



Office of the Board of County Commissioners
Cassia County, Idaho
1459 Overland Avenue, Burley, Idaho 83318
Phone: 208-878-7302

Leonard M. Beck, Chair
Commissioner Dist. 1
lbeck@cassia.gov

Robert "Bob" Kunau
Commissioner Dist. 2
bob.kunau@cassia.gov

Kent R. Searle
Commissioner, Dist. 3
ksearle@cassia.gov



Office of the Board of County Commissioners
Power County, Idaho
543 Bannock Avenue, American Falls, ID 83211
Phone: 208-226-7610

Ronald Funk, Chair
Commissioner Dist. 1
rjffarms@gmail.com

William Lasley
Commissioner Dist. 2
blasley@co.power.id.us

Delane Anderson
Commissioner, Dist. 3
anderson.delane@gmail.com

Cassia and Power Counties, Idaho Talking Points Regarding the Gateway West Transmission Line

1. WHAT?

What is the impact on private property owners in Cassia County from BLM's decision that would force Gateway off public ground and onto private agricultural ground?

- a) Cassia County and Power County, Idaho (herein referred to as the "Counties") have been actively engaged in BLM NEPA activities regarding the Gateway West Transmission Line planning process since 2009.
- b) The Counties strongly believe that retention of existing productive farmland has more enduring value to the nation than resultant energy from poorly sited Gateway West transmission lines.
- c) Loss of the agricultural sector in the Counties weakens the local, State and National economies and creates a critical national security concern. Maintaining a robust and diverse agricultural sector is essential for a nation's resilience and independence.
- d) The Counties agricultural land is a vital strategic resource that should be protected and kept free from the development of high voltage transmission lines and other energy infrastructure whenever possible.
- e) Destruction of the Counties agricultural land reduces adaptability to climate-related challenges by reducing the number of plants that help decarbonize the atmosphere.
- f) It is in the long-term economic interest of the nation to protect the Counties agricultural base including agricultural workers. Skyrocketing food prices, making basic nutrition unaffordable for many in Idaho, is a direct result of loss of agricultural land.
- g) Agriculture is a key driver of Idaho's economy, contributing approximately \$12 billion annually (\$8.4+ billion in potatoes, hay, corn, wheat, barley, corn, hops, chickpeas and other food crops plus \$3.5 billion in dairy milk production) in and supporting 1 in 8 jobs in the state. Agriculture is also 12% of the US GDP.
- h) Treating Cassia and Power County agricultural lands as exclusion areas for major ROWs including the Gateway West Project, will reduce the significant irreversible adverse impacts to agricultural landowners, food security and low income/migrant workers.

Cassia and Power Counties, Idaho

Talking Points Regarding the Greater Sage-Grouse Draft RMPA/EIS Issued March 15, 2024

2. WHY

Why we have the problem: BLMs flawed or incomplete NEPA documents that will not allow Gateway to locate a public utility on public ground.)

- a) The current threat to the Counties agricultural lands is caused by the narrowly focused federal NEPA analysis that completely misses the mark on the necessary comprehensive cumulative impact analysis.
- b) To the extent that BLM management of sage grouse makes large swathes of public lands off limits to public use for utility corridors, high-voltage transmission, and renewable energy development, BLM is pushing energy development, including the Gateway West Transmission Line Project, onto private lands that have a higher and better use when preserved for agriculture.
- c) When analyzing the Gateway West Transmission Project, BLM failed to consider existing County Comprehensive Land Use Plans and Zoning Codes and resultant socioeconomic effects of induced destruction of agricultural lands. BLM also omitted important environmental justice statistics regarding agricultural employment.
- d) A court deadline on the 2024 Sage-Grouse EIS is causing BLM to rush and make decisions that will affect land uses for the foreseeable future with a flawed analysis.
- e) An outdated 2013 Gateway West Transmission Line EIS is falsely being portrayed as meeting current NEPA standards. BLM is pretending the 2024 sage-grouse lek location data, disturbance caps, mitigation requirements and cumulative impact analysis requirements do not apply to their flawed 2013 EIS. The Counties are challenging their conclusions.

3. HOW?

How do we solve this problem? What needs to be done, can be done, should be done-to allow Gateway to locate mostly on public lands?

- a) The Counties request NEPA analysis revisions on two specific projects: 1) the current Sage-Grouse Draft Resource Management Plan Amendment/Draft Environmental Impact Statement (Draft RMPA/EIS) Issued March 15, 2024, and 2) the 2013 Gateway West Transmission Line EIS to reflect the necessary impact analyses regarding private agricultural lands.
- b) Impacts need to be addressed in more detail in both the large scale sage-grouse planning and more narrowly focused Gateway West Transmission Line NEPA processes. Though crop and dairy farmers may not be growing food directly on lands managed by BLM, the changes in BLM land management due to the sage-grouse and energy policies will adversely impact these lands.
- c) The impacts of rerouting any proposed high power transmission lines including the Gateway West Transmission Project, onto private agricultural land in Cassia and Power Counties need to be addressed on an ongoing basis.

Cassia and Power Counties, Idaho

Talking Points Regarding the Greater Sage-Grouse Draft RMPA/EIS Issued March 15, 2024

-
- d) The BLM sage-grouse team needs to stop performing NEPA analyses in a void. They cannot isolate the analysis of BLM managed lands while ignoring the shift of impacts to unwilling private landowners.
 - e) BLM needs to work more closely with local governments so that their current and future NEPA processes meet the legal requirement to fully and fairly analyze all direct, indirect and consequential impacts to private lands.
 - f) The current 2024 BLM Sage-Grouse Draft RMPA/EIS triggers a supplemental NEPA analysis for the 2013 Gateway West Transmission Line Project, to determine whether sage-grouse classifications changed and to address new data on route alternatives.
 - g) The 2013 Gateway West NEPA analysis does not meet the current sage-grouse related NEPA analyses requirements regarding distance from leks, habitat disturbance restrictions, disturbance caps, documentation and mitigation of irreversible, irretrievable commitments of resources and other important elements.
 - g) The Counties recommend BLM collocate 100% of the proposed Gateway West Transmission Line Project and other energy infrastructure adjacent to existing State and Federal highways, at least within Cassia and Power Counties or implement Alternative 7K analyzed in the 2013 Gateway West Transmission Line EIS.