and recommendations for plan development and implementation. For questions, contact Todd Crutcher, Engineering Manager at 373-0550.	Comment noted.
1	14	11/14/17	Aaron Scheff, Idaho DEQ	A DEQ short-term activity exemption (STAE) from this office is required if the project will involve de-watering of ground water during excavation and discharge back into surface water, including a description of the water treatment from this process to prevent excessive sediment and turbidity from entering surface water.	Comment noted.
1	15	11/14/17	Aaron Scheff, Idaho DEQ	Please contact DEQ to determine whether this project will require a National Pollution Discharge Elimination System (NPDES) Permit. If this project disturbs more than one acre, a stormwater permit from EPA may be required.	Comment noted. See WQA-1 through WQA-3 in the 2017 Gateway West Record of Decision (ROD).
1	16	11/14/17	Aaron Scheff, Idaho DEQ	If this project is near a source of surface water, DEQ requests that projects incorporate construction best management practices (BMPs) to assist in the protection of Idaho's water resources. Additionally, please contact DEQ to identify BMP alternatives and to determine whether this project is in an area with Total Maximum Daily Load stormwater permit conditions.	Best management practices are required by the 2017 Gateway West ROD. See the applicable EPMS in the appendix to the ROD.
1	17	11/14/17	Aaron Scheff, Idaho DEQ	The Idaho Stream Channel Protection Act requires a permit for most stream channel alterations. Please contact the Idaho Department of Water Resources (IDWR), Western Regional Office, at 2735 Airport Way, Boise, or call 208-334-2190 for more information. Information is also available on the IDWR website at:	The Project Proponents are responsible for meeting all State requirements. See Section 1.5.1 of the SEIS.

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				http://www.idwr.idaho.gov/WaterManagement/StreamsDams/Streams/AlterationPermit/AlterationPermit.htm	
1	18	11/14/17	Aaron Scheff, Idaho DEQ	The Federal Clean Water Act requires a permit for filling or dredging in waters of the United States. Please contact the US Army Corps of Engineers, Boise Field Office, at 10095 Emerald Street, Boise, or call 208-345-2155 for more information regarding permits. For questions, contact Lance Holloway, Surface Water Manager, at 373-0550.	Comment noted. The U.S. Army Corps of Engineers is a cooperating agency on the Gateway West Project and is responsible for issuing this permit.
1	19	11/14/17	Aaron Scheff, Idaho DEQ	Hazardous Waste. The types and number of requirements that must be complied with under the federal Resource Conservations and Recovery Act (RCRA) and the Idaho Rules and Standards for Hazardous Waste (IDAPA 58.01.05) are based on the quantity and type of waste generated. Every business in Idaho is required to track the volume of waste generated, determine whether each type of waste is hazardous, and ensure that all wastes are properly disposed of according to federal, state, and local requirements.	The Proponents are required to comply with the approved Hazardous Materials Management Plan. See Appendix P in the 2017 ROD.
1	20	11/14/17	Aaron Scheff, Idaho DEQ	No trash or other solid waste shall be buried, burned, or otherwise disposed of at the project site. These disposal methods are regulated by various state regulations including Idaho's Solid Waste Management Regulations and Standards, Rules and Regulations for Hazardous Waste, and Rules and Regulations for the Prevention of Air Pollution.	Comment noted.
1	21	11/14/17	Aaron Scheff, Idaho DEQ	Water Quality Standards. Site activities must comply with the Idaho Water Quality Standards (IDAPA 58.01.02) regarding hazardous and deleterious-materials storage, disposal, or accumulation adjacent to or in the immediate vicinity of state waters (IDAPA 58.01.02.800); and the cleanup and reporting of oil-filled electrical equipment (IDAPA 58.01.02.849); hazardous materials (IDAPA 58.01.02.850); and used-oil a Petroleum releases must be reported to DEQ in accordance with IDAPA 58.01.02.851.01 and 04. Hazardous material releases to state waters, or to land such that there is likelihood that it will enter state waters, must be reported to DEQ in	The Project Proponents are responsible for complying with State requirements. See Section 1.5.1 of the SEIS. See EPMs WQA-30 through WQA-43 for measures that apply to spill response.

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				accordance with IDAPA 58.01.02.850.nd petroleum releases (IDAPA 58.01.02.851 and 852).	
1	22	11/14/17	Aaron Scheff, Idaho DEQ	Ground Water Contamination. DEQ requests that this project comply with Idaho's Ground Water Quality Rules (IDAPA 58.01.11), which states that "No person shall cause or allow the release, spilling, leaking, emission, discharge, escape, leaching, or disposal of a contaminant into the environment in a manner that causes a ground water quality standard to be exceeded, injures a beneficial use of ground water, or is not in accordance with a permit, consent order or applicable best management practice, best available method or best practical method." For questions, contact Albert Crawshaw, Waste & Remediation Manager, at 373-0550.	The Project Proponents are responsible for complying with State requirements. See Section 1.5.1 of the SEIS.
1	23	11/14/17	Aaron Scheff, Idaho DEQ	If an underground storage tank (UST) or an aboveground storage tank (AST) is identified at the site, the site should be evaluated to determine whether the UST is regulated by DEQ. EPA regulates ASTs. UST and AST sites should be assessed to determine whether there is potential soil and ground water contamination. Please call DEQ at 373-0550, or visit the DEQ website (http://www.deq.idaho.gov/waste-mgmt-remediation/storage-tanks.aspx) for assistance.	Comment noted.
1	24	11/14/17	Aaron Scheff, Idaho DEQ	If applicable to this project, DEQ recommends that BMPs be implemented for any of the following conditions: wash water from cleaning vehicles, fertilizers and pesticides, animal facilities, composted waste, and ponds. Please contact DEQ for more information on any of these conditions.	The Project includes BMPs for affected resources. Please see Appendix Z to the Plan of Development in the 2017 ROD.
1	25	11/14/17	Aaron Scheff, Idaho DEQ	We look forward to working with you in a proactive manner to address potential environmental impacts that may be within our regulatory authority. If you have any questions, please contact me, or any our technical staff at 208-373-0550.	Comment noted.
2	1	11/29/17	Katie Fite, Wildlands Defense	The rubberstamp EA is greatly inadequate. The rubberstamp nature is shown by the lack of any substantive any action or any effect on the environment in the EA. There is no updated scientific, site-specific or other information as the EA merely refers back to the stale	The EA tiers to the recently completed SEIS and 2017 ROD which presented a detailed evaluation of a several alternatives and their effects. As documented in the Chapter 2 of the SEIS, the BLM considered more than 50 routes for Segments 8 and 9, including more than 20

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				FEIS that is typically based on biological and other baseline information that is several years old now.	considered by the Resource Advisory Committee (RAC).
2	2	11/29/17	Katie Fite, Wildlands Defense	<p>The EA states: “Congress passed the Consolidated Appropriations Act, 2017 (House Resolution [H.R.] 244), which incorporated the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act (Modification Act) by reference [Division G, Title IV, Sec. 431(a)]. President Donald Trump signed the Appropriations Act into law on May 5, 2017. The Modification Act (see Appendix D) directed the BLM to issue a ROW grant for the lands described in Sec. (b)(2) of the Modification Act for portions of Gateway West Segments 8 and 9, which represent the portions of the Proposed Action from the Final SEIS within the boundaries of the NCA. Specifically, the Modification Act stated that the ROW grant “.</p> <p>So ROWs have only been issued for lands within the NCA, and not lands that lie outside. Changes OUTSIDE the NCA must be fully considered.</p>	This is correct; a ROW grant was issued for the Segment 8 and 9 routes through the NCA as required by H.R. 244, but not lands that lie outside the NCA.
2	3	11/29/17	Katie Fite, Wildlands Defense	Does the Act really mandate where the line would be located the entirety of segments 8 and 9? We continue to contend that the actions of the FEIS do not conform with existing Land Use Plans (including once amended). We incorporate into these comments by reference our Appeal, Protest and comments that have already been submitted in this matter.	H.R. 244 approved the two routes across the NCA. Logically, this means that the lines from the Midpoint and Cedar Hill substations need to connect with the approved routes within the NCA. The SEIS considered over 50 alternatives between the substations. No new routes connecting the substations via the approved routes across the NCA were identified during scoping. Your Appeal, Protest, and other comments are part of the Project record for this Project.
2	4	11/29/17	Katie Fite, Wildlands Defense	There is a need for new and expanded mitigation to compensate for harmful elements of the project, its wildlife habitat, the project’s harmful climate change footprint, impacts to SRBOPA and the Salmon Falls River ACEC and setting, slickspot peppergrass habitat, migratory birds and other avian species, native raptors and other sensitive species, historic trails and other very important values of the public lands.	Appendix M of the SEIS includes over 300 environmental protection measures. These are referenced throughout the SEIS. Individual measures are evaluated in Chapter 3 of the Final Environmental Impact Statement (FEIS) and the SEIS. In addition, see Appendix K, the BLM’s mitigation framework for residual impacts within the NCA.

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2	5	11/29/17	Katie Fite, Wildlands Defense	We continue to contend that there is no need for the project, and many alternatives exist. As each year goes by and the Western U. S. energy landscape changes, the lack of need for these immense destructive high voltage transmission lines, and the out-dated nature of this very expensive project, becomes ever more apparent.	Comment noted. The BLM does not have the expertise or authority to determine the need (or lack of need thereof) for upgrading the electrical grid. The purpose of this analysis, as stated in Chapter 1 of the SEIS, is to respond to an application from the Proponents for a ROW grant across public lands.
2	6	11/29/17	Katie Fite, Wildlands Defense	The EA does not adequately lay out and assess the impacts of the amendments to the Bruneau-Kuna , Bennett Hills, Jarbidge and SRBOPA LUPs. There are seven amendments to three LUPs, and a confusing discussion of these circumstances in the EA for several pages. There is also NO REASON that BLM could not amend (or analyze alternatives amending) the affected Land Use Plans to update vital protections for sensitive species, migratory birds, historic Trails, SRBOPA values, etc. as additional mitigation - especially since climate change, grazing and other threats are not addressed in any meaningful manner. This would best reflect a current inventory of the public lands and management to protect public values and the environment.	The amendments and their effects are addressed in detail in Appendices F and G of the SEIS.
2	7	11/29/17	Katie Fite, Wildlands Defense	In the Kuna LUP, the Plan lies outside existing corridors. BH/T amendments would allow line in much too close proximity to cultural sites. The 1987 Jarbidge RMP would be amended to change VRM II to III. Only very limited areas were protected by VRM protections at a II level in these old LUPs. There have been massive habitat, viewshed and other changes in the lands of the old LUPs since the plans were adopted. This means that VRM II lands have become more rare, and/or are besieged with threats and intrusions. So the damage to visual resources and OTHER resources any of these attributes from the project is now in a 2017 context much more significant. The cumulative effects over time of all the deterioration of the environment have not been assessed. The cumulative effect over time of wildfire and weed expansion in the sagebrush ecosystem since the old LUPs were adopted has never been properly assessed.	Comment noted. Please refer to the analysis of impacts to the visual resource in Appendix G of the SEIS.
2	8	11/29/17	Katie Fite, Wildlands Defense	The plans are not a current inventory of the lands. An EIS is necessary to take a hard look at just how significant the amendments are in a 2017 context. How much relatively	Impacts to trails, including changes to the visual setting, are discussed in Section 3.1 of the SEIS and in greater

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				untrammelled VRM II land will be present in the areas of trails or other resources, for example? How much higher quality sagebrush habitat remains now vs. was present in the late 1980s? Moreover, the cumulative effects of the amendments that have already been made – for example to Trails and sensitive species must also be fully examined.	detail in Appendix J to the SEIS. Also see Appendices F and G to that document.
2	9	11/29/17	Katie Fite, Wildlands Defense	BLM states: “The BLM selected the route pairing identified in the Final SEIS as Alternative 5 (Route 8G and Route 9K) in the January Decision. The January 19, 2017, ROD approved one amendment to the Bruneau MFP, two amendments to the Twin Falls MFP, and one amendment to the Snake River Birds of Prey RMP needed to grant a ROW for Alternative 5. These plan amendments remain in effect. However, the alignment pairing in this alternative does not align with the ROW the BLM offered pursuant to the Modification Act”. WHY do these Plan amendments remain in effect?	The 2017 ROD contained two decisions, one of which approved the multiple plan amendments. These amendments became a permanent addition to the governing Land Use Plan(s). The BLM elected not to include the removal of the 2017 amendments in this planning exercise. Additional changes to the Plan(s) in the future, including removal of the 2017 amendments, would require another complete Land Use Planning process, with public scoping, comment periods, notifications, and Decision.
2	10	11/29/17	Katie Fite, Wildlands Defense	The Simpson Bill does not alleviate the need to conduct a current and adequate direct, indirect and cumulative effects analysis. WLD carries forward all our comments, protest and appeal points regarding the inadequacies of the EISs used to date in this prolonged, segmented Gateway process, as well as those submitted for the interconnected and linked B2H Idaho Power project largely in Oregon.	A detailed analysis of the direct, indirect, and cumulative effects attributed to implementing Alternative 1 in the Final SEIS is incorporated by reference in this Environmental Assessment, and comments at this time should be specific to the analysis of this Alternative. WLD did not protest the 2017 Land Use Plan amendment Decision, but did appeal the ROW Decision. That appeal was denied when the IBLA set aside and remanded the ROW Decision to the BLM for further consideration in April 2017.
2	11	11/29/17	Katie Fite, Wildlands Defense	BLM hides behind “tiering” to cover up for the appalling lack of analysis in the EA: “The analysis in this EA addresses only the portions of the Project related to Segments 8 and 9. Tiering (40 CFR 1508.28) uses the analysis in broader EIS documents to narrow the range of alternatives and concentrate on the issues not already addressed. This EA incorporates by reference and tiers to the analysis found in the 2013 Final EIS and 2016 Final SEIS regarding Project-wide impacts. It also incorporates by reference the 2017 Modification Act in its entirety ...”.	The EA tiers to the FEIS and SEIS, which is appropriate. See 40 CFR Part 1502-20: “Agencies are encouraged to tier to environmental impact statements to eliminate repetitive discussions of the same issues...” The issues identified during scoping are similar to issues considered in the FEIS and SEIS.

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2	12	11/29/17	Katie Fite, Wildlands Defense	The EA fails to effectively assess, minimize and mitigate both the impacts of reducing the NCA boundary on SRBOPA ecological, historical, cultural and other values and the public interest, and the discordancy with the Jan 2017 SEIS referenced here:	The routes across the NCA were approved by H.R. 244 and are not subject to revision in this EA.
2	13	11/29/17	Katie Fite, Wildlands Defense	The EA takes a minimal and glancing look at only three alternatives – proposed action, no action and no development. The EA greatly fails to assess and take a hard look at the very important values of No Action alternative regarding everything from the out-moded dinosaur nature of this very expensive project to its adverse impacts on native biota, historical trails and other substantial values of the affected public lands. There are no alternative mitigation alternatives, or no consideration of more protective ROW terms, BMPs, mitigation or other actions. Elements of alternatives that may better mitigate the adverse effects of the project and minimize its tremendous environmental harms are not expanded on from the very deficient minimal mitigation and minimization of the previous EISs.	The SEIS considered over 50 alternatives for Segments 8 and 9. No new alternatives were identified in scoping. The SEIS considered the Proponents' Mitigation and Enhancement Portfolio (SEIS Appendix C) and the BLM's alternative Mitigation Framework (SEIS Appendix K). The BLM will consider mitigation requirements based on direction in the applicable legislation, BLM regulations, and land management plans.
2	14	11/29/17	Katie Fite, Wildlands Defense	The proponent has never adequately identified WHERE energy transported by the line will come from, and go to, and linked or foreseeable private sector, military, INL or other projects. Thus, there is no basis or substance to the claim that if some segments or portions are built and not others, there will be harm to the company. Idaho Power has not demonstrated why this line needs to connect with the highly controversial B2H project, either.	Comment noted. Idaho Power's objectives are presented in Section 1.4.1.2 of the SEIS.
2	15	11/29/17	Katie Fite, Wildlands Defense	Certainty there are numerous ways in which mitigation and protection requirements can be strengthened – ranging from Land Use Plan amendments to require protection of species from adverse environmental effects, providing species with more guaranteed acres of restored habitat, and many other actions. There is also ample room for alternatives evaluating expanded protection and mitigation actions. This includes consideration of all of the following: <ul style="list-style-type: none"> • Avoiding the impact altogether by not taking a certain action or parts of an action. 	Comment noted. Appendix M of the SEIS includes over 300 of EPMs designed to meet these objectives. These are referenced throughout the SEIS. Individual measures are evaluated in Chapter 3 of the FEIS and the SEIS. In addition, see Appendix K, the BLM's mitigation framework for residual impacts within the NCA.

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				<ul style="list-style-type: none"> • Minimizing impact by limiting the degree of magnitude of the action and its implementation. • Rectifying the impact by repairing, rehabilitating, or restoring the affected environment. • Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action. • Compensating for the impact by replacing or providing substitute resources or environments. 	
2	16	11/29/17	Katie Fite, Wildlands Defense	<p>For example, avoiding impacts during construction, for example by not building more roads can be attained by use of helicopters to carry materials. Expanded rectification actions can be analyzed in alternatives and required in the EA ROD. Another example is marking the line throughout its length with avian flight diverters, or acquisition of parcels of land for compensation of species harms inflicted by the lethal habitat destroying line. Acquisitions could provide for nesting or other habitat to mitigate the line effects. Purchase and retirement of grazing permits can be used to better ensure rehab actions are effective and to provide higher quality undisturbed nesting or other habitats, and an improved more diverse prey base for sensitive raptors or other wildlife. This is also necessary to compensate for the threat posed by the Soda fire destruction of sagebrush habitats and the threat it poses to local and regional populations of sensitive species. It is also necessary due to the BLM's intensified damaging habitat actions such as imposition of scorched earth "fuelbreaks" to be grazed to dustbowl status by livestock in the wake of the Soda Fire.</p>	Please see the response to the previous comment.
2	17	11/29/17	Katie Fite, Wildlands Defense	<p>Additional protections and mitigation actions are also necessary due to the worsening environmental conditions and the gutting and weakening of environmental regulations and oversight that Int. Sec. Zinke is imposing on public lands. This greatly increases uncertainty associated with the entire segmented Gateway and b2H projects, and the minimal, loose worded, uncertain BMPs. SOPS, mitigation and so-called "minimization".</p>	Comment noted.

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2	18	11/29/17	Katie Fite, Wildlands Defense	<p>While the Legislation constrained the location in the SRBOPA, other areas are not constrained, and BLM should consider alternatives that also:</p> <ul style="list-style-type: none"> - Co-locate this line with existing lines to the maximum extent possible combined with upgrading existing line segments to a Double Circuit new transmission. - Locate this line along the I-84 corridor to the maximum extent possible. - A combination of co-location and paralleling the I-84 corridor, and burying significant portions of line segments. 	<p>As stated in Section 2.4.of the Gateway West FEIS, the original objective for routing was to follow existing utility ROWs and designated corridors where feasible. The majority of Alternative A follows existing lines. Routes that followed I-84 to the extent possible were considered; see I-85 North Route and I-84 North Variation Route in Section 2.5.3.1 of the SEIS.</p>
2	19	11/29/17	Katie Fite, Wildlands Defense	<p>The EIS process made vague, uncertain and unsupported references to “technical considerations” and other statements to avoid and deflect analysis of alternative paths. This continues in the EA Comment response where concerned residents are ignored in the Hemingway area, as Idaho Power insists on running the line over top their homes rather than making reasonable routing changes.</p>	<p>The BLM recognizes residents’ concerns in the vicinity of the substation. During the RAC process, an alternative was explored under which both segments would parallel the existing line to Hemingway, but that alternative was not recommended by the RAC and was not carried forward into the SEIS. An alternative alignment into Hemingway was discussed during the field trip mentioned in the letter. It was suggested that Segment 8 stop paralleling the existing 500-kV line south of Hemingway to join a common corridor with Segment 9 where both lines would enter Hemingway from the west to avoid additional impacts to the China Ditch subdivision. The Proponents considered this alignment impractical because it resulted in an additional crossing of the existing 500-kV line and created significant difficulties and crowding coming into the substation. This alignment was also not recommended by the RAC because of potential impacts to Reynolds Creek. See Section 3.23 of the SEIS for a discussion of noise effects.</p>
2	20	11/29/17	Katie Fite, Wildlands Defense	<p>Even the most basic of studies and analysis necessary to understand the line’s adverse footprint on avian migration corridors or high use areas has been ignored by Idaho Power throughout this decade long process. Minimization and mitigation have been ignored. Marking the line throughout the length in important avian use areas has been abjectly ignored. This is serious concern given the project’s proximity to the Snake River and its slashing through the SRBOPA area. Raptors, waterfowl, migratory</p>	<p>Bird mortality, including birds covered by the MBTA, is analyzed in Sections 3.10 and 3.11 of the FEIS and SEIS. Also see Section 5.2.3 of the 2017 ROD for a discussion of how the Project would comply with the MBTA. Bird collisions are addressed in Section 3.10 of the FEIS and SEIS. Also see the analysis in Chapter 4 of both the FEIS and SEIS, which discloses the cumulative effects associated with the transmission line and other past, present, and foreseeable future activities.</p>

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				songbirds including sensitive species are left highly vulnerable to injury and death from collisions with this line.	
2	21	11/29/17	Katie Fite, Wildlands Defense	There is not even study and analysis of estimate of how many birds are killed or injured from the existing lines in the area, so that the added toll of Gateway and B2H can be placed in perspective and effects understood. In Idaho Power's view, it appears ignorance is bliss when it comes to avian mortality from its huge increasingly obsolete long distance transmission lines that will pose serious threats in many areas near rivers or other attractive features for resident and migratory avian species.	The area between towers and underneath the conductor wires would not be cleared unless an access road is proposed. Therefore, direct loss of habitat is addressed for surface disturbance specifically at tower locations, access roads, temporary construction sites, and off-site ancillary facilities. Areas of the ROW spanned by transmission lines may have indirect effects to migratory birds and habitats, but our ability to quantify these impacts and develop meaningful mitigation, much less an estimate of how many birds may be killed or injured, is limited. The Migratory Bird Plan developed for this Project presents a reasonable analysis and appropriate conclusions from the available research and fully meets the intent of the MBTA.
2	22	11/29/17	Katie Fite, Wildlands Defense	The harmful crossing of Salmon Falls Creek in the area of the wildlife rich WSR and WSA has never been effectively addressed and harm mitigated and minimized. BLM must use this current process to correct its improperly mitigated actions authorized in the EISs. This matter is made more urgent due to current knowledge about declines in avian species numbers and populations, which is not adequately addressed in this rubberstamp EA. The EA must also consider an alternative alignment to the north.	A transmission line is consistent with a Recreation River designation. Note that this section of the river already includes a road, a bridge, and a 34.5-kV electric line (see Appendix F of the SEIS).
2	23	11/29/17	Katie Fite, Wildlands Defense	The EA Table 3.1 Affected Environment is plagued with all the previous EIS problems. Distances surveyed and assessed for impacts of the line itself and the access roads are much too small/narrow. Roads are often devoid of controls and concerns, with "NA" applied for many resources. For cultural resources there is no info provided. The Socioeconomic analysis lacks valuation of elements of the environment adversely impacted and/or destroyed by the project. Veg distance is much too narrow- 250 ft line, 13 ft road. Weeds, dust, herbicide drift, etc. all will extend much further. Sensitive plant distances are appallingly meager – 0.5 mi. and .25 mi. Yet weeds and soil erosion can cause adverse effects permanently much further distant – from smothering microbiotic crusts to herbicide drift on	Comment noted. The measures used in the analysis are disclosed on each applicable section of Chapter 3 of the FEIS. They are typical measures used in analyses of projects of this scale and scope. The analysis recognizes that roads have impacts. Adverse effects are disclosed in Chapter 3 of the FEIS and SEIS. The need for new roads is reduced where the new lines follow existing lines. Mitigation measures are included to avoid, reduce, or mitigate these adverse effects; however, the FEIS and SEIS disclose that there will be higher risks of adverse impacts.

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				windblown soils –as occurred in the BLM’s infamous Oust incident in eastern Idaho. Plateau, the chemical now in vogue as an Oust replacement, often kills off native vegetation. For invasive plants, roads are listed as NA, ignoring the body of scientific literature that demonstrates roads are weed corridors. For “general” fish and wildlife, road distances are a mere .5 miles. Yet roads are conduits for weed invasion. They fragment wildlife habitats, and increase human disturbance. The bared area may be used travel corridors for mammalian predators and fragment habitats and populations. The same concerns apply to sensitive species, where distances are minimal. There isalso increased human disturbance along roads – and ij areas of the SRBOPA and the southern Idaho area in general use is also likely to include target shooting, varmint hunting, and other activities that may harm species of concern.	
2	24	11/29/17	Katie Fite, Wildlands Defense	Paleo resources are largely ignored, despite proximity of Hagerman Fossil Beds and several known fossil sites. General hazards seems much too small an area. There is no analysis of the foreseeable effects of Oil and Gas potential and ultimate development causing sleeping faults to become active, and trigger earthquakes and geologic instability. Soils distances are too small especially given the erosive nature of soils and the prolonged dry periods resulting in dust and windblown soil erosion of disturbed sites. It is inexplicable why roads are not addressed here. Land use and recreation distances are also utterly minimal. Further, how could the ugly highly unnatural line cutting across the landscape only impact recreational uses and enjoyment within .25 miles? Air quality is not adequately assessed here, nor is the total pollution footprint. The line will be visible for several miles. We can not understand how Idaho Power can get away with such minimal consideration of environmental effects of all of its project disturbances – from the line itself top construction sites to access routes.	Paleo resources are analyzed and both potential effects and measures to avoid and or reduce effects are disclosed in Section 3.3.13 of the SEIS, geologic hazards in Section 3.14, and soils in Section 3.15. Dust suppression measures are discussed in Section.3.20, Air Quality. The FEIS and SEIS include analysis of visual resource impacts in Section 3.2. Also see the detailed analysis, including photo simulations, in Appendices G, E, and J.
2	25	11/29/17	Katie Fite, Wildlands Defense	EA Table 3.1 type of generic one size fits all analysis woefully ignores the unique attributes of resources	Comment noted.

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				impacted or destroyed by the line along the segment route.	
2	26	11/29/17	Katie Fite, Wildlands Defense	For SRBOPA, raptors, upland, upland habitat/veg, cultural, national historic trails, and recreation are listed. The project will affect different raptor species in very different ways. For example, effects on burrowing owl vs. effects on redtail hawks. AND the effects will vary depending on quality and quantity of seasonal habitat in the area of the line proximity of vital seasonal use areas, presence or absence of nesting pairs of birds in proximity, etc. Outside the SRBOPA, in areas where sage-grouse are a concern, the analysis has likewise been minimal and self-serving.	Effects on individual raptors species do differ as the comment states. Effects on raptor species impacted by the Project, as well as on their habitats, are disclosed in various tables in Appendix D of the FEIS and the SEIS. Also see the analyses in Sections 3.10 and 3.11 of the FEIS.
2	27	11/29/17	Katie Fite, Wildlands Defense	The EA very frequently uses wording like “could” impact. It never reveals specific locations and ways in which public land environmental values would actually be impacted, or destroyed, and how irreparable the impact of the line may be.	Since an FEIS and an EA are not decision documents, any effect is conditioned on a project being approved and on the final design. Many impacts could be avoided by proper placement of towers and roads; therefore, some effects cannot be known with certainty until a route is approved; all federal, state, and local permits are issued; and the final design is completed.
2	28	11/29/17	Katie Fite, Wildlands Defense	The EA (and all the stack of EIS documents) fails to address the role of grazing in negating the hoped for effectiveness of the EIS’s restoration promises, such as: “To minimize direct and indirect effects of vegetation removal under each alternative, the Proponents have proposed a Framework Reclamation Plan in the Plan of Development (POD) (Appendix B of Final EIS) that provides procedures for pre-construction treatment of noxious weeds and invasive plants, weed prevention and control, topsoil treatment, ROW restoration, stabilization of disturbed areas to minimize erosion and runoff, seedbed preparation, seeding methods, preliminary seed mixes, road reclamation, monitoring, and remedial actions ...”. What happens when the cows eat up and trample the “rehab”, and weeds invade?	Expanding or restricting grazing authorizations is beyond the scope of this EA. The SEIS discloses in Chapter 3 that grazing has affected habitat across the project area and considers in Chapter 4 how grazing adds to cumulative effects. The decision to allow grazing following construction would be based on site-specific conditions.
2	29	11/29/17	Katie Fite, Wildlands Defense	Moreover, along and near lengths of the ROW, BLM is proposing increased grazing use (as in the case of the U2 and Loughmiller allotments). There is no analysis of BLM re-authorization of grazing permits that contain AUM numbers dramatically in excess of current actual use.	See the response to the previous comment.

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				Burley BLM in the Berger Tracts area near salmon falls Creek just authorized an EA that will destroy sagebrush and rabbitbrush to placate ranchers who have grazed the land to dirt in many places. This, and similar actions from BLM offices across the length of the line illustrate the ongoing LOSS of sagebrush habitat, and Dark Ages style BLM management that is taking hold again. There is no analysis of the severe scorched earth disturbance from the Owyhee BLM Soda Fuelbreaks, or other agency scorched earth fuelbreak and/or grazing schemes that result from non-stop political pressures on BLM to perpetuate or expand high levels of grazing use.	
2	30	11/29/17	Katie Fite, Wildlands Defense	There is no adequate analysis and mitigation for adverse impacts to slickspot peppergrass (LEPA). We are greatly concerned at the potential for the construction and other activity associated with this project to expand forage kochia, which is known to invade and smother slickspots, along with other weeds likely to do the same. Windblown tumbleweeds from project disturbance are also highly likely to choke slickspots, and other rare plant habitat and playas, including <i>Lepidium davisii</i> sites. Ad of course, none of these locations is properly identified in mapping and other information so that the full scope of the projects' impact on the site, local, and regional populations can be adequately understood. They are also likely to clog fences, and block antelope and other species passage in places. Just as with all other environmental attributes, LEPA is given minimal consideration.	Slickspot peppergrass is addressed in Section 3.8 of the SEIS. Also see the USFWS Biological Opinion/Conference Opinion including supplemental memoranda on ESA-listed species.
2	31	11/29/17	Katie Fite, Wildlands Defense	This is despite the EA acknowledging that: "Slickspot peppergrass was reinstated as a threatened species on September 16, 2016, which was subsequent to the completion of the 2013 Biological Assessment (BA). We have determined that implementation of the Proposed Action for Segments 8 and 9 of the 2017 EA "may effect", and is "likely to adversely affect" slickspot peppergrass in a manner or to an extent similar to that which was analyzed in the original 2013 BA and for which the Service provided its 2013 Conference Opinion (CO). The BLM has requested U.S. Fish and Wildlife Service (USFWS) acknowledgement of this "may effect, likely to adversely	The BLM continues to work with the USFWS to ensure that the Project complies with the ESA, in accordance with the Conference Opinion for the Gateway West Transmission Line which states the following: 2.10 Reinitiation Notice <i>This concludes formal conference on slickspot peppergrass and its proposed critical habitat. Because the "take" prohibitions detailed under section 9(a)(1) of the Act do not apply to listed plants, requirements for re-initiation of formal consultation associated with</i>

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				affect” determination for slickspot peppergrass and its proposed critical habitat for the Proposed Action and further request USFWS confirm the conclusion of the 2013 CO as formal consultation and as the USFWS’s Biological Opinion”. How have conditions of occupied LEPA habitats changed since 2013? What areas have burned in fires or suffered other damage? What does monitoring show? How many “A” sites remain, and where? What is the proximity of sites of each Habitat category to the line route? Will the line jeopardize any occupied slickspots? The minimal provisions of the EA do not comport with recovery of the species.	<i>incidental “take” as described below are not applicable to listed plants, including slickspot peppergrass.</i>
2	32	11/29/17	Katie Fite, Wildlands Defense	There are myriad adverse effects to both rare plants and animals. These include heightened fire danger and risk from the construction and operation of the line (which are not adequately assessed, minimized and mitigated) in the EIS and EA.	Effects to special status plants are discussed in Section 3.7 of the FEIS and SEIS.
2	33	11/29/17	Katie Fite, Wildlands Defense	The EIS fails to provide detailed mapping and analysis that showed the location of LEPA and its habitats to all aspects of the project development and operation. This must be rectified.	Figure E.7-2 in Appendix E of the SEIS shows where the transmission line routes cross slickspot peppergrass habitat. The BLM typically avoids identifying the exact location of listed species in a NEPA document in order to protect individuals from collection or other harm. Please see TESPL-3 and TESPL-4 for survey, protection, and monitoring requirements.
2	34	11/29/17	Katie Fite, Wildlands Defense	Pollinators are significantly threatened by increased exotic weed invasion potential. Where does the line come within 2 miles of LEPA pollinator habitat and slickspots? How will project disturbance potentially expand harvester ants, which are LEPA seed predators? These ants thrive on disturbance, and grazing disturbance is also highly likely to worsen harvester ant problems.	See the USFWS Biological Opinion and Section 3.7 in the SEIS for Project effects on slickspot peppergrass. Also see Figure E.7-2 in Appendix E of the SEIS for a map showing where the transmission line routes cross slickspot peppergrass habitat. TESPL-4 requires a buffer around all slickspot peppergrass plants, slickspot peppergrass habitat, and areas classified as occupied by slickspot peppergrass. See Section 3.8 of the SEIS for measures proposed to prevent invasive plants from spreading in the project area. Harvester ants are associated with disturbance, primarily due to the loss of shrubs (sagebrush, rabbitbrush, Atriplex, etc.). Harvester ants tend to avoid areas with taller, more structurally diverse habitat like those found in intact shrublands. It is true that harvester ants have been found to be highly effective LEPA seed

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					predators. However, they mostly forage on Sandberg's bluegrass (<i>Poa secunda</i>) seeds as they are the most abundant, readily available seed source in the area. Harvester ants and bluegrass are ruderal species and therefore co-occur frequently. In addition, harvester ants appear to avoid cheatgrass monocultures because the seeds are large and difficult to handle. Although expansion of harvester ants is possible from initial habitat disturbance, the BLM intends to restore shrubland structure to impacted habitat as outlined in Appendix K, thereby curtailing harvester ant expansion and mitigating impacts in the mid- to long-term through these restoration efforts.
2	35	11/29/17	Katie Fite, Wildlands Defense	There are serious ongoing threats to LEPA in the project area – including military training activity and fires, and very very harmful periods and manner of livestock grazing use disturbance that is chronically inflicted. This includes winter and spring grazing when soils are very moist and trampling damage is high. The cleared line path will make it much easier for livestock to trail; along the line to access and trample slickspots that previously may have received less disturbance. The EISs and this EA greatly fail to address, minimize and mitigate the serious conflicts and threats that grazing poses to native biota, and the extent to which it will hinder project rehab. Without proper assessment of the welter of grazing, livestock facility water hauling, military training activity or other threats this and other imperiled and sensitive species face, BLM can not ensure proper minimization and mitigation of project effects. There is no hard look at grazing impacts on the SRBOPA and all other areas of the Gateway affected landscape.	Cumulative effects to slickspot peppergrass are addressed in Chapter 4 of the FEIS and SEIS.
2	36	11/29/17	Katie Fite, Wildlands Defense	Throughout its supposed “analysis”, BLM falls back on the old and minimal EIS measures repeating time after time: “No additional effects would occur from the Proposed Action and no RMP amendments would be required in addition to the ones identified in the Final EIS and Final SEIS ...”.Examples 3.3.10, 11, etc.	Comment noted. The EA makes these statements when no additional effects have been identified.

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2	37	11/29/17	Katie Fite, Wildlands Defense	The EA states: "The amendment changing the VRM Class II classification to VRM Class III would change the classification of lands within 3,000 feet of an existing transmission line. This may result in up to two additional transmission lines being located along this route, which would result in additional impacts to resources managed under the MFP. The cumulative effect of the plan amendment would not differ substantially from the effect of the Project itself, particularly given that no projects other than possible future transmission lines are proposed for the area. In addition, to allow the crossing of the Oregon NHT .the amendment (SEIS-10)". What are these other transmission lines, and what are their foreseeable adverse effects? Is this related to the Cat Creek Energy Project or some other project? WHAT additional lines are in the works? This demonstrates the perils and high significance of such amendments. The Plan must be amended ONLY for this project, with no future amendments allowed. This kind of thing represents large-scale new industrialization of the area.	The SEIS does not state that two additional lines will be placed in this location, only that there would be space for two. The BLM is not aware of proposals to add lines in this area; therefore, no lines could be identified. The Cat Creek project is not far enough along to be considered a foreseeable action. The Bureau of Reclamation sent a letter to Cat Creek in March of 2017 stating "Reclamation is concerned that Cat Creek does not understand the LOPP process, current status, or a realistic timeline, especially given that little progress has been made since Reclamation notified Cat Creek of its selection as preliminary lessee by letter dated October 17, 2016." Reclamation further states: "Reclamation's October 17, 2016 letter to Cat Creek does not authorize Cat Creek to use water from Anderson Ranch Reservoir or to begin construction activities."
2	38	11/29/17	Katie Fite, Wildlands Defense	The EA utterly minimizes the adverse impacts of its amendment. "Allowing land-disturbing developments up to 330 feet from the Oregon NHT could potentially affect the ability to conform to agency policy of protecting archaeological sites; however, stipulations for managing archeological sites as required by the National Historic Preservation Act (NHPA) should minimize this possibility. Additionally, EPMS (CR-1 through CR-8) as stated in Appendix M of the Final SEIS would be aimed at reducing these impacts, and construction would occur in a manner that would avoid disturbing important historic resources. Idaho Power could be made to bury/underbore the line, and this must be fully considered as an alternative.	Comment noted. Effects to the Oregon NHT are analyzed in Section 3.1 of the SEIS and in greater detail in Appendix M to that document. Undergrounding the line is discussed in Section 2.6.3 of the FEIS. As the photos demonstrate, placing a transmission line underground requires much greater ground disturbance than constructing an aboveground line.
2	39	11/29/17	Katie Fite, Wildlands Defense	The Kuna amendment facilitates energy sprawl, with no proper mitigation – such as placing areas off limits to energy activity.	Comment noted.
2	40	11/29/17	Katie Fite, Wildlands Defense	The following does NOTHING to protect paleo resources:" "MUA-3 Utility avoidance/restricted area – three Paleontological areas (Sugar Bowl, Glens Ferry, & McGinnis Ranch) and Oregon Trail ruts (7,200 acres/22.5	Comment noted.

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				miles) to overhead and surface disturbance and underground utilities. The current Lands decision is amended to reclassify the area identified as restricted in Section 35, T. 04 S., R. 09 E. to allow the overhead lines of a 500-kV powerline right of way, while protecting the Oregon Trail ruts."	
2	41	11/29/17	Katie Fite, Wildlands Defense	BLM states: Because the proposed water supply pipeline and the Orchard Training Center projects are located within the NCA, they are subject to the terms of Enabling Act that created the NCA. The Enabling Act requires that ground disturbing projects within the NCA must include enhancement of resource conditions.	Comment noted.
2	42	11/29/17	Katie Fite, Wildlands Defense	BLM has not effectively shown that its Gateway FEIS and EA actions "enhance natural resource conditions". There is not a current adequate resource baseline, and BLM ignored any consideration of impacts to individual sensitive animal species, the EA basically treats LEPA as disposable including within the NCA, and many other important natural components plus historical and cultural values of the SRBOPA will be ruined or marred by this action.	H.R. 244 modified the boundary of the NCA to exclude the ROW for Segments 8 and 9. The Project no longer directly affects NCA lands; therefore, the enhancement requirements in the enabling legislation for the NCA no longer apply within the approved ROW.
2	43	11/29/17	Katie Fite, Wildlands Defense	While the EA admits adverse cumulative effects to Historic Trails, it never reveals that quality of the Trail in the areas to be disturbed/marred/destroyed by Gateway, and if other comparable sites exist in the local or regional setting for these trails.	Trail assessments, including photos, photo simulations, and site conditions and use, are discussed in considerable detail in Appendix M to the SEIS.
2	44	11/29/17	Katie Fite, Wildlands Defense	Statements like the following give no indication of the magnitude, location, and irreplaceable value of the resources impacted: "The cumulative impact of past and present land uses on native vegetation is considerable. While the impact of the Project would be minor compared to the much larger past events, when taken together with various proposed developments as specified in Section 4.2 of the Final SEIS, and when added to the impacts from past and present land use changes, the overall cumulative impact would be substantial.	Comment noted. The statement is unambiguous; cumulative effects would be substantial.

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2	45	11/29/17	Katie Fite, Wildlands Defense	This statement shows that BLM would allow Idaho Power to wantonly destroy LEPA habitat and/or occupied sickspots, pollinator habitat, etc. and treats the plant like a weed: "Slickspot peppergrass habitat would be surveyed and avoided to the extent practicable for Gateway West and for other projects with a federal nexus".	The comment is incorrect; this measure does not in any way show that the BLM intends to "wantonly destroy LEPA habitat." On the contrary, it demonstrates the BLM's intent to protect LEPA. Congress and the administration have passed a law that approved building the transmission line through the area. The BLM does not have the authority to overrule Congress. This measure is designed to protect all slickspot peppergrass plants and spots, although there may be unforeseen situations where complete avoidance is not possible.
2	46	11/29/17	Katie Fite, Wildlands Defense	There is no certainty with this loose wording "to the extent practicable" here at all, or of adequate minimization and mitigation measures being applied. This is typical throughout the project lists of BMPs, SOPs, etc.	See the response to the previous comment.
2	47	11/29/17	Katie Fite, Wildlands Defense	The railroad comments about shocks, and equipment failures are a serious public health and safety issue that BLM blows off –punting to the proponents rather than requiring mandatory safety measures for public health and safety in its ROD. (See RR Comments).	The BLM's responsibility is to decide whether or not to authorize a ROW across BLM-managed land. The Proponents are responsible for working with the railroad, which owns the railway ROW, to meet their requirements and to provide for public safety.
2	48	11/29/17	Katie Fite, Wildlands Defense	F-18 BLM Comment response shows the remaining high degree of uncertainty: "It is correct that the lines on these maps do not show the exact location of the proposed lines. As stated in both the EIS and the SEIS, the lines are based on indicative design. The final locations will not be known until a route is selected, surveyed, and designed. The intent is to show a reasonable representation of the location". This admits the public never had a chance to comment on BLM's abrupt change at salmon Falls Creek WSR that significantly harms the Salmon Falls River Canyon area. It is patently false to claim the project is compatible with a recreational river WSR status. The ugly crackling line with 190 ft tall towers is the dead opposite of what is to be expected in a recreational setting, and is INDUSTRIAL instead.	As the comment states, the exact location will not be known until final design; the reasons for this are disclosed in the FEIS and SEIS. The public was given the opportunity to comment on the change in the route in the Salmon Falls Creek area between DEIS and FEIS. The BLM considered public comments on the FEIS (including your comments) prior to preparing the 2013 ROD, which made no decision on that route. An SEIS was prepared that analyzed that crossing and the public had opportunities to comment on that analysis. The project record shows that the BLM received and responded to your comments on this several times.
2	49	11/29/17	Katie Fite, Wildlands Defense	BLM at F-21 states "Revising routes between draft and final in response to information developed in preparing the Draft EIS, as well as in response to comments received on the draft, is a normal part of the NEPA process. The change in the route was disclosed to the public in the final	Revising routes between draft and final in response to information developed in preparing the Draft EIS, as well as in response to comments received on the draft, is a normal part of the NEPA process. The change in the route was disclosed to the public in the final SEIS.

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				SEIS. The BLM considered public comments on the FSEIS in the ROD. Changing a route between draft and final was not in any way illegal.	The BLM considered public comments on the SEIS in the ROD. It is not illegal to change a route between draft and final.
2	50	11/29/17	Katie Fite, Wildlands Defense	As PFA stated in comments: "The Proponents originally designed the 162.2 mile long route as the Proposed Route in Segment 9 to follow existing utility corridors and avoid the SRBOP and other protected areas where feasible." (SEIS) There's still no reasonable explanation by proponents or BLM for the split line through Idaho".	The reason for the two lines following separate paths is explained in detail in the original FEIS, which the SEIS supplements. One of the Proponents' objectives is to improve the reliability of the grid by building transmission lines in widely separated areas, thus reducing the chance that a single event, such as a wildfire, could destroy both lines. The BLM considers this to be a reasonable explanation.
2	51	11/29/17	Katie Fite, Wildlands Defense	Comment F-16 response, BLM admits that costs fluctuate over time. This EA must disclose the current costs vs. benefits, and the CHANGED energy and grid conditions across the West, as well as a glut of wind and other energy.	Comment noted. The SEIS uses updated costs. The BLM considers these to be reasonable approximations for this analysis. The actual costs during construction, which is likely years away, are unknown. Note that the routes approved in 2013 have not yet been built.
2	52	11/29/17	Katie Fite, Wildlands Defense	In Comments at F-71 NPS stated: "The NPS appreciates the listing of federally protected areas and scenic quality rating units. Please provide a clear narrative of impacts to the Oregon National Historic Trail, and also tables that identify specific crossings and related impacts to the NHT".	Please see Section 3.1 and Appendix M to the SEIS.
2	53	11/29/17	Katie Fite, Wildlands Defense	This has not been done for Trails, slickspot peppergrass, or any other affected value of public lands harmed by Gateway. It must be done so that the proper mitigation can be applied, and/or impacts avoided to the maximum degree possible. NPS submitted substantial comments on EIS deficiencies related to Trails, and the EIS fails to rectify this.	As required by the SEIS (see Appendix M), detailed cultural resource/historic properties and plant surveys are required prior to construction. Final mitigation requirements will be based on these surveys and other information. Also see the Programmatic Agreement on historic properties in Appendix E to the 2013 ROD.
2	54	11/29/17	Katie Fite, Wildlands Defense	A Supplemental EIS must be prepared for public review and comment before finalization of the Plan Amendments. The FEIS failed to resolve this uncertainty. The EIS barely scratched the surface in revealing the array of harmful impacts this project and several very harmful segments will have to the native vegetation, rare terrestrial and aquatic species, watersheds, viewsheds and important historical and cultural values and recreational and other human uses across this landscape. Thus, the Plans cannot appropriately be amended.	Comment noted. A SEIS was prepared for the Project. The EA tiers to this analysis.

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2	55	11/29/17	Katie Fite, Wildlands Defense	As referenced in our EA Scoping comments, many crucial elements of the environment were not adequately assessed in the FEIS process, including but not limited to issues and concerns in the Final Supplemental EIS for Segments 8 and 9 of the Project including :	Comment noted. The BLM believes the FEIS and SEIS did adequately analyze environmental effects.
2	56	11/29/17	Katie Fite, Wildlands Defense	Effects to the objects and values for which the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA) was designated. Both the FEIS and the EA provide minimal and superficial, if any, analysis of the site-specific and other direct, indirect and cumulative effects on SRBOPA values- including effects on nesting, wintering, foraging and other use by raptors and other sensitive animals species. Baseline inventories are out-dated, and minimal. The project's impacts on the status of local and regional populations of sensitive and other biota are not adequately addressed.	The authorized ROWs are no longer within the NCA . H.R. 244 removed the statutory ROW for Segments 8 and 9 from the NCA by redefining the NCA boundary.
2	57	11/29/17	Katie Fite, Wildlands Defense	Land use conflicts and inconsistency with land use plans; Re: Land use conflicts ---The EIS and EA greatly fail to address conflicts with private land. On both private and public land, the final path is not provided in sufficient detail so that the site-specific effects on the environment can be adequately described and quantified and/or described. Plus the line may ultimately be shifted into areas that deviate from mapped sites. This was done post-decisionally with the eastern Segments of Gateway. Idaho Power had failed to conduct adequately geological and other studies, and a portion of the line had to be moved due to geological instability. This demonstrates why much more intensive and extensive surveys are required for many elements of environmental concern.	The analysis addresses effects to both private and public, although the BLM only makes decisions for portions of the Project on federal land that it administers.
2	58	11/29/17	Katie Fite, Wildlands Defense	The EA information dealing with what has and hasn't yet been amended in LUPs is a morass of confusion. Both the amendments that have already been made as well as those the EA claims to cover are glossed over. No one amendment is adequately examined for impacts. The cumulative effects of all the amendments on values affected/harmed are also not adequately assessed.	Comment noted. The BLM believes that these effects have been adequately addressed.

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2	59	11/29/17	Katie Fite, Wildlands Defense	<p>Effects of the project on local and regional socioeconomic conditions;</p> <p>No hard look has been taken at the negative and harmful socioeconomic impacts of this Project.</p> <p>Effects on wildlife habitat, plants, and animals, including threatened, endangered, and sensitive species;</p> <p>Effects to visual resources and existing view-sheds;</p> <p>Effects to historic and cultural resources;</p> <p>Effects to Indian trust assets;</p> <p>Opportunities to apply mitigation strategies for on-site, regional, and compensatory mitigation; and</p> <p>Siting on private lands versus public</p>	<p>Comment noted. These issues have been addressed in considerable detail in Chapters 3 and 4 of the SEIS. Also see the appendices attached to the FEIS and SEIS.</p>
2	60	11/29/17	Katie Fite, Wildlands Defense	<p>There are a welter of indirect and cumulative impacts that are not adequately examined in the EA.</p> <p>This includes the adverse direct, indirect and cumulative effects of the B2H line. See FEIS and ROD info at https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=99006</p>	<p>As stated in Section 1.3 of the EA: "The analysis in this EA addresses only the portions of the Project related to Segments 8 and 9. Tiering (40 CFR 1508.28) uses the analysis in broader EIS documents to narrow the range of alternatives and concentrate on the issues not already addressed. This EA incorporates by reference and tiers to the analysis found in the 2013 Final EIS and 2016 Final SEIS regarding Project-wide impacts. The EAs by reference the 2017 Modification Act in its entirety. The BLM will, through a Decision Record supported by this EA, complete the necessary land use plan amendments needed to accommodate ROW segments defined by Alternative 1 in the Final SEIS that are beyond the extent of the statutory ROW created by the Modification Act."</p>
2	61	11/29/17	Katie Fite, Wildlands Defense	<p>The EA fails to adequately describe current and foreseeable changes to environmental laws and regulations under Trump/Zinke including the gutting of the sage-grouse plans and the land use plan amendments that accompanied them.</p> <p>Existing laws, regulations, and BLM policies; Plans, programs and policies of other Federal, State, and local governments, and Indian tribe; national energy policy and plans; public welfare and safety.</p>	<p>Agencies must perform environmental reviews based on current policies, regulations, and laws.</p>

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2	62	11/29/17	Katie Fite, Wildlands Defense	There has still never been an honest accounting of the cost of this project to the public, to residents, to ratepayers. This includes both direct and indirect costs, losses over time as the dinosaur line becomes more and more out-moded, as well as losses of scenic viewsheds and trail settings, wildlife habitats and populations, recreational uses and enjoyment, property values, open space public lands that will now be made ugly, etc.	Effects on resources are disclosed in Chapters 3 and 4 of the FEIS and SEIS. Estimating the cost to ratepayers over the life of the Project is beyond the scope of this analysis. The purpose of this analysis, as stated in Chapter 1 of the FEIS, is to respond to an application from the Proponents for a ROW grant across public lands.
2	63	11/29/17	Katie Fite, Wildlands Defense	<p>The degree to which the project will effect greenhouse gas emissions, and the energy need basis for the project have never been adequately assessed under any EIS alternatives. This is certainly not dealt with adequately in the rubberstamp EA. The project further entrenches a harmful carbon footprint, and is an incredibly wasteful use of land and other natural resources. The immense amounts of steel and other materials including all material used in wires, must be fully assessed for their carbon and other pollution footprints. The project has significant global warming and climate change impacts that must be fully assessed. See http://siteresources.worldbank.org/EXTENERGY2/Resources/4114199-1292347235985/GHGImpactofTDFullReport.pdf .</p> <p>This includes discussion of the following applicable to this project: Embodied Emissions in Construction Materials, Energy Use in Construction, Land clearing, corona discharge, SF6 and other non-generation emissions. Plus Idaho Power must provide much more specificity on generation emissions instead of referring vaguely to wind power of which there is a growing glut across the region. All of the emissions associated with the generation of the energy the line will be used to transport, the Gateway and inter-connected B2H project materials production and transportation, fuel involved in construction and operation, loss of vegetation and microbiotic crusts and their ability to absorb carbon dioxide and other climate change gases, and loss of the lands' natural resilience and its ability to buffer the adverse effects of climate change naturally, and</p>	Greenhouse gas emissions are discussed in Section 3.20 of the SEIS.

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				any other emissions and/or losses of climate change gas absorption capability, and loss or impairment of natural processes that serve to sequester carbon or otherwise moderate climate change, must be fully assessed in a SEIS. All greenhouse gases generated and emissions must be accounted for, and assessed in a SEIS, prior to adopting the Proposed Land Use Plan amendments. See for example, sodium hexafluoride https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions .	
2	64	11/29/17	Katie Fite, Wildlands Defense	The loss of the ability of the sagebrush systems to buffer climate change or to sequester carbon where vegetation is cleared or herbicided must be assessed. We are increasingly encountering herbicide dead zones in the vicinity of transmission lines in Idaho. BLM must consider the loss of natural carbon storage potential from the large-scale construction of roads, assembly sites/yards, constant de-vegetation in various forms of the powerline corridor, chronic toxic herbicides use and drift, chronic and likely expanded livestock grazing in cleared areas, etc. Given all the many disturbances caused by this project, and the inadequacy of EIS and EA weed and other risk analyses and mitigation, and failure to closely examine effects of livestock grazing - the further spread of annual flammable invasive cheatgrass, medusahead , noxious weed rush skeletonweed, and others is highly likely. This will reduce the ability of the native vegetation systems to absorb and store CO2. Grazing also reduces soil carbon storage, and greatly aggravates weed infestation and weed site dominance risk. Mack and Thompson 1982, Belsky and Gelbard 2000, Chuong et al. 2015. This poses a grave threat to sensitive sagebrush biota from slickspot peppergrass to migratory birds like sage sparrow, Brewer’s sparrow, sage thrasher and of course sage-grouse and pygmy rabbit.	The BLM intends to mitigate Project impacts to vegetation communities on lands formerly within the NCA as well as areas classified as sage-grouse habitat. Restoration of shrubland structure is expected to mitigate impacts in the mid- to long-term. This should lead to increased ability of the area to sequester carbon compared to current conditions.
2	65	11/29/17	Katie Fite, Wildlands Defense	The Proposed action includes a major segmented piece-mealed transmission line, road grading, clearing and road network expansion. It involves miles of new roads and “improved’ roads, plus all manner of additional construction phase disturbance blading, blasting and other	Comment noted. These components of the Project are presented in the SEIS and analyzed in Chapter 3 and associated appendices. Cumulative effects are analyzed in Chapter 4.

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				activity. The route at places diverges from existing corridors, disrupts wildlife habitats and aquatic species watersheds, and substantially mars scenic viewsheds and historic trails and cultural sites, the Snake River Birds of Prey National Conservation Area, the Salmon Falls Creek area WSR other wild lands.	
2	66	11/29/17	Katie Fite, Wildlands Defense	This line will provide a lethal flight hazard all along its length for migratory songbirds and other avian species, rare bats, and native insects. Migration routes have not been studied. The FEIS fails to require that necessary protections are put in place for volant species – for example, every line length between towers must be marked with avian flight diverters. There is no estimate of how many thousands – or more – birds this line may kill during migration periods, or throughout each year. Any facility lighting must be shrouded to minimize effects on night migrants. There appear to be no studies of bird migration patterns and predicted mortality and other harms that have been done for this mammoth project.	The SEIS discloses that areas spanned by transmission lines may have indirect effects to migratory birds and habitats, but our ability to quantify these impacts and develop meaningful mitigation, much less an estimate of how many birds may be killed or injured, is limited. The Migratory Bird Plan developed for the Project presents a reasonable analysis and appropriate conclusions from the available research and fully meets the intent of the MBTA.
2	67	11/29/17	Katie Fite, Wildlands Defense	The line and welter of ancillary facilities provide all manner of elevated avian predator perches and potential nesting sites for sage-grouse nest predators and predators of other avian species as well as predators of rare small mammals like the pygmy rabbit.	See the response to the previous comment.
2	68	11/29/17	Katie Fite, Wildlands Defense	The lack of study of avian migration corridors has long been brought to Idaho Power's attention. Fite (now with WLD) raised this issue throughout the segmented Gateway process. It was ignored there (throughout Gateway East and this has continued in the FEIS for Gateway West). Now this continues in the EA and the connected B2H FEIS. This is a serious public concern. BLM will be violating NEPA, FLPMA, NFMA and the MBTA and BGEPA unless a serious and hard look at the real world effects to these species is taken.	The SEIS discloses that areas spanned by transmission lines may have indirect effects to migratory birds and habitats, but our ability to quantify these impacts and develop meaningful mitigation, much less an estimate of how many birds may be killed or injured, is limited. The Migratory Bird Plan developed for the Project presents a reasonable analysis and appropriate conclusions from the available research and fully meets the intent of the MBTA.
2	69	11/29/17	Katie Fite, Wildlands Defense	This project will result in extensive "take" of migratory birds (several of which are BLM, USFS, or state sensitive species/species of special concern), and golden eagles, as well as potentially bald eagles, too. Bald eagle populations are in decline across this region already. The EIS lacks any valid analysis of the status of local and	Please refer to the USFWS Biological Opinion for a discussion of take. In addition, the SEIS discloses that areas spanned by transmission lines may have indirect effects to migratory birds and habitats, but our ability to quantify these impacts and develop meaningful mitigation, much less an estimate of how many birds

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				regional populations of all avian, bat and other species threatened by collisions with this line, ancillary facilities, and the development sprawl that will take place.	may be killed or injured, is limited. The Migratory Bird Plan developed for the Project presents a reasonable analysis and appropriate conclusions from the available research and fully meets the intent of the MBTA.
2	70	11/29/17	Katie Fite, Wildlands Defense	Volant species are also greatly threatened, and populations being reduced at unstudied levels, by the profusion of wind farms across the region – both in OR and ID. The combined B2H and Gateway lines are also likely use wind power from wind farms proliferating in Wyoming and other areas along the route (see for example Cat Creek Cargulis comments – and note this project will take a serious toll on wildlife, scenic, recreational and other values if it is built). Yet in the now-outdated wind “integration” info (most recent we can find on Idaho Power’s website), the analysis largely forsakes Wyoming. See: https://www.idahopower.com/pdfs/AboutUs/PlanningForFuture/irp/2013/windIntegrationStudy.pdf The avian and other rare, sensitive and imperiled species mortality from this wind energy proliferation must also be considered. This is ignored in the cumulative effects analysis. It is necessary to understand migration routes, use patterns/frequent flight paths in the local area, and the current status of populations so impacts can be assessed and effectively minimized and/or mitigated.	An analysis of the effects of wind turbines on volant species is beyond the scope of this analysis. The purpose of this analysis, as stated in Chapter 1 of the FEIS, is to respond to an application from the proponents for a ROW grant across public lands for a transmission line. Also, please see the discussion on the Cat Creek project in our response to your comment above.
2	71	11/29/17	Katie Fite, Wildlands Defense	BLM has failed to properly study and mitigate all of these adverse direct, indirect and cumulative effects on migratory birds, bats and other volant species and their local and regional habitats and populations. It has failed to consider a suitable range of alternatives to protect these species. Plan Amendments cannot be considered until this is done.	Comment noted. The BLM believes that these effects have been adequately addressed and will be sufficiently mitigated.
2	72	11/29/17	Katie Fite, Wildlands Defense	Idaho and Oregon sage-grouse, pygmy rabbit and other wildlife have recently experienced a large number of large fires, exacerbated by extreme weather conditions likely related to climate change. In Idaho, the Soda Fire which we discussed in previous Protests, Appeal, etc. dealt a huge blow to the potential for viable sage-grouse populations in much of the landscape in Owyhee County.	Comment noted. The BLM agrees that large fires are a significant problem.

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2	73	11/29/17	Katie Fite, Wildlands Defense	There have been numerous line-caused raptor electrocution fires in Idaho and Oregon in recent years. There have been a large series of fires in eastern Oregon in recent years. Long Draw and Holloway to the south, the immense Mustang and other fires – over 400,000 acres including crucial sage-grouse habitats. These fires occur amid a sagebrush landscape – especially in the Baker and Vale lands – that have been torn up by livestock forage seedings and exotic plantings during the heyday of the Vale Project, and these “seedings”, and BLM seeding even more harmful exotic species continues up to the present – using post- fire “rehab” as an excuse. The sagebrush sea of Oregon, and adjacent Idaho has become largely a mottled crested wheatgrass and weed wasteland in many places due to fires and human post-fire mis-management. See Arkle et al. 2014, see Soda Fire scientists letter, describing the failure of BLM rehab (much of which will be the very same methods applied with B2H). So not only are the fires, including large numbers that are human-caused like the Soda Fire, and many of which are climate-driven, consuming vast areas of habitats for TES and other important species, the agency “rehab” measures used are further harming the native habitat components that remain.	Comment noted. Raptor electrocutions are an issue with distribution lines rather than 500-kV transmission lines.
2	74	11/29/17	Katie Fite, Wildlands Defense	While BLM claims to apply “Integrated” weed management, the agency steadfastly has failed to address causes of weeds. Thus, “integrated” management is not applied, it is merely spraying/treating in various ways – while chronic grazing disturbance continues non-stop, and large-scale new development like this massive new B2H weed corridor a host of ancillary and linked disturbance continues to tear apart the landscape.	Invasive plants and measures proposed to prevent their spread are discussed in Section 3.8 of the FEIS and SEIS.
2	75	11/29/17	Katie Fite, Wildlands Defense	All known sage-grouse populations are in long-term decline. The GRSG population has already been wiped out along many lengths of the project, and now Gateway and B2H threaten the local populations that remain. Sage-grouse a landscape bird, is suffering from habitat “death by a thousand cuts”. To add in immense new powerlines threatens to further imperil GRSG and numerous other species, and may be the tipping point from which	The Project includes a very detailed, science-based analysis of sage-grouse and their habitat, and includes measures to compensate for habitat loss. See the Sage-grouse Impact Analysis (Appendix I to the FEIS).

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				populations cannot recover. BLM has failed to conduct the necessary habitat and population-level analyses required to apply effective minimization and mitigation measures – including mitigation by avoidance (not building the line).	
2	76	11/29/17	Katie Fite, Wildlands Defense	WLD provided BLM with extensive information about the high risk of weeds, and the need to study this, the long-term ineffectiveness of BLM rehab actions, the serious adverse effects of the Soda and other recent Fires, the lack of effective rehab, and a wealth of other information about the unprecedented stresses on the sagebrush and forested ecosystem in the local and regional area that will suffer from Gateway and B2H. Understanding this range of stresses is crucial for ensuring effectiveness of minimization and mitigation promises made in the EISs.	Comment noted.
2	77	11/29/17	Katie Fite, Wildlands Defense	Climate change will result in hotter temperatures that will also promote cheatgrass, medusahead and other flammable weeds. Ubiquitous livestock grazing impacts across public land and other segments of the route promote these weeds, too. See Belsky and Gelbard 2000, Reisner Dissertation 2010, Reisner et al. 2013. See Attached documents and excerpts. Spring grazing and trampling dries out sites earlier. All of this combined – climate change, hotter temps and less precip failing as snow and earlier snowmelt, increased flammable annual grasses, increased drought and/or extreme weather events – and the chronic extensive disturbance – will exacerbate fire risk.	Comment noted.
2	78	11/29/17	Katie Fite, Wildlands Defense	BLM ignores requiring re-vegetation with local native ecotypes. Forage kochia is a weed that escapes and invades native vegetation communities to their detriment. Using crested wheatgrass should not be allowed. Crested wheat has been shown to move invade areas it has not been seeded. See Stoller (long-term INL studies). Yet these are the species likely to be used across much of the landscape torn up by the project.	Comment noted.
2	79	11/29/17	Katie Fite, Wildlands Defense	In fact, mitigation for this project should include large-scale removal of crested wheatgrass seedings in and near sage-grouse and other rare species habitats. CWG also is now known to spread and invade other areas– see INEL site long-term veg monitoring reports. Moreover, fire after	Comment noted.

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				fire after fire has burned right through the cwg seedings in Vale BLM lands, in the Jarbidge, areas all around the Snake River Plain – Shoshone, Idaho Falls BLM, Pocatello BLM, etc. Despite BLM Range staff claims to the contrary, cwg is a fire hazard.	
2	80	11/29/17	Katie Fite, Wildlands Defense	<p>The line will emit electromagnetic radiation, which is harmful to humans and may also have significant effects on wildlife, domestic animals and other biota. Animals may sense the radiation and avoid it, and/or avoid the crackling/sizzling noise that is audible even to a human ear.</p> <p>IPC has long known about public and biologist’s concerns about electromagnetic radiation. See Gateway Transmission Line EIS documents, for example:</p> <p>http://www.wy.blm.gov/nepa/cfodocs/gateway_west/sgrouse/DEIS-ReferenceMaterial.pdf</p>	Electromagnetic effects are presented in Section 3.21. As the analysis shows, the electromagnetic effects fall to background levels near the edges of the ROW.
2	81	11/29/17	Katie Fite, Wildlands Defense	<p>Gateway 3-11-63 states: Greater Sage-Grouse (Candidate; MIS; Forest Service Sensitive; BLM Sensitive)</p> <p>The USFWS’s 12-Month Findings for Petitions to List the Greater Sage-Grouse as Threatened or Endangered (2010e) listed the following as potential impacts to the greater sage-grouse resulting from powerlines: 1) collisions/electrocutions, 2) consolidation of predatory birds along powerlines, 3) lower recruitment rates near lines, 4) habitat fragmentation, 5) degradation of habitat due to spread of invasive plant species, 6) impacts resulting from the line’s electromagnetic fields, and 7) direct loss of habitat. Additional impacts related to construction and operations of the line, as well as associated infrastructure, could include short-term disturbances due to construction and long-term disturbances during operations, increased road access allowing poaching in previously inaccessible locations, and changes to habitat structure resulting from altered fire regimes. Note that many of the general impacts that could occur to this species are addressed in the black-footed ferret section as “impacts that would occur to all</p>	The Project includes a very detailed, science-based analysis of sage-grouse and their habitat, and includes measures to compensate for habitat loss. See the Sage-grouse Impact Analysis (Appendix I to the FEIS).

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				species addressed" (e.g., the effects of fire, poaching, and invasive weeds).	
2	82	11/29/17	Katie Fite, Wildlands Defense	Despite all of the serious adverse impacts of this line, only limited and deficient mitigation has been developed. The latest analysis must rectify this.	Appendix M of the SEIS includes nearly 50 pages of environmental protection measures. These are referenced throughout the SEIS. Individual measures are evaluated in Chapter 3 of the FEIS and the SEIS. In addition, see Appendix K, the BLM's mitigation framework for impacts within the NCA. In addition, the sage-grouse habitat equivalency analysis addresses Project-effects on sage-grouse and proposes mitigation for direct and indirect effects. See Appendix J of the 2013 FEIS. In addition, the BLM will consider mitigation requirements based on direction in the applicable legislation, BLM regulations, and land management plans.
3	1	12/2/17	Julie Randall, Prairie Falcon Audubon	Prairie Falcon Audubon (PFA) is the south-central Idaho chapter of the National Audubon Society, whose mission it is "to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity" In view of this, PFA has undertaken the review and survey of land use practices on public lands including the projects such as Gateway Transmission Line project. We have commented throughout the entire process in hopes the Bureau of Land Management (BLM) would do the right thing and protect the areas right along Salmon Falls Creek for future wildlife and scenic values in the Twin Falls/Burley BLM Field Office.	Your comments on this issue and our responses are part of the project record. The crossing of Salmon Falls Creek would be consistent with the designation as a Recreation River. Note that this section of the river already includes a road, a bridge, and a 34.5-kV electric line (see Appendix F of the SEIS). In addition, this area is identified as a utility corridor in the 2015 Jarbidge Plan.
3	2	12/2/17	Julie Randall, Prairie Falcon Audubon	Attached is our comments on the " Proposed Gateway West Transmission Line Project Draft Supplemental EIS" dated June 2, 2016. We are resubmitting our attached comments (see attachment 2) because the important issues we brought up were ignored. These include some but not all the important issues PFA raised:	The June 2, 2016 letter (labeled EA-12 in our scoping comment table) was reviewed during the scoping process. These comments and the BLM's response are repeated below.
3	3	12/2/17	Julie Randall, Prairie	Amending without public knowledge, input, or regard, the Salmon Falls Creek Area of Critical Environmental Concern (ACEC) in Burley Field Office (FO) This is still a illegal move by the Burley FO's management and the	The public was given the opportunity to comment on the amendment for Salmon Falls Creek. The BLM considered public comments on the FEIS (including your comments) prior to preparing the 2013 ROD, which

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			Falcon Audubon	proponents of this project. See attachment for full information.	made no decision on that route or the associated plan amendments. A SEIS was prepared which analyzed that crossing and the public had opportunities to comment on that analysis. The project record shows that the BLM received and responded to your comments on this during the SEIS process.
3	4	12/2/17	Julie Randall, Prairie Falcon Audubon	If the hazy and confusing project maps are correct, there is no need to be close to the Salmon Falls Creek Canyon at any point except possibly at the canyon crossing at Lily Grade.	Comment noted
3	5	12/2/17	Julie Randall, Prairie Falcon Audubon	The Construction of the transmission line across Hagerman Valley would be detrimental to waterfowl and other migrating birds, including the Trumpeter Swan. See attachment for more information. (If the map is correct, this appears not to be an issue anymore. The EA's proposed map doesn't show the split line near the Hagerman Wildlife Management Area).	As discussed in the SEIS, the proposed line for Segment 8 was moved to the north of the existing transmission line in the Hagerman area. The route for Segment 9 is approximately 8 miles southwest of the Monument. This is clearly shown in Figure A-2 in Appendix A to the SEIS.
3	6	12/2/17	Julie Randall, Prairie Falcon Audubon	The need for segments 8 and 9. There is still no explanation by proponents or BLM for the split line through Idaho.	The reason for the two lines following separate paths is explained in detail in the original FEIS, which the SEIS supplements. One of the Proponents' objectives is to improve the reliability of the grid by building transmission lines in widely separated areas, thus reducing the chance that a single event, such as a wildfire, could destroy both lines. Another objective is to serve their growing customer base.
3 (EA-12)	1	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	The fact that a large number of BLM RMPs across the project area have to be amended to accommodate Gateway is a red light for PFA. As we have stated before, these amendments do nothing to protect or enhance. They allow the of sacrifice important, irreplaceable, and sensitive areas; including important wildlife habitat and visual resources, etc., by reducing or removing protective restrictions to allow the project. Project proponents are aware of this too. "The amendment(s) allowing a new Right Of Way(ROW) outside the existing corridors could result in cumulative impacts from future development, such as additional	The SEIS and ROD recognize that there would be adverse impacts due to this Project. The BLM must balance the need to protect habitat with other requirements, such as the need to upgrade the electrical grid.

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				impacts on visual, wildlife, plant, cultural, and vegetation resources” Final Environmental Impact Statement (FEIS) “In some cases, large areas of public lands would be reclassified, possibly allowing for additional projects without additional plan amendments. These impacts to land use planning goal would be considerable, particularly when taken together with other transmission lines request similar consideration, which if granted along the same route would create a large utility corridor.” (SEIS)	
3 (EA-12)	2	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>We believe amending RMPs for segments 8 & 9 will set a precedent for projects in the future. The very thing the older, more thoughtful, and protective RMPs protect.</p> <p>“If the amendments associated with the Proposed Route is approved, other transmission lines proposed for this general area could choose to follow this same route; however, any additional transmission lines will go through the amendment process for this RMP direction because the amendment only applies to the proposed Project.” (FEIS)</p> <p>The proponents objectives “which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs” FEIS Section 1.3, can be done within the confines of existing energy corridors to increase efficiency and reliability. With the Exception of wind energy which is essentially costly and if sited in the wrong area, deadly to wildlife. As referenced “In a Rational Look at Energy” by Kimball Rasmussen, President and CEO of Deseret Power.</p> <p>”The Proponents originally designed the the 162.2 mile long route as the Proposed Route in Segment 9 to follow existing utility corridors and avoid the SRBOP and other protected areas where feasible.” (FEIS)</p>	<p>Resource management plans are meant to be flexible. The planning rules anticipate that conditions and public needs change over time. Therefore, the planning regulations provide for amending plans as conditions and public needs change. The SEIS considered the direct, indirect, and cumulative impacts from the land use plan amendments.</p> <p>Alternative 1 follows existing transmission lines where feasible. However, following existing transmission lines or utility corridors is not without impacts. The analysis in the FEIS and SEIS considered these impacts.</p> <p>The Project objectives include creating a more reliable grid, which requires spacing lines out in such a manner that an adverse event, such as a fire, would not shut down power transmission across the area.</p>
3 (EA-12)	3	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	Maps of the project are vague and confusing. These are only general maps that don't show exactly where the lines within segments 8 and 9 will be sited. In talking to BLM representatives and others, we are not alone in this.	It is correct that the lines on these maps do not show the exact location of the proposed lines. As stated in both the FEIS and the SEIS, the lines are based on indicative design. The final locations will not be known until a route is selected, surveyed, and designed. The

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					<p>intent is to show a reasonable representation of the location.</p> <p>Detailed maps and photo overlays at a scale that shows individual buildings have been provided on the Project web site, and printed maps were provided at numerous public meetings throughout the Project, including the routes considered in this EA.</p>
3 (EA-12)	4	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Construction of this transmission line across Hagerman Valley would be detrimental to large numbers of waterfowl and other migrating birds, including the Trumpeter Swan (BLM: Regional/State imperiled, Type 3) using this flyway, the Hagerman Wildlife Refuge, the Snake River, as well as the surrounding valley.</p> <p>This is a unique area because of the large bodies of water that don't freeze during the winter months thus making it very attractive to waterfowl and other migratory birds. PFA members enjoy and make extensive use of the Hagerman WMA because it provides a unique opportunity to view the many and varied bird species that frequent the area including Bald Eagles, Trumpeter and Tundra Swans, and numerous species of other waterfowl, not only during the winter, but throughout the entire year. PFA members as well as many others utilize the WMA for birding, hiking, study, and other recreational and aesthetic pursuits.</p> <p>PFA has taken an active interest in the WMA. As part of the nationwide Christmas Bird Count program, our chapter has conducted a bird census at the Hagerman WMA for over 40 years (see Appendix A).</p> <p>Fifteen years ago, the Hagerman WMA was designated as an Important Bird Area (IBA) by the Idaho Department of Fish and Game and the National Audubon Society. http://iba.audubon.org/iba/viewSiteProfile.do?siteId=558&navSite=state</p>	<p>The BLM recognizes the importance of the area. Impacts to waterfowl and other birds in Hagerman Valley are disclosed in Section 3.10 of the FEIS and SEIS. Effects to listed species are also disclosed in the USFWS Biological Opinion.</p>
3 (EA-12)	5	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>In addition, the WMA is part of the Idaho Birding Trail system. http://fishandgame.idaho.gov/ifwis/ibt/site.aspx?id=SW36</p> <p>Thousands of waterfowl are injured and killed each year throughout the United States because of collisions with transmission lines. This is well documented. Even the</p>	<p>Bird collisions are addressed in Section 3.10 of the FEIS and SEIS.</p>

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				energy industry's own literature states that these lines need to be sited away from waterfowl flyways such as the one found in the Hagerman Valley. The Hagerman Valley also is a prominent part of the popular "Thousand Springs Byway" which has 11 priority resource sites, five of which are located in in this valley. Another mega transmission line would be a detriment to important scenic and recreational values found here.	
3 (EA-12)	6	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	FLPMA (P.L. 94-579, Section 102(a)) states that it is the policy of the United States that: (8) "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values."(SEIS). BLM's RMPs are documents written to uphold these protections for the public trust.	All BLM decisions on this and other projects must be consistent with applicable laws, regulations, and land use plans, as amended.
3 (EA-12)	7	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	PFA believes the changes made to Bureau of Land Management (BLM) Field Offices' Resource management Plan (RMP) amendments as stated in the SEIS in general and in particular, amendments to the Cassia RMP, Twin Falls Management Framework Plan (MFP), and the Jarbidge RMP are unwarranted, detrimental, and undermine the public trust. Importantly, instead of working within the confines set by the BLM F.O.s' RMPs, for the protection of invaluable natural resources for the public good; Proponents seek to undermine it.	Comment noted. Resource management plans are meant to be flexible. The planning rules anticipate that conditions and public needs change over time. Therefore, the planning regulations provide for amending plans as conditions and public needs change. The SEIS considered the direct, indirect, and cumulative impacts from the land use plan amendments.
3 (EA-12)	8	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	The SEIS states, "As with FEIS Proposed 9, the Segment 9 Revised Proposed Route would cross approximately 2.7 miles of the Salmon Falls Creek ACEC (Table 3.17-17). Note: Areas of Critical Environmental Concern (ACECs). These are areas the BLM identifies as part of the RMP in order to protect a variety of sensitive resources such as important habitat for imperiled wildlife, sensitive cultural resource areas such as archeological sites, rare geological features, or other unique attributes that deserve some form of conservation and special management.	The FEIS and SEIS acknowledge the importance of the ACEC. Effects due to permitting the line across the ACEC are disclosed in the SEIS. The BLM must balance completing public and environmental resource needs in managing public land.
3 (EA-12)	9	9-26-17	Prairie Falcon Audubon, Inc	BLM Burley F.O. management arbitrarily decided, without public knowledge, input, or regard; to change the route, in segment 9, after the Draft EIS, and take the line along rim	Revising routes between draft and final in response to information developed in preparing the Draft EIS, as well as in response to comments received on the draft,

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			– Julie Randell	of and across the Salmon Falls Creek Canyon, including Lily Grade. This is an illegal move by the Burley FO management and the proponents of this project.	is a normal part of the NEPA process. The change in the route was disclosed to the public in the final SEIS. The BLM considered public comments on the SEIS in the ROD. Changing a route between draft and final was not illegal.
3 (EA-12)	10	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>The proponents were aware this area is designated as a Area of Critical Environmental Concern (ACEC) in both BLM's Jarbidge F.O. and Burley F.O.'s, Twin Fall District on both The sides of Salmon Falls Creek Canyon. The canyon is also designated as a ACEC as well as a Outstanding Natural Area (ONV), eligible Wilderness Study Area (WSR), and A Special Recreation Management Area (SRMA).</p> <p>There was a different publicly disclosed route, Alternative 9C, in the Draft EIS.</p> <p>The FEIS states, "No amendment for this area was proposed in the Draft EIS because it was thought that crossing the WSR at the proposed location would not be consistent with WSR management goals.", ..</p> <p>"An alternative crossing of the river (Alternative 9C) would avoid the eligible WSR and the ACEC (emphasis added)."</p> <p>... "The Burley FO has stated that the WSR classification at this location is "Recreational" and that this crossing would not have a negative effect on the outstandingly remarkable values (ORVs) for that classification (emphasis added). Amendments for crossing the ACEC and VRM Class II lands are therefore provided in the Final EIS." FEIS F1-31</p> <p>At the time we couldn't find the above mentioned alternative 9c on the BLM's interactive project map, because the map doesn't show any of this part of the project. It was not included on the map in FEIS appendix F.1-34.</p> <p>Both Jarbidge RMP and Twin Falls MFP direction for Visual Resources gave explicit instructions on how the ACEC and Salmon Falls Creek Canyon should be managed.</p> <p>A amendment has already been made in the Jarbidge 2015 RMP changing a important designation of the ACEC along the west side Salmon Falls Creek Canyon allowing</p>	<p>See the previous response. Also, note that a new Jarbidge Resource Management Plan was approved in 2015; this was a new plan, not an amendment to the existing plan as implied in the comment. The new plan includes a utility corridor in the area. The plan was revised through a public process as required under FLPMA. The fact that the plan was revised is disclosed in Chapter 1 of the SEIS. The new plan is described in some detail in Appendix F of the SEIS.</p> <p>The statement quoted—"Therefore, a transmission line crossing this portion of the eligible WSR segment would not affect the river's suitability as a Recreation River"—is correct. As explained in Appendix F of the SEIS, the route was revised to avoid crossing at a location that would affect the suitability of the river as either scenic or wild. A transmission line would not be consistent with those designations. However, a transmission line is permitted in a Recreation River. Note that this section of the river already includes a road, a bridge, and a 34.5-kV electric line (see Appendix F of the SEIS).</p>

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				<p>a 500-kV transmission line to cross Salmon Falls Canyon in anticipation of the east side Twin Falls F.O. RMP amendment to the illegal change of the FEIS route without public input that negated the NEPA process.</p> <p>Interested public was not given this information or the opportunity to comment. BLM and proponents of this project violated National Environment Policy Act (NEPA) when they knowingly introduced new and additional information in their final Environmental Impact Statement (FEIS) concerning where their transmission line will cross public land in the Burley BLM Field Office (F.O.) as described in our appeal. Gateway PFA Declaration Statement 12-21-2013, pgs: 1, 5, and 6. This information is still relevant as this appeal is still unresolved!</p> <p>In reading through the Special Management Areas section, the statement "Therefore, a transmission line crossing this portion of the eligible WSR segment would not affect the river's suitability as a Recreation River."</p> <p>The proponents through a amendment, want the BLM to reduce the important designation of the ACEC as well as WSR with ORVs. to a recreational designation. It's like redesignating a Classic Bentley luxury sedan, to a AMC Gemlin and then allowing it to be treated as such.</p> <p>Granted the ACEC has been beaten but it still retains it's unique OVR's and deserves to remain a ACEC. It's a classic and should be treated a such!</p> <p>The BLM has the discretion to disallow this amendment for the future enjoyment of wide open vistas in a natural setting not far from the City of Twin Falls. This will be far more important in the future to the area.</p>	
3 (EA-12)	11	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>PFA believes: proponents objectives "which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs" (FEIS) can be done within the confines of existing energy corridors to increase efficiency and reliability.</p> <p>"The Proponents originally designed the the 162.2 mile long route as the Proposed Route in Segment 9 to follow existing utility corridors and avoid the SRBOP and other protected areas where feasible." (SEIS)</p>	<p>The reason for the two lines following separate paths is explained in detail in the original FEIS, which the SEIS supplements. One of the Proponents' objectives is to improve the reliability of the grid by building transmission lines in widely separated areas, thus reducing the chance that a single event, such as a wildfire, could destroy both lines. Another objective is to serve their growing customer base.</p>

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				There's still no reasonable explanation by proponents or BLM for the split line through Idaho. The huge cost and willingness to combat the controversy of the southern split, numbers 7,9, and 10, leads us to believe they have other plans, such as future development of proposed ill-sited wind farms: Cotteral Mountains, China Mountain, Simplot, and South Hills Important Bird Area,etc. Thereby further degarding sage-grouse and other wildlife's habitat "Other projects would continue, including other transmission line projects, wind farms. solar projects,.....The demand for electricity, especially for renewable energy would continue to grow in the Proponents' service territories." This is a clue as to the who the customers would be in the project areas.(SEIS)	
3 (EA-12)	12	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	PFA believes the reasoning behind the need for the amendments is very clear. BLM and Project Proponents believe energy companies takes precedent over anything that stands in the way of this project's construction across public land. Public land apparently has been set aside not for quality and sustainable use for future generations as stated in FLPMA (P.L. 94-579, Section 102(a)). An example of this is the changes already made to the Jarbidge RMP concerning the Salmon Falls Creek ACEC	Comment noted. The BLM must balance completing public and environmental resource needs in managing public land.
3 (EA-12)	13	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>"The EIS identifies opportunities to mitigate the impacts of siting and building Segments 8 and 9, if a ROW is granted, by incorporating avoidance, minimization, and compensation measures with consideration of local and regional conditions" Mitigation as portrayed will take care of most of the impact issues throughout the project, in reality when compared to the substantial negative impacts, the proponents mitigation strategys are not site specific and woefully small, inadequate, and apparently still in the development stage.</p> <p>When reading through the SEIS and FEIS we couldn't find where the above statement is true. There's no "avoidance, minimization, or compensation measures" for the important and unique areas such as the Salmon Falls Creek ACEC. If the statement above were true, there would be no need the change the RMPs. The only possible avoidance is to more convenient area to disturb</p>	Appendix M of the SEIS includes nearly 50 pages of environmental protection measures. These are referenced throughout the SEIS. Individual measures are evaluated in Chapter 3 of the FEIS and the SEIS. In addition, see Appendix K, the BLM's mitigation framework for residual impacts within the NCA. As noted in the SEIS, the BLM did not adopt the Proponents' mitigation plan. The reasons why the BLM found the Proponents' mitigation plan to be inadequate are described in the applicable sections of Chapter 3 of the SEIS.

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				<p>such as the SRBOP, Golden Eagle Audubon stated, "Our simple conclusion was that a route through the Birds of Prey Area presents the lesser of two evils." http://www.goldeneagleaudubon.org/Gateway-West-Transmission-Line</p> <p>"The MEP does not provide sufficient details or specifics for development of such mitigation actions related to habitat restoration. The lack of detail or specifics in the MEP makes it unclear how the MEP goals would be achieved." (SEIS). Clearly there's a need for site specific data and analysis for this project.</p> <p>Under "Habitat Restoration we find, " The goal for the Proponents' habitat restoration proposal is to convert "non-native grasslands to native perennial plant communities" as well as to conduct "noxious weed control. Proposed funding to restore habitats within the SRBOP would have no effect on agricultural resources. Habitat restoration could occur in areas currently used as rangeland and pasture, but this potential reduction in rangeland and pasture would likely only affect a very small share of this type of land in the Analysis Area."(emphasis added) (SEIS). In other words there will be little to nothing done to curb destructive land uses such as heavy grazing throughout the year.</p>	
3 (EA-12)	14	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	The problems found in the SRBOP are due to very poor and shortsighted management by federal and state agencies that have allowed the spread of invasive weeds and grassed throughout the area without little to no protection of the native sage-steppe vegetation or it's wildlife, even allowing indiscriminate shooting of prey species throughout the area.	Comment noted.
3 (EA-12)	15	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>If BLM persists in allowing grazing to continue at it's present stocking rate and there's no changes as to when these areas slated for mitigation are grazed, e.g. destructive spring grazing; grazing new seedlings, after only two growing seasons etc, based on 30 yrs. experience, we believe any mitigation will be short-lived and a waste of time and money.</p> <p>There's ways to truly mitigate these issues, but apparently the agencies lack the backbone to make the hard</p>	Comment noted. The decision to allow grazing following construction would be based on site-specific conditions.

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				decisions it would take to make mitigate work in the long term. As natural undisturbed areas of public land become scarce, true mitigation becomes nearly impossible. How can the proponents mitigate visual values? They can't, they ask BLM to revise (downgrade) the RMP plans to fit their project.	
3 (EA-12)	16	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Proponents consistently acknowledge their added adverse effects throughout the SEIS; direct, indirect, and cumulative impacts throughout the project area during all phases of the project yet at the same time they state the opposite. Below are just a few excerpts as examples:</p> <ul style="list-style-type: none"> • “surface disturbance from the Project within just a half a mile from occupied sensitive plant habitats”. • “Visual resource or scenic specifications for allowable levels of visual contrast would have to be altered” That is to say, blight visual resources across unique western landscapes along it's routes for the foreseeable future. • “important migratory bird habitats and ecological conditions through vegetation removal, fragmentation of native habitats, and possible increased in predation pressure by predators.” To be adversely and permanently affected. <p>“Gateway West would not have measurable adverse effects on natural resources within the project area.”</p>	The FEIS and SEIS were prepared by the BLM not the Proponents. The statement quoted (“Gateway West would not have measurable adverse effects on natural resources within the project area.”) is taken out of context. The FEIS and SEIS disclose the adverse impacts of the Project using the measures described in the FEIS for each resource. Effects on scenery are disclosed in Section 3.2 of the SEIS and in greater detail in Appendix G. Also see Appendix E. Effects on migratory birds are disclosed in Section 3.10 and Appendix D.
3 (EA-12)	17	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	Though the SEIS acknowledges the ongoing threats within their project area such as livestock overgrazing and invasive grasses and weeds, etc. They state that these threats would continue with or without their transmission line. In this they are correct, but the added effects of a mega transmission line do substantially add to these threats as mentioned above, especially when coupled with the destructive RMP amendments and the challenges they represent for future management.	The analysis in Chapter 4 of both the FEIS and SEIS discloses the cumulative effects associated with the transmission line and other past, present, and foreseeable future activities.
3 (EA-12)	18	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Again, instead of working within the confines set by the BLM FO.s' RMPs, for the protection of invaluable natural resources for the public trust, proponents seek to undermine it.</p> <p>Thus, many of the impacts throughout the project area can't be mitigated beyond a short time, especially for</p>	Comment noted; please see the response above to your similar comment on amending plans.

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				sagebrush-steppe obligations such as sage-grouse and pygmy rabbits, As undeveloped areas of public land are becoming scarce, true mitigation becomes nearly impossible. Also how can visual values be mitigated? Only be siting the project elsewhere.	
3 (EA-12)	19	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	We find in the SEIS the same types of general data and analysis found FEIS. It needs to be site-specific and detailed, “The NEPA analysis for Gateway, though a very thick stack of paper, does not provide the necessary site-specific details to fulfill NEPA’s hard look requirements at direct, indirect and cumulative impacts and mitigation actions. The still uncompleted surveys, reports and plans constitute avoidance, minimization and mitigation measures – ranging from cultural and historical resources to controlling project destruction and impairment actions that will seriously impact wildlife and sensitive species habitats and populations. These species include sage-grouse, pygmy rabbit, and migratory birds.” Appellants Response to Stoel Rives LLP, Council to Pacificorp and Idaho Powers’ (Respondent-Intervenors); Answer to Statement of Reasons, IBLA Docket No. 2014-55,WYW-174598; IDI-35849. Dated: May 5, 2014	Both documents include detailed assessments of the existing condition and environmental effects. For example, see the detailed tables for vegetation and wildlife in Appendix D.
3 (EA-12)	20	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	We found the SEIS to be confusing and difficult to navigate through.	Comment noted. This Project, like many major ROW projects, is complex. The Project crosses many different habitats and jurisdictions, and affects many resources at varying spatial and temporal scales. Therefore, the analysis is also complex.
3 (EA-12)	21	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	We ask that the illegal section through the Salmon Falls Creek ACEC to Lily Grade be dropped as the proponents already had 9c set out for public comment. That is what was offered through NEPA and what the public was commenting on.	As explained above (as well as in the SEIS), the Lilly Grade crossing is not illegal.
3 (EA-12)	22	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	As the SEIS is written, proposed project would substantially increase negative impacts, the proposed amendments would significantly downgrade protections to important and unique natural resources such as visual, wildlife, and special designated areas put in place for future generations.	The FEIS and SEIS acknowledge that the Project would have substantial effects, which is why an FEIS was prepared. It provides the public and the decision official the information needed to balance completing resources. The BLM must balance the need to protect habitat with other requirements, such as the need to upgrade the electrical grid.

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				Again, FLPMA (P.L. 94-579, Section 102(a)) states that it is the policy of the United States that: (8) "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values."(SEIS). BLM's RMPs are documents written to uphold these protections for the public trust	
4	1	11/29/17	Walter Meyer, Idaho Chapter OCTA	If shorter segments of the Gateway West Transmission Line can't be realigned in those locations where it crosses Visual Resource Management (VRM) Class 1 and 2 areas along remnants of the Oregon National Historic Trail and its related routes, the BLM will have to downgrade these VRM classes to allow construction of the transmission line.	Comment noted.
4	2	11/29/17	Walter Meyer, Idaho Chapter OCTA	For the above situations, it is recommended that the following measures be taken to assist in partially mitigating losses to the historic and visual integrity of the affected historic trail segments: 1. Installation of interpretive and informational signs along maintained public roads near the historic trail remnants. 2. Development of parking areas (trail heads) along maintained public roads to facilitate public non-motorized access to historic trail remnants.	Comment noted.
4	3	11/29/17	Walter Meyer, Idaho Chapter OCTA	Of course, the Oregon-California Trails Association would prefer that, if feasible, portions of the transmission line be re-routed to prevent adverse impacts to the Oregon National Historic Trail and its related routes and sites. Also, during project construction and maintenance, OCTA recommends that no motorized use be allowed along unaltered or slightly altered historic trail remnants (OCTA's Emigrant Trail Classifications 1,2, and 3).	Comment noted.
5	1	12/4/17	John Chatburn, Idaho Governor's Office of Energy & Mineral Resources	The State of Idaho appreciates the opportunity to comment on the Draft Environmental Assessment (Draft EA) for the Gateway West Transmission Line Project (Project). The Idaho Office of Energy and Mineral Resources is the Cooperating Agency for the state, and submits the following comments on behalf of the state and its relevant agencies.	Comment noted.

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5	2	12/4/17	John Chatburn, Idaho Governor's Office of Energy & Mineral Resources	BLM should find that the Proposed Action, as described in the Draft EA, is consistent with the national environmental policies and objectives set forth in Section 101 of the National Environmental Policy Act of 1978 (NEPA) and other applicable environmental requirements, and that this Project will not significantly affect the quality of the human environment or otherwise include any condition that would require consultation pursuant to Section 102(2)(C) of NEPA. BLM should further find that the Proposed Action meets the purpose and need of the EA, that BLM evaluated a reasonable range of alternatives, and that the Proposed Action does not require another Environmental Impact Statement. Finally, the BLM should determine that the Proposed Action is reasonably supported by the environmental analysis in the Draft EA, and that the issuance of a finding of no significant impact is appropriate.	Comment noted. The authorized officer will determine this in a decision document for the Project.
5	3	12/4/17	John Chatburn, Idaho Governor's Office of Energy & Mineral Resources	The Draft EA indicates that the analysis conducted on Alternative 1 in the Final Supplemental Environmental Impact Statement (FSEIS) is carried forward into the Draft EA. All of the state's comments, including comments from the Idaho Department of Parks and Recreation, submitted with respect to the analysis on Alternative 1 of the FSEIS that is incorporated into the Draft EA should be taken into consideration in BLM's decision making. The state supports adopting the Proposed Action and bringing this Project to its conclusion.	Comment noted.
5	4	12/4/17	John Chatburn, Idaho Governor's Office of Energy & Mineral Resources	Governor Otter, and the State of Idaho are grateful for your commitment to collaboratively bring this Project to a successful conclusion. If you have questions regarding the content of this letter, or need additional information from the state on this project, please do not hesitate to contact me.	Comment noted.
6	1	11/4/17	Jean Public	I AM TOTALLY OPPOSED TO THIS PROJECT. I AM AGAINST RICH WHITE MEN BEING ALLOWED TO DESTROY EARTH SO THEY CAN MAKE BIG MONEY SELLING OUT AMERICAN RICHES. WE NEED ENERGY HERE IN AMERICA. WE NEED TO KEEP	Comment noted

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				ENERGY HERE IN AMERICA FOR OUR USE. WE HAVE PLENTY RIGHT NOW. THERE IS NO REASON AT ALL TO KEEP DRILLING AT THIS TIME AND MAKE MORE AVAILABLE SO IT CAN BE SOLD TO FOREIGNERS. THIS IS AN AMERICAN ENERGY SOURCE THAT SHOULD BE FOR THE BENEFIT OF AMERICANS ONLY. JEAN PUBLIEE JEANUPBLIC1@GMAIL.COM STOP SELLING US OUT	
7	1	12/4/17	James Carkulis, Cat Creek Energy	Cat Creek Energy's review and analysis of the November 3rd release of the Draft Environmental Assessment Alternative 1 for Segments 8 & 9 remains in favor of these paths, with special emphasis on Segment 8 as the proper placement and solution for the Gateway West overall transmission system.	Comment noted.
7	2	12/4/17	James Carkulis, Cat Creek Energy	Reviewing the comments offered up in Appendix F reinforces Cat Creek's consideration for Segment 8 to follow the current 500 kV Midpoint to Hemmingway to Summer Lake transmission line corridor. The environmental comments by third parties overall are well stated and with good intentions. They reinforce our position that new transmission lines should parallel existing corridors when practical. Our position is that by doing so, it lessens the overall impact on migratory corridors and local bird and wildlife populations, as most species already have acquired knowledge of the existing lines and structures. We have no illusions that collisions and temporary displacement of some birds and wildlife shall still occur during construction, but both collisions and displacement will be quantifiably much less than if new transmission line were to be placed in a completely new corridor in which no birds of any species had experience of any manmade structures.	Comment noted.
7	3	12/4/17	James Carkulis, Cat Creek Energy	Our position expressed in our submission of 21-September-2017 remains substantially the same. The northern Segment 8 route has a much smaller environmental impact while simultaneously allowing for necessary future renewable energy generation and energy storage capabilities.	Comment noted. These comment and the BLM's response are part of the project record.
7	4	12/4/17	James Carkulis, Cat	Cat Creek Energy's earlier comments on the BLM EA set out in detail our position on the location of the Gateway	Comment noted.

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			Creek Energy	West transmission line. We insert those comments again for relevance and review, and very much welcome the reconsideration of the BLM's 19-January-2017 Record of Decision selecting the route described as Alternative 5 in the Final Supplemental EIS. Cat Creek Energy supports, in company with Idaho Governor Otter and Idaho Congressional Representatives Labrador and Simpson, a Gateway West preferred route incorporating Segment 8, Alternative 1 ("Alt 1").	
7	5	12/4/17	James Carkulis, Cat Creek Energy	Cat Creek Energy, LLC ("CCE")'s direct interest in the location of Gateway West is a function of the fact that Cat Creek will be constructing a 750 MW pump storage hydro, wind, and PV solar integrated renewable energy generation facility adjacent to Anderson Ranch Reservoir in Mountain Home, Idaho, that will interconnect with the series of transmission in the Mountain Home, ID transmission corridor including the anticipated new 500 kV Gateway West transmission line. This integrated renewable energy facility will be the largest generation facility of any kind in the state of Idaho producing up to 2,467,000 MWhr annually contributing to and making a profound impact on the East-West transmission flow. Gateway West becomes an essential intertie in CCE's generator efficiency and Segment 8, Alt 1 is the best adaptation of any route to accommodate new generation, the first primary justification for the Gateway West project.	Comment noted.
7	6	12/4/17	James Carkulis, Cat Creek Energy	This said, our reasons for favoring Segment 8, Alt 1 are principled, not only having to do with the technical-economics factors, but also the general environmental and pragmatic factors of paralleling an existing transmission corridor.	Comment noted.
7	7	12/4/17	James Carkulis, Cat Creek Energy	CCE opposed the Alt. 5 route selection on the basis of the following biological considerations: <input type="checkbox"/> Concern about the effects of other routes that are contrary to the objective and values for which the Morley Nelson Snake River Birds of Prey (MNSRBP) National Conservation Area was designated. The MNSRBP boundary is static, the airspace is not, and birds move in and out of the designated borders with aplomb.	Comment noted.

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				<input type="checkbox"/> The Morley Nelson Snake River Birds of Prey area already contains multiple major transmission corridors well known to both local and migratory avian populations. Birds have acclimated to them. <input type="checkbox"/> The selection of the Alt 5 corridor south of the MNSRBP National Conservation Area would have increased near-term avian mortalities owing to its intrusion into an area that does not have many significant vertical features at present. <input type="checkbox"/> The Alt 5 route would have displaced more potential sage-grouse habitat than Alt 1 will. <input type="checkbox"/> Federal policy has advocated for the last few years to co-locate infrastructure for all the reasons above. Paralleling the current 500 kV Midpoint/Summer Lake PacifiCorp transmission line for Segment 8 bolsters those federal guidelines. <input type="checkbox"/> BLM policy should embody a “least harm” principle, and not, at least not primarily, a respect for jurisdictional boundaries and federal designations. Paralleling the existing PacifiCorp Midpoint/Summer Lake 500 kV Transmission Line is the least geographically intrusive and most avian-compatible route for selection. The PacifiCorp existing route, even by expanding the existing corridor embracing two additional transmission lines, is still less impactful on avian populations, including those resident in and migrating through the Birds of Prey area, than Alt 5 would have been.	
7	8	12/4/17	James Carkulis, Cat Creek Energy	On the basis of the same biological considerations, CCE favors Segment 8, Alternative 1. It will be adjacent to an existent transmission corridor, i.e., not, as Alt 5 would, create new corridors through the area not yet impacted by power structures. This consideration should override any concerns relating to siting on public versus private lands and should in fact mitigate rather than increase impacts on visual resources and existing view sheds. Cat Creek Energy also favors Segment 8 Alt 1 from both the largest single generator and, by many times over, the largest load in Idaho perspectives:	Comment noted.
7	9	12/4/17	James Carkulis, Cat	As noted above, the Cat Creek Energy Storage & Renewable Generation Station facility, 25 miles north of	Comment noted.

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			Creek Energy	<p>Mountain Home, Idaho, commences operation in 2020 and will be the largest generator in Idaho at 750 MW [larger than the 585 MW installed capacity of the Brownlee Dam and mirroring its generating capacity potential at 2,406,000 MWhrs) and becomes the largest industrial load in Idaho at 890 MW. Its components include:</p> <ul style="list-style-type: none"> • 12 – 50 MW hydro turbines in a pump/generator configuration • 30- 3.65 MW wind conversion turbine generators • 186,000 PV solar panels equivalent to 40 MW (AC) max. capacity output • 72,600 MWhrs of energy storage capacity by way of a 100,000 acre-ft Upper Reservoir • A A switch/substation at Mountain Home in the transmission corridor connecting to both the 230 kV and the 500 kV transmission level systems. 	
7	10	12/4/17	James Carkulis, Cat Creek Energy	CCE is taking extraordinary measures to ensure minimum environmental impacts in its design including, but not limited to co-locating the dual-circuit 230 kV transmission line for the project alongside the current BPA 115 kV Anderson Ranch/Mountain Home transmission corridor.	Comment noted.
7	11	12/4/17	James Carkulis, Cat Creek Energy	<p>The proposed Segment 8 Alt 1 route has several operational advantages that have to do with future needs and demands for existing or potential resource commodities and values, in particular for new renewable energy resources to curb carbon emissions in the WECC and western grid.</p> <ul style="list-style-type: none"> • Gateway West’s installation and function respond to a need for the expanded transmission of renewable energy resources. • PacifiCorp’s 1,280 MW proposed Wyoming wind farm generation will require such expansion, as will the next largest renewable generator on the system, the Cat Creek Energy facility. Segment 8, Alt 1 is the logical path to achieve the basic premise of why Gateway West is being proposed of providing new transmission for new generation in the most environmentally and prudent method. Segment 8, Alt 1 reduces the environmental impact for not only 	Comment noted.

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				<p>Gateway West, but also Cat Creek Energy and its interconnection route.</p> <ul style="list-style-type: none"> • There is at present no off-ramp or intertie from Midpoint to Hemingway substations on Gateway West. CCE would create an intertie between the 230 kV IPCo system, the current PacifiCorp 500 kV line, and Gateway West with the Alt 1 route. Given the increased use of crossing Idaho by PacifiCorp for energy transit and the continued growth in the Treasure Valley, this could prove invaluable in balancing transmission and provide for one more solution to any outage or constraint condition for those flows that will undoubtedly be present and stress the 230 kV system at some time in the near future. • Generation over-capacity, load following, and regulation are very real concerns for PacifiCorp's moving energy between its east and west control areas and to California, especially when there are constraints in individual entry points to CAISO. CCE is designed to serve as the indispensable storage and generator mechanism to balance supply and demand, thus alleviating these transmission side problems. Segment 8, Alt 1 paralleling the existing PacifiCorp 500 kV line, makes CCE a potential load and supply balancing facility for the majority of electricity flow across Idaho. 	
7	12	12/4/17	James Carkulis, Cat Creek Energy	<p>For these reasons, one biological, the other technical/economic, the reconsideration of BLM's earlier decision is warranted and Cat Creek Energy enthusiastically and rationally supports (as do many others) Segment 8 Alt. 1 for the Gateway West Transmission Project. Having been in the business of developing renewable energy projects for years, and in the process, having earned a reputation for successfully completing environmentally-sensitive projects, I can attest that Segment 8 Alt. 1 is one that can be justified for its low environmental impact while reinforcing the basic reason why Gateway West is important; to promote and connect new generation.</p>	Comment noted.

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8	1	12/4/17	John Robinson, Idaho Conservation League	Thank you for the opportunity to provide comments on the Environmental Assessment for the Gateway West Transmission Line Project. Since 1973, the Idaho Conservation League has had long history of involvement with both habitat protection and regional energy issues. As Idaho's largest statewide conservation organization, we represent over 25,000 supporters who want to ensure that energy development and infrastructure are consistent with natural resource protection.	Comment noted.
8	2	12/4/17	John Robinson, Idaho Conservation League	Investing in properly sited transmission systems can protect the environment, promote economic development, diversify the power system and keep the region economically competitive. However, the impact of these transmission systems largely depends on the location of the project, the specific design of the final alignment, and mitigation actions.	Comment noted.
8	3	12/4/17	John Robinson, Idaho Conservation League	The Idaho Conservation League participated in a Gateway West subcommittee of the Boise District Resource Advisory Council and toured several proposed routes multiple times. We submitted comments throughout project development and submitted a protest on the proposed RMP amendments for this project. We have also previously submitted joint comments with The Wilderness Society and the Audubon Society. Please incorporate all our previously submitted comments and our RMP protest into the project record.	Comment noted. These comment and the BLM's response are part of the project record.
8	4	12/4/17	John Robinson, Idaho Conservation League	We understand that the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act of 2017 directed the BLM to issue a ROW grant for portions of Gateway West Segments 8 and 9 consistent with Alternative 1 of the Final Supplemental EIS. We also understand that additional NEPA analysis is needed for the public lands affected by this decision that lay beyond the NCA boundaries.	As stated in the EA, "The BLM's discretionary authority is limited by the Modification Act, which directed the agency to issue a statutory ROW for a transmission line and mandated where the ROW would be located. As intended and directed by the legislation, the BLM has offered the statutory ROW to the Proponents. It would now be unreasonable for a BLM decision to deny a ROW for segments intended to connect to the statutory ROW or to offer a ROW that would not physically connect to the statutory segments. For additional ROW segments to connect to the statutory ROW, the BLM has no choice but to select the segments as defined by Alternative 1 in the Final SEIS and mandated in the legislation (Sec. 2(c)(1) of the Modification Act). Said

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					another way, segments that would not align with and connect to the statutory ROW segments are not feasible or reasonable to select at this time.” However, additional NEPA analysis was needed in regards to land use plan amendments that may be needed for portions of the routes not covered by H.R. 244.
8	5	12/4/17	John Robinson, Idaho Conservation League	While the BLM is limited by one action alternative, we believe it is the BLM’s responsibility to consider additional mitigation measures for affected resources and to craft amendments in a way that provides a net increase of conservation protections where possible.	H.R. 244 approved the two routes across the NCA. Logically, this means that the lines from the Midpoint and Cedar Hill substations need to connect with the approved routes within the NCA. The SEIS considered over 50 alternatives between the substations. No new routes connecting the substations via the approved routes across the NCA were identified during scoping.
8	6	12/4/17	John Robinson, Idaho Conservation League	We are also concerned about potential impacts from the lighted towers of the Gateway West transmission line to dark sky resources and to the to the Dark Sky designation being considered near the Bruneau Dunes State Park. As such, we believe the BLM needs to address avoidance, minimization and mitigation criteria for these impacts. The BLM should also convene a management oversight committee regarding enhancement and mitigation efforts for areas affected by Segments 8 and 9. Our specific comments are below.	Infrared obstruction lights that incorporate both red and infrared light-emitting diodes in a single unit would be installed in specific areas of Segment 8 and 9 to ensure visibility for aircraft pilots. The system will use a universal, compact, and efficient obstruction light that has been Electrical Testing Laboratories certified to Federal Aviation Administration requirements. In order to ensure that the intensity of lighting is not so bright as to render the pilots’ night vision goggles ineffective, the Proponents propose to use equipment with peak lighting intensities of 860 nanometers for the infrared lights and 30 to 50 candelas for red lighting. Lights of these intensities are not likely to adversely affect the Park’s Dark Sky Certification. Guidelines allow parks to have unshielded lights that are less than 50 lumens and shielded light above 50 lumens are permitted. Lights outside the park are not prohibited. The 2016 Guidelines state: “Where necessary for basic safety and navigation: 1. Illumination should be to the minimum practical level, 2. The affected area of illumination should be as small as practical, 3. The duration of the illumination should be as short as practical, and 4. Illumination should minimize the amount of blue spectral components in the light (white light is not permitted).”

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					The proposed red and infrared lights would appear to comply with these guidelines.
8	7	12/4/17	John Robinson, Idaho Conservation League	Several of the Plan Amendments approved in the January 19, 2017 ROD that selected Alternative 5 (Route 8G and 9K) are no longer needed. These original amendments included one for the Bruneau MFP, two for the Twin Falls MFP, and one for the SRBOP RMP. The Modification Act also superseded the need for seven plan amendments to the SRBOP NCA RMP. The two amendments to the Twin Falls MFP and one amendment to the SRBOP NCA necessary for the route mandated by the Modification Act should be retained.	Comment noted.
8	8	12/4/17	John Robinson, Idaho Conservation League	The Proposed Action would still require seven plan amendments to three current BLM land use plans. The Kuna MFP would be amended to allow the transmission line outside of existing corridors. The Bennett Hills/Timmerman Hills MFP would be amended to allow siting the route near archaeological sites and to change Visual Resource Management Classes. The 1987 Jarbidge RMP would be amended to change Visual Resource Management classes from II to III, to allow the transmission line to cross the Oregon National Historic Trail, and to change a utility avoidance/restricted area designation.	Comment noted. Please see the analysis of these amendments in Appendices F and G of the SEIS.
8	9	12/4/17	John Robinson, Idaho Conservation League	The EA provides a summary of the proposed amendments, listed below. We recommend that the BLM consider crafting these amendments to ensure a net conservation gain where possible. Bennett Hills/Timmerman Hills Management Framework Plan: "No management activity should be allowed to cause any evident changes in the form, line color or texture that is characteristic of the landscape within this Class II area. The VRM Class II area within 3,000 feet to the north of the existing transmission line ROW will be reclassified from VRM II to VRM III (including the existing ROW)."	Comment noted.
8	10	12/4/17	John Robinson, Idaho	The BLM should consider if the VRM I or II areas in the MFP could be expanded to protect other scenic areas or if mitigation measures could remove unnecessary visual	Comment noted.

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			Conservation League	impediments as part of larger restoration efforts, make an area eligible for a more protective VRM designation, and applying more protective VRM in the MFP. Kuna Management Framework Plan: "L-4.1– Confine major new utility R/Ws (i.e., 500 KV or larger or 24-inch pipeline) to existing corridors as shown on Overlay L-4. The R/Ws will be subject to reasonable stipulations to protect other resource uses. Amend Overlay L-4 to add a major transmission line (500-kV) right of way."	
8	11	12/4/17	John Robinson, Idaho Conservation League	The BLM should examine the potential ROWs to see if any are unlikely to be needed and craft the amendment to offset this new ROW by closing another area in the Kuna MFP to such development. Jarbidge Resource Management Plan: "MUA-3 Utility avoidance/restricted area – three Paleontological areas (Sugar Bowl, Glens Ferry, & McGinnis Ranch) and Oregon Trail ruts (7,200 acres/22.5 miles) to overhead and surface disturbance and underground utilities. The current Lands decision is amended to reclassify the area identified as restricted in Section 35, T. 04 S., R. 09 E. to allow the overhead lines of a 500-kV powerline right of way, while protecting the Oregon Trail ruts."	Comment noted.
8	12	12/4/17	John Robinson, Idaho Conservation League	The BLM should examine the latest inventory of paleontological and historic resources and see what, if any, areas are not protected by the MUA-3 Utility avoidance/restricted area. As part of amending the Management Plan to allow the Gateway West ROW, the BLM should expand the avoidance/restriction area to cover unprotected areas of paleontological and historic value. "The existing ruts of the main route, north and south alternate routes of the Oregon Trail and Kelton Road will be protected by not allowing incompatible uses to occur within ½ mile corridor of ruts except where visual impacts are already compromised. Protect existing trail ruts from surface disturbance."	Comment noted.

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8	13	12/4/17	John Robinson, Idaho Conservation League	<p>The BLM should implement mitigation measures to offset for potential impacts from the project. These measures could include closing additional areas of National Historic Trails to motorized use where such use could threaten historic resources, additional outreach, education and enforcement efforts, additional interpretive displays and trailheads in suitable areas, and vegetation restoration projects or purchasing easements on lands with historic, cultural, recreational or conservation value,</p> <p>“The visual or scenic values of the public lands will be considered whenever any physical actions are proposed on BLM lands. The Degree of alterations to the natural landscape will be guided by the criteria established for the four Visual Resource Management Classes as outlined in BLM 8400. VRM Classes will be managed as shown on Map 9. The VRM decisions and Map 9 are amended to accommodate a major powerline R/W. These VRM boundaries are modified according to the new manual to reclassify the VRM Class I area associated with Oregon Trail and the Proposed 500-kV line as VRM Class IV.”</p> <p>And</p> <p>“The VRM decision and Map 9 are amended to accommodate a major powerline R/W. The VRM Classification is amended to change the VRM Class to VRM Class III, adjacent to the proposed line, where the towers would be visible and dominate the landscape.”</p>	<p>Comment noted. The BLM is considering both on-site and off-site mitigation measures for unavoidable impacts (see Section 6.7 of Appendix J to the SEIS, as well as the discussion in Appendix K to that document). Mitigation for Project effects to national historic trails would be implemented in accordance legislation, regulations, Manual 6280 (see Appendix J of the SEIS) and resource management plans as amended. Historic properties would have site-specific Historic Properties Treatment Plans (HPTPs) as discussed in Section 3.1.2.4 of the 2016 SEIS. The BLM will collaborate with cooperators, agencies, and other interested parties to develop appropriate mitigation.</p>
8	14	12/4/17	John Robinson, Idaho Conservation League	<p>The BLM should examine the potential ROWs to see if any are unlikely to be needed and craft the amendment to offset this new ROW by closing another part in the Jarbidge RMP to such development.</p>	<p>A study of future ROW needs across the project area is beyond the scope of this analysis.</p>
8	15	12/4/17	John Robinson, Idaho Conservation League	<p>The Modification Act directed the BLM to apply the Mitigation Framework presented in the Final SEIS to the authorized segments:</p> <p>1 (A) MITIGATION.—During the time of construction of each respective line segment, Gateway West shall mitigate for the impacts related to the transmission lines in accordance with the Compensatory Mitigation and Enhancement framework described in the final Supplemental Environmental Impact Statement with the</p>	<p>Comment noted.</p>

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				<p>stipulation that Compensatory Mitigation and Enhancement costs shall not exceed \$8,543,440.</p> <p>The Mitigation Framework referenced in the Modification Act is the “Compensatory Mitigation Framework for the Morley Nelson Snake River Birds of Prey National Conservation Area,” and was developed specifically to address the “enhancement” requirement of proposals within the SRBOP NCA.</p> <p>We note that the Compensatory Mitigation and Enhancement Framework was written to apply to route segments occurring within the SRBOP at the time the SEIS and ROD were released. The Modification Act withdrew the corridors for Segments 8 and 9 as identified in Alternative 1 but provided that the same Compensatory Mitigation and Enhancement Framework shall be utilized in these segments formerly within the NCA.</p> <p>The BLM must still avoid, minimize and mitigate direct and indirect impacts of the proposed action outside the current or former NCA boundary. This effects analysis includes all portions of Segments 8 and 9 outside the former NCA boundaries to their endpoints at Midpoint and Cedar Hill, respectively. The \$8,543,440 cap on enhancement costs does not apply to these areas.</p>	
8	16	12/4/17	John Robinson, Idaho Conservation League	<p>The following project-wide mitigation plans also apply to the Proposed Action: The Greater Sage-grouse Habitat Mitigation Plan, the Migratory Bird Habitat Mitigation Plan, the Historic Properties Treatment Plan, the Programmatic Agreement Regarding Compliance with the National Historic Preservation Act, and the Framework for Compensatory Mitigation and Monitoring for Unavoidable Impacts to Waters of the U.S.</p>	<p>The comment is correct. The Project-wide mitigation plans approved under the 2013 ROD apply to Segments 8 and 9. Additional mitigation may also be needed.</p>
8	17	12/4/17	John Robinson, Idaho Conservation League	<p>The Final SEIS describes potential direct and indirect impacts to a number of resources, including National Historic Trails, visual resources, cultural resources, vegetation communities, special status plants, wetlands and riparian areas and special status wildlife and fish species, among others. We are particularly concerned about impacts to the Salmon Falls Creek ACEC and to migratory birds, particularly in the Hagerman Wildlife Management Area.</p>	<p>Comment noted. Effects on migratory birds are discussed in Sections 3.10 and 3.11 of the SEIS. Also see the Tables 11.10-1 through 11.11-17 in Appendix D.</p>

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8	18	12/4/17	John Robinson, Idaho Conservation League	<p>We note that BLM Manual 6280 direct the BLM to consider multiple options to eliminate, moderate, rectify impacts:</p> <p>Consistent with BLM Manual 6280, the BLM is required, to the greatest extent possible, to consider opportunities for mitigation to a level commensurate with the adverse impact to the nature and purposes; resources, qualities, values, and associated settings; and the primary use or uses of the NHT. To eliminate or moderate adverse impacts, the BLM can consider:</p> <ul style="list-style-type: none"> • Rectifying, reducing, or eliminating the impact over time and/or compensating for the impact by replacing or providing substitute resources or environments; • On-site mitigation and design considerations can include moving the project location, minimizing the scale, camouflaging the proposed activity with visual screening techniques, or similar actions; BLM Manual 6280 Inventory and Impacts Analysis for National Historic Trails and Study Trails Gateway West Transmission Line Project 80 • Prioritizing on-site mitigation prior to considering off-site mitigation options with regional options being considered prior to statewide options; and/or • Where on-site mitigation (along the Oregon NHT) cannot adequately compensate for an adverse impact, off-site mitigation may include consideration of monetary compensation for public lands along the Oregon NHT. <p>It is anticipated that mitigation measures would be implemented through site-specific HPTPs. These plans would include measures to avoid, minimize, or mitigate adverse impacts (direct and/or indirect) to the Oregon NHT and/or the North Alternate Study Trail. In the event of unavoidable adverse impacts to the Oregon NHT and/or the North Alternate Study Trail, the Historic Property Treatment Plan may stipulate compensatory mitigation measures</p> <p>Appendix J BLM Manual 6280 Inventory and Impacts Analysis for National Historic Trails and Study Trails</p> <p>We recommend that the BLM implement mitigation measures for each of the impacted resources.</p>	<p>Comment noted. The BLM will collaborate with cooperators, agencies, and other interested parties to develop appropriate mitigation.</p>

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				We note that certain types of mitigation may provide offsets for multiple resources such as native plants, wildlife, and recreation. We understand that it may not be possible to finalize mitigation measures until the micro-siting process is complete to see what issues remain to be mitigated. We remain keenly interested in sage-grouse mitigation efforts described in Section 3.11 of the SEIS and the HEA and request that the BLM keep us informed of that process. We encourage the BLM to ensure that the offsets that the mitigation measures provide last as long as the impacts persist. The BLM should also convene a management oversight committee regarding enhancement and mitigation efforts for areas affected by Segments 8 and 9.	
8	19	12/4/17	John Robinson, Idaho Conservation League	We are also concerned about potential impacts from the lighted towers of the Gateway West transmission line to dark sky resources and to the to the Dark Sky designation being considered near the Bruneau Dunes State Park. As such, we believe the BLM needs to better assess the potential impacts of this project on dark sky features and develop avoidance, minimization and mitigation measures for these impacts.	Please see the response to your comment on the Dark Sky issue above.
9	1	12/4/17	Karen Steenhof	Thank you for the opportunity to comment on the draft Environmental Assessment for Segments 8 and 9 of the Gateway West Transmission Line Project. I support the Proposed Action as well as the proposed Land Use Plan amendments. The Proposed Action paves the way for construction of the transmission lines along the route recommended by the BLM's Boise District Resource Advisory Council, on which I have served and continue to serve. Our panel evaluated several alternative routes within the Boise District and determined that the route identified in the Proposed Action would have the least adverse impact on resources and landowners.	Comment noted.

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	2	12/4/17	Karen Steenhof	As the representative of the Raptor Research Foundation on the Boise District RAC, I look forward to providing additional input as the authorization process continues. I hope to see measures implemented that will enhance nesting opportunities for raptors and discourage roosting and perching opportunities for ravens throughout Segments 8 and 9. For example, artificial platforms like those designed by Morley Nelson for the Summer Lake line would provide more secure nesting locations for Golden Eagles in the area between Con Shea Basin and the Hemmingway Substation, where eagle reproduction has been affected adversely by motorized and non-motorized recreation.	Comment noted. Please see the discussion on mitigation measures in Appendix K to the SEIS. The BLM intends to collaborate with cooperators, agencies, and other interested parties to develop appropriate mitigation. The general process and methods of determining the compensatory mitigation obligation are currently being finalized by an inter-agency oversight committee for approved segments of the Gateway West Project in Wyoming. Once finalized, the process will be vetted and potentially adjusted in the future to conform with state-specific modification for Idaho.
	3	12/4/17	Karen Steenhof	Along the Baha line, the Companies and the BLM need to have a strategy for maintaining nesting opportunities for Ferruginous Hawks, particularly in areas where existing structures will be removed. Biologists and engineers need to work together to come up with proactive, state-of-the-art solutions. Some of these measures could be part of the Companies' design and engineering specifications; others might be part of Migratory Bird Mitigation and the Mitigation Framework for the NCA, referenced in this EA.	Comment noted.
	4	12/4/17	Karen Steenhof	The Companies' draft portfolio for mitigation and enhancement called for a management oversight committee, comprised of individuals with knowledge of the NCA and surrounding areas, who would make recommendations to the BLM on implementation of the enhancement program. In 2014, the RAC endorsed the Companies' suggestion and recommended that the BLM establish this oversight committee as soon as feasible. I did not find any mention of an oversight committee in Appendix K of the Final SEIS. I request that language be added to this Environmental Assessment that stipulates that an oversight committee, under the auspices of the RAC, will provide advice and review of the Companies' Plan of Development to ensure that appropriate approaches for raptor protection and other enhancement measures are adopted during the design and engineering process.	As stated in the SEIS, the BLM is not adopting the Proponents' MEP.

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10	1	21/4/17	Darcy Helmick, Simplot Land and Livestock	Simplot Land & Livestock is a property owner within the area of the proposed alternatives for segments 8 and 9. We are in support of Alternative 1, and believe it is the best path forward for Gateway West.	Comment noted.
10	2	21/4/17	Darcy Helmick, Simplot Land and Livestock	We have previously provided comments based on the impacts to our private property within the area of the proposed segments. All of those comments still apply. It is difficult to determine the complete impact to Simplot property and operations with the range of variability for the exact location of the line. However due to our participation in the original negotiation of these lines, we believe this alternative would have the least amount of impact to our private lands and surrounding public lands as compared to the other alternatives. Financial impacts to agricultural productions could be high in areas where new transmission installation would require movement of current irrigating systems, and could be restrictive in certain management techniques, such as aerial application of fertilizer. These are things that must be considered in the final detailed route selection.	Comment noted. Your comments and the BLM's responses are part of the project record.
11	1	12/4/17	Kelly Fuller, Western Watersheds Project	WWP is a non-profit organization with more than 5,000 members and supporters. Our mission is to protect and restore western watersheds and wildlife through education, public policy initiatives and legal advocacy. Western Watersheds Project and its staff and members use and enjoy the public lands at issue and their wildlife, cultural, and natural resources for health, recreational, scientific, spiritual, educational, aesthetic, and other purposes. Western Watersheds Project also has a direct interest in energy transmission and associated disturbance that occurs in areas with sensitive wildlife populations and important wildlife habitat.	Comment noted.
11	2	12/4/17	Kelly Fuller, Western Watersheds Project	The NEPA process for the Gateway West transmission lines has had several stages, and WWP has submitted written input to BLM for each of them. Notwithstanding, many of our concerns still remain. Therefore, we incorporate by reference our previous comment letters, protest, and Interior Board of Land Appeals (IBLA) documents.	WWP's comments and the BLM's responses are part of the project record.

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11	3	12/4/17	Kelly Fuller, Western Watersheds Project	BLM's previous January 19, 2017 Record of Decision for Segments 8 and 9 of the Gateway West Transmission Project was later remanded by IBLA for reconsideration. See DSEA at 1. Although Congress has since approved the construction of Gateway West Segments 8 and 9 and selected portions of their routes, many of the conditions of BLM's January 19, 2017 approval were not mandated by Congress. ¹ They now need to be spelled out in a new NEPA decision document since the former Record of Decision no longer applies. This will also provide BLM an opportunity to make public the resource protection conditions that are in the new Right-of-Way (ROW) grant it offered to the Proponents but were not in the original ROW grant. ² These include protective stipulations in regard to streams and riparian areas, bird nest buffers, and the Native American Graves Protection and Repatriation Act (NAGPRA). See ROW at 14-15. Inclusion in the decision document will benefit both the public and BLM. ROW grants are not generally published, but instead require a FOIA request, which is not something most members of the public know how to do. As a result, the public is not aware that BLM is requiring these resource protections.	Comment noted. BLM managers have determined that the current level of analysis contained in the suite of NEPA documents is sufficient to make an informed decision. The BLM plans on issuing a decision document, the type of decision document will depend on whether or not the authorized officer determines there are new significant impacts associated with the proposed action.
11	4	12/4/17	Kelly Fuller, Western Watersheds Project	In addition, we are concerned that a Finding of No Significant Impact and Decision Record are not the legally appropriate decision documents since the previous EIS Record of Decision was remanded. The January 19, 2017 Record of Decision was specific to Segments 8 and 9 and comprised more than 1,400 pages, including required mitigation, monitoring, and enforcement, and the Right-of-Way (ROW) grant's terms, conditions, and stipulations for construction, operation, and decommissioning of the transmission line; as well as a Proponents' Plan of Development and related frameworks and plans in regard to a wide variety of resources that would be harmed by the Project. These are significant decisions that cannot be resolved by an EA's Finding of No Significant Impact. This Project is of such significant magnitude that a full EIS with Record of Decision is required, and due to the remand, BLM no longer has that.	The BLM may issue a Finding of No New Significant Impacts beyond those disclosed in the SEIS, not a FONSI. The existing FEIS and SEIS disclose the impacts for the various alternatives considered in those documents. Note that the Segment 8 and 9 routes included in the EA are the same as Alternative 1 in the SEIS

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11	5	12/4/17	Kelly Fuller, Western Watersheds Project	One example of a significant decision at stake is a serious new management issue that has arisen with the de-designation of portions of the NCA to accommodate this Project. Since the NCA now includes two non-NCA corridors due to the Modification Act, how will BLM manage to two different land-use standards within the NCA? What will the impacts of split management be? This was not previously addressed in NEPA analysis because past alternatives that routed the Project through the NCA did not anticipate that portions of the NCA would be de-designated.	The decision to revise the boundaries of the NCA was made by Congress and the administration and is separate from any decision contemplated by the current EA. Note that the Act also requires mitigation, as discussed in Section 3.1 of the EA.
11	6	12/4/17	Kelly Fuller, Western Watersheds Project	The DSEA does not substantively respond to our Slickspot peppergrass concerns that additional analysis must be undertaken due to the changed route. Simply referring the public to the SEIS and USFWS Biological Opinion/Conference Opinion fails to respond to the concern. It also fails to respond to any changed conditions since those older documents were prepared. This is especially significant because the FSEIS's Record of Decision was for different routes than Congress has since mandated. Therefore, BLM cannot rely on the FSEIS Record of Decision's statement that "the effects analyses and conclusions for Slickspot peppergrass and its proposed critical habitat in the 2013 concurrence no longer apply to the Project." FSEIS ROD at 24. Nor can BLM rely on the FSEIS ROD's conclusion, based on the routes that have now changed, that "As such, there are no required actions for Slickspot peppergrass." FSEIS ROD at 36. Furthermore, according to the DSEA, it is not known whether USFWS considers the 2013 Conference Opinion to be the current formal Biological Opinion for the Project. DSEA at 17.	The route considered in the EA has not changed. It is the same as the Proposed Action (Alternative 1) in the SEIS. This route was fully analyzed in that document. We are not aware of any additional effects upon slickspot peppergrass beyond those documented in the SEIS. The BLM continues to work with the USFWS to ensure that the Project complies with the ESA. Please see EA Appendix G for documentation on the BLM's continued consultation with the USFWS.
11	7	12/4/17	Kelly Fuller, Western Watersheds Project	However, the BLM believes that that implementation of the Proposed Action for Segments 8 and 9 of the 2017 EA "may effect", and is "likely to adversely affect" slickspot peppergrass (DSEA at 17). Past NEPA analysis did not adequately address enforceable management thresholds, specific mitigation measures, site-specific mitigation, and monitoring in regard to Slickspot peppergrass. This must now be rectified in the SEA. For example, how will BLM	See the USFWS Biological Opinion and Section 3.7 in the SEIS for Project effects on slickspot peppergrass. Also see Figure E.7-2 in Appendix E of the SEIS for a map showing where the transmission line routes cross peppergrass habitat. TESPL-4 requires a buffer around all slickspot peppergrass plants, slickspot peppergrass habitat, and areas classified as occupied by slickspot peppergrass. See Section 3.8 of the SEIS for measures

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				enforce and monitor to ensure that the Project's disturbance does not increase cheatgrass growth, a known threat to Slickspot peppergrass?	required to prevent invasive plants from spreading in the project area.
11	8	12/4/17	Kelly Fuller, Western Watersheds Project	The DSEA has not adequately addressed the concerns about greater sage-grouse that we have raised throughout this process, such as in the Statement of Reasons that we filed during our appeal of the SEIS ROD at IBLA. See Appendix L.3 First, the remanded FSEIS ROD claimed that the Project will "achieve a net conservation gain" for sage-grouse based upon compensatory mitigation. FSEIS ROD at 21. However, a "draft" plan was only ever published, and BLM itself acknowledged it was inadequate to mitigate effects. Id. The FSEIS ROD also claimed that Proponents and the agencies will collaborate on a more effective mitigation plan at some unspecified time in the future. Id. This has not been remedied in the DSEA, which relies on the same incomplete mitigation plans that the FSEIS did. See DSEA at 8. Second, the local population of sage-grouse is isolated, small and suffering from degraded habitat. This Project will subject the local sage-grouse population to habitat fragmentation through the construction of powerlines and roads, as well as the indirect effect of habitat abandonment due to the construction of tall structures (e.g., transmission towers and lines). When sage-grouse populations become isolated, they become at "greater risk of extinction due to genetic and demographic concerns such as inbreeding depression, loss of genetic diversity, and Allee effect (the difficulty of individuals finding one another), particularly where populations are small." See Statement of Reasons at 7. Third, BLM inadequately analyzed direct and indirect impacts to sage-grouse, and failed to consider important findings on sage-grouse released between 2013 and 2016 that were relevant to the Project's impacts. See Statement of Reasons at 8-12. Fourth, BLM inadequately analyzed cumulative impacts to sage-grouse. See Statement of Reasons at 12-16.	Comment noted. Effects on sage-grouse were analyzed in the science-based HEA prepared for the Project, and summarized in Chapter 3 of the FEIS and SEIS.
11	9	12/4/17	Kelly Fuller, Western	At this point in the history of the Gateway West Project, there are mitigation strategies, frameworks, and individual mitigation measures scattered throughout thousands of	Comment noted. The required mitigation for the segments of the Gateway West Project approved in 2013 are part of the ROW grant for those segments.

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			Watersheds Project	pages of NEPA documentation, as well as Congressional instructions regarding mitigation via the Modification Act. This highly fragmented record makes it difficult for the public to decipher which mitigation is still proposed, which no longer applies, and which is not yet fully developed. We appreciate that BLM has attempted in the DSEA to clarify the still-applicable mitigation. DSEA at 8. More clarification is still needed, however.	They are included in an appendix to the ROD for that document. The general process and methods of determining the compensatory mitigation obligation are currently being finalized by an inter-agency oversight committee for approved segments of the Gateway West Project in Wyoming. Once finalized, the process will be vetted and potentially adjusted in the future to conform with state-specific modification for Idaho. Once complete, the compensatory mitigation plan will be assessed for compliance with the mitigation standard set forth in the FEIS and SEIS RODs before issuance of a Notice to Proceed for construction of the Project.
11	10	12/4/17	Kelly Fuller, Western Watersheds Project	It is unclear from the DSEA which of the proposed mitigation and compensatory mitigation measures proposed in past Gateway West NEPA analyses BLM still intends to require for impacts and residual effects to greater sage-grouse and other wildlife located inside the Birds of Prey NCA along the two narrow pathways through the NCA that Congress has now stripped of their NCA designation. For example, the Final Environmental Impact Statement (FSEIS) contains five mitigation/enhancement measures proposed specifically for the Birds of Prey NCA: habitat restoration, property purchase, law enforcement, visitor enhancement, and line and substation removal. FSEIS at 3.11-35. The DSEA states, "The Modification Act also removed the lands affected by this ROW from NCA status and stipulated that the Mitigation Framework presented in the Final SEIS would apply to the authorized segments." DSEA at 2. This would seem to indicate that anything proposed in the FSEIS Mitigation Framework still applies. But do individual mitigation/enhancement measures proposed in the FSEIS but not included specifically in the Mitigation Framework that was referenced by Congress in the Modification Act still apply?	See the previous response.
11	11	12/4/17	Kelly Fuller, Western Watersheds Project	The DSEA further states, "The Modification Act also removed the statutory ROW from the NCA by redefining the NCA boundary. The statutory ROW created a public land corridor across the NCA that is not within the NCA and is therefore not subject to the Public Law 103-64 (16 U.S.C. 460iii-2; 107 Stat. 304) (Enabling Act) that created	The Act also included a requirement for mitigation for the NCA. As stated in the EA: "In addition to these Project-wide plans, the BLM has worked with the Proponents to develop the Mitigation Framework for the NCA (Appendix K to the Final SEIS). The Mitigation Framework for the NCA is intended to analyze and

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				the NCA.” DSEA at 3. This is significant because some of the mitigation measures proposed in the FSEIS’s section 3.11 are specifically identified as “enhancement,” a term that applies specifically to NCAs. Will BLM still require the mitigation measures that were described in past NEPA analysis as “enhancement”? If not, what will BLM require in their stead to reduce the residual effects to wildlife that would have been offset by the proposed “enhancement” measures?	facilitate the development of a Mitigation Plan to offset reasonably foreseeable remaining residual effects from the Project within the NCA. BLM offered the statutory ROW grant authorized by the Modification Act Sec. 2(c)(1) to the Proponents on July 26, 2017. In Sec. 2(c)(2)(A), the Modification Act also stipulated that the Mitigation Framework presented in the Final SEIS would apply to the authorized segments. For mitigating Gateway West Transmission Project impacts within the NCA, the BLM will implement, as directed by Congress, all conditions in Sec. 2(c) of the Modification Act (see Appendix D).”
11	12	12/4/17	Kelly Fuller, Western Watersheds Project	In addition, we note that it has been almost a year since the FSEIS Record of Decision was published, yet the DSEA does not include updated versions of the various mitigation frameworks and strategies. When will BLM make the updated versions available for public comment through a NEPA or other process? When will they be final? We continue to be concerned that some of the mitigation plans for wildlife and habitat have not been fully developed. As we explained in our IBLA appeal, this is insufficient to meet BLM’s legal obligations.	Other than adding new foreseeable projects to the cumulative effects analysis, there are no new analyses in the draft EA. All analyses disclosing impacts on sage-grouse and their habitat can be found in the FEIS and SEIS. BLM managers have determined that the current level of analysis contained in the suite of NEPA documents is sufficient to make an informed decision. The general process and methods of determining the compensatory mitigation obligation are currently being finalized by an inter-agency oversight committee for approved segments of the Gateway West Project in Wyoming. Once finalized, the process will be vetted and potentially adjusted in the future to conform with state-specific modification for Idaho. Once complete, the compensatory mitigation plan will be assessed for compliance with the mitigation standard set forth in the FEIS and SEIS RODs before issuance of a Notice to Proceed for construction of the Project.
11	13	12/4/17	Kelly Fuller, Western Watersheds Project	We again suggest that grazing allotment retirement be considered as a mitigation measure for the Gateway West Transmission Project. It is a proven and cost-effective method of obtaining habitat service gains, as well as a way of facilitating fence removal, which is one of the potential mitigation measures analyzed in Gateway West’s Habitat Equivalency Analysis (HEA). In our experience, riparian areas where grazing has been removed can show markedly beneficial changes in two to five years, while upland areas take longer. A grazing rest study of riparian	Comment noted.

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				areas in the Hart Mountains in Oregon found fourfold increases in willows and rushes, and a 90% bare soil reduction over a period of two decades. See Batchelor, et al. (Appendix I). Another area where livestock have been removed to the benefit of sage-grouse and pronghorn is the Charles Sheldon National Wildlife Refuge in northwest Nevada. In addition, very dry uplands with removed or very reduced livestock use on BLM lands in Lemhi County, Idaho have recovered their native bunchgrass health within ten years. Furthermore, 25- and 45-year studies of grazing removal at the Idaho National Energy Laboratory showed dramatic increases in perennial grass cover. In the 45-year study, forbs, shrubs, and vegetative diversity also greatly increased. See Anderson and Holte (Appendix J) and Anderson and Inouye. Moreover, a study of 75 Great Basin sites in Oregon showed that removing livestock impacts is very beneficial for native vegetation and ecological health. See Reisner, et al (Appendix K).	
11	14	12/4/17	Kelly Fuller, Western Watersheds Project	Although the Project's HEA did not analyze grazing buyouts as a sage-grouse mitigation tool, BLM is not required to limit its mitigation toolbox to only those mitigation choices analyzed in an HEA.	Comment noted.
11	15	12/4/17	Kelly Fuller, Western Watersheds Project	As we stated in our scoping comments, Gateway West Segments 8 and 9 is going to kill a lot of birds, and BLM's previous NEPA analyses do not adequately assess those impacts. In our scoping comments, we provided mortality estimates and the study we based those estimates on. We note with dismay that in the DSEA, BLM continues to rely on the prior inadequate NEPA analyses.	Areas of the ROW spanned by transmission lines, while not cleared of vegetation, may cause indirect effects to migratory birds and habitats, but our ability to quantify these impacts and develop meaningful mitigation, much less an estimate of how many birds may be killed or injured, is limited. The Migratory Bird Plan developed for the Project presents a reasonable analysis and appropriate conclusions from the available research and fully meets the intent of the MBTA.
11	16	12/4/17	Kelly Fuller, Western Watersheds Project	Furthermore, we are concerned that the current proposed mitigation measures for migratory birds and their habitat do not appear to require avian mortality studies. The Project's draft Migratory Bird Habitat Mitigation Plan (2013) includes an element described as an Avian Reporting System: The Bird Mortality Tracking System is an important part of Rocky Mountain Power's adaptive management process.	Comment noted.

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				<p>The reporting system is used to identified [sic] bird mortalities and problem nests associated with Rocky Mountain Power electrical facilities in a centralized database. Additionally, when fatalities or problem nests are discovered, resource agencies are notified according to applicable procedures, permits, and regulations. Rocky Mountain Power uses, and will continue to use, the resulting data to indicate areas that may pose relatively high risk to birds, and which need additional measures to address this risk. The data may also indicate particular equipment types and/or configurations that pose a higher risk to birds.</p> <p>Appendix D of 2013 EIS ROD at 23.</p> <p>This appears to be a description of what happens if workers find dead birds in the fulfillment of their normal duties rather than actual mortality studies with systematic searches.5 Unfortunately, voluntary reporting of incidentally found dead birds to agencies is no substitute for an actual mortality study. In contrast to simply reporting dead birds found incidentally, mortality studies allow reasonable estimates of project mortality, in part because they test and adjust for searcher efficiency and scavenger removal of bird carcasses.</p> <p>Without requiring avian mortality studies, BLM has no way of knowing whether the avoidance and minimization measures described in the NEPA documentation such as marking power lines, are working or not, as well as whether adaptive management is required. This appears to be contrary to regulation: "A monitoring and enforcement program shall be adopted and summarized where applicable for any mitigation." 40 CFR §1505.2(c). As we described in our DSEA scoping comments, a reasonable estimate for bird mortality from Segments 8 and 9 of the Gateway West Project would be around 14,000 birds killed annually and more than 700,000 birds killed over the 50-year life of the Project. WWP DSEA Scoping Comments at 3 (Appendix B). That is a lot of birds, and many if not most of them are protected by the Migratory Bird Treaty Act. Therefore, it is critical that the BLM know whether the avoidance and minimization</p>	

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				mitigation measures it is requiring are working or if adaptive management is called for.	
11	17	12/4/17	Kelly Fuller, Western Watersheds Project	The Cat Creek Energy Project is a proposed 750 MW renewable energy generating and storage project 25 miles north of Mountain Home, Idaho. The proposal includes a large amount of new energy infrastructure: 400 MW pumped storage hydropower, 30 3.65 MW wind turbines, utility-scale wind power, 186,000 solar PV panels, a 230 kV transmission line, and a substation directly connecting to 230 kV and 500 kV transmission systems. ⁶ The Project has been making its way through government regulatory processes for some time, ⁷ and the Proponent told the Idaho House of Representatives in March 2017 that it had completed 7,000 pages of an Environmental Impact Statement. ⁸ Although the reservoir portion of the Cat Creek Project would be on private land, there is a federal nexus because it reportedly requires permits, approvals, and/or consultation from the U.S. Forest Service, U.S. Bureau of Reclamation, and U.S. Fish and Wildlife Service ⁹ , as well as the Bonneville Power Administration.	The BLM considered including the Cat Creek pump-storage hydroelectric project near Pine in our cumulative impacts analysis. We are aware that Cat Creek provided an optimistic picture of the project in their presentation to the legislature in March. In response to their claims, the Bureau of Reclamation sent a letter to Cat Creek dated March 24, 2017 stating: "Reclamation is concerned that Cat Creek does not understand the LOPP process, current status, or a realistic timeline, especially given that little progress has been made since Reclamation notified Cat Creek of its selection as preliminary lessee by letter dated October 17, 2016." Reclamation further stated: "Reclamation's October 17, 2016 letter to Cat Creek does not authorize Cat Creek to use water from Anderson Ranch Reservoir or to begin construction activities." As far as BLM can determine, Cat Creek has not followed through on any of the steps Reclamation's letter identified as needing to be addressed. In light of this uncertainty, we have not included it as a foreseeable project for the Gateway West cumulative effects analysis.
11	18	12/4/17	Kelly Fuller, Western Watersheds Project	Furthermore, Cat Creek Energy Project states their project will be operational in 2020 (DSEA at F-11) and "will be the largest generation facility of any kind in the state of Idaho producing up to 2,467,000 MWhr annually contributing to and making a profound impact on the East-West transmission flow." DSEA at F-9. This would be a massive project, and its various components would produce significant impacts to wildlife and habitat. ¹¹ As a result, in 2016 American Bird Conservancy (ABC) and Golden Eagle Audubon Society (GEAS) wrote to the U.S. Fish and Wildlife Service about their concerns regarding the Cat Creek Energy Project: "ABC and GEAS are concerned that the proposed site for this project poses an unacceptably high risk to state and federally protected wildlife species." See ABC-GEAS Letter at 1 (Appendix D). The ABC-GEAS letter cites potential impacts to migratory birds, raptors, eagles, and	Cat Creek based this prediction on beginning construction is 2017, which did not happen. The Reclamation letter points out that the NEPA analysis for a project of this size and complexity typically takes several years. Based on Reclamation's letter quoted above, the project will not be in service by 2020, nor is there any way to determine at this time when this could occur, or even if they will get the approvals they need to build the project.

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				bats.12 The ABC-GEAS letter also cited a 2016 letter from the Idaho Department Fish and Game that raised concerns about the potential loss of two greater sage-sage grouse leks said to be within a half mile of the proposed Cat Creek Energy Project.	
11	19	12/4/17	Kelly Fuller, Western Watersheds Project	<p>There are a number of reasons why the Cat Creek Energy Project must be included in the BLM's Gateway West, Segments 8 and 9 SEA NEPA analysis as an indirect and/or cumulative impact.</p> <p>As BLM is aware, a NEPA analysis must analyze direct, indirect, and cumulative impacts on the environment. Indirect effects are those "which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." 40 C.F.R. § 1508.8(b).</p> <p>Cumulative impacts are those which result from the "incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions." 40 C.F.R. § 1508.7.</p>	Please see the previous responses concerning the Cat Creek Project.
11	20	12/4/17	Kelly Fuller, Western Watersheds Project	<p>Here, available information indicates the Cat Creek project would effectively be caused and induced by the construction of Gateway West and the availability of that type of transmission line; and the project is reasonably foreseeable.</p> <p>First, the Cat Creek Energy Project's scoping comments for this DSEA (as excerpted in the DSEA) state that Cat Creek Energy will interconnect to the Gateway West transmission line:</p> <p>Cat Creek Energy, LLC ("CCE")'s direct interest in the location of Gateway West is a function of the fact that Cat Creek will be constructing a 750 MW pump storage hydro, wind, and PV solar integrated renewable energy generation facility adjacent to Anderson Ranch Reservoir in Mountain Home, Idaho, that will interconnect with the</p>	Please see the previous responses concerning the Cat Creek Project.

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				<p>series of transmission in the Mountain Home, ID transmission corridor including the anticipated new 500 kV Gateway West transmission line.</p> <p>DSEA at F-9.</p> <p>Second, Cat Creek Energy states that the environmental impacts of their Project and Gateway West are directly related to each other: "In addition, Segment 8, Alt 1 reduces the environmental impact for not only Gateway West, but also Cat Creek Energy and its interconnection route." DSEA at F-12. This statement demonstrates that the Cat Creek Energy Project is connected to Gateway West. If they were unrelated actions, changing the Gateway West route would not also change the environmental impacts of the Cat Creek Energy Project.</p> <p>Third, Cat Creek Energy states that its Project will create a transmission intertie between Gateway West and two other transmission lines: "There is at present no off-ramp or intertie from Midpoint to Hemingway substations on Gateway West. CCE [Cat Creek Energy Project] would create an intertie between the 230 kV IPCo system, the current PacifiCorp 500 kV line, and Gateway West with the Alt 1 route." DSEA at F-12.</p> <p>Thus, the Cat Creek Energy Project is related to the Gateway West transmission lines in Idaho and is a proposed project with both federal and nonfederal agency decisions in the works. It has not previously been analyzed in the Gateway West NEPA documentation, so must be analyzed in this SEA. The question before the BLM is what the Cat Creek Energy Project should be analyzed as. Based on the information that is currently publicly available, we believe it should be analyzed in both the indirect effects and cumulative effects sections of the SEA.</p>	
11	21	12/4/17	Kelly Fuller, Western Watersheds Project	<p>Energy generation projects such as Cat Creek cannot be built without transmission to transport their power to market, and Cat Creek's very large proposed size (750 MW) means that it not only needs transmission capacity, but also a lot of it, which further ties the Cat Creek Energy Project to Gateway West. Cat Creek is reasonably foreseeable because it has initiated the permitting process</p>	Comment noted.

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				at multiple agencies and told the Idaho State Legislature in March 2017 that it had completed about 7,000 pages of an Environmental Impact Statement. See Minutes of Idaho Legislature at 1.	
11	22	12/4/17	Kelly Fuller, Western Watersheds Project	In closing, how BLM decides to move ahead with this 50-year Project will affect wildlife and wildlife habitat for decades to come. Given this Project's plethora of significant impacts, BLM's still-to-be-made mitigation decisions are especially critical. To that end, we would like to request a meeting with BLM to discuss mitigation and other aspects of the Project. We have staff in Idaho who could easily meet with you in person, and we would greatly appreciate you contacting myself or our Senior Attorney, Kristin Ruether, to set up a meeting. She can be reached at kruether@westernwatersheds.org or (208) 440-1930.	Comment noted.