

James Dam

May 31, 2006

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

Re: Scoping Comments for the Proposed Caribou 138/115-kilovolt Substation and Caribou-Lower Valley 115-kV Transmission Line

Dear Sirs:

Please accept these comments regarding the proposed Caribou 138/115-kilovolt Substation and Caribou-Lower Valley 115-kV Transmission Line.

I support the proposed project and the documented need to build a Caribou 138/115-kV substation just north of Soda Springs, Idaho, and Lower Valley Energy's construction of a double circuit 115-kV transmission line, called Caribou-Lower Valley 115-kV, in Caribou County, Idaho. However, I do request that a full Environmental Impact Statement, in place of an Environmental Assessment, be performed to fully investigate the impacts of this proposed construction, and that the EA / EIS include information about the following topics.

A. The EA / EIS Should Fully And Adequately Examine All Cumulative Impacts And Actions, As Well As All Similar And Connected Actions.

The analysis of impacts included in the EA / EIS should address the cumulative impacts of both the proposed energy corridors and other foreseeable similar and connected activities within the same general areas. In this regard, the parties must avail themselves of information regarding energy corridors being presently used, proposed, or studied by the State(s) and the Federal Energy Regulatory Commission, as well as private entities. This area of the EA / EIS should identify how other federal, state, and local plans/programs relate to the project description and activities proposed in this EA / EIS.

In this case, the Bonneville Power Administration's obligations to analyze impacts must encompass not only the proposed corridors, but also the cumulative impacts of the corridors, taken together with the impacts of existing, proposed, or reasonably foreseeable projects, on the environment. Thus, the parties and companies must analyze the cumulative impacts not just of the proposed corridors, but also of other projects that will impact resources in common with this proposed action, and any alternative actions suggested.

In addition, once energy corridors are put in place, it is reasonably foreseeable that other energy development projects may proceed and increase based on the location of those

corridors. An increased level of projects that is likely to occur around these corridors will have a correspondingly increased level of impacts on the surrounding lands. For instance, branch power lines may need to be constructed to make best use of the power lines in the approved corridors.

Similarly, energy corridors support additional resource development projects and also require construction of additional facilities. I request that consideration be given to whether the designation of such energy corridors is likely to facilitate or hasten the construction of additional power generating / transmission facilities and other facilities.

An increased level of energy development projects that will follow these corridors are also connected, as the individual projects (such as an oil and gas development project) and will be inextricably linked to the corridors. Similarly, the clustering of projects to access the transmission corridors is likely to have a cumulatively significant effect on the resources in the area. And, since the additional energy development projects will be tied, at least to some extent, to the location of the corridors, these projects are certainly similar in terms of geography.

In order to fulfill the mandate of NEPA, that the parties and interested parties make an informed assessment of the environmental consequences of their actions, the parties can and should take these connected, cumulative and similar actions into effect and perform a cumulative impact analysis of their potential effects on the overall Western landscapes. "It is not appropriate to defer consideration of cumulative impacts to a future date when meaningful consideration can be given now." (Kern v. United States Bureau of Land Management, 284 F.3d at 1075.)

B. Special Places And Landscapes Must Not Be Designated Energy Corridors.

There are a number of sensitive landscapes and special places that must not be designated as energy corridors. In some cases these areas cannot legally be designated as an energy corridor, in other cases the areas should be avoided so as to protect natural resources from unneeded harm.

These areas include:

1. Wilderness Areas;
2. Wilderness Study Areas (WSAs);
3. National Parks and Forests;
4. National Wildlife Refuges;
5. National Monuments;
6. National Conservation Areas;
7. Other lands within BLM's National Landscape Conservation System (NLCS), such as Outstanding Natural Areas;
8. National Historic and National Scenic Trails;
9. National Wild, Scenic, and Recreational Rivers, study rivers and segments, and eligible

- rivers and segments;
- 10. BLM Areas of Critical Environmental Concern (ACECs);
- 11. Forest Service Roadless Areas; and
- 12. Citizen Proposed Wilderness Areas.

While I believe it is of primary importance that no energy corridor pass directly through any of the types of areas listed above, it is equally important that energy corridors do not infringe on the recreational enjoyment and public access of certain types of areas or otherwise interfere with their natural function or other special values. As a result, I recommend that energy corridors not be sited immediately adjacent to these areas, particularly if doing so would degrade the viewshed or likewise invalidate an area's potential for designation as wilderness.

I believe there are a number of substantive provisions of law that require these areas to not be designated as energy corridors. Of course, there are the obvious prohibitions, such as those in the Wilderness Act and the National Park Service Organic Act that prohibit the designation of energy corridors in National Parks, Forests, and Wilderness Areas. But there are a number of other substantive provisions of law that make it necessary to avoid the above referenced areas. These include section 110f of the National Historic Preservation Act (federal undertakings cannot be approved until to the maximum extent possible and agency undertakes planning and actions "to minimize harm" to National Historic Landmarks), Section 7(a)(2) of the Endangered Species Act (prohibiting federal action that jeopardizes listed species or that may destroy or adversely modify critical habitat), section 302(b) of the Federal Land Policy and Management Act (requiring BLM to take "any" action needed to prevent unnecessary or undue degradation of the public land), etc.

The significance of these substantive provisions of law is that they change the nature of the analysis that must be conducted pursuant to the National Environmental Policy Act. (NEPA) Quite simply, the parties cannot undertake actions that violate these and other provisions of law, and thus the NEPA analysis must be conducted with these responsibilities in mind, and the decision documents must reflect the duties that attach under these provisions, including ensuring the above-referenced areas are not intruded on so as to not violate these and other provisions of prevailing law.

C. Site- And Use-Specific Analysis Must Be Conducted Prior To Designation And Approval Of Energy Corridors.

The scope of NEPA analysis must be appropriate to the scope of the proposed action. (Kern v. United States Bureau of Land Management, 284 F.3d 1062, 1072 (9th Cir. 2002).

In the context of this EA / EIS, the future approval of individual corridors must be based on the specific analysis of the proposed locations and uses of the corridors. If the EA / EIS will not seek to approve individual corridors or take the place of site-specific analysis, then the scope of NEPA analysis can be focused more on the general types of

impacts and the overall effect of this initiative, as is most common. However, if the EA / EIS will commit the parties to a specific course of action, such as authorizing actual corridors for use, then a site-specific and use-specific analysis of each corridor must be completed. For purposes of the EA / EIS for energy corridors, if this document will be used to justify placement of corridors or take the place of later analysis based on the site and anticipated use of individual corridors, then this document must contain thorough site and use-specific analysis for each corridor.

I ask that the EA / EIS include commitments to conduct site-specific NEPA analyses when individual corridor locations and proposed uses are identified. In fact, BLM's resource management plans and project-level EIS's often state that site-specific analysis is not possible until a particular activity, such as a pipeline or transmission line, is proposed. This approach would also be consistent with the NEPA regulation governing tiering environmental analysis for a site specific action to a broader programmatic EIS. The regulation envisions that parties can tier to a "broad environmental impact statement" so that the subsequent environmental document "shall concentrate on the issues specific to the subsequent action." 40 C.F.R. § 1502.20. In the context of the EA / EIS, this broader programmatic document should analyze the general effects of an increased network of corridors. However, tiering to this type of analysis cannot support the approval of individual corridors, which would require a NEPA analysis of the environmental consequences, as "specific to the subsequent action," be included in the EA / EIS.

D. The Range Of Potential Uses Of The Corridors Must Be Considered.

In order to adequately analyze the potential environmental impacts of these corridors, the parties must consider the different types and degrees of effects that could result from different uses. The scoping notice confirms that these corridors may be used for electricity transmission and distribution facilities. The effects of these uses may be quite different, due to the differences in equipment, construction efforts, maintenance needs, etc.

Conceivably, these uses and additional uses may occur in the same corridor. The parties need to identify the likely environmental consequences from the full range of these and other corridor uses – both alone and in combination.

E. The Range Of Alternatives Must Include Environmentally Protective Approaches.

Whether an alternative is "reasonable" or not turns on whether it will accomplish the stated purpose for the project. For this EA / EIS, the stated purpose is to designate corridors on Federal, State, and/or private lands in Caribou County, Idaho for electricity transmission and distribution facilities. In order to fulfill this purpose, the EA / EIS must contain a range of alternatives that takes into account the many values of the public lands that are likely to be impacted by the designation of corridors, including the direct,

indirect and cumulative impacts of the corridors, as discussed in detail above, and which contemplates “more ecologically sound courses of action” to protect these values.

This approach is consistent with NEPA’s requirement to seek to mitigate identified environmental impacts and discuss mitigation measures in an EA / EIS. 40 C.F.R. §§ 1502.14, 1502.16. Moreover, the intent of NEPA is to foster excellent agency action, advance and adopt the policies of NEPA, avoid or minimize adverse impacts, serve as an action-forcing device to ensure the policies and goals of NEPA are infused into the programs and actions of parties, and state how the “requirements” of sections 101 and 102(1) of NEPA will be achieved. Id. §§ 1500.1(c), 1500.2(a), 1502.1, 1502.2(d). Thus, environmental protective approaches must be considered, and in fact adoption of these alternatives should be given preference in order to advance the purposes of NEPA.

In addition to any alternatives identified, I recommend that the parties consider the following, environmentally preferable alternatives in detail:

- 1. Limit corridors to areas adjacent to federal highways and other major state and municipal roadways/maximize use of existing infrastructure** – these areas are already established corridors and placing corridors in these areas is unlikely to significantly increase the environmental consequences of the existing uses and will be less damaging than creating new corridors. Where existing infrastructure can be used—such as existing towers for power lines and preference should be given to this economical use of resources.
- 2. Avoidance of sensitive areas** – the parties can take this opportunity to contribute to the protection of sensitive areas and resources, such as critical wildlife habitat and lands with wilderness characteristics.
- 3. Limit the uses approved for corridors based on the other values that may be affected** – for instance, if a corridor is designated in important wildlife habitat, then uses of the corridor could be limited to activities that have a onetime construction effort and limited maintenance requirements.
- 4. Designate corridors for overhead power lines or for underground pipelines, but not both, as needed to protect environmental values.** This approach would help ensure that incompatible uses are not permitted in areas where they should not be allowed. Not all corridors should be approved for all uses.

F. Use The Wind Energy EIS As A Model.

In June 2005, the Department of the Interior released its Final Programmatic Environmental Impact Statement on Wind Energy Development on BLM-Administered Lands in the Western United States. Many aspects of the Wind Energy EA / EIS represent a well thought out structure for completing an environmental impact statement, which includes a broad analysis of environmental consequences and mandatory mitigation measures, as well as a directed approach for completing project-specific analysis. I recommend that the parties utilize a similar approach for completing the energy corridor

EA / EIS. Specifically, the EA / EIS explicitly outlined Best Management Practices (BMPs) and made the incorporation of these BMPs mandatory for all projects. In addition, the Wind Energy EA / EIS required development of additional site-specific mitigation measures in connection with the analysis and approval of individual projects. I recommend that the parties include mandatory BMPs in this EA / EIS at both the general and specific level. In addition, many of the BMPs identified in the Wind Energy EA / EIS are also applicable to the development of energy corridors as part of this EA / EIS. The Wind Energy EA / EIS identified BMPs for five stages of development: Site Monitoring and Testing, Plan of Development Preparation, Construction, Operation, and Decommissioning. For each stage in the development of wind energy, BMPs were identified to mitigate the effects of or on the following:

1. Wildlife and Other Ecological Resources;
2. Visual Resources;
3. Roads;
4. Transportation;
5. Noise;
6. Noxious Weeds, Herbicides, and Pesticides;
7. Cultural/Historic Resources;
8. Paleontological Resources;
9. Hazardous Materials and Waste Management;
10. Storm Water;
11. Human Health and Safety;
12. Air Emissions and Quality; and
13. Excavations and Blasting Activities.

The Wind Energy EA / EIS listed the Resource Management Plans (RMPs) that must be amended or revised in order to comply with the EA / EIS. The parties should likewise identify RMPs, Forest Plans, Hydrologic Plans, or other governing agency documents affected by this EA / EIS. The Wind Energy EA / EIS also specifically acknowledged the importance of keeping development out of special lands and identified areas from which wind energy development would be excluded. The EA / EIS excluded all Wilderness, BLM NLCS lands and ACECs from consideration for development of wind energy (including transmission lines). While this is a good start, the parties should go a step further and adhere to the list of places to avoid provided above.

G. Avoid and Mitigate Habitat Fragmentation.

Fragmentation of wildlife habitat affects the ecological composition, structure, and functions of a landscape. Although fragmentation can be difficult to measure, there are a variety of metrics that can be used to assess the degree of existing habitat fragmentation and the condition of the landscape, then applied to available data regarding distribution of wildlife and habitat, and ultimately used to make decisions regarding appropriate locations for energy corridors. I ask that the parties complete such an analysis as part of the EA / EIS. Energy corridors cause habitat fragmentation through soil compaction, vegetation alterations, noise disturbance, physical impediments to migration, etc. Many types of energy corridors are essentially permanent clear cuts with all the negative

impacts associated with clear cutting. With respect to habitat fragmentation, I ask that the following reports be considered:

1. The Wilderness Society 2005. Wildlife at a Crossroads: Energy Development in Western Wyoming. Effects of Roads on Habitat in the Upper Green River Valley. Available at <http://www.wilderness.org/Library/reports.cfm>. This report evaluates the impact of energy development on four wildlife species and makes management recommendations to the BLM.

2. The Wilderness Society. 2002. Fragmenting Our Land: The Ecological Footprint from Oil and Gas Development. A Spatial Analysis of a Wyoming Gas Field. Available at <http://www.wilderness.org/Library/reports.cfm>. Landscape analysis of Upper Green River basin in Wyoming shows that oil and gas drilling and extraction cause significant fragmentation of habitat. Conclusion: similar analysis needed for proposed oil and gas projects.

3. The Wilderness Society. 2003. Ecological Effects of a Transportation Network on Wildlife: A Spatial Analysis of the Upper Missouri River Breaks National Monument. Available at <http://www.wilderness.org/Library/reports.cfm>. A spatial analysis of the Upper Missouri River Breaks National Monument. This report presents compelling evidence that the current transportation network in the Upper Missouri River Breaks National Monument has had a significant impact on wildlife populations and other fragile resources across the landscape

4. Wyoming Game and Fish Department. 2004. Recommendations For Development Of Oil And Gas Resources Within Crucial And Important Wildlife Habitats. 183 pp. Available at: <http://gf.state.wy.us/downloads/pdf/og.pdf>. This report presents the Wyoming Game and Fish Department views as appropriate mitigation measures in the face of different levels of energy development, and thus BLM may consider these recommendations in the final EA / EIS, and in adopt these state policies, or at a minimum present a clear and justified basis for rejecting any of the measures.

5. Annual report the impacts of energy development on big game species in the Upper Green River Valley, Wyoming, including the effects of habitat fragmentation. http://www.west-inc.com/big_game_reports.php

H. Impacts To Air Quality Must Be Considered. These energy corridors could serve as a tremendous inducement to industries creating substantial air pollution. Therefore, the EA / EIS must consider the potential effect of designating energy corridors on air pollution. The effects of this designation on Class I areas should be considered, as should the ability of States to submit approvable State Implementation Plans under EPA's regional haze rule should also be considered.

I-. Preference Should Be Given To Providing Corridors For Renewable Energy.

Facilitating the use of renewable energies has become a national priority. One of the strongest limits on the use of these kinds of energy is access to a grid for transport of the energy from where it is generated to where it is used. This is particularly true of wind energy. Thus, the EA / EIS should seek to give preference to creating corridors for the transport of renewable forms of energy, will full consideration being given to the issues identified above.

J-. Use principles of “systems science” to make strategic changes that improve reliability. There is no need to build unnecessary miles of new energy corridors to achieve reliability objectives. A few simple improvements in connectivity might do it. Use strategic links between sub-systems to achieve "improved reliability," "relieve congestion," and "enhance the capability of the national grid to deliver electricity." Consider network structure and inter-node connectivity. See Amory and Hunter Lovins' book “Brittle Power.” <http://www.rmi.org/sitepages/pid1011.php>

K-. The EIS should focus on connecting large populations, not facilitating suburban expansion or bedroom communities in rural areas. Compact urban growth forms should be encouraged. The consequences of sprawl should be factored into the NEPA analysis.

L-. Conserve Soil. Displacement and compaction of soils during construction and maintenance are a major concern.

M-. Minimize Roads. Roads are one of the most damaging impacts to ecosystems because they compact soil, divert water, cause erosion and sedimentation, fragment habitat, and serve as a vector for weeds. Don't forget to consider both the impacts of corridor construction and corridor maintenance.

N-. Protect Water Quality and Values.

Water quality impacts will be caused by construction, steep slopes, roads, and stream crossings. There are instances of horrendous practices where directional drilling under streams ends up blowing drilling mud into sensitive stream habitats. The EA / EIS should consider the problem of Off-Highway Vehicles that trespass on energy corridors and specially enjoy ripping up terrain that then erode into streams. Do not analyze best-case scenarios. Be realistic. Equipment maintenance, fueling, greasing, and cleaning operations should not be done within 500 feet of sensitive wetland / waterway, drainage areas.

O-. Impose Seasonal Restrictions. Construction and maintenance should be limited to dry seasons, especially in sloped areas.

P-. Protect roadless and unroaded areas in both forested and rangeland-grassland desert settings. Large habitat blocks were once abundant and are now rare. Energy corridors should not bisect existing large blocks of habitat. The EIS team should use GIS technology to identify and map all unroaded polygons larger than 1,000 acres and describe the impact of building and maintaining corridors through them. The EIS should

consider the impacts of energy corridors on all the recognized values of roadless and unroaded areas, including:

- (1) High quality or undisturbed soil, water, and air;
- (2) Sources of public drinking water;
- (3) Diversity of plant and animal communities;
- (4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land;
- (5) Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation;
- (6) Reference landscapes;
- (7) Natural appearing landscapes with high scenic quality;
- (8) Traditional cultural properties and sacred sites; and
- (9) Other locally identified unique characteristics.

Q-. Minimize fire hazards. Vegetation management in energy corridors typically results in the growth of dense, stunted plants with interlocking branches (fuel) close to the ground that are relatively more prone to intense fire compared to native vegetation. The long linear shade of energy corridors can also tend to spread wild fire because there is not much to break up the continuity of the unfavorable fuel structures. Energy corridors also increase the risk of fire ignitions due to increase road access and the fact that power lines also interact with smoke to cause arcs that can ignite vegetation.

R-. Prevent Wildlife Mortality. The EA / EIS should adopt alternatives that avoid and minimize direct mortality from collisions with power lines, pipelines, service vehicles, etc. The use of raptor diverters and other such design elements should be considered.

S-. Inter Agency and Inter Jurisdictional Cooperation - The Bonneville Power Administration needs to coordinate its planning and study efforts with the State of Idaho, Bureau of Land Management, the Department of Energy, the Fish and Wildlife Service, and other Federal, State, and Local jurisdictions.

T-. Is this really a site-specific EIS, if so, the analysis must be thorough? I request the parties to identify the centerline and width of the corridors. The parties must take it upon themselves to conduct a full site-specific analysis of every corridor so identified, or leave open the possibility that future site-specific analysis can result in site-specific decisions to alter corridor routes, widths, and compatible uses.

U-. Cultural Values – Please assess the impact of the construction on the cultural and paleontological resources in the proposed corridor areas. Road building contributes to looting, digging, and damage to such resources. Area cultural and paleontological surveys should be accomplished.

V-. Other Values Please assess the construction in terms of the impacts on visual resources / viewshed from sensitive receptor sites, historic and archeological resources, health and safety issues, emergency vehicles access, parking, traffic stoppages, traffic

levels, including the truck mix, impacts on existing land uses including population settlement patterns, recreation and open space impacts, and the socio – economic impacts and the end of life decommissioning and removal of project facilities and structural elements for each of the project alternatives.

W-. Lakes and Streams

The EA / EIS should describe the water bodies found in terms of size, location, hydrology and use. Existing baseline studies and data to be collected at selected streams and lakes will form the basis of the description of existing surface water quality to be included in the EA / EIS. Impacts on water quality, stream morphology, and pollution impacts should be assessed. Vehicle fueling and use of grease and other petroleum-based and hazardous substances products should be restricted to areas 500 feet away from waterways and other sensitive areas.

X-. Groundwater Resources

The EA / EIS should provide a description of groundwater resources in the areas based on historical and existing data and information. Sources of groundwater in the area will be identified and described. The discussion on groundwater quality will specifically address the potential for contamination that may have resulted from on-site activities or from surrounding areas.

Y-. Biological Resources

Information on vegetation, wetlands and wildlife should be discussed at the community and site level, and in terms of relative significance at the regional level. Particular attention will be given to communities that lie within areas of proposed development.

a. Vegetation

Vegetation communities in the areas should be identified using aerial photographs and be field verified. Identified communities will be mapped consistent with classifications and resultant mapping should be included in the EA / EIS. A listing of plant species found within each community type should be compiled during periodic field inspections conducted from spring through fall. The value of the various vegetative community types as habitat for wildlife should also be discussed in the EA / EIS. Finally, the significance of the ecosystem on a regional level should be discussed.

b. Wildlife

The EA / EIS should contain a description of the fauna within the park based upon field investigations, file searches of regulatory agencies, and document research. Fish, birds, amphibians and reptiles, and mammals should all be considered.. A list should be compiled of all species observed on the sites and those species likely to occur on the site based on habitat requirements and geographical distribution. The inventory of fauna on the sites should be correlated with the plant community mapping. On-site investigations should be based on the four seasons, so as to attempt to identify summer resident species, as well as transient species that may only occur during migration. Wildlife corridors

should also be discussed here, including geographical extent of the corridors and species that are expected to use them.

c. Rare and Endangered Species

Information concerning rare, threatened, endangered species and species of special concern that are present on the sites should be presented and discussed. Specific locations of rare species should be considered confidential.

d. Wetlands

Wetland boundaries in the sites should initially be determined using aerial photography and available State and Federal wetland, soil and topographical mapping. There are two levels of wetland identification - the sites as a whole and specific areas proposed for development of some type. Because of the large size of the proposed sites, detailed on-site wetland delineations for the whole area should be considered. However, site-specific wetland delineations will be performed in those areas potentially impacted by construction developments.

Certain critical areas should be checked in the field for accuracy. A figure illustrating wetland boundaries on the project site should be included in the EA / EIS. A brief description of the delineation methodology should be provided. Wetland boundaries shown on State and Federal mappings are determined by two different methodologies; both should be addressed. All mapping should be compatible with the base mapping for the EA / EIS. The National Wetland Inventory (NWI) wetland classifications should also be shown. A wetland delineation report including sampling locations and data should be prepared and referenced within the EA / EIS. The discussion of wetlands in the EA / EIS should include the characteristics of each identified wetland area, such as classification, size, hydrological relationship to the rest of the area, and the function and value of the wetlands and their floral/faunal communities.

Z-. Transportation

The EA / EIS should include an analysis of existing traffic studies and an updated traffic study, as necessary. The capacity and condition of existing public transportation around and to the sites should be discussed. Included in this discussion should be the current seasonal availability of service as well as the present level of use. The EA / EIS should also provide an analysis of the pedestrian environment that will identify and evaluate any trails as they relate to other forms of transportation and to the use of the sites.

A1-.Environmental Assessment (Audit)

An Environmental Assessment should be conducted as part of the planning process. This assessment identifies the likely presence of hazardous substances or petroleum products under conditions that indicate the potential for or a history of release. Findings should be described and summarized in the EA / EIS.

A2-. Unavoidable Adverse Impacts

The EA / EIS should identify any adverse impacts associated with the project sites which cannot be avoided, or adequately mitigated, if the proposed plan is implemented.

A3-. Irreversible and Irretrievable Commitments of Resources

A section of the EA / EIS should include those natural and human resources identified in that will no longer be available for future use if the project is implemented.

A4-. Infrastructure. The EA / EIS should evaluate siting and design criteria to minimize the impacts of roads, transmission lines, and ancillary support facilities associated with development to sensitive species, native plant species, migratory pathways, wildlife habitat, soil, surface water, cultural resources, and view sheds. Considerations should include placement of intra project power lines; storage of spare parts, placement of transformers; transformer design; and placement and design of operations and maintenance buildings. It should also take into account that new roads will provide access to currently inaccessible areas.

A5-. Noise

The EA / EIS should assess the impacts of noise associated with construction, including assessment of noise levels on a variety of species, the effects of noise pollution on property values, and the general nuisance factor of noise that can be heard from any residences or recreational areas. Decibel levels of the noise should be evaluated according to their ability to meet acceptable standards.

A6-. Economics

I request that the EA / EIS include a description of the current system of energy transmission, any BLM fees and royalty structure, and how facility development might affect local economies (e.g., employment, tourism, recreation, property values, local tax revenues, applicable tax credits, electricity rates and reliability, and other fiscal impacts to local governments). A full economic analysis of the costs and benefits of the transmission facility siting should be presented, including costs and benefits to federal, state, and local governments, local communities, and private landowners.

Thank you for considering these comments.

Please add me to your list of interested parties and the mailing list for future communications.

Sincerely,

James Dam