wildidaho.org

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CLV-006

Mark Korsness
Bonneville Power Administration, Public Affairs Office – DKC-7
P.O. Box 14428
Portland, Oregon 97293-4428

June 14th, 2006

RE: Idaho Conservation League and Greater Yellowstone Coalition Comments Regarding Caribou Substation & Caribou-Lower Valley Transmission Line Scoping (TNP-TPP-3)

Dear Mark,

Thank you for considering our comments on the Caribou Substation & Caribou-Lower Valley Transmission Line Scoping (TNP-TPP-3). For thirty years, the Idaho Conservation League has worked to protect Idaho's clean water, wilderness, and quality of life through citizen action, public education, and professional advocacy. For more information or to become a member, visit www.wildidaho.org. As Idaho's largest state-based conservation organization we represent over 9,000 members, many of whom have a deep personal interest in ensuring that energy development does not compromise our water, wildlands, and wildlife.

The Greater Yellowstone Coalition is a non-profit 501(c)(3) conservation organization with over 13,000 members, based in Bozeman, MT, with offices in Wyoming and Idaho. GYC's members regularly use the C-TNF, including the project area, for a variety of activities, including the permitted grazing of domestic livestock, horseback riding, fishing, hiking, hunting, wildlife viewing, spiritual renewal, biological, and botanical research, photography, and for other forms of recreation.

We are concerned about the increasing number of proposals to acquire rights-of-way and construct transmission lines on public lands. Transmission lines reduce and fragment habitat and detract from the recreational experiences that many members of the public enjoy without them. Many utilities insist that they must construct their own transmission lines, rather than cooperating and sharing transmission lines and corridors. Unfortunately this practice often comes to the detriment of public lands. These concerns are described in greater detail in our attached comments.

Once again we thank you for the opportunity to submit comments on the Caribou Substation & Caribou-Lower Valley Transmission Line Scoping (TNP-TPP-3). Please send us any subsequent documents for this project. We look forward to continuing to work with the Bonneville Power Administration on this project and others in the future.

Sincerely,

Brad Smith
Conservation Assistant
Idaho Conservation League

/s/
Marv Hoyt
Idaho Director
Greater Yellowstone Coalition

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Idaho Conservation League Comments Regarding the Caribou Substation & Caribou-Lower Valley Transmission Line Scoping (TNP-TPP-3)

Electric & Magnetic Fields

A significant portion of the transmission line would be located adjacent to private property and residences. Comparatively higher rates of human health concerns occur in locations affected by electric and magnetic fields (EMFs) associated with transmission lines. We are concerned about the potential adverse health impacts that may be caused by the construction of the substation and transmission line in local communities.

Accordingly, the environmental analysis should disclose the potential adverse health impacts that might result from the construction of the transmission line and the substation. Furthermore, the analysis should discuss whether or not any schools, residences, or facilities that provide medical care or assistance are located within the zone where EMFs associated with the proposed transmission line would occur.

Roadless Areas on the Caribou-Targhee National Forest

The environmental analysis must disclose whether or not the proposed transmission line and right-of-way would cross any inventoried roadless areas. Developments of any kind in an inventoried roadless area are considered an irreversible and irretrievable commitment of resources, the effects of which must be analyzed in an environmental impact statement (EIS) rather than an environmental assessment (EA). The Department of Energy should locate transmission lines along existing corridors and roadways and completely avoid Inventoried Roadless Areas, Wilderness Study Areas, and proposed wildernesses.

Sage-grouse

Sage-grouse and many other sagebrush obligates are on the decline throughout much of the Western United States. These species are on the decline for a number of reasons, including fragmentation of habitat from energy development and transmission line construction. Surveys need to be completed to identify any sage-grouse leks, whether active or inactive. The analysis

should also identify any habitat that might be affected by this project. Similarly, the analysis should identify any occurrences of sensitive, threatened, or endangered species such as pygmy rabbit and their associated habitats. Transmission corridors should completely avoid these identified areas.

Avian & Bat Mortality

The environmental analysis should determine if the proposed transmission line would be located within any migratory bird flyways. Locations of nest sites for ferriginous hawks, golden eagles, red-tailed hawks, turkey vultures, owls, and other species should be located. In addition, bat hibernacula should also be identified. Estimates of mortality due to transmission line collisions should be calculated. Any proposed proactive or mitigation efforts should be identified and described in the analysis such a perching deterrence devices.

OHVs

The effects of off-highway vehicles (OHVs) have been well established. Unmanaged OHV use on public lands can result in ecological degradation, reduced wildlife security, erosion, and can introduce noxious weeds and invasive plants. Presumably a maintenance access route will accompany the transmission line. Our concern is that OHV users will utilize the access road and pioneer illegal, unauthorized routes on public lands and introduce noxious weeds. The analysis should describe what measures will be taken to prevent OHV use, such as gates or barriers.

Noxious Weeds

The environmental analysis should describe what best management practices (BMPs) will be used during and after construction to prevent the introduction and spread of noxious weeds. These BMPs should include those to be used in the long-term maintenance of the substation and transmission line as well.