BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON LC 68

In the Matter ofGail Carbiener CommentsIDAHO POWER COMPANYJanuary 9, 2018

This is my third submitted comments. I appreciate your consideration to receive these comments from a concerned citizen. As I previously stated, I am outside of Idaho Power's service area, however am affected by the B2H transmission line's potential damaging effect upon the National Historic Oregon Trail. I am a member of the Oregon-California Trails Association, a national organization whose mission is to protect and preserve the historic trails.

My concern continues to be with Idaho Power's request in action item #6 on page-8: **"Conduct preliminary construction activities, acquire long-lead materials, and construct the B2H project."**

I would like the Commission to determine just what is planned under the construction activities definition. It is not clear and may include significant ground disturbing activities.

On page 34, Idaho Power states; **"During the preliminary construction phase,** geotechnical surveys and ground surveys (light detection and ranging [LiDAR] surveys) help verify potentially hazardous conditions."

In addition to this IPC on page 59 goes on to say; **"Assuming co-participant agreements** are in place, the current B2H schedule plans to commence preliminary construction activities prior to the receipt of a Site Certificate to achieve an in-service date in the mid-2020s."

A recent 500-kV Transmission Line in Southern Oregon contracted with Geotechnical Resources, Inc. (GRI) a consulting firm that specializes in a variety of geotechnical, pavement, and environmental services.

GRI defined <u>"Geotechnical Survey"</u> as: a detailed reconnaissance to describe nearsurface soil/rock and areas of potential geologic hazards that could affect the design, construction, or performance of the transmission line. The field reconnaissance was followed by a detailed subsurface investigation along the alignment.

Significant soil disturbance will certainly occur as well as equipment tracks prior to the road alignments being determined and prepared. The potential for damage to the National Historic Oregon Trail is obvious.



Respectfully,

Jair Carlinen

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