

Hooper Springs Transmission Project

Supplemental Draft Environmental Impact Statement

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Volume 3: Appendices

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Hooper Springs Transmission Project Supplemental Draft Environmental Impact Statement

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Appendix A

Caribou National Forest

Revised Forest Plan Amendment

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Caribou Forest Plan Amendment

This proposed amendment to the Caribou National Forest (CNF) Revised Forest Plan (RFP) would establish a new corridor of Management Prescription 8.1, Concentrated Development Area, to authorize transmission line construction, operation, and maintenance on Caribou-Targhee National Forest (C-TNF) lands within the proposed transmission line right-of-way (ROW).

Reason for Amendment

Currently, Bonneville Power Administration (BPA) is the lead agency preparing a supplemental draft environmental impact statement (EIS) to build a new, 115-kilovolt (kV) transmission line in Caribou County, Idaho, from a proposed new 138/115-kV BPA substation (Hooper Springs Substation), near the city of Soda Springs, Idaho, to a proposed BPA connection facility that would connect with Lower Valley Energy's (LVE) existing transmission system in northeastern Caribou County. BPA also would construct an approximately 0.2-mile-long, single-circuit 138-kV transmission line between the new Hooper Springs Substation and PacifiCorp's existing Threemile Knoll Substation to connect the new line to the regional transmission grid. BPA is considering a North Alternative, including two route options (the Long Valley Road and North Highland Road options) and a South Alternative, including five route options (Options 1, 2, 3, 3A, and 4) for the proposed transmission line. BPA's preferred alternative is the South Alternative's Option 3A; therefore, Option 3A is the subject of this proposed amendment.

Option 3A would cross approximately 3 miles of the Soda Springs Ranger District of the C-TNF that are currently designated as Management Prescriptions 5.2b, Forest Vegetation Management; 2.7.2, Elk and Deer Winter Range; 8.2.2, Phosphate Mine Areas; and 2.8.3, Aquatic Influence Zone. To be consistent with Forest Plan direction, an amendment is needed to designate the project ROW for the double-circuit 115-kV line as Prescription 8.1, Concentrated Development Areas. This amendment to the *Revised Forest Plan for the Caribou National Forest* (hereafter referred to as the Forest Plan or RFP) would allow for approval of a special use permit for the construction and operation of the proposed transmission line on the Soda Springs Ranger District of the C-TNF, Idaho. The information contained in this supplemental draft EIS would be used in support of an application for a ROW grant to use U.S. Forest Service (USFS) lands for portions of the proposed transmission line ROW extending through the C-TNF.

As a cooperating agency, USFS has and will continue to participate in all aspects of the environmental analysis, and will use this EIS as a basis for its decision regarding issuance of the special use permit and determination of terms and conditions under which the permit should be issued. The Forest Plan establishes management direction including Standards and Guidelines for land and resource management on the C-TNF. Under 36 Code of Federal Regulations (C.F.R.) 219, the National Forest Management Act, consistency with these Standards and Guidelines must be demonstrated prior to project approval. The Forest Plan may be amended to permit projects that are inconsistent with Forest Plan direction (36 C.F.R. 219.10 and CNF Forest Plan pages 1-3 and 1-4). The National Environmental Policy Act (NEPA) analysis for the Project indicates that approval of the special use permit would be inconsistent, in some instances, with Standards and

Guidelines in the CNF Forest Plan. See Table A-1 for analysis of the Project's consistency with forest-wide Standards and Guidelines.

Applicability to the Project

This Forest Plan amendment would apply only for those lands identified in the Hooper Springs Transmission Project EIS and Record of Decision (ROD), and only to decisions on those lands impacted by Option 3A. C-TNF lands not analyzed must undergo analysis following the Guidelines set forth in 36 C.F.R. 220 prior to any additional authorizations.

Management Prescriptions

Management Prescriptions are a set of management practices applied to a specific area of land in order to attain multiple-use and other goals and objectives. They identify the emphasis and focus of multiple-use management activities in a specific area; however, emphasis as used in this context is defined as a focus or a highlight and does not necessarily entail exclusive use. The specific direction stated in a Management Prescription determines what uses are allowed and to what extent the uses are permitted. Forest-wide Standards and Guidelines apply unless specified in the Management Prescription direction.

Standards

Standards are used to promote the achievement of the desired future conditions and objectives at the C-TNF or Management Prescription level. Standards are binding limitations on management activities that are within the authority of USFS to enforce. A Standard can also be expressed as a constraint on management activities or practices (see CNF Forest Plan, page 3-1). Exceptions to Standards require analysis to be disclosed in a NEPA document and a Forest Plan Amendment.

Guidelines

Guidelines are used in the same way as Standards but intended to be flexible to respond to variations, such as changing site conditions or management circumstances. Under the CNF Forest Plan, Guidelines are a preferred or advisable course of action, and they are expected to be carried out, unless site-specific analysis identifies a better approach (see CNF Forest Plan, page 3-1). Exceptions to Guidelines require that the analysis be disclosed in a NEPA document. A Forest Plan Amendment is needed unless a better site-specific approach is identified in the NEPA document.

Standards and Guidelines that would require exceptions to accommodate the proposed project and corresponding mitigation measures are discussed below and in Table A-2. Detailed analysis is provided in the EIS for the proposed project.

Forest Plan Standards and Guidelines Requiring Exceptions within the Project Area Vegetation, Guideline 1

Guideline: Manage to reduce the decline of aspen and promote aspen regeneration and establishment. Provide protection from grazing where needed and consistent with management objectives.

Need for Exception: Option 3A would permanently impact approximately 5 acres of aspen-dominated forest types as a result of access road construction and ROW clearing conversion.

Impacts to aspen-dominated forest types would be limited to the transmission line and access road ROWs, and would not be expected to impact the overall representation of this forest type on the C-TNF (see Section, 3.4, Vegetation, for further discussion).

Mitigation: To the extent practical, Option 3A would avoid vegetation removal except as necessary for ROW and access road clearing and to remove trees and snags that would pose a danger to the transmission line.

Plant Species Diversity, Guideline 4

Guideline: Maintain, and where possible, increase unique or difficult-to-replace elements such as areas of high species diversity, aspen, riparian areas, tall forbs, rare plant communities, etc.

Need for Exception: Option 3A would impact approximately 5 acres of aspen-dominated forest types.

See Section, 3.4, Vegetation, for further discussion. Similar to A.3.1 above, impacts to unique or difficult-to-replace forest types would be limited to the transmission line and access road ROWs, and would not be expected to impact the overall representation of this forest type on the C-TNF.

Mitigation: To the extent practical, Option 3A would avoid vegetation removal except as necessary for ROW clearing and to remove trees and snags that would pose a danger to the transmission line.

Bald Eagle Habitat—Occupied Nesting Zones (Zone I, 0.25 mile radius of nest) and Primary Use Areas (Zone II, 0.5 mile radius of nest), Guideline 3

Guideline: All human activities should be minimized from February 1 to August 1 [within Zones I and II].

Need for Exception: Raptor surveys conducted in April 2007 in support of a preliminary environmental assessment (EA) for the South Alternative located one bald eagle soaring within the Option 3A corridor near the Blackfoot River Narrows, but no known bald eagle nests are located in the vicinity of the project corridor. Additional surveys conducted in March, 2013 along Option 3A identified two inactive bald eagle nests. Suitable foraging habitat exists within the Option 3A corridor, and impacts to forested vegetation could remove potentially suitable nesting or perching trees.

All construction activities associated with the Project would take place from May to October; therefore, human activities cannot be minimized between February 1 and August 1. However, the activities would not occur within Zones I and II as it relates to C-TNF.

Mitigation: Pre-construction nesting bird surveys would be conducted prior to tree removal.

Snag/Cavity Nesting Habitat, Standards 2-3 and Guidelines 1-3

Standard 2: Snags with existing cavities or nests shall be the priority for retention.

Need for Exception: Vegetation clearing would be necessary for construction of the proposed 100 foot transmission line ROW (250 feet clearing width for construction, although 100 feet would be maintained during operation of the line) and access roads (30 feet clearing width, although 20 feet would be maintained as road). These areas (100 feet and 20 feet widths) would be kept clear of all tall vegetation, and would permanently convert forested habitat to non-forested area.

Mitigation: Snags with existing cavities or nests would be preserved off of the transmission line and access road ROWs when there is no danger to the transmission line.

Standard 3: Snag height shall be 15 feet or greater for all forest types.

Need for Exception: Vegetation clearing would be necessary for construction of the proposed transmission line ROW and access roads. These areas would be kept clear of all tall vegetation, and would permanently convert forested habitat to non-forested area.

Mitigation: Snags of 15 feet in height or greater would be retained off-ROW to the extent practical, when there is no danger to the transmission line.

Guideline 1: Snag dbh (diameter at breast height) > 12 inches or largest diameter for the stand for all forest types and should be retained in clusters, where possible.

Need for Exception: Vegetation clearing would be necessary for construction of the proposed transmission line ROW and access roads. These areas would be kept clear of all tall vegetation, and would permanently convert forested habitat to non-forested area.

Mitigation: Snags of dbh greater than 12 inches, or largest diameter for the stand, would be retained in clusters where possible, provided they are located off-ROW and pose no danger to the line.

Guideline 2: Hard-s snag densities for various biological potentials should be approximately as follows by forest type.

Need for Exception: Vegetation clearing would be necessary for construction of the proposed transmission line ROW and access roads for Option 3A. These areas would be kept clear of all tall vegetation, and would permanently convert forested habitat to non-forested area.

Mitigation: Snags cannot be retained within the ROW or where they pose a threat to the transmission line; however, hard-snag densities for various biological potentials as discussed in Guideline 2 would be maintained to the extent practical. Standards and Guidelines regarding biological potential for woodpeckers are not a management consideration within the 8.1 Management Prescription.

Guideline 3: Retain live trees for future snag recruitment using the following guidelines.

Need for Exception: Vegetation clearing would be necessary for construction of the proposed transmission line ROW and access roads. These areas would be kept clear of all tall vegetation, and would permanently convert forested habitat to non-forested area.

Mitigation: Live trees cannot be retained in the ROW or where they pose a threat to the transmission line; however, live trees off of the ROW that do not pose a risk to the transmission line or access roads would be retained for future snag recruitment to the extent practical.

Transportation and Utility Corridors, Guideline 3

Guideline: Utility structures should be made to blend with the existing landscape to the extent feasible.

Need for Exception: Option 3A would be visible from the Blackfoot River and Blackfoot River Road on USFS Partial Retention and Modification lands and therefore potentially not consistent with this guideline. The visual landscape surrounding the Option 3A corridor is relatively natural-appearing but Visual Quality Objectives (VQOs) in that area allow for some visual evidence of human activity if it remains subordinate to the general character of the landscape.

Mitigation: The visual impact of the proposed transmission line would be minimized to the extent practical. See Section 3.3, Visual Resources, for further discussion.

Scenic Resources, Standard 1

Standard: Objectives for scenery (either VQOs or Scenic Integrity Objective [SIOs]) shall be met along Scenic or Historic Byways, Wild and Scenic Rivers, and other sensitive travel routes and special emphasis areas.

Need for Exception: The portion of Option 3A traversing USFS lands in and near the Blackfoot River Narrows passes through an area with a Partial Retention VQO. In this area, the transmission line would be visible from the Blackfoot River, which is listed on the Nationwide Rivers Inventory (NRI) as potentially eligible for listing under the Wild and Scenic Rivers Act because of its scenic and fisheries resources.

Mitigation: Transmission line structures on C-TNF land would be steel and would be consistent with the line, form, color, and texture of the landscape to the extent practical. It is expected this would minimize the visual impact of the transmission line on the visual landscape. See Section 3.3, Visual Resources, for further discussion.

Management Prescription 2.8.3, Aquatic Influence Zone, Lands, Guideline 1

Guideline: Avoid locating facilities and utility corridors in Aquatic Influence Zones (AIZs).

Need for Exception: Option 3A would avoid locating facilities and utility corridors in AIZs to the extent practical. Less than 0.3 acre of impacts to AIZs would occur as a result of access road crossings of intermittent streams. The ROW corridor would include approximately 6.9 acres of land located within Management Prescription 2.8.3; however, the transmission line would span these areas and the majority of these acres would not require clearing or manipulation of vegetation.

Mitigation: Mitigation measures would be designed and implemented to further protect AIZ resources. These mitigation measures would include, but not be limited to, maintaining erosion controls near waterbodies; locating refueling and servicing operations outside of AIZs; and minimizing the project ground-disturbance footprint in sensitive areas such as stream crossings and wetlands, stream and wetland buffers, and AIZs. See Section 3.6.4, Water Resources, Floodplains, and Wetlands, and Section 3.5.4, Geology and Soils, for a detailed discussion of mitigation measures.

Management Prescription 2.8.3, Aquatic Influence Zone, Timber, Guideline 1

Guideline: Timber harvest, including fuelwood cutting, is generally not allowed unless:

- catastrophic events such as fire, flooding, wind, or insect damage result in degraded riparian conditions, and unscheduled timber harvest (salvage and commercial fuelwood cutting) is selected as the most desirable management practice
- silvicultural practices are necessary to achieve desired vegetation characteristics and desired AIZ attributes

Need for Exception: Option 3A would require tree removal in a small number of wetland and intermittent waterbody AIZs for hazardous tree and safety and fire hazard related concerns. However, impacts to individual AIZs would be low and tree removal would only occur as necessary to ensure the safety of the line (see Section 3.6.3, Water Resources, Floodplains, and Wetlands).

Mitigation: Mitigation measures would be designed and implemented to further protect AIZ resources, as discussed for Lands, Guideline 1 above, and detailed in Sections 3.6.4, Water Resources, Floodplains, and Wetlands, and 3.5.4, Geology and Soils. In addition, where possible, trees would be incorporated into mitigation, including snags, down woody debris (DWD), and large woody debris (LWD) to help promote the attainment of desired AIZ characteristics.

Forest Plan Direction to be Amended within the Project Area

The proposed amendment would designate a new corridor of Management Prescription 8.1, Concentrated Development Area, on lands currently designated as Management Prescriptions 5.2, Forest Vegetation Management; 2.7.2, Elk and Deer Winter Range; and 8.2.2, Phosphate Mine Areas to accommodate the Option 3A corridor. As described in the Forest Plan (RFP 4-78), lands in Management Prescription 8.1 are “generally highly developed areas with much evidence of people, structures, roads, and often disturbed ground.” The portion of Option 3A that would traverse C-TNF lands would require a ROW approximately 3 miles long by 100 feet wide. In forested areas, the transmission line would require a 250-foot clearing width as requested by C-TNF to ensure the long-term safety of the line from potential hazard trees and minimize the frequency with which BPA may be required to perform additional hazard tree clearing. Therefore, approximately an additional 75 feet of forest clearing would take place on each side of the ROW in forested areas. Table A-1 details the acreage of each existing management prescription that would need to be converted to Management Prescription 8.1 for Option 3A.

Table A-1. Acreage Added to Prescription 8.1 by Existing Management Prescription

Management Prescription	Option 3A (Acres) ¹
5.2 Forest Vegetation Management	15.4
2.7.2 Elk and Deer Winter Range	20
8.2.2 Phosphate Mine Areas	0.25
TOTAL	36.3

¹ Acreage added to Prescription 8.1 was calculated using the proposed 100 foot ROW width rather than the 250 foot clearing width.

Access roads necessary to construct and maintain the transmission line would remain in their respective Management Prescriptions (5.2b; 2.7.2; 8.2.2; and 2.8.3) and would be managed to comply with those prescriptions. The area surrounding the proposed transmission line and new access roads for Option 3A would retain its existing Recreation Opportunity Spectrum (ROS) class of Roded Modified.

The proposed amendment would allow “concentrated development in small areas for development and infrastructure needs,” consistent with the goals of Management Prescription 8.1. In accordance with standards for Management Prescription 8.1, if through opportunistic or incidental monitoring of the transmission line by BPA maintenance or USFS personnel, or consistent anecdotal reports, the line is found to be causing mortality, BPA would work with USFS to correct the problem. Standards and Guidelines regarding biological potential for woodpeckers are not a management consideration within the 8.1 Management Prescription.

NEPA Analysis

The NEPA evaluation of this proposed amendment, as called for by 36 C.F.R. Part 219, Section 219.10(f), is being performed as part of the Hooper Springs Transmission Project EIS process. As part of the proposed Forest Plan Amendment evaluation, a determination as to whether the proposed amendment is a significant or non-significant amendment to the Forest Plan would be made and documented in the ROD. This amendment is consistent with NEPA, 40 C.F.R. Parts 1500 to 1508, FSH 1909.15 (09/20/10), and 36 C.F.R. 220.

Effects

The direct, indirect, and cumulative impacts of the Project are discussed in Chapter 3 of the Draft EIS. Also refer to Section 3.3 and Appendix B for an analysis of the effects on visual resources; Sections 3.1 and 3.2 for impacts to land use and recreation; Section 3.4 for impacts to vegetation; Section 3.5 for impacts to geology and soils; Section 3.6 for impacts to water resources and wetlands; Section 3.7 for impacts to wildlife; and Sections 3.4, 3.6 and 3.7 and Appendices D and G for impacts to special status species. Changing the management to Concentrated Development would allow actions that would impact vegetation and wildlife within the area. However, the long-term impacts associated with operation and maintenance of the line would be intermittent and low.

Refer to Table A-2 for analysis of the Project's consistency with applicable forest-wide Standards and Guidelines. Impacts and mitigation associated with each Standard and Guideline are also discussed where applicable.

Table A-2 Project Consistency with Forest-wide Standards and Guidelines

U.S. Forest Service, Caribou National Forest

Standards and Guidelines	Consistency
FOREST-WIDE GUIDANCE	
Fire	
Standard 1. All fires shall be suppressed if they are in areas not covered by a pre-approved fire management plan.	Fire management measures in the BPA master contract for the Project would include provisions for monitoring under certain conditions. BPA would also coordinate fire suppression measures with USFS.
Guideline 1. Prescribed and wildland fire use is allowed and encouraged unless prohibited by individual prescription area direction.	N/A. The Project would not involve the use of prescribed fire during construction or operation of the Project, because it would pose a danger to the line. Per Management Prescription 8.1, Fire/Fuels, Guideline 1, “mechanical treatments would be preferred in these areas.”
Guideline 2. When developing vegetation treatment projects, give priority to those reducing fuels in the wildland/urban interface. Strive to move vegetation currently in Fire Condition Class 3 to Condition Classes 1 and 2.	Fire management measures in the BPA master contract for the Project would include provisions for fuels reduction. To the extent possible, BPA would strive to move vegetation currently in Fire Condition Class 3 to Classes 1 and 2.
Guideline 3. When developing wildland fire use plans, consider noxious weed infestations when determining which areas to allow wildland fire use	BPA would consider noxious weed infestations in development and implementation of fire management measures.
Caves	
Standard 1. Retain vegetation in the vicinity of a cave or cave course if it is required to protect the cave’s microenvironment (habitat, climate, vegetation, etc.).	N/A. The Project would not be located near, nor would it disturb any known caves.
Guideline 1. Gating of cave entrances may be allowed as long as the entrance maintains natural airflow patterns.	N/A. The Project would not be located near, nor would it disturb any known caves.
Guideline 2. Management activities may be permitted within any area draining into or away from a cave if they are not likely to adversely affect the cave ecosystem.	N/A. The Project would not be located near, nor would it disturb any known caves.
Soils—All Ecosystems	
Standard 1. Land types identified as being unstable or marginally unstable in the Caribou National Forest Soil Resource Inventory shall be ground verified prior to soil disturbing activities to determine the capability of the land to sustain resource development activities including road construction.	BPA and contractors performed ground verification during summer of 2013 to determine the capability of the land to sustain road and transmission line construction activities.
Standard 2. Suitability for resource management activities shall be disclosed in the site-specific analysis.	The suitability of the Project area for each alternative is analyzed in this EIS document. See Section 3.5, Geology and Soils, for further discussion.

U.S. Forest Service, Caribou National Forest

Standards and Guidelines	Consistency
<p>Standard 3. For ground-disturbing activities where detrimental soil disturbances (defined in Forest Service Handbook 2509.18) occur on areas of 10 acres or greater, plan and implement rehabilitation to meet desired future conditions.</p>	<p>Ground disturbance associated with ROW clearing and road construction exceeds 10 acres. Within the ROW, low-growing vegetation would largely be allowed to reestablish, but tall vegetation that could interfere with operation and maintenance of the transmission line would not. See Section 3.4, Vegetation, for further discussion.</p> <p>Permanent and improved access roads would not be rehabilitated; however, roads would use low grades, out sloping, intercepting dips, water bars, and ditch-outs as needed to minimize erosion. See Section 3.5, Geology and Soils, for further discussion of mitigation measures. Ground-disturbing activities associated with either alternative would not prevent the area surrounding the proposed transmission line ROW and access roads from meeting Desired Future Conditions as described on Page RFP 3-2 of the CNF RFP.</p>
<p>Standard 4. On land types where landslides or landslide prone areas have been identified, a site-specific analysis shall be conducted to ensure project implementation is compatible with desired future conditions.</p>	<p>Based on analysis detailed in Section 3.5, Geology and Soils, the Project would not be intentionally sited on any land types that are landslide-prone. BPA would conduct engineering geotechnical surveys during spring 2014.</p>
<p>Guideline 1. Resource developments and utilization should be restricted to lands identified in the Soil Resource Inventory as being capable of sustaining such impacts.</p>	<p>The soils within the project area are expected to be capable of sustaining the impacts from the Project. See Section 3.5, Geology and Soils. BPA would coordinate with USFS as needed concerning review of the Soil Resource Inventory as applicable to the Project.</p>
<p>Guideline 2. Maintain ground cover, microbiotic crusts, and fine organic matter that would protect the soil from erosion in excess of soil loss tolerance limits and provide nutrient cycling.</p>	<p>Grubbing would be limited to areas around structure sites to reduce the impact on low-lying vegetation.</p> <p>Disturbance associated with permanent and reconstructed access roads for Option 3A would result in the permanent loss of ground cover on up to approximately 13 acres.</p> <p>See Section 3.4, Vegetation and Section, and Section 3.5, Geology and Soils, for further discussion.</p>
<p>Guideline 3. Detrimental soil disturbance such as compaction, erosion, puddling, displacement, and severely burned soils caused by management practices should be limited or mitigated to meet long-term soil productivity goals.</p>	<p>Mitigation measures would be implemented to minimize impacts to long-term soil productivity, including retention and on-site reuse of all topsoils removed; revegetation of all temporarily disturbed areas; break-up of compacted soils prior to reseeded; and monitoring of all reseeded areas. See Section 3.4, Vegetation and Section, and Section 3.5, Geology and Soils, for further discussion.</p>
Soils—Forested Ecosystems	
<p>Guideline 1. Reduce soil erosion to less than the soil loss tolerance limits on lands disturbed by management activities within one growing season after disturbance.</p>	<p>BPA would implement erosion control measures on all permanent access roads and would also initiate reclamation of all temporarily disturbed areas immediately following construction. BPA would replant all temporarily disturbed areas, but plans to allow for two growing seasons in order to measure success. See Section 3.4 Vegetation, and Section 3.5, Geology and Soils, for further discussion.</p>

U.S. Forest Service, Caribou National Forest

Standards and Guidelines	Consistency
<p>Guideline 2. Sustain site productivity by providing the following minimum amounts of woody residue =3 inches in diameter dispersed on the site as outlined in Table 3.1, below. These do not apply within a 300-foot corridor on either side of roads designated as open on the most current version of the Travel Plan.</p> <p>Table 3.1 Minimum Woody Residue by Forest Habitat Type</p> <p><u>3-5 tons/acre:</u></p> <p>Limber pine/curleaf mountain mahogany (Pifl/Cele) Douglas-fir /mountain snowberry (Psme/Syor) Douglas-fir /common juniper (Psme/Juco) Lodgepole pine/heartleaf arnica (Pico/Arco)</p> <p><u>5-10 tons/acre</u></p> <p>Douglas-fir/ninebark (Psme/Phma) Subalpine fir/pine grass (Abla/Caru) Douglas-fir/mountain maple (Psme/Acgl) Subalpine fir/heartleaf arnica (Abla/Arco) Subalpine fir/Ross sedge (Abla/Caro) Douglas-fir/blue huckleberry (Psme/Vagl) Lodgepole pine/blue huckleberry (Pico/Vagl) Douglas-fir/Oregon grape (Psme/Bere) Lodgepole pine/grouse whortleberry (Pico/Vasc) Douglas-fir/white spirea (Psme/Spbe) Lodgepole pine/pine grass (Pico/Caru) Douglas-fir/pine grass (Psme/Caru) Lodgepole pine/elk sedge (Pico/Cage) Subalpine fir/white spirea (Abla/Spbe)</p> <p><u>10-15 tons/acre</u></p> <p>Douglas-fir/mountain sweetroot (Psme/Osch) Subalpine fir/mountain arnica (Abla/Arla) Subalpine fir/mountain maple (Abla/Acgl) Subalpine fir/common snowberry (Abla/Syal) Subalpine fir/grouse whortleberry (Abla/Vasc) Subalpine fir/ninebark (Abla/Phma) Subalpine fir/western meadow -rue (Abla/Thoc) Subalpine fir/blue huckleberry (Abla/Vagl) Subalpine fir/Oregon grape (Abla/Bere)</p> <p><u>15-20 tons/acre</u></p> <p>Engelmann spruce/sweetscented bedstraw(Pien/Gatr) Subalpine fir/mountain sweetroot (Abla/Osch)</p>	<p>BPA would incorporate measures to provide minimum amounts of woody residue to the extent practical. This could include the retention of woody residue within the transmission line ROW as well as placement of woody residue within the ROW following construction.</p>

U.S. Forest Service, Caribou National Forest

Standards and Guidelines	Consistency
Air Quality	
Standard 1. All management ignited fires shall comply with rules, regulations and permit procedures required by the Idaho Department of Health and Welfare, Department of Environmental Quality or appropriate agency from Wyoming and Utah. Planned activities shall be conducted in accordance with the Idaho State Implementation Plan of the Clean Air Act, the Montana/Idaho Smoke Management Plan, and other plans and policies that control smoke emissions on the National Forest.	N/A. The Project would not include the use of prescribed burning.
Guideline 1. Follow visibility and clearing index guidelines when implementing management practices such as prescribed burning.	N/A. The Project would not include the use of prescribed burning.
Guideline 2. Ensure treatments using prescribed fire are consistent with EPA's Interim Air Quality Policy on Wildland and Prescribed Fires, or more current direction.	N/A. The Project would not include the use of prescribed burning.
Lands and Land Exchanges	
Standard 1. Priority shall be given to acquiring lands having special importance or unique characteristics such as riparian areas, historic sites, habitat for federally listed species, recreation sites, etc.	N/A. The Project would not include any land acquisition on USFS land.
Standard 2. Any planned activities on the National Forest which might disturb Geodetic control survey monuments and boundary markers shall be evaluated at the time of project planning and environmental analysis for each specific project.	BPA survey crews would verify the locations of any geodetic survey control monuments and/or boundary markers, and would coordinate with USFS as needed to avoid implementation of any activities that would disturb such markers.
Guideline 1. Access to the Forest should be maintained or improved, as needed, for administration, protection, and public access. Small scale adjustments of landownership may be made through sale and/or exchanges to facilitate economical and logical administration of Federal lands.	Upon completion of construction of the transmission line, new permanent and improved access roads would be gated to exclude public motorized access. Open public roadways would remain open. Traffic associated with maintenance vehicles would be infrequent and would have no impact on access to the Forest. Roadways that may be damaged by construction vehicles and heavy equipment during construction would be repaired and improved as needed. See Section 3.2, Recreation, and Section 3.11, Transportation, for further discussion.
Guideline 2. Maintain a landline location and boundary posting program to identify existing locations and prevent future occupancy trespass.	Upon completion of construction of the transmission line, new permanent and improved access roads would be gated to exclude public motorized access. Open public roadways would remain open. Traffic associated with maintenance vehicles would be infrequent and would have no impact on access to the Forest. Roads that may be damaged by construction vehicles and heavy equipment during construction would be repaired and improved as needed. See Section 3.2, Recreation, and Section 3.11, Transportation, for further discussion.
Special Uses	
Standard 1. Allow special uses that are compatible with other resources.	The intent of this EIS is to support a decision that ensures the Project would be constructed and maintained in such a way as to be compatible with other resources.
Standard 2. Establish and maintain current appraisal data, where required, rental fees and user fees for all special use authorizations.	BPA would establish and maintain current appraisal data, where required.
Standard 3. Adequate bonds or other security instruments shall be required for special use authorizations if it is determined that the use has potential for disturbance that may require rehabilitation or when needed to ensure other performance.	BPA acknowledges that, should it be determined that the proposed transmission line has potential for disturbance that may require rehabilitation, adequate bonds or other security instruments may be required for authorization of the special use permit.

U.S. Forest Service, Caribou National Forest

Standards and Guidelines	Consistency
Transportation and Utility Corridors	
<p>Standard 1. Existing and proposed ROWs of the following types shall be designated as corridors (Prescription 8.1). This does not prevent the inclusion of lower-rated transmission lines or smaller pipelines within the corridors.</p> <p>Communication lines and zones for interstate use.</p> <p>Railroads.</p> <p>Federal, state, interstate, and forest highways.</p> <p>Electric transmission lines of 66KV and greater, including fiberoptics.</p> <p>Oil, gas, slurry, or other pipelines 10 inches or larger in diameter.</p>	<p>The Project is the subject of an application for amendment to the Caribou Forest Plan to designate the portion of the proposed transmission line ROW located on C-TNF lands as Prescription 8.1, Concentrated Development Area.</p>
<p>Standard 2. Proponents of new facilities within existing corridors, and new corridor routes, shall demonstrate that the proposal is in the public interest, and that no other reasonable alternative exists to public land routing.</p>	<p>The Project is the subject of an EIS. Chapter 1 of the EIS describes the underlying public need it intends to serve. Given the somewhat linear nature of the C-TNF it would be very difficult to site around the Forest.</p> <p>The interconnection with the existing LVE transmission line at the eastern terminus of Option 3A lies on the opposite side of an approximately 3-mile wide section of C-TNF land from the western portion of the corridor. Given the linear nature of the C-TNF in the Option 3A corridor, it would be infeasible to site around the Forest.</p>
<p>Standard 3. Allow for essential access for repair and maintenance of facilities within energy corridors.</p>	<p>Option 3A would include approximately 5.5 miles of permanent and reconstructed access roads.</p> <p>Access roads would be constructed and used specifically for essential repair of and maintenance access to the proposed transmission line ROW. These roads would be gated during the operation and maintenance phase of the proposed transmission line to exclude public motorized access. See Section 3.2, Recreation, for further discussion.</p>
<p>Guideline 1. Utility corridors should have irregular clearing widths and follow patterns of existing natural openings.</p>	<p>The edges of the Option 3A ROW would be feathered, and BPA would coordinate with USFS to ensure that ROW clearing is consistent with Forest Plan standards and guidelines for utility corridors.</p>
<p>Guideline 2. Long distance lines of 35KV or smaller and short - distance lines of 115KV or smaller should be buried.</p>	<p>Option 3A would be approximately 24 miles long and would traverse approximately 3 miles of USFS land. These would not qualify as short-distance lines and therefore would be unfeasible to bury.</p>
<p>Guideline 3. Utility structures should be made to blend with the existing landscape to the extent feasible.</p>	<p>Under Option 3A, the transmission line ROW and structures would be visible from Blackfoot River Road and the Blackfoot River in the vicinity of the Blackfoot River Narrows.</p>
<p>Guideline 4. Where feasible, new facilities should be limited to existing ROWs having widening potential</p>	<p>The alternatives analyzed in the EIS were selected as the most feasible options based upon an alternatives analysis conducted in support of a preliminary EA. See Chapter 2, Proposed Action and Alternatives, for further discussion. All new facilities on USFS lands are restricted to the proposed transmission line ROW.</p>
<p>Guideline 5. Before new corridors or widening of existing corridors are approved, consideration should be given to wheeling, uprating, or multiple circuiting of transmission lines or increasing pipeline capacity by addition of compressors or looping.</p>	<p>The alternatives analyzed in the EIS were selected as the most feasible options based upon alternatives analysis conducted in support of a preliminary EA and subsequent public scoping efforts. See Chapter 2, Proposed Project and Alternatives, for further discussion.</p>

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Standards and Guidelines	Consistency
Guideline 6. Avoid parallel corridors. Consolidate facilities within existing energy corridors where feasible.	The Project would avoid parallel utility corridors.
Guideline 7. Pipelines and other related utilities should share utility corridors except as needed to meet other resource goals	N/A. The Project would not include the routing of any pipelines.
Hydropower Facilities	
Standard 1. Forest Service personnel shall provide terms/conditions or recommendations to FERC under authority of the Federal Power Act when a proposed hydropower project (on or off Forest land) has the potential to affect Forest resources.	N/A. The Project does not include the construction of any hydropower facilities.
Minerals and Geology—General Mining	
Standard 1. Lessee/operator shall conduct pre-mining, concurrent, and/or post-mining water quality and aquatic habitat monitoring (both surface and groundwater) on all phosphate-mining sites where bond release has not occurred, using most current sampling procedures and protocols.	Option 3A would not involve mining but would cross one or more phosphate mining areas that may have heavy metal and selenium soil contamination, BPA has worked closely with USFS, BLM, and the mining companies to identify a potential pathway for its transmission facilities through the phosphate mining areas in an effort to avoid known contamination and minimize potential for release of contamination into waterbodies. Additionally, Option 3A would include both a Stormwater Pollution Prevention Plan (SWPPP) and Spill Prevention and Response Procedures to control and prevent releases into waterbodies and adjacent AIZs (See Section 3.5.4, Geology and Soils, and Section 3.13.4, Public Health and Safety).
Standard 2. Best Management Practices shall continue to be developed, refined and implemented to ensure that no release of hazardous substances into the environment exceeding established state and/or federal standards occurs.	As stated above, BPA has worked closely with USFS, BLM, and the mining companies to identify a potential pathway for its transmission facilities through phosphate mining areas in an effort to avoid known contamination and minimize potential for release of contamination into waterbodies. Option 3A would include both a Stormwater Pollution Prevention Plan (SWPPP) and Spill Prevention and Response Procedures to control and prevent releases into waterbodies and adjacent AIZs (See Section 3.5.4, Geology and Soils, and Section 3.13.4, Public Health and Safety).
Standard 3. Prior to closure of inactive or abandoned underground mines, surveys for cave-dependent species shall be completed and applicable mitigation measures developed/implemented.	N/A. Option 3A would not involve the closure of any inactive or abandoned mines.
Standard 4. When surface disturbing activities are proposed within geologic units having a moderate or high potential for the occurrence of vertebrate fossils (other than fish or sharks), a field survey of the area shall be made prior to, and if possible, during the proposed activities.	Option 3A is not expected to traverse geologic units having a moderate or high potential for the occurrence of vertebrate fossils. BPA would continue to coordinate with USFS on this matter, and if it is determined that there is potential for the occurrence of vertebrate fossils, field surveys would be conducted prior to, and if possible, during construction of the transmission line.
Standard 5. Recreational gold dredging shall be conducted in accordance with applicable Forest direction and Idaho Department of Water Resources' Application for a Permit to Alter a Stream Channel-Recreational Dredging Application (For Suction Dredges with Nozzle Size of 5 inches Diameter or Less and Equipment rated at 15 hp or less).	N/A. Option 3A would not involve recreational gold dredging.

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Standards and Guidelines	Consistency
Guideline 1. Development of locatable minerals should minimize surface disturbance, sedimentation, air pollution, visual impairment, and meet applicable State Water Quality Standards.	Option 3A would not involve the development of locatable minerals. Proposed measures to mitigate surface disturbance, sedimentation, air pollution, visual impairment are discussed in Sections 3.3, Visual Resources; 3.5, Geology and Soils; 3.13, Public Health and Safety; and 3.14, Air Quality. Sections 3.6, Water Resources, Floodplains and Wetlands and 3.13, Public Health and Safety, discuss mitigation measures intended to ensure that the project meets applicable state water quality standards.
Guideline 2. Give priority to use of currently developed mineral material (sand, clay, gravel and stone) sources over undeveloped sources. New sources can be identified when existing sources are unable to economically or safely supply the quality and quantity of material needed.	To the extent that sand, clay, gravel, stone, or other mineral resources may be necessary for construction of the transmission line and roads, BPA would prioritize sourcing of these materials from existing and currently developed sources.
Minerals and Geology—Drastically Disturbed Lands¹	
	The Project would not disturb a large area of surface soils or highly alter topography. Therefore, it is not expected that lands impacted by the Project would be considered “drastically disturbed.” Revegetation and other mitigation measures associated with the Project are discussed below as they apply to the Standards and Guidelines for Drastically Disturbed Lands.
Standard 1. Mines shall be administered to help assure compliance with applicable State and/or Federal surface and groundwater regulatory standards.	N/A. The Project does not include any mining activity.
Standard 2. Diversions to control surface flow and infiltration on overburden piles, pit backfill, and all disturbed areas shall be designed to be self-maintaining or maintained by the lessee.	N/A. The Project does not include any mining activity.
Standard 3. Soil resources shall be inventoried to National Cooperative Soil Survey standards for Order 2 or more detailed levels. Volumes and suitability of soil resources for reclamation shall be determined before disturbance.	N/A. As the Standards and Guidelines for Drastically Disturbed Lands would likely not apply, it is not expected that an Order 2 or more detailed soil survey would be necessary
Standard 4. Topsoil and selected subsoils suitable for reclamation, as identified in the soil inventory, shall be salvaged on all slopes where equipment can safely operate and either stockpiled and protected or directly placed.	All native topsoil removed for structure and access road construction would be stockpiled and reused on-site for restoration activities. See Section 3.5, Geology and Soils, for further discussion of proposed mitigation measures.
Standard 5. Mining operations covering multiple year periods shall include plans for concurrent reclamation, which shall be reviewed and, if necessary, updated annually with the operator.	N/A. The Project does not include any mining activity.
Standard 6. Interim reclamation shall be conducted according to a plan submitted at the time the Forest Service is notified of a temporary shutdown.	N/A. The Project does not include any mining activity.
Standard 7. Reclamation vegetation shall be monitored for bio-accumulation of hazardous substances prior to release for multiple use management.	N/A. The Project does not include any mining activity.

¹ Drastically disturbed lands are extremely large areas where the surface soil layers or topography have been highly altered or rearranged through human activities such as mining. (Caribou Revised Forest Plan, p. 3-14)

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Standards and Guidelines	Consistency
Standard 8. The lessee/operator shall monitor reclamation work annually and report to the Forest Service until reclamation is accepted and the bond released.	N/A. As the Standards and Guidelines for Drastically Disturbed Lands would likely not apply, it is not expected that a bond would be required. Reclamation and reseeding efforts would be monitored during construction and afterward as needed. BPA would conduct monitoring of all ground-disturbed areas for 5 years for noxious weed invasions, and take corrective action as necessary, in coordination with C-TNF personnel and in adherence to the Forest's weed management efforts. See Section 3.4, Vegetation, and Section 3.5, Geology and Soils, for further discussion of proposed mitigation measures.
Standard 9. Loss of available surface water sources for uses such as wildlife or grazing, as a consequence of mining operations shall be replaced or mitigated by the mine operator. This includes the loss of water quality sufficient to maintain post-mining uses.	N/A. The Project does not include any mining activity.
Standard 10. Within mine areas, native vegetation shall be retained undisturbed when disturbance of the site is not necessary for minerals development or safety.	N/A. The Project does not include any mining activity.
Standard 11. Actual cost reclamation bond amounts shall be determined and bonds secured prior to surface disturbance or project implementation.	N/A. The Project does not include any mining activity.
Standard 12. Surface water management shall be designed and maintained to control water runoff, erosion, sedimentation, and contamination.	BPA would implement erosion control measures during construction to control runoff, erosion, and sedimentation, and would revegetate disturbed areas upon completion of construction. Where appropriate, erosion control measures would be left in place and maintained during operation of the Project.
Guideline 1. Suitable topsoil/subsoil should be spread over the selected area of application in a way that best supports biological diversity and prevents the release of hazardous substances.	Native topsoil removed for structure and access road construction would be stockpiled and reused on-site for restoration activities to promote regrowth from the native seed bank in the topsoil.
Guideline 2. Selection of plant species for establishment should reflect the surrounding ecosystem and post remedial land use. Plant materials used should be adapted to the climate of the site. Consideration and preference should be given to promoting natural succession, native plant species, and structural diversity.	Appropriate seed mixes, application rates, and seeding dates would be used to revegetate temporarily disturbed areas following completion of construction activities. Native topsoil removed for structure and access road construction would be stockpiled and reused on-site for restoration activities to promote regrowth from the native seed bank in the topsoil. BPA would coordinate with the Forest botanist and silviculturalist for proper seed mixes to be used in revegetation efforts. See Section 3.4, Vegetation, and Section 3.5, Geology and Soils, for further discussion of proposed mitigation measures.
Guideline 4. Reclaimed areas should be graded and shaped, where possible, to a stable topographic relief that conforms and blends in with the variability of surrounding slopes. Final reclaimed slopes shall not be steeper than 3:1.	N/A. The Standards and Guidelines for Drastically Disturbed Lands would likely not apply to the Project, and no large areas of land would need to be reclaimed. BPA construction plans would include re-grading temporarily disturbed areas to their original morphology.
Guideline 5. Implement appropriate BMP's identified in current Best Management Practices for Mining In Idaho and other appropriate sources.	N/A. The Project does not include any mining activity.

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Standards and Guidelines	Consistency
Guideline 6. Ground cover should be assessed prior to release of the reclamation bond to assure: 1) minimum ground cover exists to attain long-term soil productivity requirements; 2) ground cover should persist at minimum cover needs without artificial assistance (e.g. watering, fertilizers, etc.); and 3) meet or trend towards post-mining land use goals.	N/A. The Project does not include any mining activity.
Guideline 7. In reclaimed areas, vegetation should include species that meet wildlife habitat needs. Wildlife structures (slash piles, logs, rock piles) using native vegetation and materials are designed to provide cover for wildlife movements in created openings.	To the extent practical, Option 3A would avoid the removal of vegetation and vegetation communities that provide important wildlife habitat, including large trees and snags and tall, thick sagebrush stands. Appropriate seed mixes, application rates, and seeding dates would be used to revegetate temporarily disturbed areas following completion of construction activities. Wildlife habitat structures including slash piles or logs would be retained or placed on the ROW as practicable. See Section 3.4, Vegetation, and 3.7, Wildlife, for further discussion.
Guideline 8. Roads, disturbed areas, and facilities no longer needed for mining operations should be reclaimed as prescribed in the reclamation plan within one year after the lands become available for reclamation.	N/A. The Project does not include any mining activity.
Guideline 9. Objectives for scenery may or may not be met on drastically disturbed lands.	N/A. The Project does not include any drastically disturbed lands.
Watershed and Riparian Resources	
Guideline 1. Not more than 30 percent of any of the principal watershed ² and/or their subwatersheds (6 th HUC) should be in a hydrologically disturbed condition ³ at any one time.	Of the 6 th level HUC (12-digit) watersheds that contain USFS land affected by the Option 3A, the Project would impact no more than 0.4 percent
Guideline 2. Proposed actions analyzed under NEPA should adhere to the State Source Water Assessment Plan to achieve consistency with the Safe Drinking Water Act, and amendments, to emphasize the protection of surface and ground water sources used for public drinking water.	There are no groundwater monitoring wells located on USFS land within the Option 3A ROW. There are therefore no anticipated direct impacts to groundwater or wells for Option 3A. See Section 3.6, Water Resources, Floodplains, and Wetlands, for further discussion.

² These Project Work Inventory (PWI) watersheds have been delineated on the C-TNF and are at approximately the same scale as 5th level hydrologic unit codes (HUC) that were used in the ICEBMP assessment effort.

³ Hydrologically Disturbed Condition. Changes in natural canopy cover (vegetation removal) or a change in surface soil characteristics (such as compaction) that may alter natural streamflow quantities and character. Hydrologically Recovered Condition. Vegetative life form where natural canopy coverage is achieved and subsequent streamflow quantities and character (timing and amount) reflect more natural conditions. Roads are considered hydrologically recovered if obliterated or ripped and drained and have 80 percent or more ground cover.

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Standards and Guidelines	Consistency
Guideline 3. Projects in watersheds with 303(d) listed waterbodies and/or delineated Source Water Protection Areas should be supported by scale and level of analysis sufficient to permit an understanding of the implications of the project within the larger watershed context.	<p>Within the project area, the Blackfoot River, Little Blackfoot River, Meadow Creek and Mill Canyon Creek are listed on the 2010 303(d) list. See Section 3.6, Water Resources, Floodplains, and Wetlands for specific analysis of impacts associated with these waterbodies. Option 3A would not impact the Little Blackfoot River, Tin Cup Creek or Chippy Creek, their intermittent tributaries, or associated Aquatic Influence Zones (AIZs).</p> <p>No more than 0.4 percent of any 6th level HUC watershed would be affected by Option 3A, and impacts to the waters within these watersheds would be primarily short term. At a watershed level these impacts would be de minimis.</p>
Guideline 4. Proposed actions analyzed under NEPA should adhere to the State Nonpoint Source Management Plan to best achieve consistency with both Sections 313 and 319 of the Federal Water Pollution Control Act.	The Idaho state plan was considered in the evaluation of the Project. Many of the mitigation measures proposed are intended to reduce increased sedimentation, a major non-point source of pollution in area waterbodies as a result of construction. See Sections 3.5, Geology and Soils, and Section 3.6, Water Resources, Floodplains, and Wetlands.
Vegetation	
Standard 1. Do not conduct management activities that may alter canopy vegetation within 400 feet of a Natural Resource Conservation Service (NRCS) snow measuring site without first contacting NRCS.	BPA would confirm the location of any NRCS snow measuring sites within the project area, and would contact NRCS regarding any canopy-altering management activities that may take place within 400 feet of a snow measuring site.
Standard 2. In each 5th code HUC which has the ecological capability to produce forested vegetation, the combination of mature and old age classes (including old growth) shall be at least 20 percent of the forested acres. At least 15 percent of all the forested acres in the HUC are to meet or be actively managed to attain old growth characteristics.	The removal of forest vegetation in the affected HUCs should not limit the Forest's ability to meet this standard. See Section 3.4, Vegetation, for further detail.
Standard 3. The definition of old growth characteristics by forest type found in "Characteristics of Old-Growth Forests in the Intermountain Region (Hamilton 1993) shall be used unless more current direction is developed.	BPA and contractors conducted old growth surveys for the Option 3A corridor in August of 2013. Based on the definition of old growth characteristics by forest type found in Hamilton (1993), none of the stands surveyed met the criteria for old growth.
Standard 4. Silvicultural prescriptions shall be completed for all forested vegetation treatments.	The BPA Forester would coordinate with the Forest silviculturalist to develop the appropriate prescription.
Guideline 1. Manage to reduce the decline of aspen and promote aspen regeneration and establishment. Provide protection from grazing where needed and consistent with management objectives.	<p>Option 3A would permanently impact approximately 5 acres of aspen-dominated forest types. The Option 3A corridor traverses areas of C-TNF land where grazing is allowed but not specifically identified as a management goal. If necessary, protection from grazing would be provided as is consistent with management objectives.</p> <p>Impacts to aspen-dominated communities would be limited to the transmission line ROW and off-ROW access roads. See Section 3.4, Vegetation, for further discussion.</p>
Guideline 2. Focus treatments on aspen clones which are at the greatest risk of conversion to conifer.	Some aspen communities would be permanently impacted by the Project. Impacts to aspen-dominated communities would be limited to the transmission line ROW and off-ROW access roads.

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Standards and Guidelines	Consistency																																																																				
<p>Guideline 3. For aspen and conifer types, acres classified as mature and old growth should be in blocks over 200 acres in size unless the natural patch size is smaller. (A block can consist of a combination of mature and old growth forest types). Within these blocks:</p> <ul style="list-style-type: none"> ▪ Maintain the dead and down woody material guidelines for wildlife. (See Wildlife Standards and Guidelines for Dead and Down material). ▪ Silvicultural techniques may be used to maintain or improve old growth and mature forest characteristics. ▪ If a catastrophic event (such as fire) reduces the acres of old growth and mature forest below 20 percent of the forested acres in a principal watershed, identify replacement forested acres. When necessary, use silvicultural techniques to promote desired characteristics in the replacement acres. 	<p>BPA and contractors conducted old growth surveys for the Option 3A corridor in August 2013. Based on the definition of old growth characteristics by forest type found in Hamilton (1993), none of the stands surveyed met the criteria for old growth.</p>																																																																				
<p>Guideline 4. When delineating old forests, use the definitions of late seral stages by forest type as shown in the Table 3.2 below. These are guidelines and site-specific stand structure should determine delineation of late seral stands.</p> <p>Table 3.2 Characteristics of Late Seral Forests by Vegetation Overstory Type.</p> <table border="1"> <thead> <tr> <th>Forest Type</th> <th>Age</th> <th>Trees per Acre</th> <th>DBH in inches (diameter at breast height)</th> </tr> </thead> <tbody> <tr> <td>Lodgepole pine</td> <td>100+</td> <td>40+</td> <td>9+</td> </tr> <tr> <td>Mixed Conifer</td> <td>100+</td> <td>40+</td> <td>12+</td> </tr> <tr> <td>Spruce/fir</td> <td>110+</td> <td>20+</td> <td>12</td> </tr> <tr> <td>Douglas-fir</td> <td>14+</td> <td>25+</td> <td>14+</td> </tr> <tr> <td>Aspen</td> <td>0+</td> <td>20+</td> <td>10+</td> </tr> </tbody> </table>	Forest Type	Age	Trees per Acre	DBH in inches (diameter at breast height)	Lodgepole pine	100+	40+	9+	Mixed Conifer	100+	40+	12+	Spruce/fir	110+	20+	12	Douglas-fir	14+	25+	14+	Aspen	0+	20+	10+	<p>The definitions of mature, old forest/late seral, and old growth used in this survey are based on criteria presented in “Forest Stand Structure” (Beck 2010), a draft white paper that synthesizes definitions provided in the RFP and elsewhere. Table 1 shows the thresholds used in this study to evaluate stand structure.</p> <p align="center">Table 1. Forest Size Structure Classes*</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Cover Type</th> <th>Age (years)</th> <th>Trees per Acre</th> <th>dbh/Size (inches)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Mature</td> <td>Douglas-fir</td> <td>90-139</td> <td>~50+</td> <td>9+</td> </tr> <tr> <td>Lodgepole Pine</td> <td>80-99</td> <td>~50+</td> <td>8+</td> </tr> <tr> <td>Aspen</td> <td>40-59</td> <td>~35+</td> <td>7+</td> </tr> <tr> <td rowspan="3">Old Forest/Late Seral</td> <td>Douglas-Fir</td> <td>140+</td> <td>25+</td> <td>14+</td> </tr> <tr> <td>Lodgepole Pine</td> <td>100+</td> <td>40+</td> <td>9+</td> </tr> <tr> <td>Aspen</td> <td>60+</td> <td>20+</td> <td>10+</td> </tr> <tr> <td rowspan="3">Old Growth</td> <td>Douglas-Fir</td> <td>200</td> <td>10</td> <td>18+</td> </tr> <tr> <td>Lodgepole Pine</td> <td>140</td> <td>25</td> <td>11+</td> </tr> <tr> <td>Aspen</td> <td>100</td> <td>20</td> <td>12+</td> </tr> </tbody> </table> <p>* Forest Stand Structure, Beck 2010</p> <p>BPA and contractors conducted old growth surveys for the Option 3A corridor in August of 2013. Based on the definition of old growth characteristics by forest type found in Hamilton (1993), none of the stands surveyed met the criteria for old growth. See Section 3.4, Vegetation, for further discussion.</p>	Description	Cover Type	Age (years)	Trees per Acre	dbh/Size (inches)	Mature	Douglas-fir	90-139	~50+	9+	Lodgepole Pine	80-99	~50+	8+	Aspen	40-59	~35+	7+	Old Forest/Late Seral	Douglas-Fir	140+	25+	14+	Lodgepole Pine	100+	40+	9+	Aspen	60+	20+	10+	Old Growth	Douglas-Fir	200	10	18+	Lodgepole Pine	140	25	11+	Aspen	100	20	12+
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<p>Guideline 5. Use methods of vegetation treatment that emulate natural disturbance and successional processes.</p>	<p>The Project would use methods of vegetation treatment that emulate natural disturbance and successional processes.</p>																																																																				

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Standards and Guidelines	Consistency
Guideline 6. Forest vegetation manipulation is allowed on unsuitable timberlands to accomplish individual management prescription directions, other resource benefits, or for the reduction of hazardous fuels in urban interface zones. Production of wood products should not be the primary consideration.	Forest vegetation manipulation would be necessary for construction of the ROW and access roads. Production of wood products is not a primary consideration of the Project.
Guideline 7. Vegetation manipulation may include mechanical treatments, chemical treatments, commercial or non-commercial timber harvest of wood products, prescribed fire, wildfire for resource benefit, or other appropriate methods. Manipulations should emphasize ecological and multiple use outcomes over being “above-cost.”	Vegetation manipulation associated with either alternative would include mechanical treatment within the ROW, and adjacent to the ROW as needed to remove danger trees. Merchantable timber removed as a result of ROW clearing would be sold commercially. Vegetation manipulation would emphasize ecological and multiple-use outcomes over being “above cost.” See Section 3.4, Vegetation, for further discussion of mitigation measures. Future vegetation management may include mechanical and chemical treatments.
Guideline 8. Wood fiber should be utilized consistent with ecosystem management and multiple use goals.	The Project would require the removal of all trees within forested areas of the 100 foot ROW and subsequent sale of all merchantable timber harvested; however, production of wood fiber is not a primary goal of this Project.
Guideline 9. Give priority to vegetation treatments in private land interface zones or in those vegetation types identified as having high degree of departure from HRV.	BPA would work with all private landowners adjacent to C-TNF lands to avoid vegetation impacts. BPA also would coordinate with the Forest botanist to avoid specific vegetation types if they are present within the project corridor.
Guideline 10. Woodland types including mountain mahogany, juniper and maple should be prioritized for treatments based on site-specific needs.	The Project would not cross woodland types including mountain mahogany, juniper and maple.
Noxious Weeds and Invasive Plant Species	
Standard 1. Only weed-free hay, straw, pellets, and mulch shall be used on Forest.	Only weed-free hay, straw and mulch would be used to control erosion during construction and revegetation activities. See Section 3.4, Vegetation, for further discussion of mitigation measures.
Standard 2. All seed used shall be certified to be free of noxious weed seeds from weeds listed on the current All States Noxious Weeds List.	All seed used would be certified to be free of noxious weed seeds from weeds listed on the current All States Noxious Weeds List. Seed mix would be coordinated with the Forest botanist. See Section 3.4, Vegetation, for further discussion of mitigation measures.
Standard 3. Gravel or borrow material sources shall be monitored for noxious weeds and other invasive species. Sources infested with noxious weeds shall be closed until the weeds are successfully controlled.	Gravel or borrow material sources would be monitored for noxious weeds and other invasive species. Sources infested with noxious weeds would be closed until the weeds are successfully controlled. BPA may need to coordinate with USFS to inspect borrow source.
Standard 4. Noxious weeds shall be aggressively treated throughout the Forest, unless specifically prohibited, following the Caribou Noxious Weed Strategy. Using Integrated Weed Management, methods of control and access shall be consistent with the goals of each prescription area.	BPA would conduct monitoring of all ground-disturbed areas for 5 years for noxious weeds invasions, and take corrective action as necessary, according to the Caribou Noxious Weed Strategy and the BPA Transmission System Vegetation Management EIS. See Section 3.4, Vegetation, for further discussion of mitigation measures.

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Standards and Guidelines	Consistency
Guideline 1. Weed treatment projects, especially those using herbicides, should be timed to achieve desired effects on target vegetation, while having minimal effects on non-target vegetation.	The BPA Transmission System Vegetation Management EIS calls for the use of localized and spot application of herbicides as needed. BPA would coordinate closely with USFS land managers to time herbicide applications appropriately to avoid effects on non-target vegetation. See Section 3.4, Vegetation, for further discussion of mitigation measures.
Guideline 2. Protect biological control insectories and allow harvest for distribution to other weed infestations, providing the original insectory can be maintained.	The Project would not be located near, nor would it affect, any biological control insectories.
Guideline 3. Monitor, as needed, disturbed areas, such as landings, skid trails, roads, mines, burned areas, etc., for noxious weeds or invasive species and treat where necessary.	All reclaimed areas would be surveyed and/or monitored to determine whether noxious weeds have been spread within the project area. Corrective actions would be taken as needed. See Section 3.4, Vegetation, for further discussion of mitigation measures.
Guideline 4. Evaluate the potential for invasion by noxious weeds into proposed vegetation units and wildland fire use plan areas and modify units or mitigate where necessary.	All reclaimed areas would be surveyed and/or monitored to determine whether noxious weeds have the potential to spread to proposed vegetation units and wildland fire use plan areas. Corrective actions would be taken as needed. See Section 3.4, Vegetation, for further discussion of mitigation measures.
Plant Species Diversity	
Standard 1. Projects and activities shall be managed to avoid adverse impacts to sensitive plant species that would result in a trend toward federal listing or loss of viability.	The Project would be managed to avoid adverse impacts to sensitive plant species that would result in a trend toward federal listing or loss of viability. See Section 3.4, Vegetation, for further discussion of sensitive plant species and mitigation measures.
Standard 2. Do not allow collection of rare plants, except for research or scientific purposes, under the direction of the Forest or Regional Botanist.	The Project would not involve the collection of rare plants.
Guideline 1. Native plant species from genetically local sources should be used to the extent practical for erosion control, fire rehabilitation, riparian restoration, road ROWs seedings, and other revegetation projects.	Native plant species from genetically local sources would be used to the extent practical for erosion control, fire rehabilitation, riparian restoration, road ROW seedings, and other revegetation projects per coordination with the Forest botanist.
Guideline 2. Where practical, disturbed sites should be allowed to revegetate naturally where the seed source and soil conditions are favorable (e.g. low erosion potential, deeper soils) and noxious weeds are not expected to be a problem.	Where practical, disturbed sites would be allowed to revegetate naturally where the seed source and soil conditions are favorable (e.g. low erosion potential, deeper soils) and noxious weeds are not expected to be a problem. Native topsoil removed for structure and access road construction would be stockpiled and reused on-site for restoration activities to promote regrowth from the native seed bank in the topsoil. See Section 3.4, Vegetation, and Section 3.5, Geology and Soils.
Guideline 3. Known occurrences or habitat for rare plants on the “Forest Watch” list and rare or unique plant communities on the Forest should be maintained.	Surveys conducted in 2007 in support of a preliminary EA suggest that no rare plants are located within the Option 3A corridor. BPA and contractors would conduct additional rare plant surveys for the Option 3A corridor during 2014 if necessary. Option 3A would limit vegetation removal, such as danger tree clearing, to the minimum amount necessary to minimize loss of potential habitat for special status species. See Section 3.4, Vegetation, for further discussion of rare plant presence and mitigation measures.

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Standards and Guidelines	Consistency
Guideline 4. Maintain, and where possible, increase unique or difficult-to-replace elements such as areas of high species diversity aspen, riparian areas, tall forbs, rare plant communities, etc.	Option 3A would limit vegetation removal to the minimum amount necessary to minimize loss of potential habitat for special status species and unique or difficult-to-replace plant communities. See Section, 3.4, Vegetation, for further discussion.
Guideline 5. The Forest Botanist or Ecologist should review seed mixes used for revegetation to insure no adverse impacts to threatened, endangered, sensitive species, other species at risk and the overall native flora within the analysis area.	BPA would coordinate with USFS regarding seed mixes to be used for revegetation.
Special Forest Products	
Standard 1. Provide for the historical, cultural, and recreational uses, as well as the rights and privileges afforded Native Americans under treaties and agreements, before commercial uses of special forest products are allowed.	The Project would not involve the commercial use of special forest products.
Guideline 1. Permits may be issued to authorize the collection of plant species (e.g., vascular and nonvascular) for personal use where collection is not likely to adversely affect species viability.	The Project would not involve the collection of plant species for personal use.
Guideline 2. In cases where plant collection permits are issued, encourage collection from areas where plants would be removed as a result of other activities. Encourage collection of seeds or cuttings instead of removing whole plants.	The Project would not involve the collection of plant species for personal use.
Management Indicator Species	
Standard 1. In project analyses affecting the habitats listed below, assess impacts to habitat and populations for the following management indicator species: <ul style="list-style-type: none"> ▪ Grassland and open canopy sagebrush habitats—Columbian Sharp-tailed Grouse ▪ Sagebrush habitats—Sage Grouse ▪ Mature and old forest habitats—Northern Goshawk 	The EIS analyzes the impacts of Option 3A as they relate to the Columbian sharp-tailed grouse, sage-grouse, and northern goshawk, as well as these species' respective habitats. See Section 3.7, Wildlife, for further discussion.
Sensitive Species	
Guideline 1. Survey for the presence of sensitive species if suitable habitats are found within a project area a minimum of once prior to or during project development.	Suitable habitat for a number of sensitive species exists within the area surrounding the Option 3A corridor. Special status species observed during field surveys along the Option 3A corridor during 2011 surveys includes the northern goshawk and the three-toed woodpecker. BPA and contractors conducted additional surveys for the Option 3A corridor during 2013; these surveys recorded a flammulated owl near a ridge top of a mature aspen stand. Pre-construction surveys would be conducted for nesting bird species in furtherance of the Migratory Bird Treaty Act and Forest goals.

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Standards and Guidelines	Consistency
Dead and Down Material	
<p>Guideline 1. Following forested vegetation treatments, an average of 11 logs per acre should be left consisting of logs in decomposition classes 1, 2, and/or 3 (where they exist).</p> <ul style="list-style-type: none"> ▪ In specific areas where fuel loading and fire hazards are a concern (i.e. urban interface areas), the number of logs per acre can be reduced to meet acceptable fuel loading standards. ▪ This guideline does not apply within 300 feet of an open designated route. ▪ These requirements can be achieved, in part, with the down woody debris requirements for soils; they are interrelated and are not cumulative. ▪ Logs do not need to be evenly distributed over the forested acres. Some acres may have no logs, while others may have many more than 11 logs per acre. The guideline is to have an average of 11 logs per acre on a least 60 percent of the forest acres of each analysis area. 	<p>BPA would retain and/or place dead and down woody material within the ROW to the extent practical. Because it would be limited to a ROW width of 100 feet, the presence of the line should not affect the average amount of down woody debris per acre to an extent that would create a detrimental impact or cause an area to fall below the average levels stated in the guideline.</p>
Animal Damage Management	
<p>Standard 1. Activities shall be conducted in compliance with the most recent APHIS-Wildlife Services (WS) Predator Damage Management direction.</p>	<p>Activities would be conducted in compliance with the most recent Animal and Plant Health Inspection Service (APHIS)-Wildlife Services (WS) Predator Damage Management direction.</p>
Snag/Cavity Nesting Habitat	
<p>Standard 1. Public, workforce, and contractor safety shall be considered and provided for in selecting the arrangement of retained snags and trees.</p>	<p>BPA would only remove snags that posed a risk to the public, workforce, contractor, and integrity of the transmission line.</p>
<p>Standard 2. Snags with existing cavities or nests shall be the priority for retention.</p>	<p>Roadway and transmission line ROW clearing widths would be 30 and 250 feet, respectively. Snags with existing cavities or nests would be preserved off-ROW when there is no danger to the line.</p>
<p>Standard 3. Snag height shall be 15 feet or greater for all forest types.</p>	<p>Snags of 15 feet in height or greater would be retained off-ROW, when there is no danger to the line.</p>
<p>Guideline 1. Snag dbh (diameter at breast height) > 12 inches or largest diameter for the stand for all forest types and should be retained in clusters, where possible.</p>	<p>Snags of dbh greater than 12 inches, or largest diameter for the stand, would be retained in clusters where possible, provided they are located off-ROW and pose no danger to the line.</p>

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Standards and Guidelines		Consistency																																											
<p>Guideline 2. Hard-s snag densities for various biological potentials should be approximately as follows by forest type. Biological potentials for woodpeckers were determined through analysis during the Targhee RFP (1997) and are incorporated in Table 3.3, below. The analysis area for calculating biological potential for woodpeckers should usually be the specific management prescription area polygon. Smaller analysis areas can be used when identified for site-specific projects.</p> <p>Table 3.3 Biological Potentials by Forested Vegetation Type.</p> <table border="1"> <thead> <tr> <th></th> <th colspan="3">Number of Snags per 100 Forested Acres¹</th> </tr> <tr> <th>Percent of Biological Potential</th> <th>Aspen</th> <th>Douglas-fir Spruce/Fir</th> <th>Lodgepole</th> </tr> </thead> <tbody> <tr> <td>100</td> <td>828</td> <td>978</td> <td>877</td> </tr> <tr> <td>80</td> <td>62</td> <td>782</td> <td>702</td> </tr> <tr> <td>60</td> <td>497</td> <td>587</td> <td>526</td> </tr> <tr> <td>40</td> <td>331</td> <td>391</td> <td>351</td> </tr> <tr> <td>20</td> <td>16</td> <td>196</td> <td>175</td> </tr> </tbody> </table> <p>¹In mixed species stands, use the average number of snags for dominant forest types.</p>			Number of Snags per 100 Forested Acres ¹			Percent of Biological Potential	Aspen	Douglas-fir Spruce/Fir	Lodgepole	100	828	978	877	80	62	782	702	60	497	587	526	40	331	391	351	20	16	196	175	<p>Snags cannot be retained within the ROW or where they pose a threat to the transmission line; however, hard-s snag densities for various biological potentials as discussed in Guideline 2 would be maintained to the extent practical.</p> <p>Per Management Prescription 8.1, Wildlife, Standard 1, biological potential for woodpeckers is not a management consideration in Concentrated Development Areas.</p>															
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<p>Guideline 3. Retain live trees for future snag recruitment using the following guidelines in Table 3.4:</p> <p>Table 3.4 Live Trees for Snag Recruitment</p> <table border="1"> <thead> <tr> <th></th> <th colspan="5">Number of Live Trees per 100 Forested Acres</th> </tr> <tr> <th>Percent of Biological Potential</th> <th>≥1 inch dbh</th> <th>≥7-9.9 inch dbh</th> <th>≥5-6.9 inch dbh</th> <th><5.0 inch dbh</th> <th>Total Trees per acre</th> </tr> </thead> <tbody> <tr> <td>100</td> <td>800</td> <td>500</td> <td>□500</td> <td>700</td> <td>2500</td> </tr> <tr> <td>□80</td> <td>600</td> <td>□400</td> <td>400</td> <td>600</td> <td>2000</td> </tr> <tr> <td>60</td> <td>500</td> <td>300</td> <td>300</td> <td>400</td> <td>150</td> </tr> <tr> <td>40</td> <td>300</td> <td>200</td> <td>200</td> <td>300</td> <td>100</td> </tr> <tr> <td>20</td> <td>200</td> <td>100</td> <td>100</td> <td>100</td> <td>□00</td> </tr> </tbody> </table>			Number of Live Trees per 100 Forested Acres					Percent of Biological Potential	≥1 inch dbh	≥7-9.9 inch dbh	≥5-6.9 inch dbh	<5.0 inch dbh	Total Trees per acre	100	800	500	□500	700	2500	□80	600	□400	400	600	2000	60	500	300	300	400	150	40	300	200	200	300	100	20	200	100	100	100	□00	<p>Live trees cannot be retained in the ROW or where they pose a threat to the transmission line; however, live trees would be retained for future snag recruitment to the extent practical as discussed in Guideline 3.</p>	
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<p>Guideline 4. If existing snag levels are below the biological potential for woodpeckers that is identified for a particular prescription area, no dead standing trees should be harvested. Snag creation should only occur if specified as mitigation in a project level analysis.</p>		<p>Snags cannot be retained in the ROW or where they pose a threat to the transmission line; however, snags would be retained to the extent practical, similar to live trees as discussed in Guideline 3.</p> <p>Per Management Prescription 8.1, Wildlife, Standard 1, biological potential for woodpeckers is not a management consideration in Concentrated Development Areas.</p>																																											
<p>Guideline 5. Strive not to disturb or destroy existing nests, whether active or inactive.</p>		<p>The Project would strive not to disturb or destroy existing nests, whether active or inactive. Pre-construction nest surveys would be conducted to limit disturbance.</p>																																											

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Standards and Guidelines	Consistency
Bald Eagle Habitat—Occupied nesting zones (Zone I, 0.25 mile radius of nest) and primary use areas (Zone II, 0.5 mile radius of nest)	
Standard 1. Use silvicultural techniques which maintain or promote mature and old growth timber stand characteristics in both the short and long-term, but reduce the risks of insects and disease epidemics.	The results of old growth surveys conducted in 2013 indicate the forest stands within the Option 3A corridor do not meet Region 4 old-growth criteria. While the Project would require that all tall-growing vegetation within a 250-foot wide corridor in forested areas be cleared to ensure the safety of the transmission line, the amount of forest clearing is relatively minimal in comparison to the area of forested land in the region surrounding the project. Option 3A would therefore not be expected to preclude efforts to maintain or promote mature and old growth timber stand characteristics throughout the forest.
Standard 2. Vegetation management, such as timber harvest or thinning, which could disturb an active bald eagle nest can occur only between September 1 and January 31 or when documented as unoccupied.	Surveys conducted for the Option 3A corridor during the spring of 2013 identified two inactive bald eagle nests, but no known active nests, within 1 mile of the project corridor. Additional pre-construction nesting bird surveys would be conducted prior to tree removal.
Standard 3. Prohibit new structures, such as power lines, that have the potential to cause direct mortality to bald eagles.	Surveys conducted for the Option 3A corridor during the spring 2013 identified two inactive bald eagle nests, but no known active nests, within 1 mile of the project corridor. Additional pre-construction nesting bird surveys would be conducted prior to tree removal.
Guideline 1. "Control" should be the suppression response for wildfires to minimize loss of habitat unless a site-specific analysis demonstrates differently.	"Control" would be the suppression response for wildfires to minimize loss of habitat unless a site-specific analysis demonstrates differently.
Guideline 2. Prohibit wildlife management or predator management activity with the potential to cause mortality to bald eagles, such as exposed traps.	No wildlife management or predator management activity would be associated with the Project.
Guideline 3. All human activities should be minimized from February 1 to August 1.	If BPA decides to proceed with the Project, construction of the proposed substation and transmission lines would be expected to take place in two phases, each lasting from spring to fall, over a period of 16 months; therefore, human activities cannot be minimized during the entire period between February 1 and August 1.
Bald Eagle Habitat—Home ranges (Zone III, 2.5 mile radius of nest)	
Standard 1. Follow existing, site-specific management plans (when they exist) for each bald eagle territory or ZONE III management direction in the Bald Eagle Management Plan for the Greater Yellowstone Area when site-specific management plans do not exist.	Option 3A would follow existing, site-specific management plans (when they exist) for each bald eagle territory or ZONE III management direction in the Bald Eagle Management Plan for the Greater Yellowstone Area when site-specific management plans do not exist. Surveys conducted in 2013 identified two inactive bald eagle nests within 1 mile of the project corridor. Several bald eagles were observed soaring and/or foraging during these surveys, but no active bald eagle nests were documented. Additional raptor surveys would be conducted for the Option 3A corridor prior to tree removal.

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Standards and Guidelines	Consistency
Standard 2. Within a 2.5-mile radius of nest, prohibit all use of herbicides and pesticides which cause egg shell thinning as determined by EPA labeling.	Surveys by BPA and contractors in spring 2013 documented no active bald eagle nests within 1 mile of the Option 3A corridor, but identified two inactive nests. Pre-construction nesting bird surveys would be conducted prior to any tree removal associated with either alternative. BPA does not use any herbicides which cause eggshell thinning as determined by U.S. Environmental Protection Agency (EPA) labeling.
Bald Eagle Habitat—Winter Foraging and Roosting	
Guideline 1. Activities and developments should be designed to minimize conflicts with bald eagle wintering and migration habitat.	The construction period would be from May to October; therefore, activities and development should have no impacts on bald eagle winter habitat.
Gray Wolf	
Standard 1. Restrict intrusive human disturbances (motorized access, vegetation management, livestock grazing, etc.) within one mile around active den sites and rendezvous sites between April 1 and June 30 when there are five or fewer breeding pairs of wolves in the Yellowstone Nonessential Experimental Population Area (applies to the portion of the Forest east of Interstate 15) or the Central Idaho Nonessential Experimental Population Area (applies to the portion of the Forest west of Interstate 15). After six or more breeding pairs become established in each experimental population area, land use restrictions will not be necessary (USFS 2003).	Forested habitats in the C-TNF may provide some foraging and migratory habitat for gray wolves; however, documented and anticipated use of the project corridor by wolves is low. The Project would not disturb, nor would it be located near, any known, active gray wolf denning or rendezvous sites. See Section 3.7, Wildlife, for further discussion.
Standard 2. If and when wolves are de-listed, they will be managed in accordance with approved state management plans.	BPA would coordinate with the Idaho Department of Fish and Game (IDFG) concerning any management activities that may impact wolves.
Standard 3. When six or more breeding pairs are established, the U.S. Fish and Wildlife Service will issue “Take” permits (valid for 45 days) to individuals holding Term Grazing Permits authorizing them to injure or kill gray wolves that are attacking livestock on their allotment. “Take” is permitted only after 1) USFWS is notified, 2) USDA -APHIS Wildlife Services verifies that a wolf is the cause of depredation, and 3) capture results by USDA-APHIS-WS are unsuccessful.	N/A. The Project would not involve the take of wolves.
Peregrine Falcon Habitat	
Standard 1. Within 15 miles of all known nest sites, prohibit all use of herbicides and pesticides which cause egg shell thinning as determined by risk assessment (USFS 2003).	Vegetation management activities associated with the Project would not use any herbicides that cause egg shell thinning.
Guideline 1. For proposed projects within two miles of known peregrine falcon nests, minimize such items as: (1) human activities (rock climbing, aircraft, ground and water transportation, high noise levels, and permanent facilities) which could cause disturbance to nesting pairs and young during the nesting period between March 15 and July 31; (2) activities or habitat alterations which could adversely affect prey availability.	No known peregrine falcon nests are within 2 miles of Option 3A. Pre-construction nesting bird surveys would be conducted prior to tree removal. If a nest is identified prior to tree clearing activities, BPA would consult with Forest and U.S. Fish and Wildlife Service (USFWS) personnel on mitigation or avoidance protocols.
Goshawk Habitat	

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Standards and Guidelines				Consistency																																																												
<p>Standard 1. The management standards and guidelines in Table 3.5 below apply to all forest types within active and historic goshawk nesting territories.</p> <p>Table 3.5 Management Standards and Guidelines within Active Goshawk Nesting Territories.</p> <table border="1"> <thead> <tr> <th>Attribute</th> <th>Nest Area</th> <th>Post-Fledging Family Area</th> <th>Foraging Area</th> </tr> </thead> <tbody> <tr> <td>Number of Areas (S)</td> <td align="center">1</td> <td align="center">1</td> <td align="center">1</td> </tr> <tr> <td>Size of each area (acres) (S)</td> <td align="center">> 200 acres</td> <td align="center">> 400 acres</td> <td align="center">> 5,400 acres</td> </tr> <tr> <td>Management Season⁵ (G)</td> <td align="center">Sept-Mar</td> <td align="center">Sept-Mar</td> <td align="center">Year-long</td> </tr> <tr> <td>Open Road Density⁴ (G)</td> <td align="center">No new system roads</td> <td align="center">No new system roads</td> <td align="center">Use management Prescription density</td> </tr> <tr> <td colspan="4">Size Class Distribution For Forested Acres (%) (G):</td> </tr> <tr> <td>Nonstocked/seeding</td> <td align="center">0%</td> <td align="center">< 20%</td> <td align="center">< 25%</td> </tr> <tr> <td>Sapling</td> <td align="center">0%</td> <td align="center">< 20%</td> <td align="center">< 25%</td> </tr> <tr> <td>Pole</td> <td align="center">0%</td> <td align="center">< 20%</td> <td align="center">< 25%</td> </tr> <tr> <td>Mature/old¹</td> <td align="center">100%</td> <td align="center">> 40%</td> <td align="center">= 30%</td> </tr> <tr> <td>Rotation Age (years)(G)</td> <td align="center">--</td> <td align="center">60 to 240 years</td> <td align="center">60 to 240 years</td> </tr> <tr> <td>Maximum Created Opening (Acres) (G)</td> <td align="center">0</td> <td align="center">< 40 acres</td> <td align="center">< 40 acres</td> </tr> <tr> <td>Snags and Reserve Trees² (G)</td> <td colspan="3">as specified in management prescription</td> </tr> <tr> <td>Downed Logs (average/acre) (G)</td> <td align="center">Forest-wide S&Gs</td> <td align="center">Forest-wide S&Gs</td> <td align="center">Forest-wide S&Gs</td> </tr> <tr> <td>Thinning (G)</td> <td align="center">Non-uniform³</td> <td align="center">Non-uniform</td> <td align="center">By silvicultural prescription</td> </tr> </tbody> </table>				Attribute	Nest Area	Post-Fledging Family Area	Foraging Area	Number of Areas (S)	1	1	1	Size of each area (acres) (S)	> 200 acres	> 400 acres	> 5,400 acres	Management Season ⁵ (G)	Sept-Mar	Sept-Mar	Year-long	Open Road Density ⁴ (G)	No new system roads	No new system roads	Use management Prescription density	Size Class Distribution For Forested Acres (%) (G):				Nonstocked/seeding	0%	< 20%	< 25%	Sapling	0%	< 20%	< 25%	Pole	0%	< 20%	< 25%	Mature/old ¹	100%	> 40%	= 30%	Rotation Age (years)(G)	--	60 to 240 years	60 to 240 years	Maximum Created Opening (Acres) (G)	0	< 40 acres	< 40 acres	Snags and Reserve Trees ² (G)	as specified in management prescription			Downed Logs (average/acre) (G)	Forest-wide S&Gs	Forest-wide S&Gs	Forest-wide S&Gs	Thinning (G)	Non-uniform ³	Non-uniform	By silvicultural prescription	<p>To the extent practical, snags would be maintained at the levels prescribed in the CNF RFP, and tree removal within mature and late seral forest stands would be limited to the minimum extent necessary, provided trees are not in the ROW and do not pose a danger to the transmission line. Sufficient mature aspen and conifer forest habitat would remain functional at both the local and range-wide scales to maintain goshawk viability. The Project is therefore not likely result in any measurable impact to the species. See Section 3.7, Wildlife, for further discussion.</p>
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<p>¹ Mature and old age canopy closure for nest sites and post-fledging family areas should range between 75% and 100%.</p> <p>² Refer to previous section on snag/cavity nesting habitat for explanation of biological potential.</p> <p>³ Maximize diversity of structure.</p> <p>⁴ Open roads in goshawk territories shall be given priority for closure to meet management prescription road density standards. First priority shall be to close roads in nest areas; second priority in post-fledging family areas; third priority in foraging areas. Where possible, open road density should be zero in the nest areas and the post-fledging family areas.</p> <p>⁵ This applies only to active nests. There is no restriction for nest areas where current surveys have documented that the nest is unoccupied. Management activities are defined as mechanical treatments and road building.</p>																																																																

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Standards and Guidelines	Consistency
Flammulated Owl Habitat	
Standard 1. Do not allow timber harvest activities within a 30-acre area around all known flammulated owl nest sites.	Surveys conducted for this species in 2007 in the vicinity of the Option 3A corridor located suitable nesting sites but no active nests. During additional raptor surveys conducted in the spring 2013, a flammulated owl call was heard near a ridge top in a mature aspen stand. There are no known flammulated owl nest sites within 30 miles of the Option 3A corridor. Pre-construction nesting bird surveys would be conducted prior to any tree removal. If a nest is identified prior to tree clearing activities, BPA would consult with Forest and USFWS personnel on mitigation or avoidance protocols.
Boreal Owl Habitat	
Guideline 1. Within a 3,600-acre area around all known boreal owl nest sites, maintain over 40% of the forested acres in mature and old age classes. (Hayward and Verner, 1994, Hayward, 1997)	Surveys conducted within the Option 3A corridor during the spring 2013 did not identify any known boreal owl nest sites within a 3,600-acre area surrounding the Option 3A corridor. Suitable nesting habitat exists within the general vicinity of the project corridor, and boreal owls have a high probability of occurring in the area. Pre-construction nesting bird surveys would be conducted prior to any tree removal associated with either alternative. If a nest is identified prior to tree clearing activities, BPA would consult with Forest and USFWS personnel on mitigation or avoidance protocols.
Great Gray Owl Habitat	
Guideline 1. Within a 1,600-acre area around all known great gray owl nest sites, maintain over 40% of the forested acres in mature and old age classes. (Hayward and Verner, 1994)	Raptor surveys were conducted for the Option 3A corridor during the spring 2013 did not identify any active great grey owl nests within a 1,600 acre area surrounding the project corridor. Pre-construction nesting bird surveys would be conducted prior to tree removal. If a nest is identified prior to tree clearing activities, BPA would consult with Forest and USFWS personnel on mitigation or avoidance protocols.
Guideline 2. Restrict the use of strychnine poison to control pocket gophers within a 1/2 mile buffer around all active great gray owl nest sites.	The Project would not involve the use of strychnine poison to control pocket gophers.
Trumpeter Swan Habitat	
Standard 1. Maintain suitable trumpeter swan nesting habitat conditions in Elk Valley Marsh and other sites.	Elk Valley marsh is over 20 miles southeast of Option 3A. No suitable trumpeter swan nesting habitat is known to exist within the Option 3A ROW or access road corridors; therefore, the Project would not be expected to impact trumpeter swan nesting habitat.
Guideline 1. Change livestock grazing through management or fencing when grazing is adversely affecting trumpeter swan use or productivity.	The Project would not involve any cattle grazing.
Harlequin Duck Habitat	
Guideline 1. Avoid establishing new trails, roads, or facilities within 300 feet (on each side) of any stream reach with documented harlequin duck breeding activity.	The Project would avoid establishing new roads or facilities within 300 feet (on each side) of any stream reach with documented harlequin duck breeding activity.

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Standards and Guidelines	Consistency
Big Game	
Guideline 1. Provide for vegetation buffers of at least one sight distance (Thomas et al. 1979) around big game concentration/use areas, such as wallows and mineral licks. Sight distance is the distance at which 90 percent of a deer or elk is hidden from an observer. This will vary depending on site specific stand conditions.	Conversion of forested habitat within the transmission line and access road ROWs to low-growing vegetation could provide for increased foraging habitat for big game animals, but would also provide reduced cover for these species and could subject them to greater predatory pressures. Cover would remain available beyond the edge of the ROW, however, and a network of forested habitat would remain at the regional scale to ensure no net loss of habitat function. See Section 3.7, Wildlife, for further discussion.
Guideline 2. Provide for security or travel corridors near created openings.	Security would be available adjacent to the ROW. It is likely that some animals would utilize the cleared ROW as a travel corridor or for forage.
Guideline 3. Where summer or fall habitat conditions, including security areas ¹⁷ , are identified as a factor in not meeting State population objectives, work with State wildlife management agencies to address the issue(s). ¹⁷ Security is an area of cover (vegetative or topographic) over ½ mile from an open motorized route and over 250 acres.	BPA would work with IDFG to determine whether summer or fall habitat conditions, including security areas, are identified as a factor in not meeting State population objectives, and would work with IDFG to address any issues.
Sage Grouse and Columbian Sharp-Tailed Grouse	
Standard 1. Cooperate with other state and federal agencies and private landowners to survey, inventory, and manage habitats for sage-grouse and Columbian sharp-tailed grouse.	Aerial surveys conducted in spring 2013 observed one male and two female greater sage-grouse on top of a steep ridge approximately 3,000 feet north of the Option 3A corridor. A follow-up ground visit of this site did not reveal any evidence of greater sage-grouse presence. BPA would continue to consult with the Bureau of Land Management (BLM), USFWS, and IDFG, along with private landowners, to survey, inventory, and manage habitats for sage-grouse and Columbian sharp-tailed grouse prior to construction of the Project, if necessary. If active leks are identified prior to ROW clearing activities, BPA would consult with USFWS personnel on mitigation or avoidance protocols.
Guideline 1. Current guidelines for sage and sharp-tailed grouse management, such as Connelly et al. (2000), should be used as a basis to develop site-specific recommendations for proposed sagebrush treatments.	Current guidelines for sage and sharp-tailed grouse management, including Connelly et al. (2000) would be used to develop sagebrush treatments associated with the Project.
Guideline 2. Management activities should consider proximity to active lek locations during site-specific project planning. Those within 10 miles of an active sage-grouse lek and 2 miles of active sharp-tailed grouse leks should be considered further for suitability as grouse habitat.	Aerial surveys conducted in spring 2013 observed one male and two female greater sage-grouse on top of a steep ridge approximately 3,000 feet north of the Option 3A corridor. A follow-up ground visit of this site did not reveal any evidence of greater sage-grouse presence. No active sage-grouse leks are known to exist within 10 miles of the project corridor and no active sharp-tailed grouse leks are known to exist within 2 miles of the Option 3A corridor. Construction activity would be prohibited within 10 miles of an active greater sage-grouse lek and within 2 miles of active Columbian sharp-tailed grouse leks between the end of March and the beginning of May. See Section 3.7, Wildlife, for further discussion.

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Standards and Guidelines	Consistency
Guideline 3. If management activities would impact courtship, limit physical, mechanical, and audible disturbances in the breeding complex during the breeding season (March to May) within three hours of sunrise and sunset each day.	If BPA decides to proceed with the Project, construction of the proposed substation and transmission lines would be expected to take place in two phases, each lasting from spring to fall, over a period of 16 months.
Guideline 4. Where management actions will disturb nesting grouse, avoid manipulation or alteration of vegetation during the nesting period (May to June).	Pre-construction nesting bird surveys would be conducted prior to tree removal. See Section 3.7, Wildlife, for further discussion.
Amphibians	
Guideline 1. Ensure habitats in the Tincup Creek Drainage and other known toad breeding locations are managed to maintain or improve the existing population and distribution of western toads.	The Project would not impact western toad habitats in the Tincup Creek drainage.
Guideline 2. Ensure habitats in the Toponce area and other known northern leopard frog breeding locations are managed to maintain or improve the existing population and distribution of the frogs.	The Toponce area is over 25 miles from the Project. The Project would not impact breeding habitat for northern leopard frog.
Guideline 3. Maintain amphibian habitats when developing and modifying springs and wetlands.	Construction of Option 3A would result in approximately 1.07 acres (0.07 acre PUB plus 1 acre of PSS) of short-term impacts to wetlands within the 250 foot clearing width on C-TNF lands and 0.73 acre (0.66 acre PSS plus 0.067 acre PUB) of short-term wetland impacts within the proposed 100 foot ROW. No long-term impacts would occur on C-TNF lands because there no structures, pulling sites, or access roads would be proposed in those areas. Impacts on riparian and wetland habitats as a result of the Project would be of short duration and would not result in any measurable impacts to potential amphibian habitat. See Section 3.6, Water Resources, Floodplains, and Wetlands, for further discussion.
Bats	
Guideline 1. All abandoned underground mines should be evaluated as bat habitat prior to closure. As an alternative to collapsing mine entrances, gate abandoned mines to retain roosting and hibernation habitat for bats. (Idaho Conservation Effort, 1995, M-1)	N/A. There are no known underground mines in the vicinity of the proposed project.
Guideline 2. Gating of mines should be considered where human disturbance is disturbing/displacing bats. Where gates are used, they should be designed in accordance with published literature (i.e., Tuttle and Taylor, 1994). (Idaho Conservation Effort, 1995, Appendix B)	N/A. There are no known underground mines in the vicinity of the Project.
Guideline 3. Discourage or restrict entry to mines and caves known to be occupied by hibernating bats or bats with young. Exceptions include surveys conducted by qualified personnel (Idaho Conservation Effort, 1995, I-3,4).	N/A. There are no caves or known underground mines in the vicinity of the Project.
Guideline 4. Prior to closure of inactive or abandoned underground mines, surveys for cave-dependent species should be completed and mitigation measures implemented	N/A. There are no caves or known underground mines in the vicinity of the Project.
Landbirds	
Guideline 1. Stands of mature trees (including snags and dead-topped trees) should be maintained next to wet meadows.	Stands of mature trees (including snags and dead-topped trees) would be maintained next to wet meadows, provided they are off-ROW and do not pose a danger to the line.

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Standards and Guidelines	Consistency
Guideline 2. Where feasible, maintain 30 to 50 percent of the sagebrush habitat in a 5th code HUC in contiguous blocks greater than 320 acres to support sagebrush obligate species. (Page and Ritter 1999)	Given the limited sage brush removal necessary for the Project, at least 30 to 50 percent of the habitat would be retained.
Guideline 3. Practices which stabilize or increase native grass and forbs cover in sagebrush habitats with 5% to 25% sagebrush canopy cover should be implemented. (Page and Ritter 1999)	Practices which stabilize or increase native grass and forbs cover in sagebrush habitats with 5 to 25 percent sagebrush canopy cover would be implemented, except for permanent access road ROWs. Native grasses and forbs would be retained to the extent possible. See Section 3.4 Vegetation.
Guideline 4. In sagebrush habitats, manage herbaceous cover to conceal nests through the first incubation period for ground and low shrub-nesting birds. It is assumed that proper use of rest-rotation or deferred-rotation grazing should meet these conditions, although not every year on every area (Idaho Partners in Flight 2000).	The Project would be implemented in such a way as to minimize impacts to sagebrush habitat.
Wolverine	
Guideline 1. Restrict intrusive human disturbance within one mile around known active den sites, March 1 to May 15 (Idaho State Conservation Effort 1995).	If BPA decides to proceed with the Project, construction of the proposed substation and transmission lines would be expected to take place in two phases, each lasting from spring to fall, over a period of 16 months. The Project would not be located near, nor would it disturb, any known wolverine den sites.
Tribal Coordination	
Standard 1. Forest consultation procedures and intergovernmental agreements with the tribes to guide future cooperative efforts shall comply with the protocols set forth in the National Resource Book on American Indian and Alaska Native Relations Working Draft 1995 or its successor.	The Project would not require any intergovernmental agreements between tribes and C-TNF or BPA. BPA is conducting its own Section 106 consultation as part of its planning and decision-making process.
Standard 2. No groomed snowmobile trails accessing the Fort Hall Reservation shall be considered, unless requested by the Tribe.	N/A. The Project is not located near the Fort Hall Reservation.
Facilities	
Standard 1. Facilities shall comply with local, State and national health and safety standards	The Project would comply with local, state and national health and safety standards.
Guideline 1. Architectural designs should follow principles and concepts outlined in the Built Environment Image Guide (BEIG).	The Project would not involve the construction of any buildings except a control house within the Hooper Springs Substation.
Transportation—Roads	
Standard 1. Roads analysis (currently in Part 212 of Title 36 of the Code of Federal Regulations) shall be used to inform road management decisions; including construction, reconstruction, or obliteration of roads.	BPA would work with the C-TNF on all access road design to ensure that road design is consistent with the Forest Plan.
Standard 2. Road construction, reconstruction and maintenance standards and criteria shall be guided by roads analysis and documented through the use of road management objectives (RMOs).	BPA would work with the C-TNF to ensure that road construction, improvement, and maintenance standards and criteria would be guided by roads analysis and documented through the use of road management objectives (RMOs).
Standard 3. For roads scheduled for decommissioning, the site-specific analysis shall disclose and analyze effects of the closure methods.	For roads scheduled for decommissioning, the site-specific analysis would disclose and analyze effects of the closure methods.

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Standards and Guidelines	Consistency
Guideline 1. Minimize construction of new transportation routes, evaluate existing routes, and reconstruct or relocate those routes not meeting management goals.	All access roads constructed specifically for Option 3A would be closed to the public and gated to exclude motorized use after completion of construction. All existing roads and other transportation routes currently open to the public would remain open following completion of construction.
Guideline 2. When highway construction or reconstruction is proposed in wildlife linkage areas, identify potential crossings and consider mitigation.	N/A. No highway construction or reconstruction is proposed as part of the Project.
Guideline 3. Design and construct roads to a standard appropriate to their intended use, considering safety, cost, and resource impacts, emphasizing protection of water quality.	BPA would work with the C-TNF to ensure that roads are designed and constructed to a standard appropriate to their intended use, considering safety, cost, and resource impacts, emphasizing protection of water quality.
Guideline 4. Avoid road construction on unstable slopes and highly erosive soils.	The Project would avoid road construction on unstable slopes and highly erosive soils. See Section 3.5, Geology and Soils.
Guideline 5. Identify safety hazards on Forest System Roads and correct or mitigate the situation, or close hazardous roads to public use.	All new access roads constructed specifically for Option 3A would be closed to the public and gated to exclude motorized use after completion of construction. All existing motorized roads and trails currently open to the public would remain open following completion of construction. Safety hazards would be identified on Forest System Roads and reported to USFS. Damage caused by BPA and contractors as a result of project construction would be corrected or mitigated by BPA.
Guideline 6. As needed, schedule roads to receive maintenance, repairs, or improvements to protect investment, maintain the intended serviceability, and protect other resources. Prioritize road maintenance activities using factors such as safety, resource protection needs, administrative needs, user comfort, and the identified traffic service level.	As needed, BPA would maintain, repair, or improve access roads to protect investment, maintain intended serviceability, and protect other resources.
Guideline 7. Surface gravel should be placed on roads where necessary to reduce rutting, surface erosion and to reduce maintenance costs.	Surface gravel would be placed on access roads where necessary. See Section 3.5, Soils and Geology, for further discussion.
Guideline 8. Conserve surface materials when blading and shaping roads.	All native topsoil removed for access road construction would be stockpiled and reused on-site for restoration activities. See Section 3.5, Geology and Soils, for further discussion.
Guideline 9. Existing cut slopes that contain suitable material may be widened and material used for surfacing.	Existing cut slopes that contain suitable material would be widened and material used for surfacing if necessary.
Guideline 11. Roads identified as unneeded in a roads analysis should be decommissioned, stabilized and returned to production.	Only those roads deemed necessary for transmission line maintenance would be maintained.
Guideline 12. Road closures should be located and designed to effectively control motorized use and minimize safety hazards.	All access roads would be closed and gated to exclude public motorized access. Road closures would be located and designed to effectively control motorized use and minimize safety hazards.
Guideline 13. All roads should be properly drained before closure.	All roads would be properly drained before closure.
Guideline 14. When a road is closed at the forest boundary, a vehicular turnaround should be provided on the forest to avoid impacts to adjacent non-federal lands.	BPA would work with the C-TNF on all access road design to ensure that road design is consistent with the Forest Plan.

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Standards and Guidelines	Consistency
Transportation—Access	
Standard 1. Open Motorized Route Density (OMRD) shall not exceed the levels identified on the Plan ORMD Map. OMRD is defined as the miles of designated motorized roads and trails per square mile within a specific prescription area polygon.	All new access roads constructed specifically for Option 3A would be closed to the public and gated to exclude motorized use after completion of construction. All existing motorized roads and trails currently open to the public would remain open following completion of construction. Therefore, the Project would have no impact on OMRD.
Standard 1. Open Motorized Route Density (OMRD) shall not exceed the levels identified on the Plan ORMD Map. OMRD is defined as the miles of designated motorized roads and trails per square mile within a specific prescription area polygon.	All new access roads constructed specifically for Option 3A would be closed to the public and gated to exclude motorized use after completion of construction. All existing motorized roads and trails currently open to the public would remain open following completion of construction. Therefore, the Project would have no impact on OMRD.
Standard 2. The Open Motorized Route Density (OMRD) standards prescribed for each prescription area and travel restrictions as depicted on the Travel Plan do not restrict responses to emergency events to protect human life, property values and structures, and forest resources. Responses to emergency events include, but are not limited to, law enforcement, search and rescue, and fire suppression.	BPA acknowledges that the OMRD standards prescribed for each prescription area and travel restrictions as depicted on the Travel Plan do not restrict responses to emergency events to protect human life, property values and structures, and forest resources.
Standard 3. The travel planning process shall consider additional areas for non-motorized winter recreation.	All new access roads constructed specifically for the Project would be gated to exclude public motorized access. Authorized motorized vehicle access on these roads would be restricted to BPA personnel or C-TNF official administrative business only. All existing motorized roads and trails currently open to the public would remain open after completion of construction. See Section 3.2, Recreation, for further discussion.
Standard 5. Unless otherwise posted motorized access is allowed for parking, wood gathering, and dispersed camping within 300 feet of an open designated road.	All existing motorized roads and trails currently open to the public would remain open after completion of construction. Following completion of construction, the Project would not restrict any uses currently allowed within 300 feet of an open designated road, including parking, wood gathering, and dispersed camping See Section 3.2, Recreation, for further discussion.
Guideline 1. The construction of new or maintenance of existing, motorized and non-motorized access routes should be consistent with the ROS class in which they are located.	All access roads constructed specifically for the Project would be closed to the public and gated to exclude motorized use after completion of construction. All existing motorized and non-motorized access routes currently open to the public would remain open following completion of construction. The Project would therefore be consistent with the existing Roaded Modified ROS class. See Section 3.2, Recreation, for further discussion.
Guideline 2. Areas open to cross-country motorized travel may be administratively restricted to designated routes or closed if unacceptable resource damage occurs.	BPA acknowledges that areas open to cross-country motorized travel may be administratively restricted to designated routes or closed if unacceptable resource damage occurs.
Trails	
Guideline 1. Protection measures for forest system trails should be included in management activity plans and authorizations.	Construction and maintenance activities would include measures to protect forest system trails.
Guideline 2. Operations, maintenance and rehabilitation of existing trails should be the priority over new construction.	BPA acknowledges that operations, maintenance, and rehabilitation of existing trails should be the priority over new construction.
Guideline 3. Encourage management and maintenance of winter trails by cooperative agreements with agencies and user groups.	N/A. The Project would not be providing or maintaining any winter recreational trails.

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Standards and Guidelines	Consistency
Recreation	
Guideline 1. Developed sites within grazing allotments should be fenced where conflicts with livestock occur.	To the extent that any potential conflicts with grazing livestock may exist, cattle exclusion measures would be implemented.
Guideline 2. Waste disposal containers in developed recreation sites should be bear-resistant, where necessary.	N/A. The Project would not be located within any developed recreation sites.
Guideline 3. Rehabilitation of existing facilities should be the priority over new construction.	The Project would not construct any new recreational facilities, and is not expected to adversely impact any existing facilities to the extent that rehabilitation would be required.
Guideline 4. Projects should be planned and implemented to meet the Recreation Opportunity Spectrum (ROS) as depicted on the Forest ROS map.	The ROS for Option 3A is Roaded Modified. The Option 3A is consistent with the Roaded Modified ROS class.
Scenic Resources	
Standard 1. Objectives for scenery (either VQOs or SIOs) shall be met along Scenic or Historic Byways, Wild and Scenic Rivers, and other sensitive travel routes and special emphasis areas.	Option 3A would traverse USFS Partial Retention and Modification lands and would meet these VQOs to the extent practicable. Option 3A also would cross the Blackfoot River on C-TNF land in the vicinity of the Blackfoot River Narrows. The Blackfoot River is listed on the NRI as potentially eligible for listing under the Wild and Scenic Rivers Act because of its scenic and fisheries resources. Option 3A is not expected to foreclose any opportunities for listing of the Blackfoot River as a wild, scenic, or recreation river. BPA would consult with National Park Service (NPS) and C-TNF officials regarding any potential visual impacts along the Blackfoot River.
Guideline 1. New and reconstructed structures and facilities should be built to blend with the surrounding landscape, using the concepts outlined in the Built Environment Image Guide or current direction.	Under Option 3A, transmission line structures on C-TNF land would be steel and would be made consistent with the line, form, color, and texture of the landscape to the extent practical. It is expected this would minimize the visual impact of the transmission line on the visual landscape. See Section 3.3, Visual Resources, for further discussion.
Guideline 2. Until the Scenery Management System is fully implemented, projects should be planned and implemented to meet the VQOs as displayed on the Forest VQO map.	Option 3A would be planned and implemented to meet the VQOs as displayed on the Forest VQO map. See Section 3.3, Visual Resources.
Heritage Resources	
Standard 1. Cultural resources inventories shall be conducted in consultation with the Idaho State Historic Preservation Office, Local Native American Tribes, and interested individuals or organizations likely to have knowledge or interest in the historic properties in the area.	Pre-construction surveys and construction monitoring, including necessary consultation with the Idaho State Historic Preservation Office (SHPO), potentially affected tribes, and C-TNF archaeologist would take place as part of the Project. See Section 3.9, Cultural Resources, for further discussion.
Standard 2. Unevaluated cultural resource sites ⁴ shall be treated as significant until comprehensive evaluations are completed.	Unevaluated cultural resource sites would be treated as significant until comprehensive evaluations are completed. See Section 3.9, Cultural Resources, for further discussion.
Guideline 1. Management plans for each historic property nominated to the National Register of Historic Places should be developed within 5 years.	N/A. The Project would not include the nomination of any properties to the National Register of Historic Places.

⁴ 36 C.F.R. 800.4 requires that when proposing undertakings that might affect historic properties the Agency must 1) determine the scope of effects; 2) identify historic properties; and 3) evaluate the historic significance of the property.

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Standards and Guidelines	Consistency						
Grazing Management—Range Resources							
Standard 1. Livestock grazing shall be restricted following prescribed or natural fire and/or rangeland planting or seeding before seed set of the second growing season, or until the objectives of the treatment are achieved.	Where decommissioning of temporary roads or mitigation of other disturbed areas would involve planting of rangeland vegetation, BPA would coordinate with C-TNF and grazing leaseholders as applicable to restrict livestock grazing until the objectives of revegetation treatments are achieved.						
Guideline 1. Stock driveways should be eliminated as opportunities occur.	Should opportunities to eliminate stock driveways occur during construction of the transmission line, these stock driveways would be eliminated.						
Guideline 2. Where water is developed at springs and seeps, return water to point of origin after livestock leave unit, if possible.	N/A. Option 3A would not involve the development of water at springs and seeps for livestock watering.						
Guideline 3. Seeding or establishment of monocultures should be avoided, and efforts should be made to establish and/or maintain a variety of desirable grass, forbs, and shrub species.	Disturbed areas would be re-seeded with a mix of native and C-TNF approved species.						
Grazing Management—Forage Utilization							
<p>Guideline 1. Apply upland forage utilization levels to all allotments as shown in the Table 3.6 below, unless determined through development of site-specific standards in the allotment management planning process. These utilization guidelines apply to native and desirable nonnative key plant species as recorded at the end of the grazing period (when the livestock leave the unit/pasture).</p> <p>Table 3.6 Upland Forage Utilization Levels</p> <table border="1"> <thead> <tr> <th align="center">Vegetation Component</th> <th align="center">Allowable Percent Utilization</th> </tr> </thead> <tbody> <tr> <td>Grasses and Herbaceous Species (% dry weight)</td> <td align="center">35-55%</td> </tr> <tr> <td>(% dry weight)</td> <td align="center">25-35%</td> </tr> </tbody> </table>	Vegetation Component	Allowable Percent Utilization	Grasses and Herbaceous Species (% dry weight)	35-55%	(% dry weight)	25-35%	The Project would not involve any grazing, and in general, BPA would avoid impacting access or forage utilization by existing grazing permit holders to the extent practical.
Vegetation Component	Allowable Percent Utilization						
Grasses and Herbaceous Species (% dry weight)	35-55%						
(% dry weight)	25-35%						
Guideline 2. Forest Service administrative site livestock pastures should comply with the forest-wide standards and guidelines for forage utilization and riparian management.	N/A. Option 3A would not establish any Forest Service administrative site livestock pastures.						
Grazing Management—Livestock Grazing Permits							
Standard 1. The ability of individuals holding grazing permits on public land to harass adult wolves in an opportunistic, noninjurious manner shall become part of their permit conditions so it is clearly understood exactly what can occur (USDI, F&W Svc. 1994a and 1994b).	N/A. BPA would not acquire any grazing permits as part of this project and does not anticipate a need to deter wolves from traveling near or within the transmission line corridor.						
Guideline 1. Permittees may be allowed motorized access to maintain or develop range improvements assigned in their grazing permits or for other authorized administrative activities. AMPs and Annual Operating Instructions should include direction to comply; travel permits should be issued to authorize this use.	There may be some grazing restrictions within the ROW footprint during construction of the line; however, these would be temporary, site-specific and generally limited to the active construction period. Where permittees may be allowed motorized access to maintain or develop range improvements on existing grazing permits, BPA would work with C-TNF and permit holders to avoid restricting access.						

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Standards and Guidelines		Consistency	
Timber Management			
Standard 1. All commercial sales, including sawtimber, convertible products, select material, and commercial firewood, shall be advertised and sold on a bid basis, unless demand can be met and "sale on demand" sales can be justified.		Merchantable timber cleared during tree removal for ROW clearing would be advertised and sold on a bid basis, unless demand can be met and "sale on demand" sales can be justified in consultation with the Forest.	
Standard 2. For tree planting projects, tree seedlings used shall be native species grown from seed from the appropriate seed zone, matched to site and elevation. Use the Expert System to determine seed transfer guidelines.		N/A. The Project would not include any tree planting. BPA would coordinate with the Forest botanist regarding appropriate seed mixes to be used for revegetation of disturbed areas.	
Guideline 1. Design timber management projects to simulate natural patch sizes, shapes, connectivity, and species composition and age-class diversity in accordance with silvicultural prescription.		The Project is not a typical timber harvest and therefore would create a linear opening of uniform width.	
Guideline 2. The silvicultural system used on managed timberlands should allow for control of pests, animal damage, including livestock, and vegetation competition to promote regeneration and tree growth at optimum levels.		N/A. The Project corridor would not be managed for timber production, as the ROW must be kept clear of trees and tall vegetation throughout the life of the Project.	
Guideline 3. When feasible and appropriate, use prescribed burning to dispose of slash to reduce fire hazard and to provide seed beds for natural regeneration.		Smoke and hot gases from fire can create a conductive path for electricity, causing electric arcs that can endanger people and objects, and cause the line to go out. Therefore, prescribed fire is not feasible or appropriate to the Project and would not be used for slash disposal.	
Guideline 4. A full complement of harvest systems and techniques may be used across the Forest unless specifically prohibited or limited by individual prescription direction.		Harvest techniques used for clearing of transmission line and access road ROWs would be appropriate to the applicable management prescription direction.	
Minimum Stocking Guidelines			
Guideline 1. Table 3.7, below, shows the minimum stocking which should occur before a regenerated area can be certified as stocked.		No restocking would take place in the ROW or on permanent access roads.	
Table 3.7 Minimum Stocking by Forested Vegetation Type.			
Species	Minimum Stocking (Trees/Acre)¹		Percent of Area Meeting Minimum Stocking
Lodgepole pine	170		70
Douglas-fir	140		70
Mixed Conifer ²	200		70
Spruce-fir	200		70
Aspen	5000		70
¹ Healthy, free-to-grow seedlings at least six (6 inches in height). Aspen may comprise a percentage of the stocking on conifer sites, dependent on the site-specific prescription (Rangelands 20(1): Decline of quaking aspen in the Interior West).			
² Douglas-fir, lodgepole pine, subalpine fir and Engelmann spruce.			

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Standards and Guidelines	Consistency
Created Openings	
Standard 1. The maximum size limit for forested vegetation openings created in one harvest operation by the even-aged silvicultural system shall normally be 40 acres. Openings may exceed 40 acres in aspen and lodgepole pine types contingent on Regional Forester approval, or as a result of natural catastrophic conditions such as fire, insect and disease, or windstorm.	The Project is not a typical timber harvest and therefore would create a larger, but linear opening. The Option 3A ROW and adjacent cleared area would convert up to approximately 29 acres of forested land to non-forested vegetation Proposed off-ROW access roads and pulling sites would convert up to an additional 4.2 acres of forested land to non-forested vegetation.
Standard 2. A harvested area of commercial forestland shall not be considered a created opening for silvicultural purposes when stocking surveys indicate that minimum stocking is achieved and average tree height equals or exceeds seven feet. When other resource management considerations (such as wildlife habitat, watershed needs, or visual requirements) prevail, a created opening shall no longer be considered an opening when the vegetation meets a particular management objective stated in the applicable management prescription.	No stocking would be conducted on the ROW. See above.
Logging Systems	
Guideline 1. Limit tractor skidding to slopes less than 40 percent and generally prohibit logging on slopes over 60 percent.	Tractor skidding would be limited to slopes less than 40 percent, and logging would generally be prohibited on slopes greater than 60 percent.
Guideline 2. Consider use of helicopter logging methods or other specialized logging methods on slopes in excess of 40 percent.	For slopes in excess of 40 percent, BPA would consider helicopter logging or other specialized methods as practical.
Guideline 3. Yarding operations should not take place when ground conditions are wet enough that there is a risk of rutting and compaction as determined by the sale administrator.	Yarding operations would not take place if ground conditions are wet enough that there is a risk of rutting and compaction.
Guideline 4. Minimize skid trails and temporary roads during logging operations. Identify skid trails and temporary roads requiring construction in the sale planning process and assure appropriate rehabilitation of these trails by the purchaser or in post-sale activities.	No temporary roads would be constructed on C-TNF lands as part of the Project; however, all permanent and reconstructed access roadways constructed specifically for the Project would be gated and closed to public motorized use. Any skid trails would be rehabilitated appropriately following construction of the Project. All existing motorized routes currently open to the public would remain open following completion of construction.
General Practices	
Standard 1. Suitability shall be verified at the site-specific level.	The Project is not a typical timber harvest and therefore the need to clear forested area for placement of the transmission line ROW would take precedence over the suitability of a site for timber production.
Guideline 1. Commercial sales of forest products should be offered in a variety of sale-size packages to meet the needs of small and large operations.	The Project is not a typical timber harvest. USFS would sell merchantable timber harvested as a result of ROW clearing directly to BPA in a settlement sale. BPA would hire a logger to conduct the logging work.
Firewood	
Guideline 1. Woody debris and dead standing snags are available, by permit, within 300 feet of an open motorized road for public firewood gathering unless the area is designated otherwise.	The Project is not anticipated to affect the availability, by permit, of woody debris and dead standing snags for public firewood gathering within 300 feet of an open road.
Guideline 2. The Forest may designate other areas for firewood gathering if needed to meet resource goals and public demand.	The Project is not anticipated to affect the ability of USFS to designate other areas for public firewood gathering if needed to meet resource goals and public demand.

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Standards and Guidelines		Consistency								
SUBSECTION AND PRESCRIPTION AREAS										
PRESCRIPTION 2.7.2 (D)—ELK AND DEER WINTER RANGE										
Access										
<p>The following table defines access allowable under prescription 2.7.1 (d)</p> <p>Table (d)</p> <table border="1"> <thead> <tr> <th align="center">Season</th> <th align="center">Type of Access</th> </tr> </thead> <tbody> <tr> <td align="center">Snow free season</td> <td>Motorized use allowed only on designated roads and trails</td> </tr> <tr> <td align="center">Snow Season</td> <td>Motorized use allowed only on designated trails, some winter range has no designated routes</td> </tr> <tr> <td colspan="2">Some site specific exceptions may apply; travel plan maps supersede this direction. Some winter range has no snow season designated routes</td> </tr> </tbody> </table>		Season	Type of Access	Snow free season	Motorized use allowed only on designated roads and trails	Snow Season	Motorized use allowed only on designated trails, some winter range has no designated routes	Some site specific exceptions may apply; travel plan maps supersede this direction. Some winter range has no snow season designated routes		<p>All access roadways constructed specifically for the Project would be closed to exclude public motorized access upon completion of construction. All existing motorized routes currently open to the public would remain open following completion of construction. Motorized use by BPA maintenance personnel and vehicles would take place mostly during summer months or in response to an emergency. Emergency responses would last only as long as necessary to restore power.</p>
Season	Type of Access									
Snow free season	Motorized use allowed only on designated roads and trails									
Snow Season	Motorized use allowed only on designated trails, some winter range has no designated routes									
Some site specific exceptions may apply; travel plan maps supersede this direction. Some winter range has no snow season designated routes										
PRESCRIPTION 3.2 (B, E, F)—SEMI-PRIMITIVE RECREATION										
Fire/Fuels										
Guideline 1. Employ Minimum Impact Suppression Tactics to the extent possible.		N/A. The route of Option 3A as currently designed would not traverse any lands within Management Prescription 3.2.								
Wildlife										
Guideline 1. Maintain snags at =60 percent biological potential for woodpeckers.		N/A. The route of Option 3A as currently designed would not traverse any lands within Management Prescription 3.2.								
Access										
<p>Standard 1. The following table defines access allowable under prescription 3.2(b):</p> <p>Table (b)</p> <table border="1"> <thead> <tr> <th align="center">Season</th> <th align="center">Type of Access</th> </tr> </thead> <tbody> <tr> <td align="center">Snow free season</td> <td>Motorized use allowed only on designated roads and trails</td> </tr> <tr> <td align="center">Snow Season</td> <td>Cross-country motorized allowed</td> </tr> <tr> <td colspan="2">Some site specific exceptions may apply; travel plan maps supersede this direction.</td> </tr> </tbody> </table>		Season	Type of Access	Snow free season	Motorized use allowed only on designated roads and trails	Snow Season	Cross-country motorized allowed	Some site specific exceptions may apply; travel plan maps supersede this direction.		<p>The route of Option 3A as currently designed would not traverse any lands within Management Prescription 3.2. In the short term, the Project could restrict public access to designated roads and trails as a result of area closures for safety reasons. The Project would not create any additional designated roads, as all access roads constructed specifically for the Project would be closed to exclude public motorized access upon completion of construction. All existing motorized routes currently open to the public would remain open following completion of construction. The Project would therefore have no impact on access in the long term. See Sections 3.1, Land Use, and Section 3.2, Recreation, for further discussion.</p>
Season	Type of Access									
Snow free season	Motorized use allowed only on designated roads and trails									
Snow Season	Cross-country motorized allowed									
Some site specific exceptions may apply; travel plan maps supersede this direction.										

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Standards and Guidelines	Consistency						
PRESCRIPTION 5.2 (B, C, F)—FOREST VEGETATION MANAGEMENT							
Disturbances							
Guideline 1. Practices to prevent or control natural disturbances, such as insect and disease losses and wildfire, are emphasized.	The portion of Option 3A that would traverse lands in Management Prescription 5.2 is approximately 1.2 miles long and would impact approximately 14 acres of forest. Based on the relatively small amount of forest impacted, Option 3A would not be expected to prevent or exacerbate natural disturbances. As noted below, wildfires would be suppressed, per Management Prescription 8.1, Fire/Fuels Standard 1, which states, “all wildland fire shall be aggressively suppressed.”						
Fire/Fuels							
Guideline 1. Wildfires should be suppressed.	Wildfires would be suppressed, per Management Prescription 8.1, Fire/Fuels Standard 1, which states, “all wildland fire shall be aggressively suppressed.”						
Guideline 2. Prescribed fire may be used to reduce fuel loading; obtain natural regeneration; for wildlife habitat improvement; and for other purposes that meet the goals of this prescription.	Prescribed fire would not be used to reduce fuel loading, because smoke and hot gases from a fire can create a conductive path for electricity, and electrical arcs can endanger people and objects potentially causing an outage of the transmission line.						
Wildlife							
Guideline 1. Maintain snag habitat at =40 percent of the biological potential for woodpeckers.	Snag habitat would be maintained to approach 40 percent of biological potential for woodpeckers to the extent practical; however, no snags would be retained within the 100-foot-wide ROW or where they would otherwise pose a danger to the transmission line. Per Management Prescription 8.1, Wildlife, Standard 1, biological potential for woodpeckers is not a management consideration in Concentrated Development Areas.						
Vegetation							
Guideline 1. Where aspen exists, it should be maintained or enhanced as a component through restoration treatments.	Option 3A would permanently impact approximately 5 acres of aspen-dominated forest types. Tree removal would be limited only to areas within the 100-foot ROW or where trees pose a danger to the line.						
Guideline 2. All ground-disturbed areas within an activity area should be monitored for five years for noxious weeds invasions.	BPA would conduct pre- and post-construction weed surveys to identify potential weed introduction/spread areas and focus monitoring/treatment in any areas where noxious weeds were present.						
Access							
Standard 1. The following table defines access allowable under prescription 5.2(b): Table (b)	In the short term, the Project could restrict public access to designated roads and trails as a result of area closures for safety reasons. The Project would not create any additional designated roads, as all access roads would be closed and gated to exclude motorized access. The Project would therefore have no impact on access in the long term. See Sections 3.1, Land Use, 3.2, Recreation, and 3.11, Transportation, for further discussion.						
<table border="1"> <tr> <td>Season</td> <td>Type of Access</td> </tr> <tr> <td>Snow free season</td> <td>Motorized use allowed only on designated roads and trails</td> </tr> <tr> <td>Snow Season</td> <td>Cross-country motorized allowed</td> </tr> </table>		Season	Type of Access	Snow free season	Motorized use allowed only on designated roads and trails	Snow Season	Cross-country motorized allowed
Season		Type of Access					
Snow free season		Motorized use allowed only on designated roads and trails					
Snow Season	Cross-country motorized allowed						
Some site specific exceptions may apply; travel plan maps supersede this direction.							

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Standards and Guidelines	Consistency								
<p>Standard 2. The following table defines access allowable under prescription 5.2 (c)</p> <p>Table (c)</p> <table border="1"> <thead> <tr> <th>Season</th> <th>Type of Access</th> </tr> </thead> <tbody> <tr> <td>Snow free season</td> <td>Cross-country motorized use allowed</td> </tr> <tr> <td>Snow Season</td> <td>Cross-country motorized use allowed</td> </tr> <tr> <td colspan="2">Some site specific exceptions may apply; travel plan maps supersede this direction.</td> </tr> </tbody> </table>	Season	Type of Access	Snow free season	Cross-country motorized use allowed	Snow Season	Cross-country motorized use allowed	Some site specific exceptions may apply; travel plan maps supersede this direction.		<p>In the short term, the Project could restrict public access to designated roads and trails as a result of area closures for safety reasons. The Project would not create any additional designated roads, because all access roads would be closed and gated to exclude motorized access. The Project would therefore have no impact on access in the long term. See Sections 3.1, Land Use, 3.2, Recreation, and 3.11, Transportation, for further discussion.</p>
Season	Type of Access								
Snow free season	Cross-country motorized use allowed								
Snow Season	Cross-country motorized use allowed								
Some site specific exceptions may apply; travel plan maps supersede this direction.									
<p>Standard 3. The following table defines access allowable under prescription 5.2 (f)</p> <p>Table (f)</p> <table border="1"> <thead> <tr> <th>Season</th> <th>Type of Access</th> </tr> </thead> <tbody> <tr> <td>Snow free season</td> <td>Motorized use allowed only on designated roads and trails</td> </tr> <tr> <td>Snow Season</td> <td>Non-motorized</td> </tr> <tr> <td colspan="2">Some site specific exceptions may apply; travel plan maps supersede this direction.</td> </tr> </tbody> </table>	Season	Type of Access	Snow free season	Motorized use allowed only on designated roads and trails	Snow Season	Non-motorized	Some site specific exceptions may apply; travel plan maps supersede this direction.		<p>In the short term, the Project could restrict public access to designated roads and trails as a result of area closures for safety reasons. The Project would not create any additional designated roads, because all access roads would be closed and gated to exclude motorized access. The Project would therefore have no impact on access in the long term. See Sections 3.1, Land Use, 3.2, Recreation, and 3.11, Transportation, for further discussion.</p>
Season	Type of Access								
Snow free season	Motorized use allowed only on designated roads and trails								
Snow Season	Non-motorized								
Some site specific exceptions may apply; travel plan maps supersede this direction.									
Recreation									
<p>Guideline 1. Avoid and mitigate impacts to recreation facilities and trails.</p>	<p>There are no developed recreation facilities in the project area; trails would be avoided and any impacts mitigated. Trails crossing the ROW could be closed temporarily for safety reasons, but would remain open following construction of the transmission line. See Section 3.2, Recreation, for further discussion.</p>								

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Standards and Guidelines	Consistency
Scenic Resources	
Guideline 1. Opportunities to improve scenic integrity should be considered in proposed vegetation treatments.	BPA would incorporate various measures to preserve scenic integrity, which may include such management action as feathering of the ROW to minimize visual impact. BPA would work with the C-TNF forester to ensure that tree clearing is consistent with the forest plan
Range	
Guideline 1. Livestock grazing may be allowed on transitory forage produced following timber harvest where and when that use would not conflict with regeneration and restoration efforts.	Transitory forage may be produced following vegetation clearing associated with construction of the transmission line. Disturbed areas associated with the Option 3A ROW, access roads and pulling sites would be re-seeded with native or C-TNF approved vegetation which may or may not include forage species. Wherever grazing may be present, the presence of the line would not be expected to interfere with that use, and grazing would not be restricted except where it may conflict with regeneration and restoration efforts.
Timber	
Standard 1. Lands in this prescription are included in the suitable timber base and contribute to the Allowable Sale Quantity (ASQ).	USFS would sell merchantable timber harvested as a result of ROW clearing directly to BPA in a settlement sale. BPA would hire a logger to conduct the logging work. Upon inclusion of the transmission line ROW in Management Prescription 8.1, these lands would be removed from the suitable timber base and would no longer contribute to the Allowable Sale Quantity (ASQ), per management Prescription 8.1, Timber, Standard 1.
Standard 2. The ASQ attributed to stands on slopes between 40% and 60% and areas within Inventoried Roadless Areas is a noninterchangeable component (NIC) ⁵ .	No timber harvest would take place within Inventoried Roadless Areas under Option 3A. BPA would only harvest timber on slopes exceeding 40% as necessary to for the construction and safety of the line. Non-ground based equipment (helicopters or cable) would likely be required on slopes exceeding 40 percent on C-TNF lands. Upon inclusion of the transmission line ROW in Management Prescription 8.1, all lands within the ROW would be removed from the suitable timber base and would no longer contribute to the Allowable Sale Quantity (ASQ), per management Prescription 8.1, Timber, Standard 1.
Guideline 1. Harvest and treatment residues should be made available for firewood and other products in a manner compatible with site preparation, productivity, and restocking requirements. Designated aspen areas should be made available for firewood.	Typically, BPA's logging subcontractor would be responsible for disposing of the harvest residue. However, BPA would work with the C-TNF to make harvest residues available for firewood if appropriate.
Guideline 2. All forms of timber harvest, including salvage, to achieve stated goals and objectives are permitted.	Where it would cross forested areas, Option 3A would involve the clearing of all tall-growing vegetation within a 250-foot wide corridor. USFS would sell merchantable timber harvested as a result of clearing directly to BPA in a settlement sale. BPA would hire a logger to conduct the logging work.

⁵ A portion of the ASQ, which cannot be substituted for from other areas or species types. Volume programmed from an NIC will not be replaced by volume from other areas of the Forest.

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Standards and Guidelines	Consistency								
PRESCRIPTION 6.2 (B, E, F)—RANGELAND VEGETATION MANAGEMENT	N/A. The 6.2 Management Prescription does not occur on areas of the C-TNF traversed by Option 3A, and therefore does not apply to this Forest Plan Amendment.								
Vegetation									
Guideline 1. Focus vegetation treatments in those communities that have departed from their historical range of variability.	N/A. The 6.2 Management Prescription does not occur on areas of the C-TNF traversed by Option 3A, and therefore does not apply to this Forest Plan Amendment.								
Recreation									
Guideline 1. Recreation facilities, which are not detrimental to livestock management, may be provided	N/A. The 6.2 Management Prescription does not occur on areas of the C-TNF traversed by Option 3A, and therefore does not apply to this Forest Plan Amendment.								
Wildlife									
Standard 1. Maintain snags at = 40 percent of biological potential for woodpeckers.	N/A. The 6.2 Management Prescription does not occur on areas of the C-TNF traversed by Option 3A, and therefore does not apply to this Forest Plan Amendment.								
Access									
Standard 2. The following table defines access allowable under prescription 6.2 (e) Table (e)	N/A. The 6.2(e) Management Prescription does not occur on any of the areas of the C-TNF traversed by the Option 3A corridor.								
<table border="1"> <thead> <tr> <th align="center">Season</th> <th align="center">Type of Access</th> </tr> </thead> <tbody> <tr> <td align="center">Snow free season</td> <td align="center">Non-motorized travel only allowed</td> </tr> <tr> <td align="center">Snow Season</td> <td align="center">Cross-country motorized allowed</td> </tr> <tr> <td colspan="2">Some site specific exceptions may apply; travel plan maps supersede this direction.</td> </tr> </tbody> </table>	Season	Type of Access	Snow free season	Non-motorized travel only allowed	Snow Season	Cross-country motorized allowed	Some site specific exceptions may apply; travel plan maps supersede this direction.		
Season	Type of Access								
Snow free season	Non-motorized travel only allowed								
Snow Season	Cross-country motorized allowed								
Some site specific exceptions may apply; travel plan maps supersede this direction.									
PRESCRIPTION 2.8.3—AQUATIC INFLUENCE ZONE									
<p>This management prescription applies to the Aquatic Influence Zone (AIZ) associated with lakes, reservoirs, ponds, perennial and intermittent streams, and wetlands, such as wet meadows, springs, seeps, bogs and other areas. These areas control the hydrologic, geomorphic, and ecological processes that directly affect water quality and aquatic life. They also provide unique habitat characteristics important to plant and animal species that rely on aquatic, wetland, or riparian ecosystems for all or a portion of their life cycle.</p> <p>The AIZ management prescription provides an extensive set of goals, standards, and guidelines regarding ecological processes and patterns, land use, fish and wildlife management, and access within the AIZ. These goals, standards and guidelines are discussed on pages RFP 4-45 through RFP 4-53 of the CNF Forest Plan.</p>	<p>No structures would be sited within Management Prescription 2.8.3. The Project would avoid siting roads within the AIZ to the extent practical, and would impact less than 0.3 acre within the AIZ. The ROW corridor would include approximately 6.9 acres of land located within the AIZ; however, the transmission line would span these areas and the majority would not require clearing or manipulation of vegetation.</p> <p>Goals, standards and guidelines for Management Prescription 2.8.3 that are applicable to the Project are discussed in Sections 3.1, Land Use , 3.2, Recreation, and 4.17.6, “Guidelines – Management Prescription 2.8.3 Aquatic Influence Zone.”</p> <p>Mitigation measures associated with impacts of the Project on AIZs are discussed in Section 3.6, Water Resources, Floodplains, and Wetlands.</p>								

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Standards and Guidelines	Consistency
Fire/Fuels	
Guideline 1. Locate incident bases, camps, helibases, staging areas, helispots, and other centers for incident activities outside of AIZs. If the only suitable location for such activities is within the AIZ, an exemption may be granted following a review and recommendation by a resource advisor.	During construction, BPA would locate all fire protection equipment and staging areas outside of AIZs. BPA would continue to coordinate with local fire districts and C-TNF personnel to develop fire and emergency response plans for the operating phase of the line, and would prioritize locating any equipment or staging areas outside of AIZs (see Section 3.13.4, Public Health and Safety).
Guideline 2. When taking water from fish-bearing streams for suppression activities, intake hoses should be screened, taking into account the fish species, life stages, and streamflow present at the time.	BPA would coordinate all suppression activities with the C-TNF.
Guideline 3. Allow wildland fire use, prescribed fire, and mechanical fuel treatments to meet the desired future conditions of the AIZ.	Mechanical treatment would be used periodically to keep the transmission line ROW clear of tall-growing vegetation, and these treatments would be designed to meet the desired future conditions of the AIZ to the extent practical. Wildfires would be suppressed and prescribed fire would not be used to treat fuels, because smoke and hot gases from a fire can create a conductive path for electricity, and electrical arcs can endanger people and objects potentially causing an outage of the transmission line.
Guideline 4. Design fire suppression strategies, practices, and actions so they minimize disturbance of riparian ground cover and vegetation.	BPA would coordinate and design all suppression activities with the C-TNF.
Guideline 5. Avoid mixing and delivery of chemical retardant, foam, or additives to surface waters.	BPA would coordinate all suppression activities with the C-TNF including avoiding delivery of chemicals to surface waters.
Lands	
Standard 1. Special use authorizations for new projects involving instream facilities shall maintain minimum instream flows to maintain or improve desired AIZ attributes.	N/A. The Project would not involve the placement of any instream facilities and would not affect instream flow levels.
Standard 2. For licensing and relicensing, use conditioning authority granted under Section 4(e) of the Federal Power Act to ensure that hydroelectric facilities located within AIZs are located, operated, and maintained in a manner that protects, mitigates, or enhances Forest resources.	N/A. The Project would not involve the licensing or relicensing or a hydroelectric facility.
Guideline 1. Avoid locating facilities and utility corridors in Aquatic Influence Zones.	Option 3A would avoid locating facilities and utility corridors in AIZs. Less than 0.3 acre of impacts to AIZs would occur as a result of access road crossings of intermittent streams. The ROW corridor would include approximately 6.9 acres of land located within Management Prescription 2.8.3; however, the transmission line would span these areas and the majority would not require clearing or manipulation of vegetation. Long-term control of vegetation would occur in a small portion of previously-forested AIZs.
Guideline 2. For any diversion, fish passage and/or screening devices to prevent accidental loss of fish should be provided where needed.	N/A. The Project would not involve diversion of any streams.
Guideline 3. Use land acquisition, exchange, and conservation easements to meet desired AIZ attributes.	The Project would not involve the acquisition or exchange of land, or the establishment of conservation easements by either BPA or C-TNF. BPA would continue to coordinate with C-TNF to ensure that actions taken during construction, post-construction mitigation, and operation of the transmission line promote the achievement of desired AIZ attributes to the extent practical.

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Standards and Guidelines	Consistency
Guideline 4. When reauthorizing existing special use authorizations or existing Forest Service projects involving instream facilities, exclusive of facilities retrofitted to existing dams, where feasible, provide for minimum instream flows as specified by the Forest or State.	N/A. The Project would not involve the operation or reauthorization of any instream facilities.
Guideline 5. For licensing and relicensing of hydroelectric projects, consider the posting of a bond to cover decommissioning costs associated with new structures such as dams and large buildings.	N/A. The Project would not involve the licensing or relicensing of any hydroelectric projects.
Minerals/Geology	
Guideline 1. Locate new structures, support facilities, and roads outside AIZs. Where no alternative to siting facilities in AIZs exists, locate and construct the facilities in ways that avoid or reduce impacts to desired AIZs attributes. Where no alternative to road construction exists, keep roads to the minimum necessary for the approved mineral activity.	Option 3A would avoid locating facilities and utility corridors in AIZs. No structures would be located within AIZs. Less than 0.3 acre of impacts to AIZs would occur as a result of access road crossings of intermittent streams.
Guideline 2. New leases for energy minerals should prohibit surface occupancy for exploration and development unless there are no other options for location and desired AIZ attributes can be met.	N/A. The Project would not involve new leases for energy minerals.
Guideline 3. The operating plans of existing leases for energy minerals should be modified to minimize impacts to desired AIZ attributes.	N/A. The Project would not involve the extraction of energy minerals.
Guideline 4. Do not locate debris, mine overburden, excess material, leaching pads, and other facilities within Aquatic Influence Zones, unless no other alternatives are available. If no other alternative exists, ensure that safeguards are in place to prevent release or drainage of toxic or other hazardous materials onto these lands.	In general, the Project would avoid ground disturbance or the placement of any materials within AIZs. If no other alternative exists, safeguards would be implemented to prevent release or drainage of toxic or other hazardous materials into AIZs. Option 3A would include both a Stormwater Pollution Prevention Plan (SWPPP) and Spill Prevention and Response Procedures to control and prevent releases into waterbodies and adjacent AIZs (See Section 3.5.4, Geology and Soils, and Section 3.13.4, Public Health and Safety).
Guideline 5. These areas would generally not be available for development of mineral materials unless AIZ attributes would be maintained or improved.	N/A. The Project would not involve the development of mineral materials.
Biological Elements—General Riparian Area Management	
Standard 1. Within legal authorities, ensure that new proposed management activities within watersheds containing 303(d) listed waterbodies improve or maintain overall progress toward beneficial use attainment for pollutants which led to listing.	The proposed project would include an Erosion and Sediment Control Plan that would incorporate Best Management Practices (BMPs). The implementation of this plan and BMPs would ensure that 303(d) waterbodies would maintain overall progress towards attainment for pollutants which led to their listing.
Guideline 1. Felled trees should remain on site when needed to meet woody debris objectives and desired AIZ attributes.	BPA would coordinate with the C-TNF on woody debris placement within the ROW and AIZs.
Guideline 2. Use herbicides, pesticides, and other toxicants and chemicals only as needed to maintain desired AIZ attributes.	BPA would apply herbicides according to the BPA Transmission System Vegetation Management Program EIS (DOE/EIS-0285) and label recommendations. Use of herbicides, pesticides and other toxicants would be avoided within AIZs to the extent practical.

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Standards and Guidelines	Consistency
Guideline 3. Avoid storage of fuels and other toxicants or refueling within AIZs unless there are no other alternatives. Any refueling sites within an AIZ should have an approved spill containment plan.	BPA would locate storage of fuels and other toxicants or refueling outside of AIZs. In general, the project would prepare and implement Spill Prevention and Response Procedures to avoid and contain accidental spills, including notification assessment, security, clean-up, and reporting requirements (see Section 3.13.4, Public Health and Safety).
Biological Elements—Fisheries	
Guideline 1. Where feasible, restore connectedness of disjunct populations and enhance fish passage for native fish.	The Blackfoot River would be the only fish-bearing stream crossed by the Option 3A corridor. The transmission line would span the Blackfoot River twice and no work would occur in fish-bearing streams. It is therefore expected that Option 3A would neither degrade nor enhance fish passage and population connectivity (See Section 3.8.3, Fish).
Guideline 2. Design and implement fish and other aquatic biota habitat restoration and enhancement actions in a manner that contributes to attainment of desired AIZ attributes.	Tree removal would occur in a small number of intermittent waterbody AIZs; however, impacts to individual AIZs would be low and tree removal would only occur as necessary to ensure the safety of the line.
Guideline 3. Coordinate with State Fish and Game management agencies to develop fish stocking strategies within the Forest. Discourage stocking of non-native fish species in lakes and streams managed for native fish populations.	N/A. The Project would not involve stocking of fish.
Biological Elements—Wildlife	
Standard 1. Snags shall be maintained at = 80 percent of biological potential for woodpeckers (See Tables 3.4 and 3.5).	Snag habitat would be maintained to approach 80 percent of biological potential for woodpeckers to the extent practical; however, no snags would be retained within the 100-foot-wide ROW or where they would otherwise pose a danger to the transmission line.
Forest Use and Occupation—Access	
Standard 1. Snowmobiles are prohibited on unfrozen watercourses.	Snowmobiles would not be used to traverse unfrozen watercourses.
Forest Use and Occupation—Roads and Trails	
Standard 1. All new and replaced culverts, both permanent and temporary, shall be designed and installed to meet desired conditions for riparian and aquatic species.	Under Option 3A, no new access roads would be constructed over any perennial waterbodies and no access roads crossing the Blackfoot River would be improved. Culverts placed at access road crossings of intermittent streams and drainages would be designed and installed to meet desired conditions for riparian and aquatic species.
Guideline 1. Avoid constructing roads within the AIZ unless there is no practical alternative.	Option 3A has been designed to avoid constructing roads within the AIZ to the extent practical; due to the nature of the topography in the area, a small number of access road crossing would be necessary at intermittent streams and drainages, resulting in a total impact of less than 0.3 acre to AIZ areas.
Guideline 2. Culverts (permanent and temporary) should be sized so that the probability of flow exceedance is fifty percent or less during the time the culvert is expected to be in place. Consider bedload and debris when sizing culverts.	BPA would size culverts accordingly and in coordination with the C-TNF.
Guideline 3. When feasible, use bridges, arches, and open-bottom culverts in fish-bearing streams.	Option 3A would not cross any fish-bearing streams with the exception of the Blackfoot River, which it would span.

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Standards and Guidelines	Consistency
Guideline 4. Avoid placing ditch relief culverts where they may discharge onto erodible slopes or directly into streams.	BPA would avoid placing ditch relief culverts where they may discharge onto erodible slopes or directly into streams. Roads would be designed to be out-sloping wherever possible to prevent the concentrated discharge of water. Where culverts, waterbars, or ditches do discharge, riprap slope protection would be installed to protect erodible slopes.
Guideline 5. Where feasible, install cross-drainage above stream crossings to prevent ditch sediments from entering streams.	BPA would install waterbars on all grades within 20 vertical feet of stream crossings to prevent sediments from entering streams.
Guideline 6. New or reconstructed roads and trails should cross the AIZ riparian areas as perpendicular as possible.	Access roads crossing AIZ areas have been designed to cross these areas as perpendicular as possible.
Guideline 7. Avoid making channel changes on streams or drainages.	BPA would avoid making channel changes on streams or drainages.
Guideline 8. Design and install drainage crossings to reduce the chances of turning stream flows down the road prism in case of a blocked or overflowing culvert.	BPA would design and install drainage crossings to reduce chances of turning stream flows down the road prism if culverts become blocked. BPA culverts would be designed conservatively to reduce the likelihood of blockage
Guideline 9. Road drainage patterns should avoid disruption of natural hydrologic flow paths.	Roads would be designed to avoid disruption of natural hydrologic flow paths. Roads would be designed to be out-sloping wherever possible to allow water to flow over them instead of channeling and causing concentrated discharge. Roads would be designed to be in high areas away from natural flow paths wherever possible.
Recreation	
Standard 1. Grazing by recreational stock shall meet AIZ grazing standards for utilization of riparian vegetation.	N/A. The Project would not involve grazing by recreational stock.
Standard 2. Design, construct, and operate new recreation facilities, including trails and dispersed sites, in a manner that maintains progress toward desired AIZ attributes.	N/A. The Project would not involve the design, construction, or operation of new recreational facilities.
Guideline 1. Manage existing recreation facilities, including trails and dispersed sites, to minimize adverse impacts and, where feasible, move towards desired AIZ attributes.	N/A. Option 3A would not directly impact any recreational facilities (See Section 3.2.3, Recreation).

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Standards and Guidelines		Consistency		
Grazing Management				
Standard 1. Table 4.1, below, shall be used for riparian grazing until more site-specific standards are implemented using the Caribou Riparian Grazing Implementation Guide. If current Annual Operating Instructions have more stringent requirements they shall be used, however. Generally, the factor most critical for maintaining riparian and stream channel characteristics shall be used. These utilization guidelines apply to native and desirable nonnative key plant species as recorded at the end of the grazing period (when the livestock leave the unit/pasture).		N/A. Option 3A would not involve grazing, riparian or otherwise.		
		Condition of Riparian (Lotic) Area		
Parameter	Location Measured	Properly Functioning \Condition	Functionin g at Risk	Non-functioning
% Herbaceous Species Utilization	Greenline	45%	35%	30%
	In AIZ	55%	45%	35%
% Woody Spp Utilization	-	45%	40%	30%
Stubble Height	Greenline	4 inches	6 inches	6 inches
% Bank Disturbance	Cumulative	30%	25%	20%
Standard 2. The most current version of the Caribou Riparian Grazing Implementation Guide shall be used for the primary source of direction for grazing in Forest riparian areas and shall be incorporated during allotment management planning.		N/A. Option 3A would not involve grazing, riparian or otherwise.		
Guideline 1. Avoid locating new livestock handling and/or management facilities inside of AIZs.		N/A. Option 3A would not involve any livestock handling or management facilities.		
Guideline 2. Where feasible, relocate or close existing livestock handling facilities that will not maintain progress toward desired AIZ attributes.		N/A. Option 3A would not involve any livestock handling or management facilities.		
Timber				
Standard 1. Aquatic Influence Zones are not included in the suitable timber base and do not contribute to the Allowable Sale Quantity (ASQ).		The Project is not a typical timber sale. C-TNF would sell any merchantable timber located within the transmission line ROW corridor directly to BPA in a settlement sale and BPA would hire a logger to conduct the logging work. Tree removal would occur in a small number of wetland and intermittent waterbody AIZs; however, impacts to individual AIZs would be low and tree removal would only occur as necessary to ensure the safety of the line.		

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Standards and Guidelines	Consistency
<p>Guideline 1. Timber harvest, including fuelwood cutting, is generally not allowed unless:</p> <ul style="list-style-type: none"> ▪ catastrophic events such as fire, flooding, wind, or insect damage result in degraded riparian conditions, and unscheduled timber harvest (salvage and commercial fuelwood cutting) is selected as the most desirable management practice ▪ silvicultural practices are necessary to achieve desired vegetation characteristics and desired AIZ attributes. 	<p>The Project would not be a typical timber sale. Tree removal would occur for hazardous tree and safety and fire hazard related concerns; some of these trees which are identified as merchantable timber would be sold. Tree removal would occur in a small number of wetland and intermittent waterbody AIZs; however, impacts to individual AIZs would be low and tree removal would only occur as necessary to ensure the safety of the line (see Section 3.6.3, Water Resources, Floodplains, and Wetlands). Where possible, trees would be incorporated into mitigation, including snags, down woody debris (DWD), and large woody debris (LWD) to help promote the attainment of desired AIZ characteristics.</p>
<p>Guideline 2. Mechanized slash piling and burning should be minimized within the AIZ.</p>	<p>Mechanized slash piling would be minimized within the AIZ. No burning would take place during construction or operation of the Project, because it would pose a danger to the line.</p>
<p>PRESCRIPTION 2.1.6(b)—GRAVEL CREEK SPECIAL EMPHASIS AREA</p>	
<p>Goal 2. The area is managed according to the Memorandum of Understanding with the Idaho Dept. of Transportation, Federal Highway Administration, and the Army Corps of Engineers.</p>	<p>N/A. The 2.1.6(b) Management Prescription does not occur on any of the areas of the C-TNF traversed by the Option 3A corridor.</p>
<p>Objective 1. Coordinate a review of the status of the property with Idaho Department of Transportation, Federal Highway Administration, and the Army Corps of Engineers every three years.</p>	

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http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5229166.pdf. Accessed September 12, 2011.

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Appendix B

Visual Resource Assessment

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Visual Resource Assessment

This appendix provides the overall methodology and accompanying analyses conducted to inform the impact analysis completed in Chapter 3 of the supplemental draft environmental impact statement (EIS). It describes the different federal land managers' visual resource management approaches, and provides viewshed analyses throughout the project area for the North and South alternatives, and Option 3A.

Basis for Analysis

Both the U.S. Forest Service (USFS) and the Bureau of Land Management (BLM) place a special emphasis on preserving the natural landscape and, as such, have developed specific manuals for evaluating an existing landscape and assessing potential impacts to visual resources. The U.S. Department of Agriculture and USFS developed *Landscape Aesthetics: A Handbook for Scenery Management*, defining a Scenery Management System (USFS 1995) and the Department of the Interior and BLM developed a Visual Resource Management (VRM) program (BLM 1980). Guidance from both documents was used to complete the visual assessment for this project.

USFS was founded with a mission “to sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations” (USFS 2011). With this mission USFS coined the motto “caring for the land and serving the people.” A guiding point of this mission statement is to advocate conservation ethics in order to promote the health, productivity, diversity and beauty of forests and associated lands. Likewise, BLM’s mission statement is “to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.” An important aspect of preserving and protecting an area for future enjoyment is the preservation of the natural landscape. The viewscape of a given area consists of the landforms, vegetation, water features, and cultural modifications (physical changes caused by human activities) that impart an overall visual impression of the area landscape.

Caribou-Targhee National Forest Visual Quality Objectives

The EIS for the Caribou Revised Forest Plan (RFP) used the Visual Management System developed in the 1970s to establish Visual Quality Objectives (VQOs) for parcels within the Caribou-Targhee National Forest (C-TNF). The plan identified five classes of VQOs: preservation, retention, partial retention, modification, and maximum modification (USFS 2003b).

- **Preservation**—allows ecological changes only. Management activities except for very low visual impact recreation facilities are prohibited. Applies to wilderness areas, primitive areas, wild river corridors, other specialty-classified areas, areas awaiting classification, and some unique management units that do not justify special classification.

- **Retention**—allows management activities that are not visually evident. Activities may only repeat form, line, color, and texture that are frequently found in the character landscape. Changes in size, amount, intensity, direction, pattern, etc., should not be evident.
- **Partial Retention**—allows management activities that remain visually subordinate to the characteristic landscape. Activities may repeat form, line, color, and texture common to the characteristic landscape but changes in their qualities of size, amount, intensity, direction, pattern, etc., remain visually subordinate to the characteristic landscape. Activities may also introduce form line, color, or textures that are found infrequently or not at all in the characteristic landscape but they should remain subordinate to the visual strength of the characteristic landscape.
- **Modification**—allows management activities that may visually dominate the original characteristic landscape. However, activities of vegetative and land form alteration must borrow from naturally established form, line, color, or texture so completely and at such scale that its visual characteristics are those of natural occurrences within the surrounding area or character type. Additional parts of these activities such as structures, roads, slash, root wads, etc., must remain visually subordinate to the proposed composition. Introduction of facilities such as buildings, signs, roads, etc., should borrow naturally established form, line, color, or texture so completely and at such scale that its visual characteristics are compatible with the natural surroundings.
- **Maximum Modification**—allows management activities that may dominate the characteristic landscape. However, when viewed as background, the visual characteristics must be those of natural occurrences within the surrounding area or character type. When viewed as foreground or middle ground, they may not appear to completely borrow from naturally established form, line, color, or texture. Alterations may be out of scale or contain details that are incongruent with natural occurrences as seen in foreground or middle ground. Introduction of structures, roads, slash, and root wads, etc., must remain visually subordinate to the proposed composition as viewed in the background.

The RFP outlines a prescription for visual quality maintenance within the C-TNF. The prescription emphasizes maintaining the existing scenery within major travel corridors with high quality natural vistas, while allowing livestock production, and other compatible commodity outputs. Logging is permitted, but the areas where the visual quality maintenance prescription applies are not part of the suitable timber base. Goals associated with this prescription include the following:

- Manage travel corridors to protect the natural visual quality. Manage in an environmentally sensitive manner to promote the production of non-commodity resources at varying levels, and limited commodity production.
- Manage to provide various dispersed recreational opportunities.
- Provide interpretive opportunities to enhance visitors' experience.

- Utility corridors should have irregular clearing widths and follow patterns of existing natural openings.
- Utility structures should be made to blend with the existing landscape to the extent feasible.
- Avoid parallel corridors. Consolidate facilities within existing energy corridors where feasible.

The C-TNF lands within the project area include those areas classified as Retention and Partial Retention.

BLM Visual Resource Management Classes

BLM conducted a visual resource inventory, as part of the Pocatello Field Office Proposed Resource Management Plan (RMP) and Final EIS, completed in April 2010 (BLM 2010). All parcels within the Pocatello Field Office lands were assigned management classes with the following established objectives:

- **Class I**—to preserve the existing character of the landscape. The level of change to the characteristic landscape should be very low and must not attract attention.
- **Class II**—to retain the existing character of the landscape. The level of change to the characteristic landscape should be low.
- **Class III**—to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate.
- **Class IV**—to provide for management activities that requires major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high.

BLM lands within the project area fall into Class II and IV areas.

In addition, the BLM methodology was also used to assess Bureau of Indian Affairs (BIA) lands, which lack a specific visual designation. These BIA lands fell into a BLM Classes II and III. Class III lands are just east of the reservoir and adjacent to Highway 34 (BLM 2010). BIA Class II lands are those that consist of areas with shallow to deep canyons, rolling hills, and open meadows.

BLM guidance speaks specifically to assessing impacts of linear alignments such as right-of-ways (ROWs), roads, trails, pipeline developments, and underground and overhead utility lines (BLM 2007). The guidance states that major considerations for determining an alignment include the following:

- **Topography**—visually, it can be used to subordinate or hide man-made changes in the landscape. Projects located at breaks in topography or behind existing tree groupings are

usually of much less visual impact than projects located on steep side slopes. By taking advantage of natural topographic features, cut and fill slopes can be greatly minimized.

- **Topographic Breaks**—typically, these exhibit a natural line element that the proposed alignments can repeat or blend with to strengthen the design. This line element is partly established by a visual shadow zone, which would further aid in reducing the contrast of the Project.
- **Soils**—soils should be analyzed for stability and fertility and a re-vegetation program should be planned.
- **Hydrology**—hydrological conditions can strongly affect the visual impact of buried and surface construction. The risks of surface and subsurface erosion within the corridor should be analyzed and evaluated.
- **Linear Crossings**—crossings with other linear features or structures should be designed to minimize their visual impact:
 - When possible, crossings should be made at a right angle.
 - Structures should be set as far back from the crossing as possible.
 - In areas with tree and shrub cover, the ROW and structures should be screened from the crossing area.

Potential Viewers and Sensitivities

An assessment of the visual impact of any project should consider the viewer, including their expectations, activities, and frequency of viewing direct and indirect results of the Project. Four types of viewers were identified within the project area.

Local Residents

Local residents are people who live in the area of the Project and who may view the Project from their yards or homes, while driving on local roads, or during other activities in their daily lives. Local residents can be highly sensitive to changes in the landscape that can be viewed from their homes and neighborhoods. The sensitivity of local residents to the visual impact of the Project may be mitigated by exposure to other existing transmission lines and associated facilities and other dissonant features such as phosphate mines already within the viewshed.

Commuters and Travelers

Commuters and travelers are people who travel near the proposed project on their way to other destinations. They may view the Project on a regular basis or only once. Typically, drivers would have limited views of the Project where vegetation or structures provide screening and where the transmission line is running high above the road surface. The visual perception of the Project for commuters and travelers is anticipated to be relatively low because they are typically moving and have a relatively short duration of visual exposure to it. Drivers tend to be occupied with traffic and navigation and are to a much lesser degree concerned with off-road views. Passengers would

have a greater occasion for off-road views. The exception to this assessment is scenic roads and byways, which are considered to provide scenic value as part of the driving experience for drivers as well as passengers.

Employees

Employees who work at local businesses, primarily in commercial areas along the routes, would experience the Project as they commute and potentially from their place of employment. They may view the Project from the parking lot as they enter their place of business. Workers may not have views to the outside from within their building and would likely be focused on their work rather than views of the landscape. Due to limited views and focus, employees are not anticipated to have high sensitivity to the Project near their place of work.

Recreational Users

Recreational users include local residents and tourists involved in recreational activities at the Blackfoot Reservoir, C-TNF, Soda Springs geyser, Pioneer Historic Byway, state and local parks, waterfronts and boating facilities, historic and cultural sites; and natural areas. Scenery and visual quality may or may not be an important recreational experience for these viewers. For some recreational users, scenery may be an important part of their experience as their activities may include attentiveness to views of the landscape for a long period of time. Such viewers also may have a high appreciation for visual quality and high sensitivity to visual change, as many of these users may be present in the area because of the pristine natural character of the landscape and scenic views.

Scenic Integrity and Visual Absorption

Scenic integrity is the degree from which the landscape character deviates from a natural, natural-appearing landscape in line, form, color, and texture of the landscape. In general, natural and natural-appearing landscapes have the greatest scenic integrity. As human-made incongruities are added to the landscape the scenic integrity diminishes.

The ability of a landscape to absorb or incorporate alterations with limited reduction in scenic integrity depends on the landscape's character, complexity, and other environmental factors. A new transmission line next to an existing line provides less contrast, and therefore can be absorbed into that landscape better than introducing a transmission line as a new feature in an undeveloped area.

Landscape character encompasses the patterns of landform (topography), vegetation, land use, and aquatic resources (i.e., lakes, streams, and wetlands). The visual character is influenced by natural systems as well as by human interactions and use of land. In natural settings, visual character attributes are natural elements, whereas in rural or pastoral/agricultural settings they may include human-made elements such as fences, walls, barns and outbuildings, and occasional residences. In a more developed setting, the visual character may include buildings, lawn areas and landscaping, pavement, and utility infrastructure. Landscape character throughout the project area has been broken into four categories: C-TNF lands, BLM lands, BIA lands, and non-federal lands. An element common to all land categories, and important to visual resources, is the

Pioneer Historic Byway or Highway 34, which runs through the majority of the project area. Highway 34 is an Idaho state and nationally recognized scenic byway with several points of interest within the Project, including Hooper Springs, China Hat Geological formation, Henry-Chester Country Store and the Gray's Lake Wildlife Refuge.

Viewshed Analysis

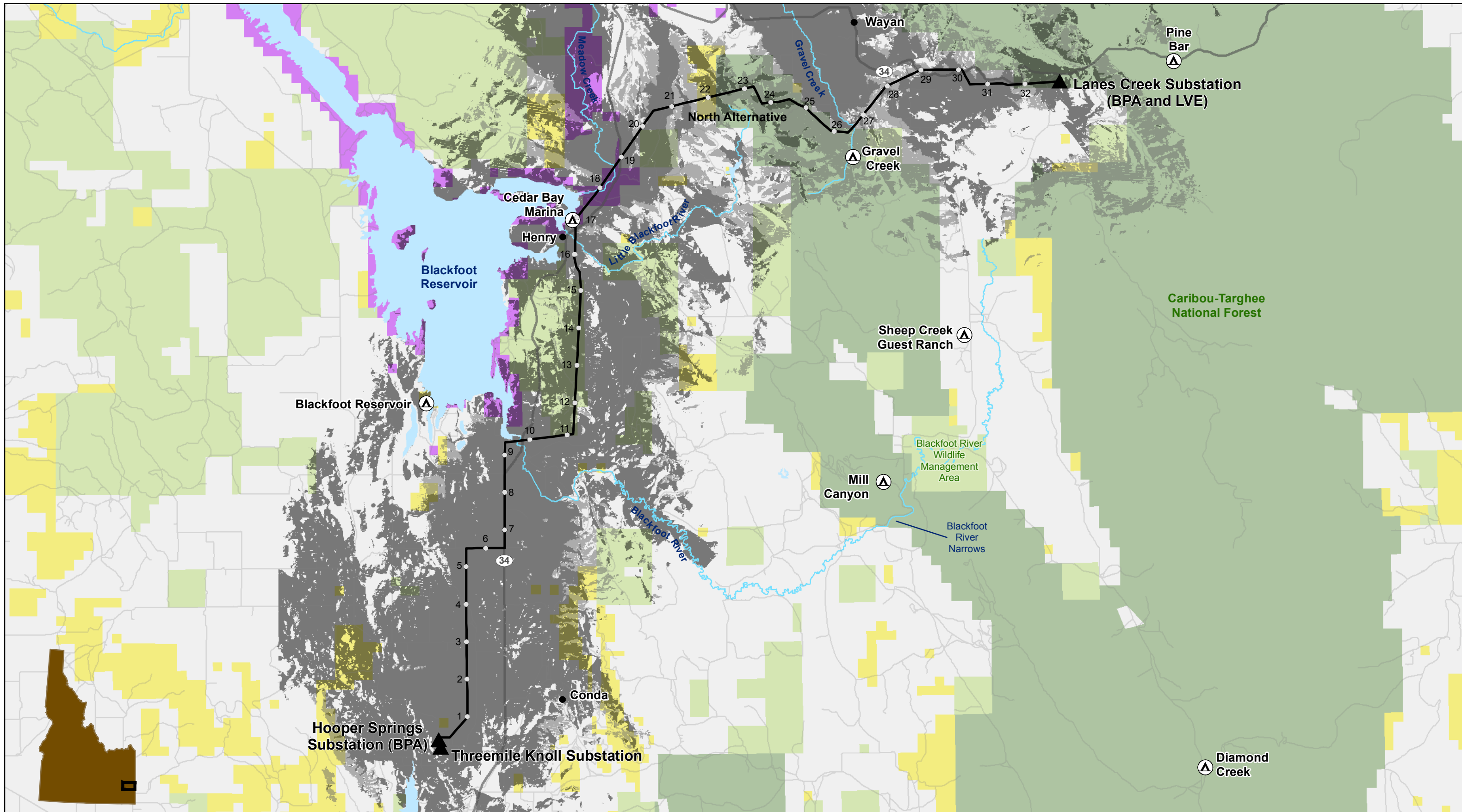
Viewshed analyses were conducted for the North and South alternatives and Option 3A to simulate potential views that would be blocked by forest cover or topography and showcase areas where the proposed project structures may be visible. Structure visibility is illustrated in Maps B-1 through B-12. The results of the viewshed analyses are illustrated with the different federal land management categories for each area associated with the standards described above. BLM standards are used for areas managed by BIA. The locations of state and private lands throughout the study area, including roadways and publicly accessible recreational areas such as campgrounds, are also illustrated.

Potentially visible areas are shown in the maps as either “Visible” or “Visible with Trees.” “Visible” indicates areas from which the structures are predicted to be visible from locations on the ground and would likely be visible to a visitor. “Visible with Trees” refers to those areas from which the structures would be visible only if the intervening forest cover was removed. Since an observer would be at ground level or the base of the tree cover, it is assumed that the proposed transmission line would not be visible from these areas.

Initial review of the viewshed for the North Alternative shows that, in the southern half of the corridor, the transmission line would be largely visible (Maps B-2 and B-3), while views would be more limited within the northeast portion of the transmission line corridor (Maps B-4 and B-5).

The South Alternative would be largely visible in the southwest portion of the corridor and while paralleling the Blackfoot River and Blackfoot River Road and at the Blackfoot River Narrows (Maps B-7 and B-8). It would have reduced visibility between line miles 5 and 9, and as it enters the C-TNF between line miles 19-22 (Map B-9).

Option 3A, similar to the North Alternative, would also be highly visible in the southwest portion of the corridor, and similar to the South Alternative, would be visible while paralleling the Blackfoot River and Blackfoot River Road and at the Blackfoot River Narrows crossing (Map B-11). It would have reduced visibility as it enters the C-TNF but would be visible from the Blackfoot River Wildlife Management Area (Blackfoot River WMA) (Map B-12).



▲ Substation	Land Ownership	— Local Road
● City	■ Caribou-Targhee National Forest	— State Route
⊠ Campground	■ Bureau of Land Management	Viewshed
○ Mile Markers - North Alternative	■ Bureau of Indian Affairs	■ Visible
— North Alternative	■ State Land	■ Visible with Trees
	■ Private Land	

Coordinate System: NAD 1983 State Plane Idaho East (feet)
 Projection: Transverse Mercator
 Datum: North American 1983

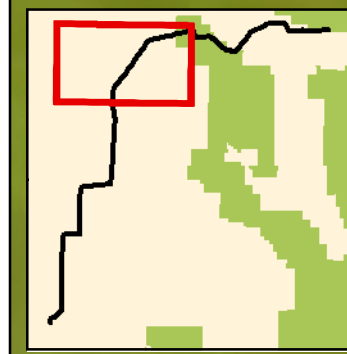
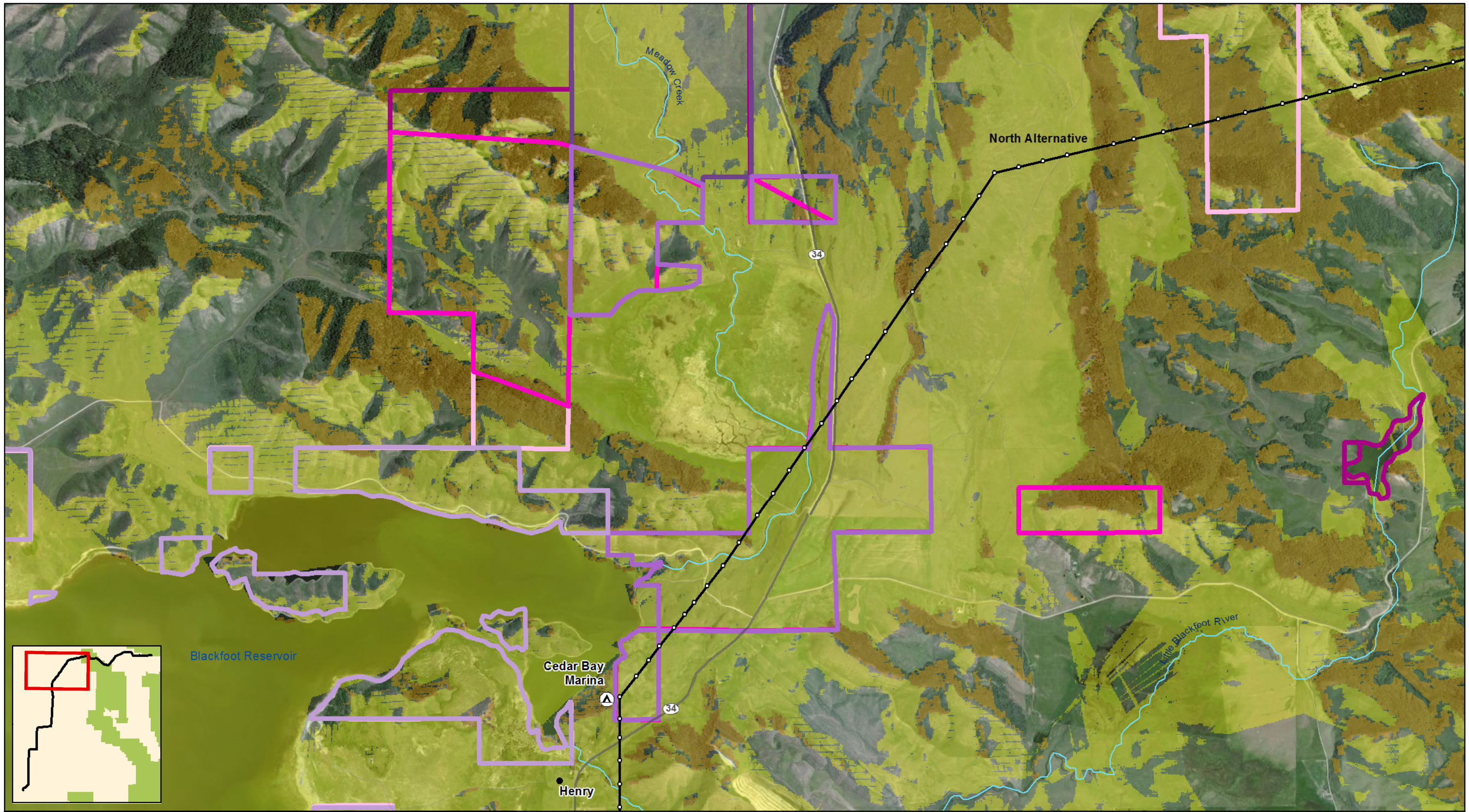
Date: 12/19/2013

Hooper Springs Transmission Project

Map B-1

Viewshed Analysis of North Alternative

Date: 12/19/2013



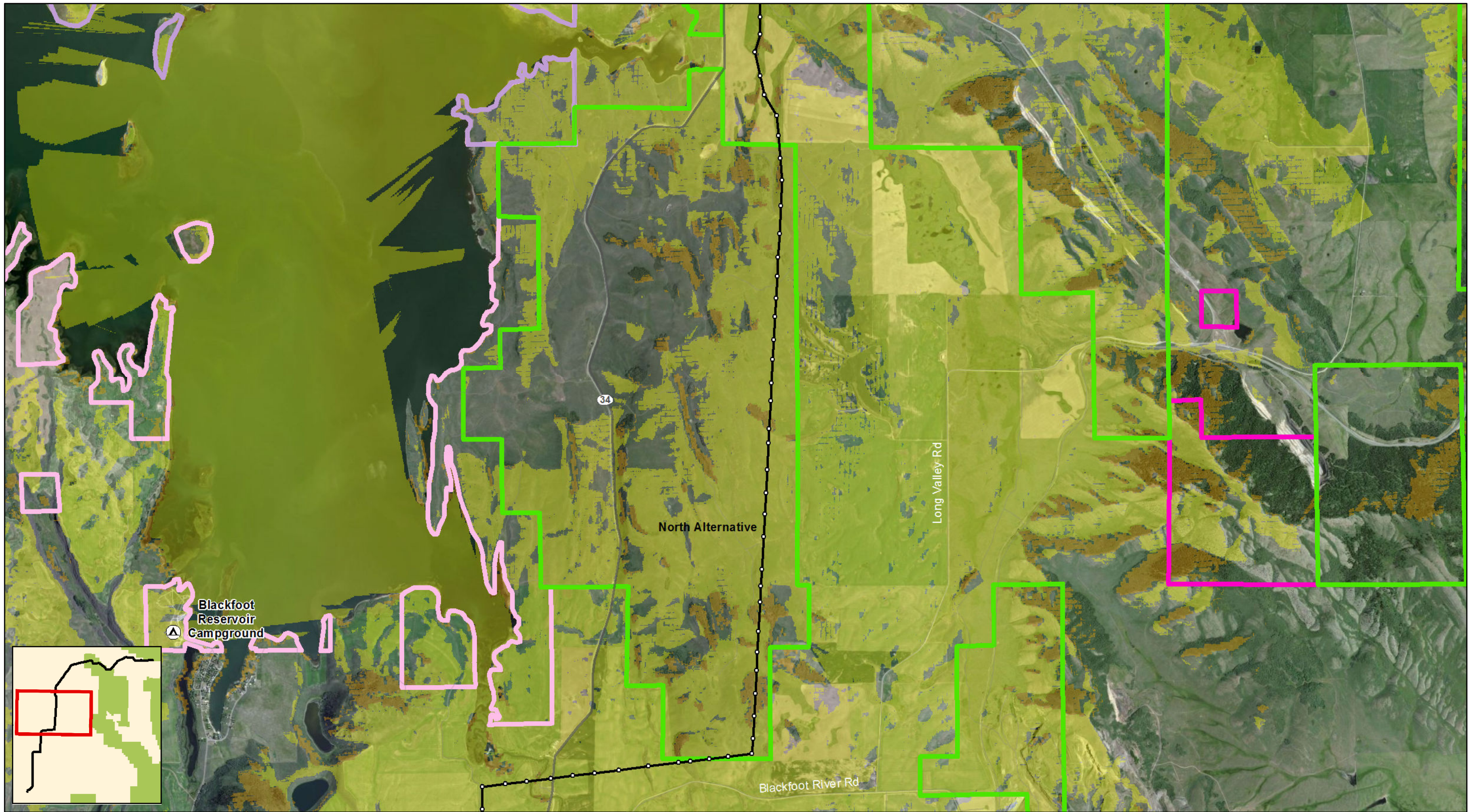
○ Planned Structures	Ⓐ Campground	● City
— North Alternative	□ Class II: BIA Lands	□ Class II: BLM Lands
Viewshed	□ Class III: BIA Lands	□ Class III: BLM Lands
■ Visible	□ Class IV: BIA Lands	□ Class IV: BLM Lands
■ Visible with Trees		

Coordinate System: NAD 1983 State Plane Idaho East (feet)
 Projection: Transverse Mercator
 Datum: North American 1983



Date: 1/8/2014

Hooper Springs Transmission Project
Map B-2
Viewshed for BLM and BIA Lands
Along North Alternative



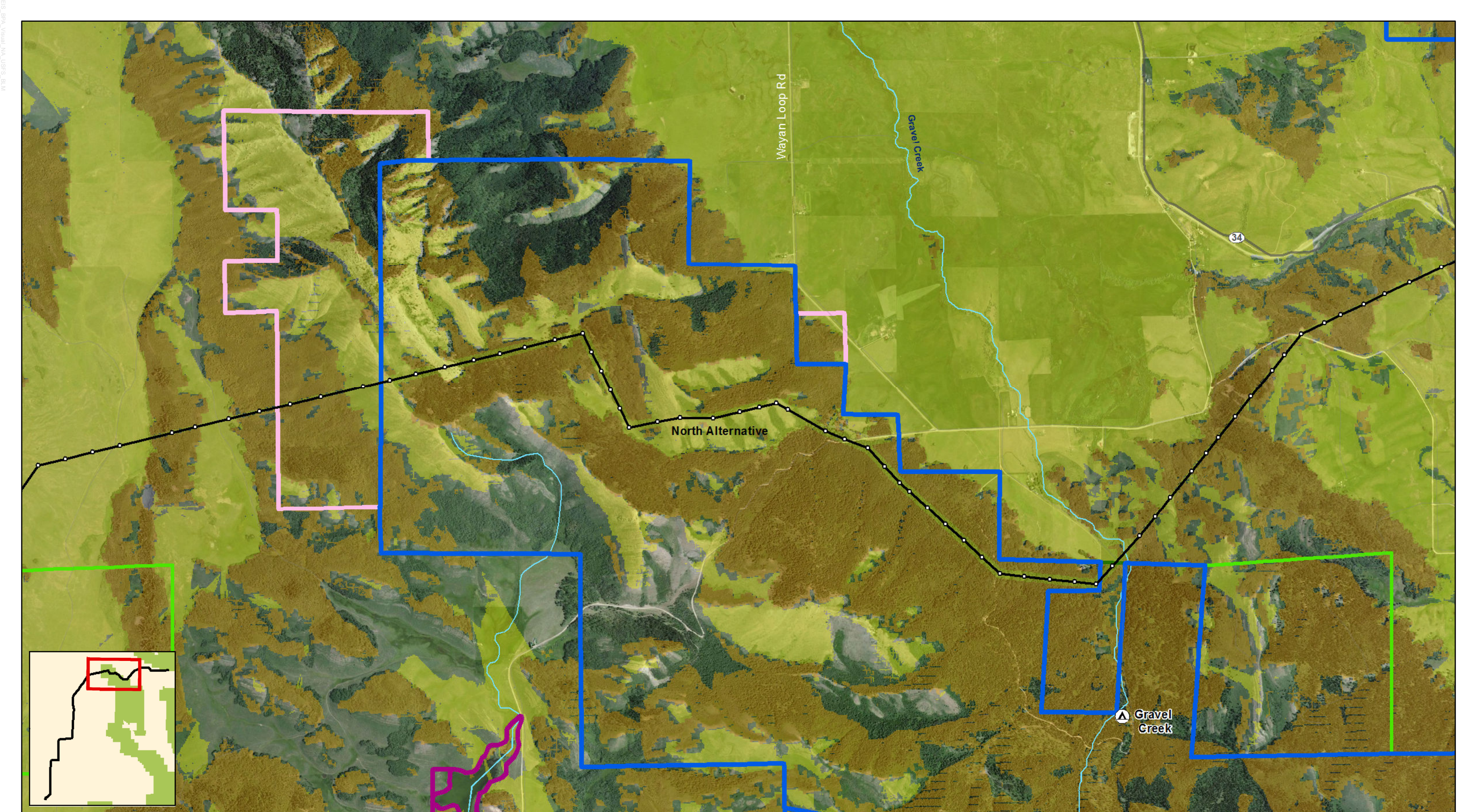
● City	Class II: BIA Lands	Campground
○ Planned Structures	Class II: BLM Lands	Viewshed
— North Alternative	Class III: BLM Lands	Visible
	State Land	Visible with Trees

N
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 Coordinate System: NAD 1983 State Plane
 Idaho East (feet)
 Projection: Transverse Mercator
 Datum: North American 1983


0 0.25 0.5 1 Miles

Date: 1/8/2014

Hooper Springs Transmission Project
Map B-3
Viewshed for Non-Federal Lands
and Blackfoot Reservoir Campground
Along North Alternative



- City
- Ⓐ Campground
- Planned Structures
- North Alternative
- ▭ State Land
- Viewshed**
- ▭ Visible
- ▭ Visible with Trees
- ▭ Class II: BLM Lands
- ▭ Class III: BLM Lands
- ▭ Class IV: BLM Lands
- USFS VRM Classification**
- ▭ USFS Partial Retention

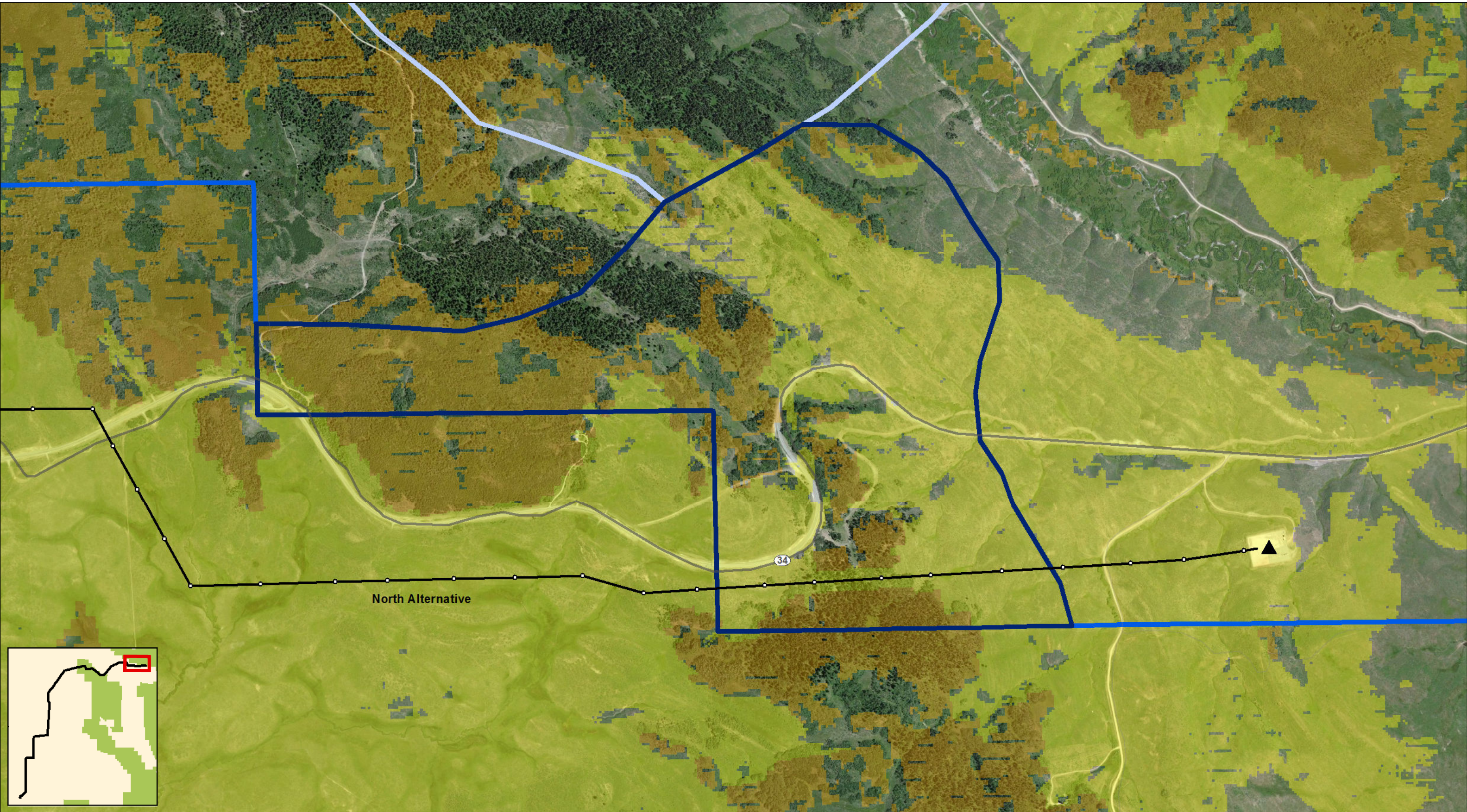

 Coordinate System: NAD 1983 State Plane
 Idaho East (feet)
 Projection: Transverse Mercator
 Datum: North American 1983

0 0.25 0.5 1 Miles



 Date: 1/8/2014

Hooper Springs Transmission Project
Map B-4
Viewshed for C-TNF and BLM Lands
Along North Alternative



▲ Substation	USFS VRM Classification	Viewshed
○ Planned Structures	Retention	Visible
— North Alternative	USFS Partial Retention	Visible with Trees
	Modification	

Coordinate System: NAD 1983 State Plane Idaho East (feet)
 Projection: Transverse Mercator
 Datum: North American 1983

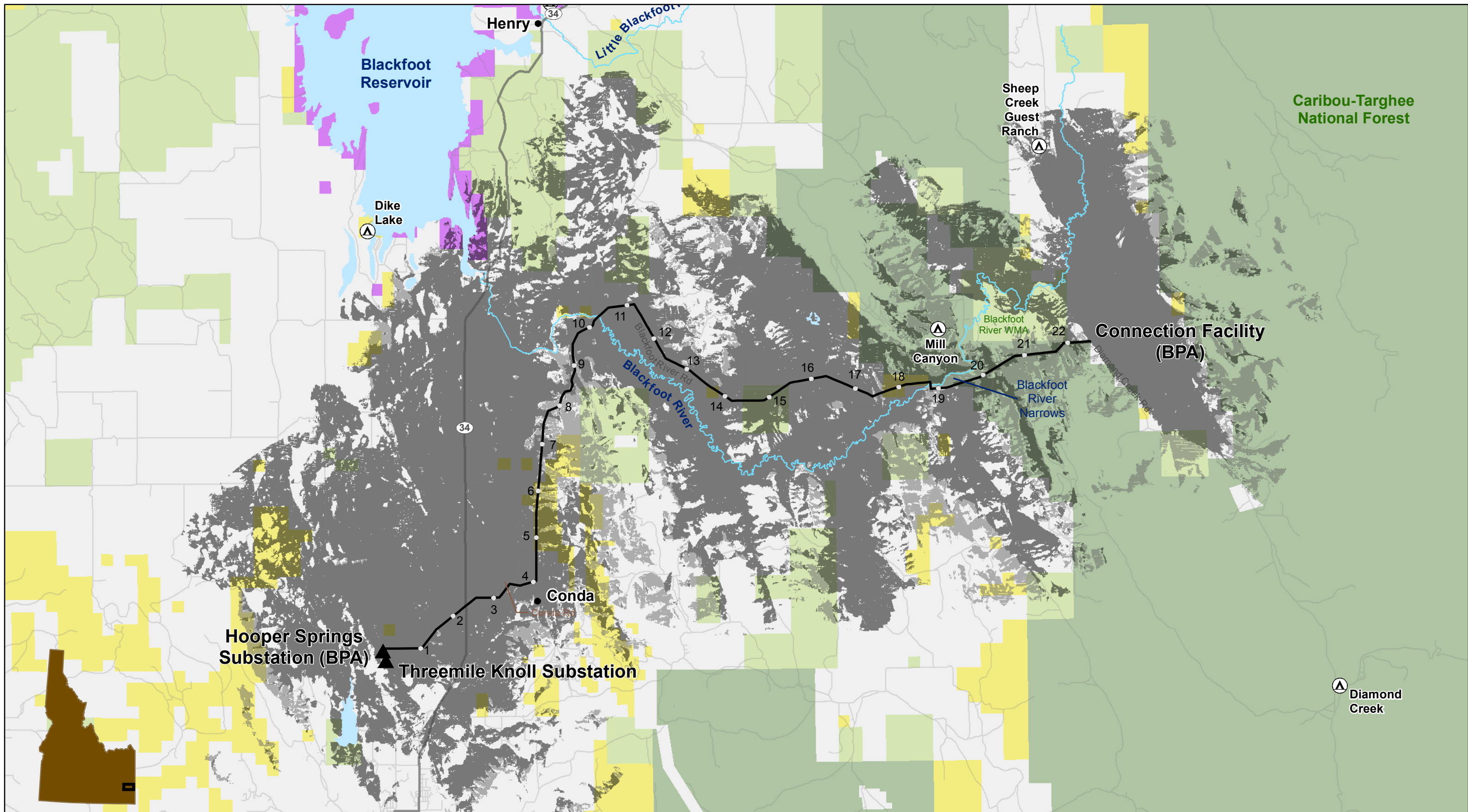
0 0.25 0.5 Miles

Date: 1/8/2014

Hooper Springs Transmission Project

Map B-5

Viewshed for C-TNF Lands Along North Alternative



▲ Substation	Land Ownership	— Local Road
● City	■ Caribou-Targhee National Forest	— State Route
⬆ Campground	■ Bureau of Land Management	Viewshed
○ Mile Markers - Option 3A	■ Bureau of Indian Affairs	■ Visible
— South Alternative	■ State Land	■ Visible with Trees
	■ Private Land	

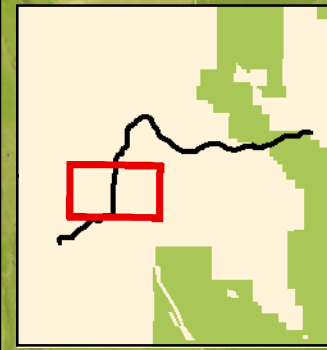
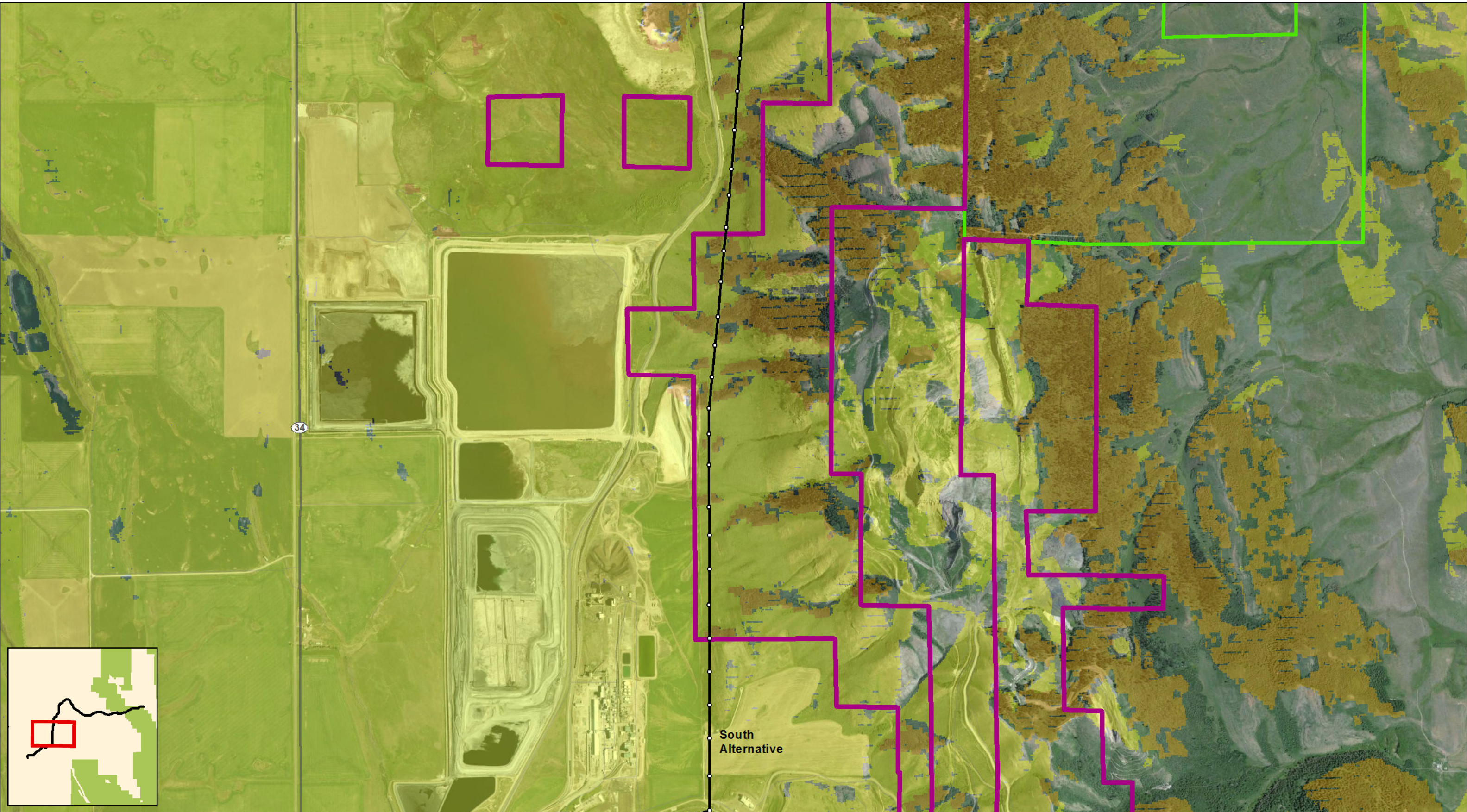
Coordinate System: NAD 1983 State Plane Idaho East (feet)
 Projection: Transverse Mercator
 Datum: North American 1983

Date: 12/19/2013

Hooper Springs Transmission Project

Map B-6

Viewshed Analysis of South Alternative

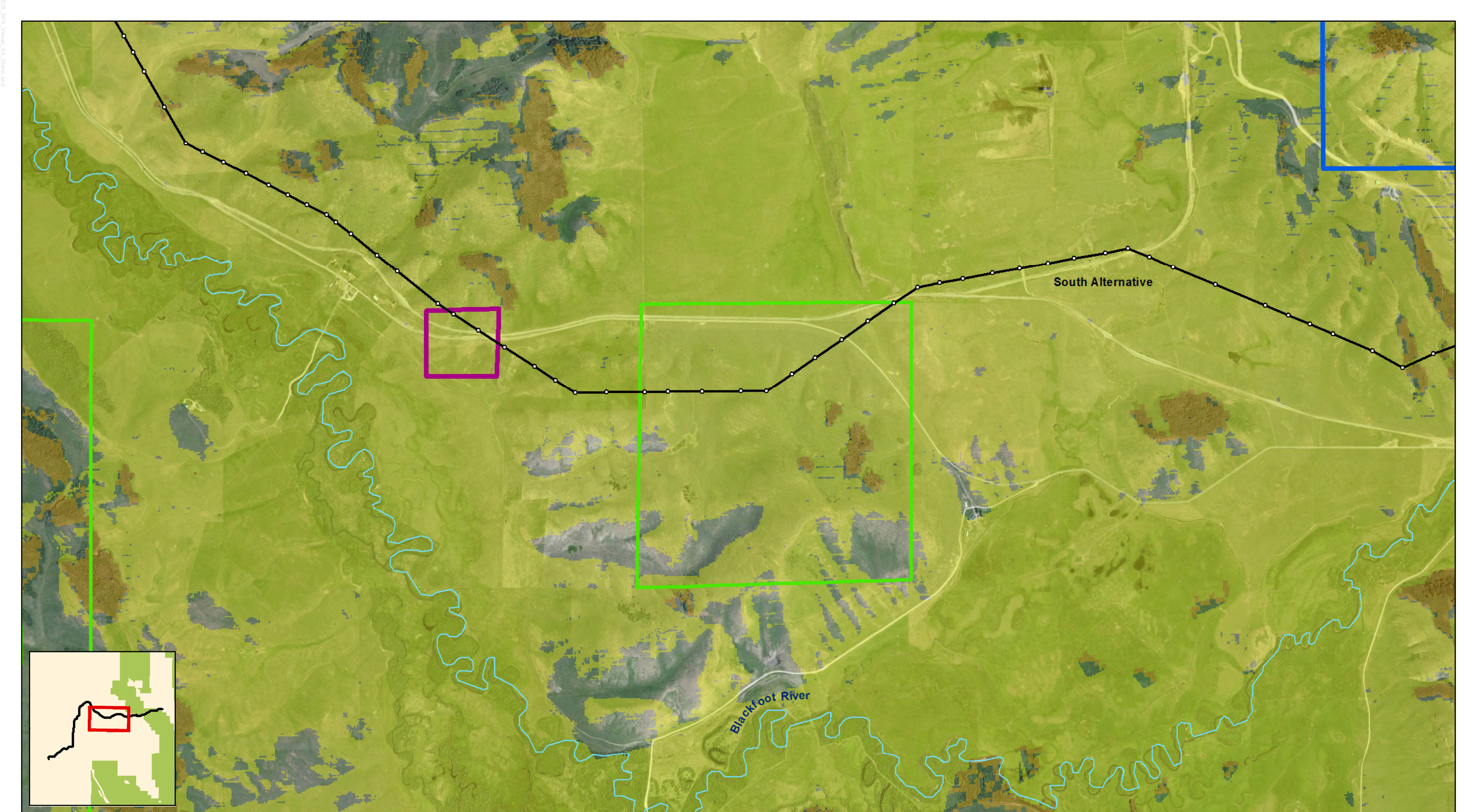


- City
- Planned Structures
- South Alternative
- State Land
- Viewshed**
- Visible
- Visible with Trees
- Class II: BLM Lands
- Class III: BLM Lands
- Class IV: BLM Lands

Coordinate System: NAD 1983 State Plane
Idaho East (feet)
Projection: Transverse Mercator
Datum: North American 1983

Date: 1/8/2014

Hooper Springs Transmission Project
Map B-7
Viewshed for BLM Lands
Along South Alternative



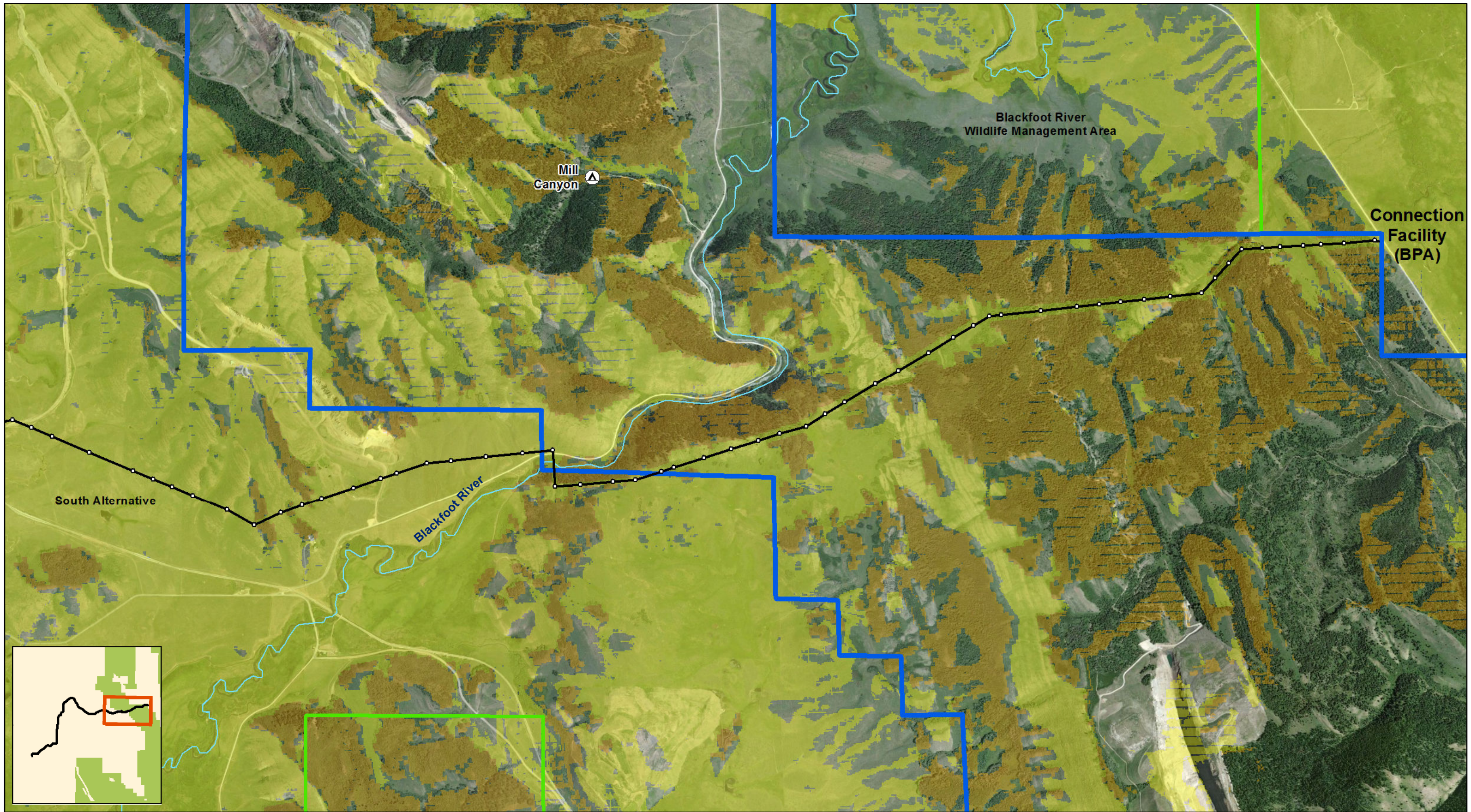
● City	State Land	Class II: BLM Lands
○ Planned Structures	Viewshed	Class III: BLM Lands
— South Alternative	Visible	Class IV: BLM Lands
	Visible with Trees	USFS VRM Classification
		USFS Partial Retention

Coordinate System: NAD 1983 State Plane
Idaho East (feet)
Projection: Transverse Mercator
Datum: North American 1983

0 0.25 0.5 1 Miles

Date: 1/8/2014

Hooper Springs Transmission Project
Map B-8
Viewshed for Non-Federal and BLM Lands
Along South Alternative

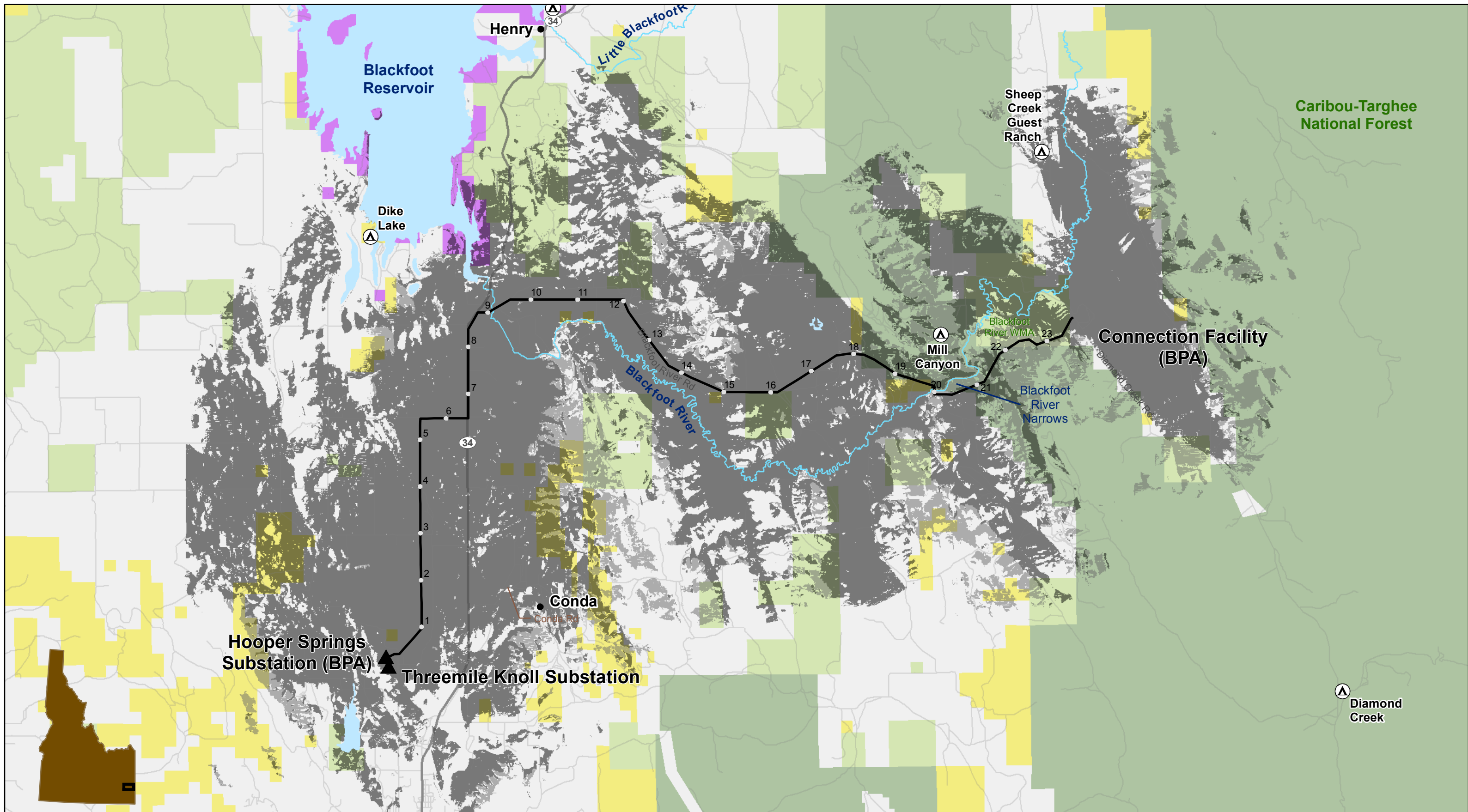


● City	Ⓜ Campground	▭ State Land
○ Planned Structures	Viewshed	USFS VRM Classification
— South Alternative	▭ Visible	▭ USFS Partial Retention
	▭ Visible with Trees	

Coordinate System: NAD 1983 State Plane
 Idaho East (feet)
 Projection: Transverse Mercator
 Datum: North American 1983

Date: 1/8/2014

Hooper Springs Transmission Project
Map B-9
Viewshed for C-TNF Lands
and the Blackfoot River WMA
along South Alternative



▲ Substation	Land Ownership	— Local Road
● City	■ Caribou-Targhee National Forest	— State Route
Ⓐ Campground	■ Bureau of Land Management	Viewshed
○ Mile Markers - Option 3A	■ Bureau of Indian Affairs	■ Visible
— Option 3A	■ State Land	■ Visible with Trees
	■ Private Land	

Coordinate System: NAD 1983 State Plane
Idaho East (feet)
Projection: Transverse Mercator
Datum: North American 1983

Date: 1/8/2014

Hooper Springs Transmission Project

Map B-10

Viewshed Analysis of South Alternative Option 3A



● City	State Land	Class II: BLM Lands
○ Planned Structures	Viewshed	Class III: BLM Lands
— Option 3A	Visible	Class IV: BLM Lands
	Visible with Trees	USFS VRM Classification
		USFS Partial Retention

Coordinate System: NAD 1983 State Plane Idaho East (feet)

 Projection: Transverse Mercator

 Datum: North American 1983

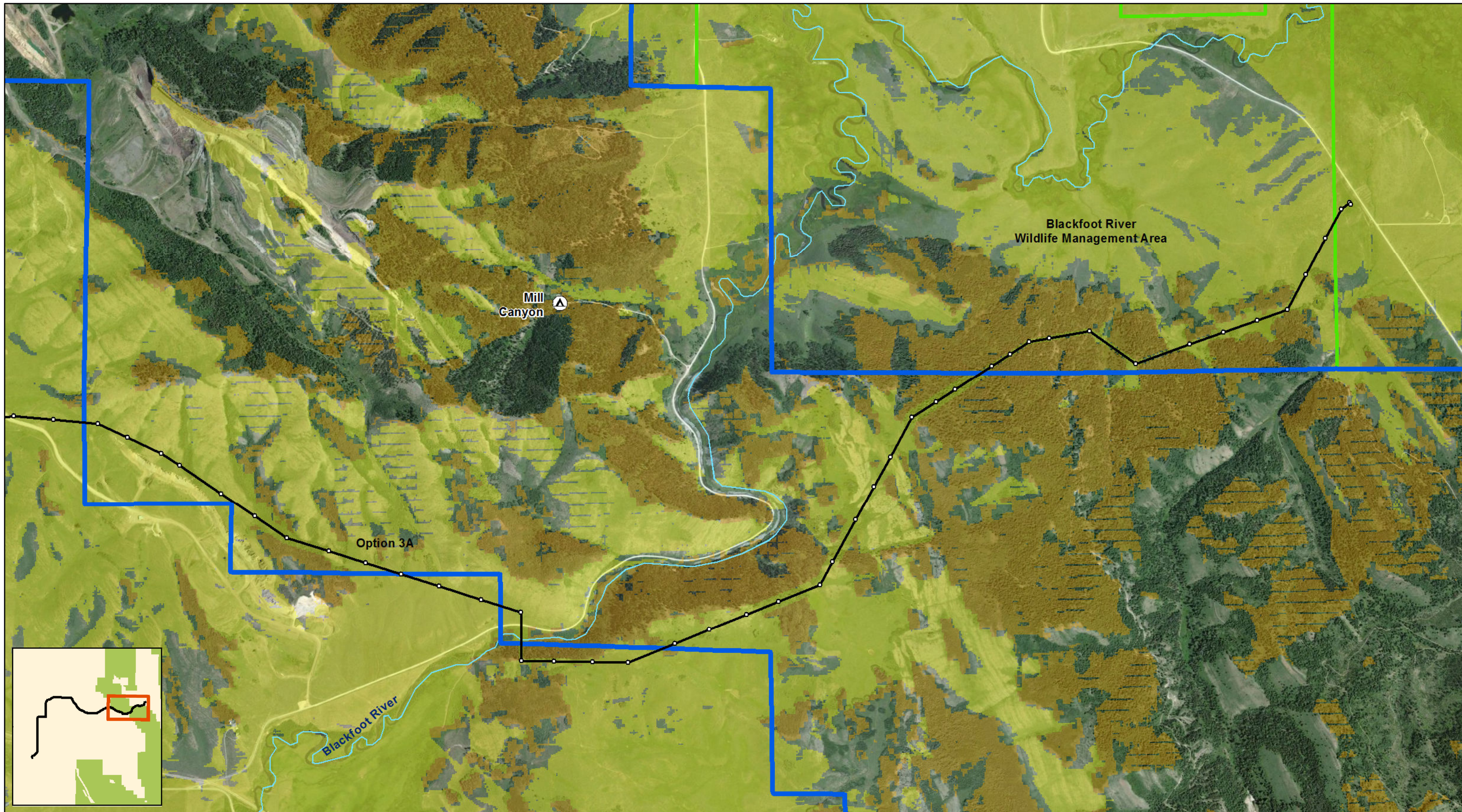
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Date: 1/8/2014


Hooper Springs Transmission Project

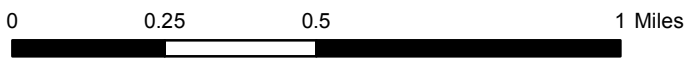
Map B-11

Viewshed for Non-Federal and BLM Lands Along South Alternative Option 3A



● City	Ⓜ Campground	▭ State Land
○ Planned Structures	Viewshed	USFS VRM Classification
— Option 3A	▭ Visible	▭ USFS Partial Retention
	▭ Visible with Trees	


 Coordinate System: NAD 1983 State Plane Idaho East (feet)
 Projection: Transverse Mercator
 Datum: North American 1983


 0 0.25 0.5 1 Miles



Date: 1/8/2014

Hooper Springs Transmission Project
Map B-12
Viewshed for C-TNF Lands and the Blackfoot River WMA along South Alternative Option 3A

Transmission Line Photographic Simulations

Photographic simulations provide representative views of the transmission line from specific locations. The simulations are intended to provide a visual picture of a 115-kilovolt (kV) transmission line in several representative sensitive settings within the landscape surrounding the project corridor. As mentioned previously, both wooden H-frame and steel mono-pole structures would be used for the North Alternative and steel poles would be used for the South Alternative. In addition, steel towers on the North Alternative would be single circuit while those structures on the South Alternative would be double circuit. Option 3A also would consist of double-circuit steel poles. A set of 3-D models was used to complete the photo simulations (Figures B-1, B-2, and B-3 shown below).

Figure B-1. 3-D Models of Wood Pole Structures Used for Photographic Simulations

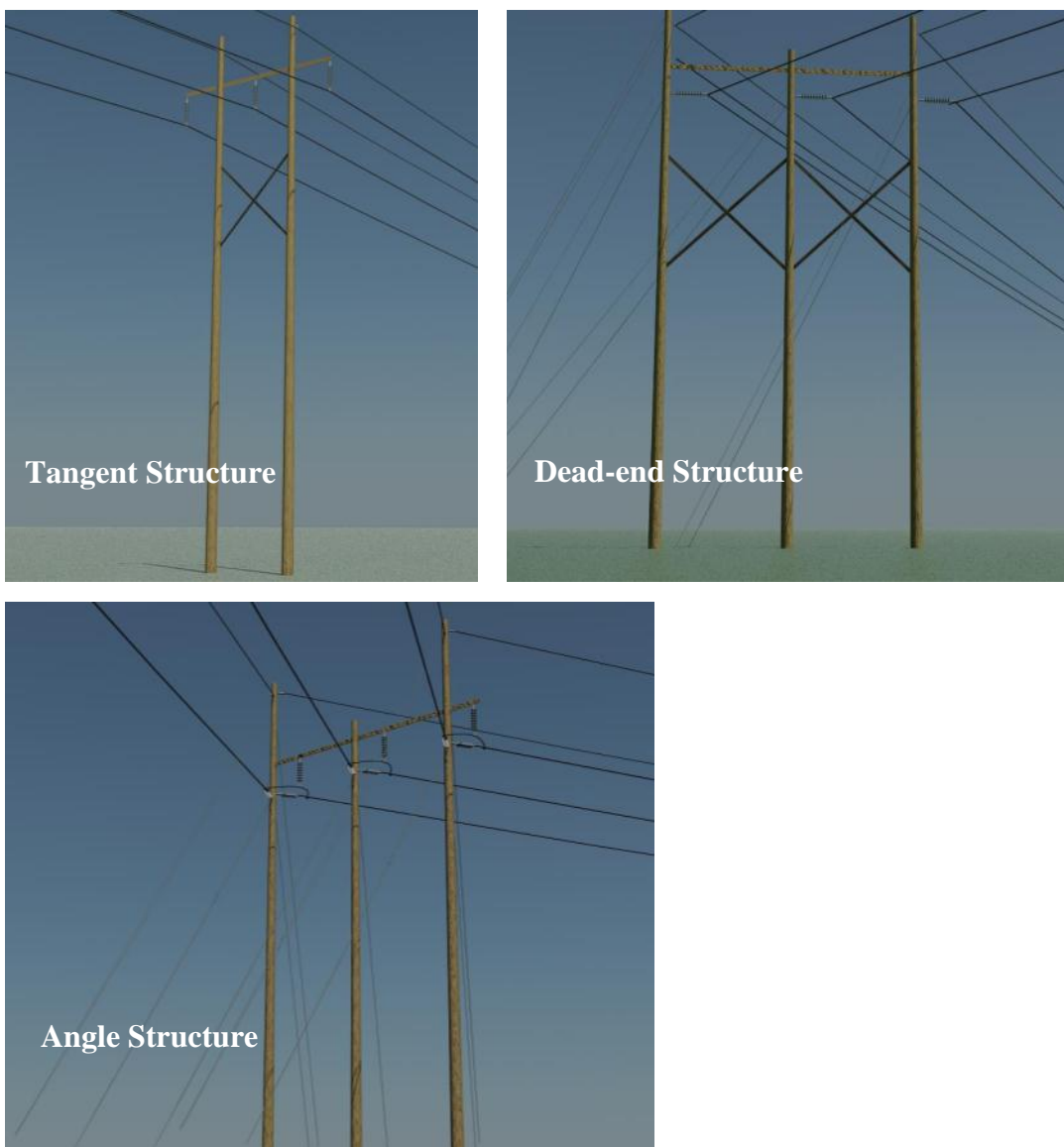


Figure B-2. 3-D Model of Single-circuit Steel Pole Structure Used for Photographic Simulations



Figure B-3. 3-D Model of Double-circuit Steel Pole Structure Used for Photographic Simulations



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Appendix C

Plant Species Inventory

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**Vascular Plant Species Documented During Plant Inventory Surveys Conducted
within the Project Area.**

Scientific Name	Common Name
<i>Abies lasiocarpa</i>	Subalpine fir
<i>Acer glabrum</i>	Rocky mountain maple
<i>Achillea millefolium</i>	Common yarrow
<i>Agastache urticifolia</i>	Western horsemint
<i>Agropyron cristatum</i>	Crested wheatgrass
<i>Agrostis alba</i>	Redtop
<i>Alopecurus pratensis</i>	Meadow foxtail
<i>Amelanchier alnifolia</i>	Serviceberry
<i>Anaphalis margaritacea</i>	Pearly everlasting
<i>Antennaria alpina</i>	Alpine pussytoes
<i>Arnica cordifolia</i>	Heartleaf arnica
<i>Artemisia cana</i>	Silver sagebrush
<i>Artemisia ludoviciana</i>	White sagebrush
<i>Artemisia tridentata</i> var. <i>tridentata</i>	Big sagebrush
<i>Artemisia tridentata</i> var. <i>wyomingensis</i>	Wyoming big sagebrush
<i>Artemisia tripartita</i>	Threetip sagebrush
<i>Aster perelegans</i>	Elegant aster
<i>Berberis repens</i>	Oregon grape
<i>Bromus inermis</i>	Smooth brome
<i>Bromus tectorum</i>	Cheatgrass
<i>Calochortus nuttallii</i>	Sego lily
<i>Carex geyeri</i>	Elk sedge
<i>Carex lenticularis</i>	Shore sedge
<i>Carex pachystachya</i>	Thick-head sedge
<i>Carex rostrata</i>	Beaked sedge
<i>Carex rupestris</i>	Curly sedge
<i>Calamagrostis rubescens</i>	Pinegrass
<i>Castilleja miniata</i>	Common red paintbrush
<i>Castilleja flava</i>	Yellow paintbrush
<i>Chrysothamnus nauseosus</i>	Green rabbitbrush
<i>Chrysothamnus viscidiflorus</i>	Yellow rabbitbrush
<i>Cirsium arvense</i>	Canada thistle
<i>Cirsium scariosum</i>	Elk thistle
<i>Cornus sericea</i>	Red-osier dogwood
<i>Cryptantha</i> sp.	Cryptantha

Scientific Name	Common Name
<i>Cynoglossum officinale</i>	Gypsyflower
<i>Delphinium sp.</i>	Larkspur
<i>Deschampsia caespitosa</i>	Tufted hairgrass
<i>Eleocharis palustris</i>	Creeping spikerush
<i>Epilobium ciliatum</i>	Hairy willow-herb
<i>Epilobium ciliatum ssp. Watsonii</i>	Fringed willowherb
<i>Eriogonum ovalifolium</i>	Cushion buckwheat
<i>Eriogonum heracleoides</i>	Parsnip-leaved buckwheat
<i>Festuca idahoensis</i>	Idaho fescue
<i>Fragaria vesca</i>	Woodland strawberry
<i>Fritillaria pudica</i>	Yellow bell
<i>Galium boreale</i>	Northern bedstraw
<i>Geranium viscosissimum</i>	Sticky Purple Geranium (Sticky crane's-bill)
<i>Geum macrophyllum</i>	Large-leaf avens
<i>Geum triflorum</i>	Prairie smoke
<i>Glyceria striata</i>	Fowl manna grass
<i>Grindelia squarrosa</i>	Curly-cup gumweed
<i>Juncus acuminatus</i>	Taper-tip rush
<i>Juncus balticus</i>	Baltic rush
<i>Juncus effusus</i>	Soft rush
<i>Juncus patens</i>	Spreading rush
<i>Juniperus scopulorum</i>	Rocky Mountain juniper
<i>Lupinus sp.</i>	Lupine
<i>Madia glomerata</i>	Mountain tarweed
<i>Osmorhiza chilensis</i>	Licorice root
<i>Pedicularis groenlandica</i>	Elephant's head lousewort
<i>Penstemon acuminatus</i>	Sharpleaf penstemon
<i>Phalaris arundinacea</i>	Reed canary grass
<i>Phleum pratense</i>	Timothy
<i>Phlox sp.</i>	Phlox
<i>Pinus contorta</i>	Lodgepole pine
<i>Poa bulbosa</i>	Bulbous bluegrass
<i>Poa palustris</i>	Fowl bluegrass
<i>Poa pratensis</i>	Kentucky bluegrass
<i>Populus tremuloides</i>	Quaking aspen
<i>Potentilla gracilis</i>	Northwest cinquefoil
<i>Prunella vulgaris</i>	Heal-all

Scientific Name	Common Name
<i>Prunus virginiana</i>	Chokecherry
<i>Purshia tridentata</i>	Bitterbrush
<i>Pseudotsuga menziesii</i>	Douglas-fir
<i>Rhamnus alnifolia</i>	Buckthorn
<i>Ribes lacustre</i>	Black gooseberry
<i>Ribes</i> spp	Currants
<i>Rosa nutkana</i>	Nootka rose
<i>Rudbeckia occidentalis</i>	Western coneflower
<i>Salix boothii</i>	Booth willow
<i>Salix exigua</i>	Coyote willow
<i>Salix sitchensis</i>	Sitka willow
<i>Salix wolfii</i>	Wolf willow
<i>Senecio</i> sp.	Groundsel
<i>Spiranthes romanzoffiana</i>	Hooded ladies-tresses
<i>Stachys cooleyae</i>	Cooley's hedge nettle
<i>Stellaria longifolia</i>	Long-leaf starwort
<i>Symphoricarpos alba</i>	Snowberry
<i>Taraxacum officinale</i>	Common dandelion
<i>Thlaspi arvense</i>	Field penny-cress
<i>Urtica dioica</i>	Stinging nettle
<i>Vaccinium membranaceum</i>	Black huckleberry
<i>Vccinium ovatum</i>	Evergreen huckleberry
<i>Wyethia amplexicaulis</i>	Northern muleears

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Appendix D

Vegetation Special Status Species

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Vegetation

Special Status Species

Federally Listed and Candidate Species

The U.S. Fish and Wildlife Service (USFWS) has not included any federally Endangered Species Act (ESA)-listed plant species as potentially occurring in Caribou County, Idaho.

U.S. Forest Service Sensitive Species

Payson's Bladderpod (*Lesquerella paysonii*)

Payson's bladderpod is a U.S. Forest Service (USFS) sensitive species, and is listed as S2 by the Idaho State Department of Natural Heritage. In Idaho, Payson's bladderpod populations are typically found on ridgelines in sagebrush or forest openings on gravelly soils that have carbonate parent material, and microhabitat for this species is very specific (Moseley 1996). Suitable microhabitats consist of dry and open, gravelly, well-drained substrates that, in most cases, are exposed to prevailing winds throughout the year. This micro-habitat is in topography that indicates low snow deposition: the windward side ridgelines and upper slopes. Payson's bladderpod occurs on montane, subalpine, and alpine ridgelines and the upper portions of southerly slopes in highly dissected mountains. Elevations range from 6,000 to 9,950 feet, with most populations occurring above 8,000 feet (Moseley 1996).

Distribution of Payson's bladderpod is largely restricted to the carbonate mountain ranges of west-central Wyoming and adjacent Idaho, although two disjunct populations have also been found in southwestern Montana (Moseley 1996). In Idaho, it occurs on the ridges and high peaks of the Snake River Range above the escarpment that parallels the Snake River (Moseley 1996). These populations are contiguous with its known distribution in Wyoming and extend about 12 miles northwest into Idaho from the Wyoming border. A lone population on Caribou Mountain is separated from other known populations in Idaho by 19 miles.

The nearest known population of this species is located on Caribou-Targhee National Forest (C-TNF) land on Caribou Mountain, approximately 2 miles north of the project area (IDFG 2011b). This species was not documented during botanical inventory surveys conducted on C-TNF lands in 2007 for the South Alternative and 2011 for the North Alternative. The North Alternative crosses a rocky ridge top with a western aspect slope, which represents potentially suitable habitat for Payson's bladderpod; however, because it was not located during surveys it is not likely to be impacted by the Project. New surveys of Option 3A were conducted during the 2013 summer to reassess the existence any new occurrences.

Compact (Cache) Beardtongue (*Penstemon compactus*)

Compact (Cache) beardtongue is a federal species of concern, a USFS sensitive species, and is listed as S2 by the Idaho State Department of Natural Heritage. It is endemic to the northern part

of the Bear River Range in Cache County, Utah, and adjacent Franklin County, Idaho. Cache beardtongue occurs on bedrock slabs, rock outcrops, cliff bands, or gravelly, shallow soil habitats. It occurs on various aspects along high-elevation ridge crests and associated summit or upper slopes areas, ranging from flat to moderately steep (Mancuso 2003). All Idaho populations of Cache beardtongue occur on carbonate substrate, either St. Charles limestone or Fish Haven dolomite (Mitchell and Bennett 1979), between 8,600 to 9,400 feet elevation (Mancuso 2003).

Seven small populations of this species are known to occur in Idaho, all on C-TNF in the upper Logan River-Franklin Basin area, approximately 40 to 50 miles south of the project area (Mancuso 2003). There are areas with potentially suitable habitat for this species on dolomitic limestone (limestone that is composed of over 50 percent dolomite) rocks within the project area on the C-TNF, but the project area is largely outside the known range of this species and no portions of the North or South alternatives are above approximately 7,500 feet elevation.

This species was not documented during the botanical inventory surveys conducted of the South Alternative in 2007 or the North Alternative in 2011.

Starveling Milkvetch (*Astragalus jejunus* var. *jejunus*)

Starveling milkvetch is a Bureau of Land Management (BLM) Type 2 sensitive species, a USFS sensitive species, and is listed as S2 by the Idaho State Department of Natural Heritage. It has been documented on the Montpelier District of C-TNF (Mancuso and Moseley 1990). These occurrences were restricted to barren, eroding, shale substrate belonging to the Twin Creek

limestone formation (Mancuso and Moseley 1990), which is not present within the project area. Outcrops of Twin Creek limestone exhibit a white to gray to bluish-green, porcelain-like appearance that is distinctive even from a distance. All populations are restricted to a narrow range of habitat conditions that are generally discontinuous and not very extensive, particularly on C-TNF (Mancuso and Moseley 1990).

Suitable limestone habitat for starveling milkvetch does not occur within the project area nor was it detected during vegetation surveys.

Bureau of Land Management Sensitive and State Review Species

Hoary Willow (*Salix candida*)

Hoary willow is a BLM Type 4 sensitive species and is listed as S2 by the Idaho State Department of Natural Heritage. It has been documented approximately 1 mile east of the Proposed Action right-of-way, near the town of Henry, Idaho (IDFG 2011b). Hoary willow is a low-growing willow species that grows on floating mats and in bogs, fens, and willow thickets around ponds, primarily between 6,600 and 9,200 feet elevation (Walford et al. 1997).

Riparian wetland habitats on BLM-owned lands associated with Meadow Creek within the North Alternative represent potentially suitable habitat for hoary willow. Additionally, riparian wetland habitats on non-BLM-owned lands associated with the Blackfoot River, Little Blackfoot River, and Gravel Creek also represent potentially suitable habitat for hoary willow. In addition, past

occurrence of hoary willow were documented within a mile of the South Alternative. However, this species was not documented during special status plant surveys and botanical inventory surveys conducted along the South Alternative in 2007 and the North Alternative in 2011.

Idaho Sedge (*Carex idaho*)

Idaho sedge is a BLM Type 2 sensitive species and is listed as S2 by the Idaho State Department of Natural Heritage. It is a relatively low, inconspicuous sedge that typically grows scattered in small patches in the border between wet meadow, emergent wetlands, and sagebrush-steppe vegetation (Mancuso and Severud 2004). It commonly occurs in moist mountain and riparian meadows.

Idaho sedge has been documented at several locations on C-TNF within the vicinity of the North Alternative (IDFG 2011b), but has not been documented on BLM-owned lands within the vicinity of the North Alternative. In addition, Idaho sedge has not been documented within the North Alternative. Potentially suitable habitat for Idaho sedge occurs within the mountain meadows and wetlands of Reservoir Canyon on C-TNF, portions of which are within the North Alternative corridor. Similarly, no occurrences of Idaho sedge have been documented in the South Alternative, though potentially suitable habitat is also present. This species was not encountered during botanical inventory surveys conducted along the South Alternative during 2007 and along the North Alternative during 2011.

Green Needlegrass (*Nassella viridula* = *Stipa viridula*)

Green needlegrass is a BLM Type 4 sensitive species and is listed as S2 by the Idaho State Department of Natural Heritage. Green needlegrass is a widespread species occurring mostly east of the Continental Divide, especially in the northern Great Plains region. Idaho populations are at the species' western periphery (Mancuso and Mosely 1992). One of the few Idaho occurrences is located at the northern end of the Bear River Range, near the town of Alexander, Idaho (Mancuso 2003).

Suitable habitat for green needlegrass consists of sandy, well-drained soils in grassland and sagebrush habitats. Much of the sagebrush-dominated land under BLM and state of Idaho ownership represent potentially suitable habitat for green needlegrass. However, this species was not encountered during either botanical inventory surveys conducted within the South or North alternatives in 2007 and 2011, respectively.

Red Glasswort (*Salicornia rubra*)

Red glasswort is a BLM Type 4 sensitive species and is listed as S2 by the Idaho State Department of Natural Heritage. It is a succulent halophyte, characteristic of salt flats and the margins of alkaline lakes in arid regions of the West. The range of red glasswort is relatively widespread, but because of its specialized habitat, its distribution is local and sporadic. It prefers moist or seasonally moist stream banks and meadows high in salt concentrations with open and exposed soils (Jankovsky-Jones 2001).

No populations of red glasswort have been documented within the project vicinity (IDFG 2011b) and based on field review and desktop review there are no saline or alkaline lakes or ponds identified within the South or North alternatives or their vicinity. This species was not encountered during botanical inventory surveys conducted in 2007 for the South Alternative or 2011 for the North Alternative.

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Appendix E

Soil Descriptions

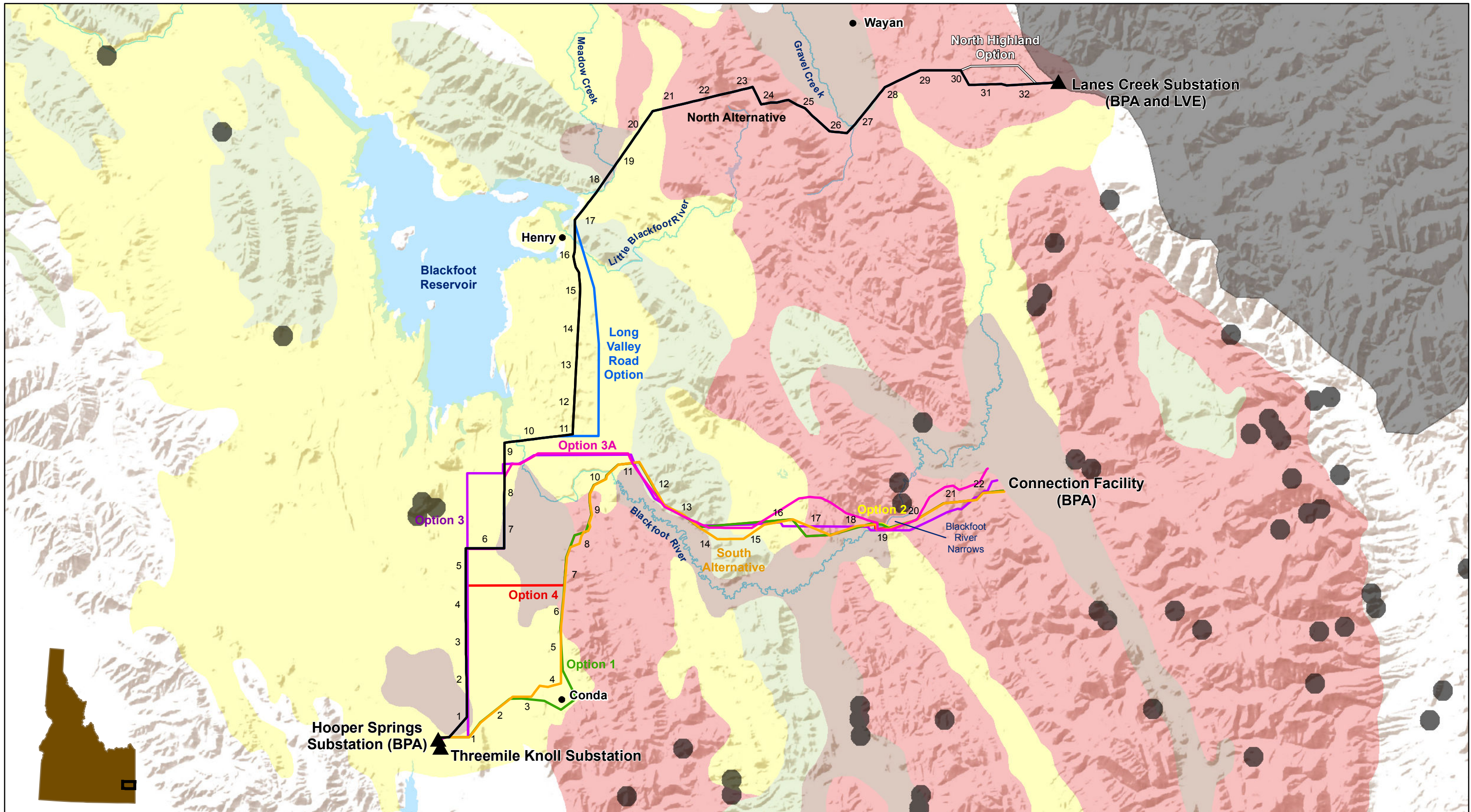
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Introduction

Soils in the project area were described using the State Soil Geographic Database (STATSGO). More refined data for non-C-TNF lands was unavailable because the Natural Resources Conservation Service (NRCS) is in the process of classifying soils in Caribou County (See Map E-1). However, the C-TNF conducted a soil survey of the Caribou portion of the Forest in 1990. The CNF Soil Survey (USFS 1990) was used in combination with additional soil characterizations conducted in support of project planning. Field notes from site-specific verification soil sampling are available in the administrative record.

The CNF Soil Survey maps are provided below (Maps E-2 and E-3) and associated soil characteristic descriptions.

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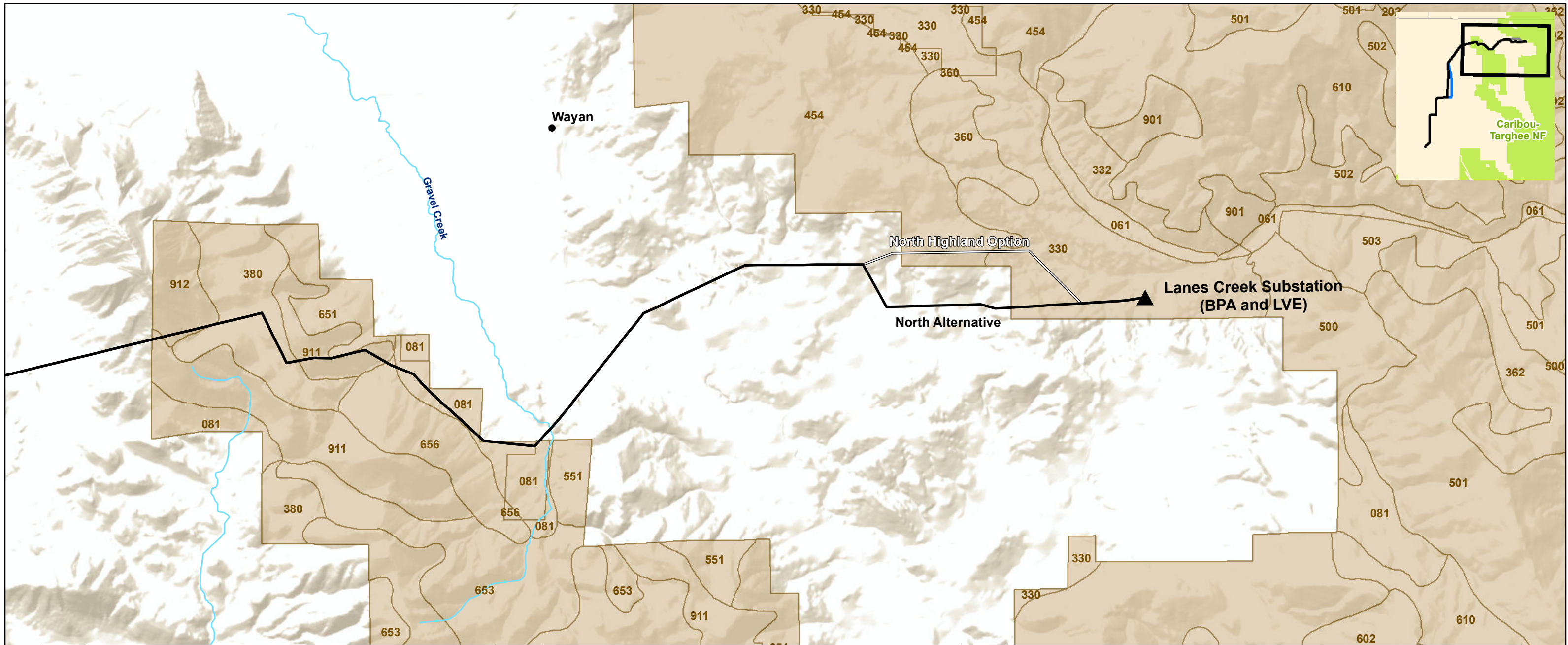


▲ Substation	— South Alternative	● City	Soils
— North Alternative	— Option 1	● Landslide Deposit of Unclassified Material	■ Outlet-Enochville
— Long Valley Road Option	— Option 2	■ Landslide Complex	■ Robin-Lantonia-Lanark
— North Highland Option	— Option 3		■ Nielson-Dranyon-Dra
	— Option 3A		■ Turnerville-Tongu-River-Tetonia-Rock Outcrop-Midfork-Buffork-Adel
	— Option 4		

Data Sources: BPA, USGS, ESRI, Idaho Geological Survey
 Landslide Data from Adams, Breckenridge, and Othberg (1991)
 Coordinate System: NAD 1983 State Plane Idaho East (feet)
 Projection: Transverse Mercator
 Datum: North American 1983

Hooper Springs Transmission Project

Map E-1
STATSGO Soil Map Units
in the Project Area
 Date: 1/8/2014



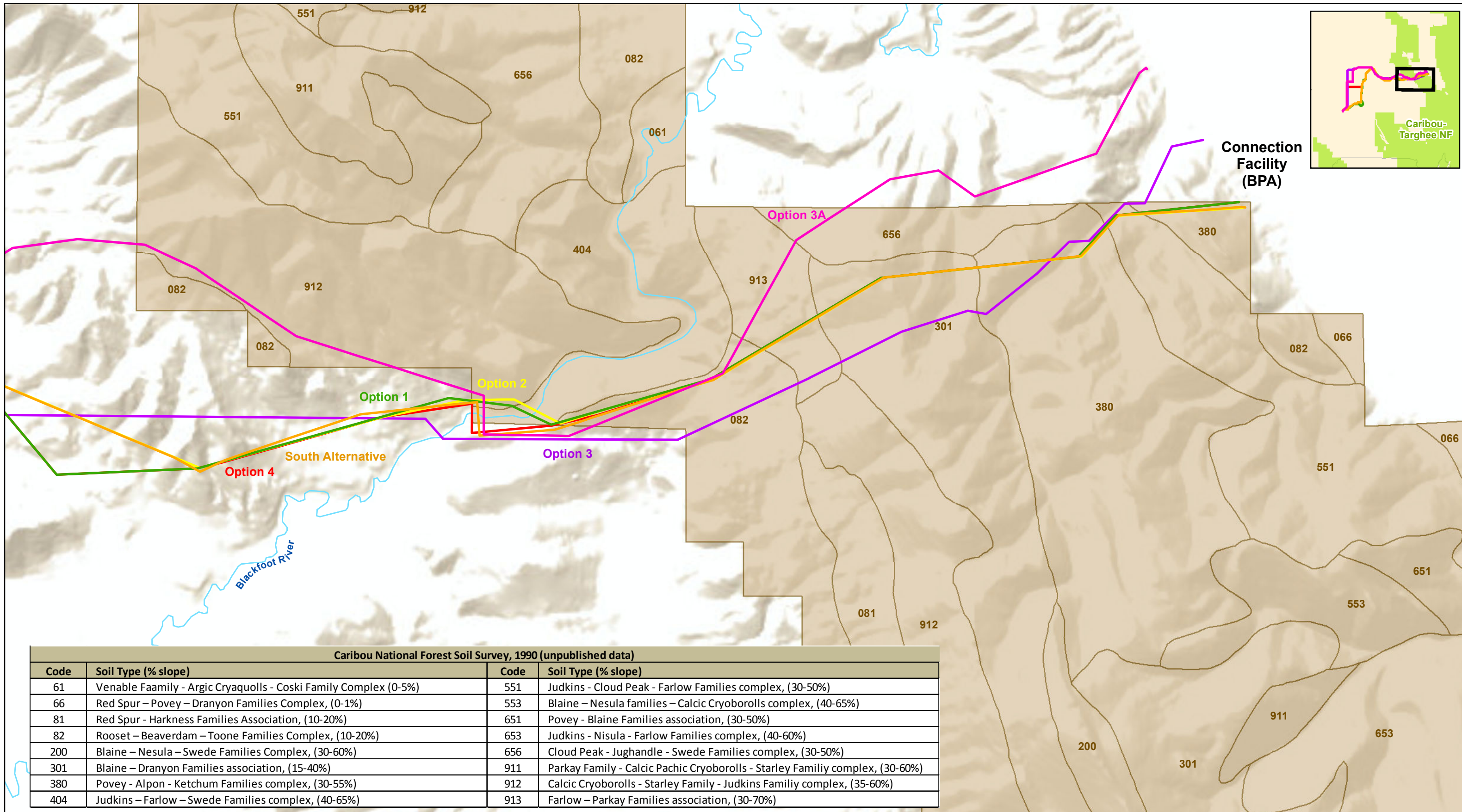
Caribou National Forest Soil Survey, 1990 (unpublished data)					
Code	Soil Type (% slope)	Code	Soil Type (% slope)	Code	Soil Type (% slope)
901	Beaverdam – Blaine – Nisula Families complex (30-50%)	602	Judkins – Farlow Families complex (35-55%)	362	Swede – Dranyon – Nisula Families complex (20-50%)
330	Beaverdam – Swede – Toponce Families complex (5-25%)	653	Judkins – Nisula – Farlow Families complex (40-60%)	500	Swede – Dranyon – Toponce Families complex (20-35%)
610	Beaverdam – Toponce – Ericson Families complex (35-55%)	432	Nisula – Starman – Blaine Families complex (50-70%)	503	Swede – Mikesell – Nisula Families complex (35-55%)
912	Calcic Cryoborolls – Starley Family – Judkins Family complex (35-60%)	911	Parkay Family – Calcic Pachic Cryoborolls – Starley Family complex (30-60%)	456	Swede – Nisula – Ketchum Families association (10-25%)
656	Cloud Peak – Jughandle – Swede Families complex (30-50%)	380	Povey – Alpon – Ketchum Families complex (30-55%)	360	Swede – Rooset – Nisula Families complex (35-55%)
502	Dranyon – Beaverdam – Blaine Families complex (20-50%)	651	Povey – Blaine Families association (30-50%)	332	Swede Family – Typic Cryoboralfs, fine loamy – Typic Cryoboralfs, loamy association (20-45%)
300	Ericson – Cloud Peak – Ketchum Families complex (15-40%)	081	Red Spur – Harkness Families Association (10-20%)	501	Toponce – Swede – Beaverdam Families (35-50%)
433	Harkness Family – Mollic Cryoboralfs – Typic Cryoboralfs complex (2-45%)	202	Swede – Blaine – Povey Families Complex (20-35%)	454	Toponce – Swede – Dranyon Families complex (25-50%)
551	Judkins – Cloud Peak – Farlow Families complex (30-50%)			061	Venable Family – Argic Cryaquolls – Coski Family Complex (0-5%)

Substation
 North Alternative
 North Highland Option
 City
 Caribou NF Soil Survey

Coordinate System: NAD 1983 State Plane
 Idaho East (feet)
 Projection: Transverse Mercator
 Datum: North American 1983

Date: 1/8/2014

Hooper Springs Transmission Project
Map E-2
CNF Soil Survey Map Units
Along the North Alternative



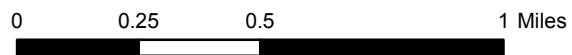
Caribou National Forest Soil Survey, 1990 (unpublished data)

Code	Soil Type (% slope)	Code	Soil Type (% slope)
61	Venable Faamily - Argic Cryaquolls - Coski Family Complex (0-5%)	551	Judkins - Cloud Peak - Farlow Families complex, (30-50%)
66	Red Spur - Povey - Dranyon Families Complex, (0-1%)	553	Blaine - Nesula families - Calcic Cryoborolls complex, (40-65%)
81	Red Spur - Harkness Families Association, (10-20%)	651	Povey - Blaine Families association, (30-50%)
82	Rooset - Beaverdam - Toone Families Complex, (10-20%)	653	Judkins - Nisula - Farlow Families complex, (40-60%)
200	Blaine - Nesula - Swede Families Complex, (30-60%)	656	Cloud Peak - Jughandle - Swede Families complex, (30-50%)
301	Blaine - Dranyon Families association, (15-40%)	911	Parkay Family - Calcic Pachic Cryoborolls - Starley Family complex, (30-60%)
380	Povey - Alpon - Ketchum Families complex, (30-55%)	912	Calcic Cryoborolls - Starley Family - Judkins Family complex, (35-60%)
404	Judkins - Farlow - Swede Families complex, (40-65%)	913	Farlow - Parkay Families association, (30-70%)

- Caribou NF Soil Survey
- South Alternative
- Option 1
- Option 2
- Option 3
- Option 3A
- Option 4



Coordinate System: NAD 1983 State Plane
 Idaho East (feet)
 Projection: Transverse Mercator
 Datum: North American 1983



Date: 1/8/2014

Hooper Springs Transmission Project

Map E-3

CNF Soil Survey Map Units
 Along the South Alternative

Review of Soil Survey of the Caribou National Forest Idaho

The soil map units from the Caribou National Forest Soil Survey (USFS 1990) (Maps E-2- and E-3) identified within the project area include the following:

North Alternative

- 081 – Red Spur - Harkness Families association, 10 to 20 percent slopes;
- 330 - Beaverdam – Swede – Toponce Families complex, 5 to 25 percent slopes
- 380 - Povey – Alpon – Ketchum Families complex, 30 to 55 percent slopes
- 651 - Povey – Blaine Families association, 30 to 50 percent slopes
- 656 - Cloud Peak – Jughandle – Swede Families complex, 30 to 50 percent slopes
- 911 - Parkay Family – Calcic Pachic Cryoborolls – Starley Family complex, 30 to 60 percent slopes
- 912 - Calcic Cryoborolls – Starley Family – Judkins Family complex, 35 to 60 percent slopes

South Alternative

- 082 – Rooset-Beaverdam – Toone Families complex, 10 to 20 percent slopes
- 301 – Blaine – Dranyon Families association, 15 to 45 percent slopes
- 380 – Povey – Alpon – Ketchum Families complex, 30 to 55 percent slopes
- 551 – Judkins – Cloud Peak – Farlow Families complex, 30 to 50 percent slopes
- 913 – Farlow – Parkay Families association, 30 to 70 percent slopes

Option 3A

- 082 – Rooset-Beaverdam – Toone Families complex, 10 to 20 percent slopes
- 404 – Judkins – Farlow – Swede families complex, 40 to 65 percent slopes
- 656 – Cloud Peak – Jughandle – Swede Families complex, 30 to 50 percent slopes
- 912 – Calcic Cryoborolls – Starley Family – Judkins Family complex, 35 to 60 percent slopes
- 913 – Farlow – Parkay Families association, 30 to 70 percent slopes

The soils described in the Soil Survey of the Caribou National Forest, Idaho, 1990 (USFS 1990) were originally classified using an older version of Keys to Soil Taxonomy. In this analysis their classification was updated using the most recent Keys to Soil Taxonomy (Soil Survey Staff 2010). The descriptions of these soil map units are provided below.

081 - Red Spur - Harkness Families Association

The Red Spur - Harkness Families association is made up of soils from the Red Spur and Harkness Families which are generally located on gently to moderately sloping toe slopes or fans. This map unit was located on elevations between 6,200 and 6,700 feet above mean sea level (msl) and supports dense stands of lodgepole pine and aspen trees. Neither Family in the association are hydric soils, which are soils that formed under conditions of saturation, flooding or ponding long enough during the growing season to develop anaerobic conditions in the upper part. The Red Spur Family consists of very deep and well-drained loam and cobbly clay loam soils. These soils are derived from alluvium and colluvium from sandstone limestone, shale, conglomerate, siltstone, or quartzite. Alluvium is the process where materials are transported and deposited by water and colluvium is the process where materials are transported and deposited by the force of gravity in the form of soil creep, mass wasting, and erosion. Flooding is rare on Red Spur soils but may occur from April through June after annual snow melt. Under older versions of Soil Taxonomy, Red Spur soils were classified as fine-loamy, mixed Cryic Pachic Paleborolls, but would now likely be classified as fine-loamy, mixed Pachic Palecryolls (Soil Survey Staff 2010).

The Harkness Family consists of deep and well-drained silt loam and clayey soils. These soils are derived from residuum, alluvium, and colluvium from shale, sandstone, siltstone, mudstone, and limestone. Residuum refers to soil material that has formed in place by physical and chemical erosion. Flooding and ponding are not associated with the Harkness Family. Under older versions of Soil Taxonomy, Harkness Family soils were classified as fine, montmorillonitic Mollic Cryoborolls but would now likely be classified as Fine, montmorillonitic Mollic Haplocryolls (Soil Survey Staff 2010).

082 - Rooset – Beaverdam – Toone Families Complex

The Rooset – Beaverdam – Toone Families complex is comprised of soils from the Rooset, Beaverdam, and Toone Families which are generally located on gently to moderately sloping toeslopes and foothills of broad valleys. This map unit is located on elevations between 6,200 and 6,500 feet above msl and supports vegetation communities of big sagebrush and grass with small components of aspen trees. Flooding and ponding are not associated with the complex and none of the Families in the complex are hydric soils. The Rooset Family consists of deep, well-drained cobbly loam and cobbly clay loam. Rooset soils are formed from alluvium and colluvium. Under older versions of Soil Taxonomy, Rooset soils were classified as Clayey-skeletal, montmorillonitic Argic Cryoborolls but would now likely be classified as Clayey-skeletal, montmorillonitic Typic Argicryolls (Soil Survey Staff 2010).

The Beaverdam Family consists of deep and well-drained loams and clay loams. Beaverdam soils are formed from residuum, alluvium, and colluvium from sandstone, limestone, shale, siltstone, mudstone, dolomite, tuff, and conglomerate. Under older versions of Soil Taxonomy, the Beaverdam Family soils were classified as Fine, montmorillonitic Argic Cryoborolls but would now likely be classified as Fine, montmorillonitic Typic Argicryolls (Soil Survey Staff 2010).

The Toone Family consists of deep and well-drained loam and gravelly clay. Toone soils are formed from residuum of diorite and conglomerate of sandstone and quartzite. Under older versions of Soil Taxonomy, Toone soils were classified as Clayey-skeletal, montmorillonitic

Cryic Pachic Paleborolls but would now likely be classified as Clayey-skeletal, montmorillonitic Pachic Palecryolls (Soil Survey Staff 2010).

301 - Blaine – Dranyon Families Association

The Blaine – Dranyon Families association is comprised of soils from the Blaine and Dranyon Families which are generally located on moderately steep and moderately sloping low-relief uplands. This map unit is located on elevations between 6,500 and 8,500 feet above msl and supports vegetation communities of big sagebrush and mountain shrubs. Flooding and ponding are not associated with the complex and none of the Families in the complex are hydric soils. The Blaine Family consists of moderately deep and well-drained gravelly silt loam and cobbly clay loams. Blaine Family soils are derived from colluvium and residuum of igneous rock, conglomerate shalestone, and sandstone. Under older versions of Soil Taxonomy, Blaine Family soils were classified as Loamy-skeletal, mixed Argic Cryoborolls but would now likely be classified as Loamy-skeletal, mixed Typic Argicryolls (Soil Survey Staff 2010).

The Dranyon Family consists of deep and well-drained loams and gravelly clay loams. Dranyon Family soils are derived from colluvium of sandstone, rhyolite, and loess. Under older versions of Soil Taxonomy, Dranyon Family soils were classified as Fine-loamy, mixed Argic Pachic Cryoborolls but would now likely be classified as Fine-loamy, mixed, Pachic, Argicryolls (Soil Survey Staff 2010).

330 - Beaverdam – Swede - Toponce Families Complex

The Beaverdam – Swede - Toponce Families complex is made up of soils from the Beaverdam, Swede, and Toponce Families which are generally located on gently to moderately sloping upland basins. This map unit was located on elevations between 6,500 and 7,500 feet above msl and supports a vegetative mosaic consisting of big sagebrush interspersed with forbs and grasses. Flooding and ponding are not associated with the complex and none of the Families in the complex are hydric soils. The Beaverdam Family consists of deep and well-drained loams and clay loams. Beaverdam soils are formed from residuum, alluvium, and colluvium from sandstone, limestone, shale, siltstone, mudstone, dolomite, tuff, and conglomerate. Under older versions of Soil Taxonomy, the Beaverdam Family soils were classified as Fine, montmorillonitic Argic Cryoborolls but would now likely be classified as Fine, montmorillonitic Typic Argicryolls (Soil Survey Staff 2010).

The Swede Family consists of moderately deep and well-drained loam and clay loam soils. Swede soils are formed from residuum, alluvium, and colluvium from limestone, sandstone, conglomerate, chert, siltstone, quartzite, dolomite, and shale. Under older versions of Soil Taxonomy, Swede Family soils were classified as Fine-loamy, mixed Argic Cryoborolls but would now likely be classified as Fine-loamy, mixed Typic Argicryolls (Soil Survey Staff 2010).

The Toponce Family consists of moderately deep and well-drained loam and clayey soils. Toponce soils are formed from residuum, alluvium, and colluvium from sandstone, shale, conglomerate, siltstone, mudstone, and limestone. Under older versions of Soil Taxonomy, the Toponce Family was classified as Fine, montmorillonitic Argic Pachic Cryoborolls but would now likely be classified as Fine, montmorillonitic Pachic Argicryolls (Soil Survey Staff 2010).

380 - Povey – Alpon - Ketchum Families Complex

The Povey – Alpon - Ketchum Families complex is comprised of soils from the Povey, Alpon and Ketchum Families which are generally located on moderately steep to steep sloping scarps and dip slopes. This map unit was located on elevations between 6,500 and 7,500 feet above msl and supports a variety of vegetation complexes including aspen/mountain bush, conifer/forbs, and sagebrush/grass. Flooding and ponding are not associated with the complex and none of the Families in the complex are hydric soils. The Povey Family consists of moderately deep to very deep well-drained loam, gravelly loam, and cobbly loam soil. Povey soils are formed from alluvium and colluvium from slate, shale, granite, mudstone, conglomerate, limestone, sandstone, quartzite, and dolomite. Under older versions of Soil Taxonomy, Povey soils were classified as Loamy-skeletal, mixed Pachic Cryoborolls but would now likely be classified as Loamy-skeletal, mixed Pachic Haplocryolls (Soil Survey Staff 2010).

The Alpon Family consists of very deep well-drained gravelly loam and gravelly clay loam soil. Alpon soils are formed from residuum from sandstone, limestone, siltstone, and shale. Under older versions of Soil Taxonomy, the Alpon Family soils were classified as Fine-loamy, mixed Cryic Paleborolls but would now likely be classified as Fine-loamy, mixed Typic Palecryolls (Soil Survey Staff 2010).

The Ketchum Family consists of moderately deep to very deep somewhat excessively drained gravelly loam and cobbly loam soil. Ketchum soils are formed from residuum and colluvium from sandstone, dolomite, quartzite, shale, siltstone, mudstone, conglomerate, chert, slate, and limestone. Under older versions of Soil Taxonomy, Ketchum Family soils were classified as Loamy-skeletal, mixed Typic Cryochrepts but would now likely be classified as Loamy-skeletal, mixed Xeric Haplocryepts (Soil Survey Staff 2010).

404 – Judkins – Farlow – Swede Families Complex

The Judkins – Farlow – Swede Families complex is comprised from soils from the Judkins, Farlow, and Swede Families, which are generally located on moderately to very steeply sloping canyon sideslopes. The map unit is located on elevations between 6,500 and 8,000 feet above msl and supports vegetation communities of conifers and shrubs. Flooding and ponding are not associated with the complex and none of the Families in the complex are hydric soils. The Judkins Family consists of moderately deep and well-drained gravelly loam soils. The Judkins Family is formed from residuum, colluvium, and alluvium from shale, sandstone, granite, limestone, quartzite, chert, conglomerate, mudstone, siltstone, and dolomite. Under older versions of Soil Taxonomy, Judkins Family soils were classified as Loamy-skeletal, mixed Mollic Cryoboralfs but now would likely be classified as Loamy-skeletal, mixed Mollic Haplocryalfs (Soil Survey Staff 2010).

The Farlow Family consists of moderately deep and well-drained gravelly loam. Farlow soils are derived from residuum and colluvium of limestone and calcareous sandstone. Under older versions of soil taxonomy, Farlow soils were classified as Loamy-skeletal, mixed, Typic Cryoborolls but would now likely be classified as Loamy-skeletal, mixed, Typic Haplocryolls (Soil Survey Staff 2010).

The Swede Family consists of moderately deep and well-drained loam and clay loam soils. Swede soils are formed from residuum, alluvium, and colluvium from limestone, sandstone,

conglomerate, chert, siltstone, quartzite, dolomite, and shale. Under older versions of Soil Taxonomy, Swede Family soils were classified as Fine-loamy, mixed Argic Cryoborolls but would now likely be classified as Fine-loamy, mixed Typic Argicryolls (Soil Survey Staff 2010).

551 - Judkins – Cloud Peak – Farlow Families Complex

The Judkins – Cloud Peak – Farlow Families complex is comprised from soils from the Judkins, Cloud Peak, and Farlow Families which are generally located on moderately to steeply sloping dissected valley sideslopes. The map unit is located on elevations between 6,500 and 8,000 feet above msl and supports vegetation communities of conifer and aspen trees. Flooding and ponding are not associated with the complex and none of the Families in the complex are hydric soils. The Judkins Family consists of moderately deep and well-drained gravelly loam soils. The Judkins Family is formed from residuum, colluvium, and alluvium from shale, sandstone, granite, limestone, quartzite, chert, conglomerate, mudstone, siltstone, and dolomite. Under older versions of Soil Taxonomy, Judkins Family soils were classified as Loamy-skeletal, mixed Mollic Cryoborolls but now would likely be classified as Loamy-skeletal, mixed Mollic Haplocryolls (Soil Survey Staff 2010).

The Cloud Peak Family consists of very deep and well-drained gravelly and cobbly loams. The Cloud Peak Family is formed from residuum from quartzite, limestone, shale, mudstone, dolomite, and chert. Under older versions of Soil Taxonomy, Cloud Peak Family soils were classified as Loamy-skeletal, mixed Typic Cryoborolls but would now likely be classified as Loamy-skeletal, mixed Typic Haplocryolls (Soil Survey Staff 2010).

The Farlow Family consists of moderately deep and well-drained gravelly loam. Farlow soils are derived from residuum and colluvium of limestone and calcareous sandstone. Under older versions of soil taxonomy, Farlow soils were classified as Loamy-skeletal, mixed, Typic Cryoborolls but would now likely be classified as Loamy-skeletal, mixed, Typic Haplocryolls (Soil Survey Staff 2010).

651 - Povey – Blaine Families Association

The Povey - Blaine Families association is comprised of soils from the Povey and Blaine Families which are generally located on moderately steep to steep sloping valley sideslopes. This map unit was located at elevations between 6,700 and 8,500 feet above msl and supports primarily aspen with inclusions of Douglas fir and lodgepole pine. Flooding and ponding are not associated with the association and none of the Families in the association are hydric soils. The Povey Family was described above.

The Blaine Family consists of deep and well-drained gravelly loam soils. Blaine soils formed from residuum, alluvium, and colluvium from glacial till, quartzite, limestone, dolomite, sandstone, mudstone, slate, shale, and conglomerate. Under older versions of Soil Taxonomy, Blaine Family soils were classified as Loamy-skeletal, mixed Argic Cryoborolls but would now likely be classified as Loamy-skeletal, mixed Typic Argicryolls (Soil Survey Staff 2010).

656 - Cloud Peak – Jughandle - Swede Families Complex

The Cloud Peak – Jughandle - Swede Families complex is comprised of soils from the Cloud Peak, Jughandle, and Swede Families located on moderately steep to steep valley sideslopes. This map unit was located at elevations between 6,500 and 8,500 feet above msl and primarily

supports intermixed conifer-shrub communities. Flooding and ponding are not associated with the complex and none of the Families in the complex are hydric soils. The Cloud Peak Family consists of very deep and well-drained gravelly and cobbly loams. The Cloud Peak Family is formed from residuum from quartzite, limestone, shale, mudstone, dolomite, and chert. Under older versions of Soil Taxonomy, Cloud Peak Family soils were classified as Loamy-skeletal, mixed Typic Cryoborolls but would now likely be classified as Loamy-skeletal, mixed Typic Haplocryolls (Soil Survey Staff 2010).

The Jughandle Family consists of deep and somewhat excessively drained loam and cobbly sandy loam soil. The Jughandle Family is formed from residuum from shale and sandstone. Under older versions of Soil Taxonomy, Jughandle Family soils were classified as Coarse-loamy, mixed Typic Chryochrepts but would now likely be classified as Coarse-loamy, mixed Typic Haplocryepts (Soil Survey Staff 2010). The Swede Family is described above.

911 - Parkay Family – Calcic Pachic Cryoborolls - Starley Family Complex

The Parkay Family - Calcic Pachic Cryoborolls - Starley Family complex is comprised of soils from the Parkay and Starley Families and soils classified as Calcic Pachic Cryoborolls; the map unit was located on moderately steep to steep escarpments. This map unit was located at elevations between 6,700 and 8,200 feet above msl and supports a dominantly sagebrush-grass community. Flooding and ponding are not associated with the complex and none of the Families in the complex are hydric soils. The Parkay Family consists of very deep and well-drained loam and cobbly loam soils. The Parkay Family is formed from colluvium and residuum from limestone, siltstone, sandstone, dolomite, mudstone, conglomerate, shale, slate, or quartz. Under older versions of Soil Taxonomy, Parkay Family soils were classified as Loamy-skeletal, mixed Argic Pachic Cryoborolls but would now likely be classified as Loamy-skeletal, mixed Pachic Argicryolls (Soil Survey Staff 2010).

The Starley Family consists of shallow and somewhat excessively drained gravelly loam soils. The Starley Family is formed from residuum from sandstone, siltstone, conglomerate, quartzite, and limestone. Under older versions of Soil Taxonomy, Starley Family soils were classified as Loamy-skeletal, mixed Lithic Cryoborolls but would now likely be classified as Loamy-skeletal, mixed Lithic Haplocryolls (Soil Survey Staff 2010).

The Calcic Pachic Cryoborolls are moderately deep and well-drained gravelly loam and cobbly loam soils. The Calcic Pachic Cryoborolls are formed from residuum and colluvium from sandstone or limestone. Calcic Pachic Cryoborolls would now likely be classified as Calcic Pachic Argicryolls (Soil Survey Staff 2010).

912 - Calcic Cryoborolls – Starley Family - Judkins Family Complex

The Calcic Cryoborolls - Starley Family - Judkins Family complex is comprised of soils from the Starley and Judkins Families and soils classified as Calcic Cryoborolls located on moderately steep to steep dissected escarpments. This map unit was located at elevations between 6,200 and 8,700 feet above msl and supports mainly big sagebrush and grass communities with an occasional aspen or Douglas fir stand. Flooding and ponding are not associated with the complex and none of the Families in the complex are hydric soils.

The Judkins Family consists of moderately deep and well-drained gravelly loam soils. The Judkins Family is formed from residuum, colluvium, and alluvium from shale, sandstone, granite, limestone, quartzite, chert, conglomerate, mudstone, siltstone, and dolomite. Under older versions of Soil Taxonomy, Judkins Family soils were classified as Loamy-skeletal, mixed Mollic Cryoboralfs but now would likely be classified as Loamy-skeletal, mixed Mollic Haplocryalfs (Soil Survey Staff 2010).

The Calcic Cryoborolls consist of moderately deep and well-drained gravelly loam and cobbly loam. The Calcic Cryoborolls are formed from residuum from limestone, shale, and sandstone. Calcic Cryoborolls would now likely be classified as Typic Calcicryolls (Soil Survey Staff 2010). The Starley Family is described above.

913 - Farlow – Parkay Families Association

The Farlow – Parkay Families association is comprised of soils from the Farlow and Parkay Families which are generally located on steep to very steeply sloping escarpments. The map unit is located on elevations between 6,500 and 8,500 feet above msl and supports vegetation communities of sagebrush and grass interspersed with aspen, conifer, and shrubs. Flooding and ponding are not associated with the complex and none of the Families in the complex are hydric soils. The Farlow Family consists of moderately deep and well-drained gravelly loam. Farlow soils are derived from residuum and colluvium of limestone and calcareous sandstone. Under older versions of Soil Taxonomy, Farlow soils were classified as Loamy-skeletal, mixed, Typic Cryoborolls but would now likely be classified as Loamy-skeletal, mixed, Typic Haplocryolls (Soil Survey Staff 2010).

The Parkay Family consists of moderately deep and well-drained gravelly silt loam and cobbly loam. Parkay soils are derived from alluvium, colluvium, and residuum of igneous rocks. Under older versions of Soil Taxonomy, Parkay soils were classified as Loamy-skeletal, mixed, Argic Pachic Cryoborolls but would now likely be classified as Loamy-skeletal, mixed Pachic Argicryolls (Soil Survey Staff 2010).

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Appendix F

Wildlife Species Inventory

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Wildlife Species Observed within the Project Area during Wildlife and Vegetation Surveys¹

Common Name	Scientific Name	Habitat	Abundance ²
Birds			
Red-Tailed Hawk	<i>Buteo jamaicensis</i>	Edges of fields and roads	High
Swainson's Hawk	<i>Buteo swainsoni</i>	Grasslands, open woodlands and sparse shrublands	Low
Sandhill Crane	<i>Grus canadensis</i>	Wetlands	High
Flammulated Owl	<i>Otus flammeolus</i>	Conifer/aspen forest	Low
Bald Eagle	<i>Haliaeetus leucocephalus</i>	Lakes and rivers with mature trees	High
Northern Goshawk	<i>Accipiter gentilis</i>	Conifer/aspen forest	High
Three-Toed Woodpecker	<i>Picoides dorsalis</i>	Mature conifer forests	Low
Killdeer	<i>Charadrius vociferus</i>	Open grasslands, wetlands, and croplands	High
Mourning Dove	<i>Zenaida macroura</i>	Edge habitat where forests and open areas meet	High
Common Raven	<i>Corvus corax</i>	Open grassland forested habitats	High
Northern Flicker	<i>Colaptes auratus</i>	Woodlands, forest edges, and open fields with scattered trees	High
Ring-Necked Pheasant	<i>Phasianus colchicus</i>	Open fields, brushy hedgerows, and forest edges	Low
Turkey Vulture	<i>Cathartes aura</i>	Open areas including mixed farmland, forest, and rangeland	High
Ruffed Grouse	<i>Bonasa umbellus</i>	Aspen and conifer forest habitats	High
Great Horned Owl	<i>Bubo virginianus</i>	Forest edges and aspen stands	High
Saw-whet Owl	<i>Aegolius acadicus</i>	Conifer and mixed habitats with standing snags and/or hollow trees	Low
American White Pelican	<i>Pelecanus erythrorhynchos</i>	Opens waters of rivers and lakes	High
Greater Sage Grouse	<i>Centrocercus urophasianus</i>	Sagebrush	Low
Mammals			
Snowshoe Hare	<i>Lepus americanus</i>	Immature forests with abundant understory vegetation	High
Cottontail Rabbit	<i>Sylvilagus sp.</i>	Sagebrush, grasslands, and roadsides	High
Black Bear	<i>Ursus americanus</i>	Deciduous, coniferous, and mixed forests	Moderate
Mule Deer	<i>Odocoileus hemionus</i>	Open sagebrush areas and rocky hillsides	Moderate
White-Tailed Deer	<i>Odocoileus virginianus</i>	Forested areas	Low
Coyote	<i>Canis latrans</i>	All areas	High
Elk	<i>Cervus canadensis</i>	Forested and forest edge habitat	High

Common Name	Scientific Name	Habitat	Abundance ²
Moose	<i>Alces alces</i>	Forested areas with plenty of snowpack and nearby streams, lakes, and wetlands	High
Skunk	<i>Mephitis mephitis</i>	Woods, grasslands, agricultural fields, and roadsides	High
Uinta Ground Squirrel	<i>Urocitellus armatus</i>	Sub-alpine meadows and forest edge areas	High
Yellow Pine Chipmunk	<i>Tamias amoenus</i>	Open coniferous forest	High
Yellow-Bellied Marmot	<i>Marmota flaviventris</i>	Open high elevation habitat	Low
Red Fox	<i>Vulpes vulpes</i>	Road crossing in forested habitat	Low
Amphibians			
Leopard Frog	<i>Rana pipiens</i>	Lakes, ponds, slow moving streams, and marshes	High

¹ The tables provides a list of species identified during surveys and does not reflect all species potentially present in the Project area.

² Abundance levels are a qualitative measure based on number of observations during field surveys meant to describe general species abundance based only on observations.

Appendix G

Wildlife Special Status Species

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Wildlife

Special Status Species

The following analysis does not consider the risk of collision with the transmission line in describing potential impacts, because those impacts are described in Section 3.7.4 and would be in addition to the impacts described below for all bird species considered.

Federally Listed and Candidate Species

Canada Lynx (*Lynx canadensis*)

The Canada lynx is an Endangered Species Act (ESA)-listed threatened species, a Bureau of Land Management (BLM) Type 1 special-status species, and an Idaho Department of Fish and Game (IDFG) Species of Greatest Conservation Need designated threatened species. Critical habitat for Canada lynx was designated in 2009, with none being designated in Caribou County. Lynx are solitary carnivores, generally occurring at low densities in boreal forest habitats. Throughout most of their range, Canada lynx densities and population dynamics are strongly tied to the distribution and abundance of snowshoe hare, their primary prey (Koehler and Britnell 1990). Kittens are born in May or June after a 60- to 74-day gestation period, and typically remain with their mothers until about 10 months of age (Koehler 1990). Females may not reproduce during food shortages, and food availability directly correlates with the survival probability of young Canada lynx. Few kittens survive when food is scarce (Koehler 1990).

On a landscape scale, suitable Canada lynx habitat includes a mosaic of early seral stages that support snowshoe hare populations and late seral stages of dense old growth forest that provide ideal denning, security, and red squirrel habitat. Connectivity between Canada lynx populations is critical. They require dispersal corridors several miles wide with only narrow gaps. Large tracts of continuous coniferous forest are the most desirable for Canada lynx travel and dispersal (Ruediger et al. 2000).

The historic range of the Canada lynx in the Greater Yellowstone Area includes Idaho, Montana, and Wyoming (Ruediger et al. 2000). Lynx have not historically been found within 2 miles of the west side of the North Alternative on Caribou-Targhee National Forest (C-TNF) lands (IDFG 2011b). The U.S. Forest Service (USFS) has not designated any lynx analysis units within the project area; however it is within an area that has been designated as linkage habitat by USFS (2007a). Suitable foraging habitat for lynx occurs in the project area on C-TNF lands.

Surveys conducted within the project area resulted in no evidence of lynx presence. Several snowshoe hare were observed, however, and the mature and late seral stands of Douglas-fir may provide potentially suitable foraging/linkage habitat for lynx.

Vegetation clearing within the project area and long-term impacts to forested vegetation associated with access roads would affect conifer-dominated and aspen-dominated forest. Impacts to forested habitats would fragment the existing habitat, reducing its suitability for

Canada lynx foraging and cover. However, roads like Henry Cutoff Road and Blackfoot River Road, are much more significant north–south barriers to lynx travel because of traffic and human activity, and lynx are not known to use the area as a migratory corridor. Sufficient habitat would remain functional at both the local and range-wide scales to maintain the viability of the species and to maintain the forested habitats within the project corridor as linkage habitat to documented lynx habitats on other portions of C-TNF and the Bridger-Teton National Forest. Given the limited extent of potential impacts from further habitat fragmentation and the low level of documented and anticipated use of the project area, the construction and operation of either alternative or their options would have no effect on the Canada lynx.

Yellow-billed Cuckoo (*Coccyzus americanus occidentalis*)

The yellow-billed cuckoo is a candidate species under the ESA, but is not reported as present in Caribou County. It is also a BLM Type 1 special-status species and an IDFG Species of Greatest Conservation Need protected non-game species. In the west, yellow-billed cuckoos prefer sites with a dense understory of willow (*Salix* spp.) combined with mature cottonwoods (*Populus* spp.), generally within approximately 328 feet of slow or standing water (Gaines and Laymon 1984). The yellow-billed cuckoo is also known to use non-riparian, dense vegetation such as wooded parks, cemeteries, farmsteads, tree islands, Great Basin shrub-steppe, and high-elevation willow thickets (DeGraff et al. 1991).

Surveys conducted in 2005 in Idaho for all areas with historic records of yellow-billed cuckoos indicate that more than half (51 percent; 40 of 78) of the historic yellow-billed cuckoo records in Idaho were from southeastern Idaho, most from the Snake River Corridor (Reynolds and Hinckley 2005). Results indicate that yellow-billed cuckoos in Idaho are mainly associated with cottonwood galleries along the Snake River in southeast Idaho.

There is a low potential for yellow-billed cuckoos to be present within the project area. There is little riparian shrub habitat and there are no cottonwood stands within the North Alternative corridor. Some small stands of willow are found within the riparian habitat adjacent to the portion of Gravel Creek within the project corridor. Other riparian habitats consist primarily of emergent vegetation, which is not suitable habitat for yellow-billed cuckoo.

There have been no documented occurrences of yellow-billed cuckoo within 2 miles of the North Alternative (IDFG 2011b) and it is not on the U.S. Fish and Wildlife Service (USFWS) ESA candidate species list for Caribou County. No yellow-billed cuckoos were observed during wildlife surveys conducted in 2011 within the North Alternative. For these reasons, the North Alternative would have no effect on the yellow-billed cuckoo or its habitat. Additionally, no birds were documented during surveys along the South Alternative and Option 3A, though the dense willow and willow-dogwood habitat along the Blackfoot River may provide some potentially suitable habitat.

Greater Sage-grouse (*Centrocercus urophasianus*)

The greater sage-grouse is a federally proposed species for listing in Caribou County under the ESA. It is listed as a USFS sensitive species and a Management Indicator Species (MIS) for sagebrush habitats. It is also a BLM Type 2 special-status species. In addition, it is a IDFG

Species of Greatest Conservation Need and is classified as a game species. Sage-grouse are closely linked to sagebrush habitats during all seasons of the year. They prefer relatively tall sagebrush for nesting areas and open sites surrounded by sagebrush for lekking (Connelly et al. 2000).

Lek surveys were conducted on state and Bureau of Indian Affairs (BIA) lands. Most of the sagebrush-dominated habitats within the project area provide potentially suitable habitat for sage-grouse lekking, nesting, brooding, and/or wintering. No sage-grouse ground surveys were conducted on C-TNF land because there are no known leks and suitable habitat does not exist.

A documented sage-grouse lek site is located approximately 1,500 feet west of the North Alternative, on the large piece of state-owned land east of the Blackfoot Reservoir (IDFG 2011b). Lek surveys were conducted at this lek on three occasions in 2011 and no evidence of sage-grouse, feathers, droppings, or tracks were observed. The lek is approximately 30 feet wide, and is located adjacent to an off highway vehicle (OHV) track.

Construction of the North Alternative would result in short-term impacts on 3.6 acres of sagebrush habitat and approximately 71.3 acres of long-term impacts to sagebrush habitat. These long-term impacts would reduce the amount of available sagebrush habitat for greater sage-grouse. However, sufficient amounts of suitable sagebrush habitat would remain functional at both the local and range-wide scales to maintain the viability of this species. Any grouse within the immediate vicinity of the North Alternative may be displaced temporarily during construction due to temporarily elevated construction noise and increased human presence. Displacement of grouse could potentially temporarily increase predation as grouse seek out alternative suitable habitat. While some individual birds may be affected at a low level, the North Alternative would not be expected to result in any measurable impact on the species.

Along the South Alternative, there is a lek site near the eastern boundary. On the west side of the South Alternative, a sage-grouse was flushed on C-TNF land in 2007, during great gray owl and northern goshawk surveys. Sage-grouse also use areas of South Alternative where it crosses BLM parcels. Grouse droppings were found during surveys in 2007. There is a lek location adjacent to the South Alternative very near the easternmost BLM parcel.

Additional ground-based and aerial surveys were conducted along the South Alternative and Option 3A in 2013. The ground-based lek surveys did not document any greater sage-grouse or any sign of grouse activity such as feathers, tracks, or droppings that would indicate the presence of a lek or breeding displays. Aerial surveys within the project corridor also did not document any sign of greater sage-grouse activity. However, during this aerial survey one male and two female greater sage-grouse were observed on top of a steep ridge approximately 3,000 feet north of the South Alternative. A follow up ground visit of this site by USFS did not reveal any evidence of greater sage-grouse presence.

Construction of the South Alternative would result in short-term impacts on 80 acres of sagebrush habitat and approximately 33.2 acres of long-term impacts to sagebrush habitat. Construction of Option 3A would result in short-term impacts on 77.2 acres of sagebrush habitat and approximately 30.9 acres of long-term impacts to sagebrush habitat. Impacts from the South Alternative and Option 3A would be similar as those described for the North Alternative.

Wolverine (*Gulo gulo*)

The wolverine is a federally proposed species for listing in Caribou County under the ESA. It is also listed as a USFS sensitive species, a BLM Type 3 special-status species, and an IDFG Species of Greatest Conservation Need protected non-game species. Wolverines inhabit high mountain forests of dense conifers, primarily in true fir (*Abies* sp.) cover types as well as subarctic-alpine tundra. Lack of human disturbance is an important component of wolverine habitat (Groves et al. 1997). They are solitary animals, with females requiring approximately 148 square miles of land for a single territory, and males requiring up to 610 square miles (Groves et al. 1997). Wolverines seasonally move between higher and lower elevation areas in search of food. Wolverines prefer subalpine rock and scree habitats with boulders and wood debris for denning (Krebs and Lewis 1999).

In southeast Idaho, spring snow cover is thought to be one of the most important characteristics for defining suitable denning habitat, especially snow cover that remains into the latter part of the denning cycle from mid-April to mid-May (Aubry et al. 2007). USFS aerial surveys conducted in 2002 reported wolverine trails in the snow in mountains east of Soda Springs (IDFG 2011b). There have also been documented historical observations of wolverines approximately 2 miles south of the North Alternative, in a drainage on C-TNF land northeast of Henry Peak (IDFG 2011b). Recently, an unconfirmed wolverine sighting was made near Enoch Valley (D. Green 2012, personal communication).

A 2001-2008 research team tracked a dispersing male wolverine that crossed all of project alternatives (Inman et al. 2012). This wolverine was tracked making a big loop from the C-TNF southwest to the town of Wayan, southwest to the Fox Hills, along the southern shore of Blackfoot Reservoir, west to the town of Tyhee (north of Pocatello), then northeast back to the C-TNF (Inman et al. 2012). However, this study concluded that wolverines strongly select for areas greater than 8,530 feet (2,600 meters) in elevation, and typically avoided areas less than 7,054 feet (2,150 meters) in elevation, including times with deep snow when other animals are driven to lower elevations. (Inman et al. 2012). Other studies and surveys also conclude that wolverines have moderate potential for occurrence within the project area.

Winter tracking surveys conducted within the North Alternative in 2011 did not identify any wolverine tracks or any suitable denning habitat or signs of denning activity. None of the high-elevation subalpine habitats within the North Alternative provide suitable conditions for wolverine denning. The North Alternative also does not provide significant migratory habitat, as it is situated near the northern end of the Gray's Range, and does not provide habitat connectivity to the north.

Wolverines are not known or expected to use the habitat within the North Alternative extensively, but documented sightings within the vicinity indicate that the area does provide suitable foraging habitat. Impacts to forested habitats would further fragment existing habitat, reducing its suitability for wolverine foraging. Sufficient foraging habitat would remain functional at both the local and range-wide scales to maintain the viability of the species. For this reason, impacts to the wolverine associated with the construction and operation of the North Alternative would be low.

The South Alternative and Option 3A corridors have several flat rocky, steep-sloped areas adjacent to dense stands of conifers, but these areas do not meet talus criteria necessary to provide suitable denning sites. No potential denning areas were found within the South Alternative. No wolverine snow trails or tracks were found in the South Alternative during late spring raptor surveys in 2007. Additional winter tracking surveys completed on C-TNF lands in 2013 did not document the presence of any wolverine on the South Alternative or Option 3A. However, potentially suitable migratory and linkage habitat was identified.

Columbia Spotted Frog (*Rana luteiventris*)

The Columbia spotted frog is a candidate for listing under the ESA (although is not known to occur in Caribou County), a USFS sensitive species, a BLM Type 1 special-status species, and an IDFG Species of Greatest Conservation Need protected non-game species. Columbia spotted frogs are adapted to mountainous areas near cold, slow moving streams, springs, or marshes where emergent vegetation is not extensive (USFS 2007b). Columbia spotted frogs can move a considerable distance from water after breeding and tend to frequent mixed conifer and subalpine forests, grasslands, and shrublands of sagebrush and rabbitbrush (USFS 2007b). There are no known occurrences of Columbia spotted frogs in C-TNF and frogs were not documented during surveys conducted during wetland delineations within either alternative.

Impacts on riparian habitats as a result of the either alternative would mostly be short term and would not result in any measurable impacts to potential habitat for the Columbia spotted frog. For these reasons, the construction and operation of the Project would have no effect on the Columbia spotted frog.

U.S. Forest Service Sensitive Species

Bald Eagle (*Haliaeetus leucocephalus*)

The bald eagle is listed as sensitive by USFS, as a BLM Type 2 special-status species, and as a Species of Greatest Conservation Need protected non-game species by IDFG. They are also protected by the Bald and Golden Eagle Protection Act of 1940 (BGEPA). Bald eagles are closely associated with lakes and large rivers in open areas, forests, and mountains. They nest near open water in late-successional forest with multiple perches and nest sites and low levels of human disturbance (McGarigal 1988; Wright and Escano 1986). Nest sites are usually within 0.25 mile to 1 mile of open water, with less than 5 percent of the lakeshore or riverbank developed within 1 mile. Bald eagles need large trees, preferably snags, along rivers with good visibility, but also use trees or boulders for perching. Protected, deep ravines with large trees are often used as night roosts (Wright and Escano 1986).

Bald eagle habitat suitability within the project area is high. Suitable foraging habitat exists within the project area in open water habitats, meadows, and roadways. Suitable nesting habitat also occurs throughout the forested habitats within the project area, due to the abundance of large snags and perch trees. Bald eagles were observed on several occasions foraging within the project area.

Noise during project construction could disturb or displace nesting or roosting bald eagles temporarily, but no nests have been documented within 1 mile of the North Alternative corridor (IDFG 2011b). An active nest, with a fledgling in the nest and an adult observed foraging in the vicinity was documented on private lands north of Soda Springs, 1.5 miles southeast of the southern end of the North Alternative. This location is outside of the 660 foot buffer zone recommended in the National Bald Eagle Management Guidelines (USFWS, 2005) for transmission lines. The North Alternative does not pose an electrocution risk to bald eagles. Furthermore, the North Alternative does not bisect the nest from any prime foraging habitat or cross any prime foraging habitat. The avian collision risk model discussed in Section 3.7.4 of the EIS found the area within 2.5 miles of the bald eagle nest to have relatively low collision risk.

Bald eagle presence was also documented in the South Alternative, specifically near the Narrows. The suitability of this area for foraging may be due to the open water area and the potential for road-killed ungulates.

During aerial raptor nest surveys conducted in 2013, two inactive bald eagle nests were observed within 1 mile of the project corridors. One of these nests, located in the southern portion of the North and South alternatives and Option 3A, had been documented in 2011 as a potential active bald eagle nest. The second inactive bald eagle nest was documented in a large Douglas-fir snag overlooking the Blackfoot River east of the haul road, near the center of the South Alternative corridor. Several bald eagles were observed soaring and/or foraging during these aerial surveys, but no active bald eagle nests were documented.

Bald eagles would experience similar impacts regardless of the alternative implemented. Clearing of forested vegetation could remove potentially suitable nesting or perching trees, but would not adversely affect foraging habitat. During project construction, bald eagles would most likely avoid the immediate area, due to noise and human presence; therefore, incidental mortality would not be likely to occur. Even though some potential bald eagle habitat may be impacted through forest clearing, sufficient habitat would remain functional at both the local and range-wide scales to maintain the viability of the species. Therefore, project impacts on bald eagles would be low.

Boreal Owl (*Aegolius funereus*)

The boreal owl is a USFS sensitive species and an IDFG Species of Greatest Conservation Need protected non-game species. The species typically prefers high-elevation spruce/fir forests or aspen forest for foraging and nesting. Boreal owls prefer nesting habitat that consists of forests with a relatively high density of large trees, an open understory, and a multi-layered canopy (Hayward 1994). The boreal owl is a secondary cavity nester, and relies on woodpeckers to excavate snags and decaying trees, which the owls subsequently use for nesting and roosting. Habitat structural diversity is important in order to provide suitable habitat for both nesting and foraging (Hayward 1994).

This species occurs in the C-TNF in several high-elevation mixed conifer breeding habitats. Surveys have documented them in Cold Spring (Bear Camp Gulch), Danish Flat, Mill Creek (Bear River Range) and Johnson Creek (Aspen Range) (USFS 2005). This species is not known to occur within either alternative. Habitat suitability is high, however, within the high-elevation

conifer- and aspen-dominated forest habitats in C-TNF. These stands provide potentially suitable nesting and foraging habitat for boreal owl because typically, they are structurally diverse, mature and late seral stands with large trees, snags, and cavity trees.

Vocalization surveys conducted in 2011 and 2013 on C-TNF lands within the North Alternative corridor and vicinity did not result in any responses or observations of boreal owls. These surveys were conducted according to protocols developed in close coordination with USFS (Green 2011, personal communication).

Surveys along the South Alternative and Option 3A conducted in 2013 did not document the presence of the boreal owl.

Great Gray Owl (*Strix nebulosa*)

The great gray owl is a USFS sensitive species and an IDFG Species of Greatest Conservation Need protected non-game species. The species typically inhabits mixed coniferous forests, usually bordering meadows or small open areas in the forest. Semi-open areas, where small rodents are abundant, near dense coniferous forests, for roosting and nesting, are optimum habitats for great gray owls. Broken top snags, stumps, dwarf mistletoe platforms, or old hawk and raven nests are used for nesting (Hayward 1994). Great gray owls have been documented in many areas of C-TNF, including one historic observation within approximately 2.5 miles of the North Alternative corridor (IDFG 2011b).

Vocalization surveys conducted on C-TNF lands within the North Alternative corridor and vicinity did not result in any responses or observations of great gray owls.

Great gray owls have been found in many areas of the C-TNF. Observations are particularly concentrated near the South Alternative. Early season, evening callback surveys were completed along the South Alternative within the C-TNF in 2007, and there were no replies to the calls.

In 2006 and 2007, suitable nesting sites consisting of mature conifers with large mistletoe clumps were mapped. In addition to mistletoe clumps, a hawk nest was mapped that could potentially become a nest site as well.

Additional surveys along the South Alternative and Option 3A in 2013 did not document the presence of the great gray owl.

Flammulated Owl (*Otus flammeolus*)

The flammulated owl is a USFS sensitive species, a BLM Type 3 special-status species, and an IDFG Species of Greatest Conservation Need protected non-game species. Flammulated owls are secondary cavity nesters that primarily feed on nocturnal lepidopteron moths (Hayward 1994). They typically prefer ponderosa pine habitat, but also use Douglas-fir, aspen, and limber pine habitat. Two key habitat features that limit flammulated owl populations are availability of nest cavities and availability of foraging habitat (Linkhart and Reynolds 1997).

Flammulated owls have been documented in the Bannock Range, Bear River Range, and Smoky Canyon area (USFS 2005), but none have been documented within 2 miles of the North

Alternative corridor (IDFG 2011b). Forested habitat in C-TNF associated with the North Alternative provides suitable foraging and nesting habitat for flammulated owls because the forests typically are structurally diverse, mature and late seral stands with large trees, snags, and cavity trees.

Vocalization surveys on C-TNF lands within the North Alternative corridor documented one flammulated owl response within a dense stand of Douglas-fir.

The South Alternative and its route options possess suitable flammulated owl habitat. During surveys of the Southern Alternative and Option 3A in 2013, a flammulated owl call was heard near a ridge top in a mature aspen stand. Appropriate mitigation measures would be developed to reduce potential impacts.

Vegetation clearing associated with either alternative and long-term impacts to forested vegetation associated with access roads would affect conifer-dominated forest and aspen-dominated forest.

This disturbance would represent a direct impact to potentially suitable habitat, and could also indirectly affect habitat suitability because of forest fragmentation and the potential for increased human presence. Individual owls could also be temporarily displaced during construction due to temporarily elevated construction noise and increased human presence. While some individual owls could be negatively affected, the neither alternative would likely result in any measurable impact to the species. Sufficient habitat would remain functional at both the local and range-wide scales to maintain the viability of the species. In addition, clearing vegetation outside the nesting season could further reduce overall impacts to owls. Impacts to western boreal owls, great gray owls, and flammulated owls associated with the construction and operation of the Project would be low.

Northern Goshawk (*Accipiter gentilis*)

The northern goshawk is a USFS sensitive species, a Management Indicator Species (MIS) for mature and old forest habitats, and an IDFG Species of Greatest Conservation Need protected non-game species. Northern goshawks nest in mature to old forest stands with relatively large-diameter trees and high canopy closure (Hayward and Escano 1989; Siders and Kennedy 1996). They nest in a variety of forest types, including Douglas-fir, lodgepole pine, aspen, ponderosa pine, Engelmann spruce, and subalpine fir (Siders and Kennedy 1996; Squires and Ruggiero 1996; Weber 2006).

Northern goshawks have been documented as nesting in many areas of C-TNF, but no nests were documented within or adjacent to the North or South alternatives (IDFG 2011b). Mature aspen and conifer stands associated with the alternative corridors represent suitable nesting habitat for northern goshawk because the stands typically are structurally diverse, mature and late seral stands with large trees and snags.

Vocalization surveys conducted for the North Alternative in 2011 documented one northern goshawk response within a dense stand of Douglas-fir. A northern goshawk was also heard during forest inventory surveys from a location approximately 3,500 feet south of the first

response, in the same mixed aspen/conifer stand. No northern goshawks or nests were observed. Additional surveys conducted along the North Alternative in 2013 did not document the presence of any northern goshawk.

Vocalization surveys of the South Alternative under taken in 2006 and 2007, and in the South Alternative and Option 3A corridors in 2013; however, surveys did not yield any conclusive goshawk responses.

Vegetation clearing within the North and South alternative corridors and long-term impacts to forested vegetation associated with access roads would affect conifer-dominated forest and aspen-dominated forest. This disturbance would represent a direct impact to potentially suitable nesting habitat for northern goshawks and could also indirectly affect habitat suitability through fragmentation and the potential for increased human presence; however, because the ROW would be only 100 feet wide, goshawks are likely to continue to forage in the ROW following construction (Reynolds et al. 1992). Individual birds could also be temporarily displaced during construction due to temporarily elevated construction noise and increased human presence. While some individual birds could be negatively affected, the Project would not likely result in any measurable impact to the species. Snags would be maintained at the levels prescribed in the C-TNF RFP, and tree removal within mature and late seral forest stands would be limited to the minimum extent necessary. Sufficient mature aspen and conifer forest habitat would remain functional at both the local and range-wide scales to maintain the viability of these species. Impacts to northern goshawks associated with the construction and operation of the Project would be low.

Three-toed Woodpecker (*Picoides tridactylus*)

The three-toed woodpecker is a USFS sensitive species and an IDFG Species of Greatest Conservation Need protected non-game species. Three-toed woodpeckers are typically found in mature stands of spruce/fir and lodgepole pine, where they forage for insects in dead or dying trees (Imbeau and Desrochers 2002). Snags are highly preferred over live trees for foraging (possibly because of the kinds or number of insect species involved) (Imbeau and Desrochers 2002). Post-fire conditions are important to this species for both feeding and nesting purposes. They are primarily associated with mature forests because of snag requirements for nesting (Imbeau and Desrochers 2002).

In C-TNF, three-toed woodpeckers have been documented in the Bear River Range, at the north end of the Soda Springs Ranger District, and in the Manning Creek area. Mature aspen and conifer stands associated with the North Alternative corridor represent potentially suitable nesting habitat for the three-toed woodpecker because the stands typically are structurally diverse, mature and late seral stands with large trees and snags. The North Alternative did not display any evidence of recent burning activity or insect outbreaks, but the mature and late seral conifer stands associated with the alternative likely have the structural complexity necessary to provide suitable nesting and foraging habitat for three-toed woodpeckers.

Vocalization surveys conducted in on C-TNF lands within the North Alternative documented one three-toed woodpecker adjacent to a trail at the base of a mature Douglas-fir stand. The bird was foraging in a live aspen tree. Several unidentified woodpeckers were documented during wildlife

surveys within the North Alternative corridor; most were heard foraging in snags. There was no response to any of the vocalization calls.

Vocalization surveys conducted in 2013 did not record the presence of any three-toed woodpeckers along either the North or South alternative or Option 3A corridors.

Vegetation clearing within the North or South alternative or Option 3A corridors and long-term impacts to forested vegetation associated with access roads would affect conifer-dominated forest and aspen-dominated forest and result in similar impacts to three-toed woodpeckers, as described for northern goshawks.

Columbian Sharp-Tailed Grouse (*Tympanuchus phasianellus columbianus*)

The Columbian sharp-tailed grouse is listed as a USFS sensitive species and an MIS for grassland and open canopy sagebrush habitats. It is also a BLM Type 3 special-status species. The IDFG lists it as a Species of Greatest Conservation Need game species. Columbian sharp-tailed grouse use a variety of seasonal habitats each year. These habitats are in areas of high quality shrub/meadow steppe, primarily grasslands and open-canopy sagebrush. Columbian sharp-tailed grouse need grassland and low shrub-dominated habitats for nesting and brood-rearing habitat (Moyles 1981).

Several Columbian sharp-tailed grouse leks (male breeding display areas) have been documented within the vicinity of the project area, but none have been documented within either alternative corridors (IDFG 2011b). Two sharp-tailed grouse leks have previously been documented between 2 and 3 miles west of the North Alternative corridor, along the northern and western edge of Fivemile Meadows (IDFG 2011b). Sagebrush, grassland, and mountain shrub cover types on state and BIA lands within the North Alternative corridor likely provide suitable nesting, brood-rearing, and winter habitat for Columbian sharp-tailed grouse.

No Columbian sharp-tailed grouse or any grouse leks were documented during lek surveys conducted on state and BIA lands within the North Alternative corridor. Surveys were not conducted on USFS land because it does not provide suitable habitat.

Like the greater sage-grouse, discussed above, the sharp-tailed grouse uses sagebrush habitat which would be affected by the North Alternative. However, the sharp-tailed grouse is also known to occur in grasslands, mountain-shrub, aspen, and riparian dominated habitats (Marks and Marks 1987; Ulliman 1995; Apa 1998; and Giesen and Connell 1993). Construction of the North Alternative would result in short-term impacts on grassland, mountain-shrub, and wetland habitat of which some would be riparian. The North Alternative would result in permanent impacts on mountain-shrub, grassland, aspen, and wetland habitat. These long-term impacts would reduce the amount of available habitat for the sharp-tailed grouse; however, the sharp-tailed grouse is a habitat generalist and sufficient amounts of suitable habitat would remain functional at both the local and range-wide scales to maintain the viability of this species. Any grouse within the immediate vicinity may be displaced temporarily during construction due to temporarily elevated construction noise and increased human presence. Displacement of grouse could potentially temporarily increase predation as they seek out alternative suitable habitat.

While some individual birds may be affected, the North Alternative would not be expected to result in any measurable impact on the species.

Although no sharp-tailed grouse were documented along the South Alternative or Option 3A corridors, sagebrush-dominated habitats within the project corridors provide suitable nesting, brood-rearing, and winter habitat. Construction of either the South Alternative or Option 3A would result in similar though fewer impacts to habitat that could be used by the grouse. However, these habitats are wide-spread and suitable alternative areas are available. Therefore impacts to sharp-tailed grouse would be the same as those described for the North Alternative.

Peregrine Falcon (*Falco peregrinus*)

The peregrine falcon is listed as a USFS sensitive species, a BLM Type 3 special-status species, and an IDFG Species of Greatest Conservation Need designated threatened species. The species forages in a variety of habitats, but requires large cliffs for nesting. Peregrines most commonly nest on large cliffs less than 9,500 feet in elevation, and in areas closely associated with open water, wetlands, and riparian habitat (Cade 1982).

The nearest documented peregrine falcon nest is located approximately 1.5 miles north of the North Alternative, in the northwestern corner of the USFS-administered portion of Little Gray Ridge (IDFG 2011b). No peregrine falcons or nests were documented within a 1-mile radius of the North Alternative corridor. There are some rocky outcrops and cliffs on ridgetops and southern-aspect slopes within the vicinity of the alternative's alignment, but none within the corridor. The wetlands and riparian habitats in C-TNF within the North Alternative likely provide suitable foraging habitat for peregrine falcon.

Surveyors did not observe any peregrine falcons during wildlife surveys and raptor nest surveys and there is no suitable peregrine falcon nesting habitat within the North Alternative corridor. Impacts to these habitats would be low, and mostly short in duration. If present, peregrine falcons could be temporarily disturbed during project construction, due to temporarily elevated construction noise and increased human presence. However, there are sufficient suitable foraging habitats within the vicinity that no individual peregrine falcon would be substantially affected. Impacts to the peregrine falcon associated with the construction and operation of the North Alternative would be low.

Raptor surveys in the vicinity of the South Alternative and Option 3A were conducted in spring/summer 2013. No falcons were determined to be present.

Trumpeter Swan (*Cygnus buccinator*)

The trumpeter swan is listed as a USFS sensitive species and a BLM Type 3 special-status species. IDFG lists it as a Species of Greatest Conservation Need game species. Trumpeter swans are the largest waterfowl in North America. Suitable breeding habitat includes lakes and ponds and adjacent marshes containing sufficient vegetation and nesting locations (Mitchell 1994). Habitat requirements for breeding include room to take off (approximately 328 feet [100 meters]), shallow, unpolluted water with sufficient emergent vegetation and invertebrates, appropriate nest sites (e.g., muskrat lodges), and areas with little human disturbance (Mitchell

1994). Appropriate winter habitat occurs in areas where water does not freeze and food is plentiful and accessible. Trumpeter swans will move from one lake or pond to another if conditions become too severe (Mitchell 1994).

Trumpeter swans are found on the Gray's Lake National Wildlife Refuge and the Blackfoot Reservoir, and the area between the two water bodies is an important flyway for trumpeter swans (Mende 2011; IDFG 2011b). On the Blackfoot Reservoir, trumpeter swans have been documented at the boat ramp in the town of Henry, approximately 400 feet west of the North Alternative, and near the mouth of Meadow Creek, approximately 2,500 feet west of the North Alternative (IDFG 2011b). Trumpeter swans have also been documented in the vicinity of Meadow Creek, in the Chubb Flat area, approximately 2.5 miles northwest of the alignment (IDFG 2011b). The portions of Goose Lake and Meadow Creek that are within the North Alternative corridor represent potentially suitable breeding habitat for trumpeter swans.

Construction of the North Alternative would result in very small amounts of temporary impacts to potential trumpeter swan breeding habitat in riparian wetlands adjacent to Meadow Creek. However, this very small amount of impact would not significantly affect the habitat suitability within the rest of Meadow Creek and the adjacent Goose Lake. Some individual trumpeter swans could be temporarily displaced during construction due to temporarily elevated construction noise and increased human presence. If these disturbances occurred during a sensitive time during the breeding period it could result in reduced reproductive success. However, while the North Alternative might impact some individual birds, it would not be expected to result in substantial impacts to the species, given the availability of high quality habitats present within the project vicinity. Impacts to the trumpeter swan associated with the construction and operation of the North Alternative would be low. The location of transmission lines could increase the collision risk for trumpeter swans as they enter and depart from the area. Marking the lines in these areas to increase line visibility would reduce this potential collision risk.

Trumpeter swan presence in the area of the South Alternative and Option 3A corridors was not documented during initial surveys or during subsequent surveys conducted in spring/summer 2013.

Harlequin Duck (*Histrionicus histrionicus*)

The Harlequin duck is listed as a USFS sensitive species, a BLM Type 4 species, and a Species of Greatest Conservation Need game animal by IDFG. This species is known to breed on forested mountain streams of relatively low gradient from Alaska and western Canada, south to eastern Oregon, east-central California, Idaho, and Wyoming. In Idaho, hens typically nest in cliff cavities, tree cavities, and on the ground. They winter in rough coastal waters from the Aleutian and Pribilof islands, south to central California. Birds migrate to Idaho from the Pacific Coast in April and females return to the coast in August or September. Males typically return earlier. Fewer than 100 birds, occurring on about 30 streams in northern Idaho comprise the entire population in Idaho (IDFG 1997).

Because the Harlequin duck occurs primarily in northern Idaho and has a low potential for occurrence in the areas of the North or South alternatives and their options including

Option 3A, impacts to this species as a result of project construction are unlikely (IDFG 1997).

Gray Wolf (*Canis lupus*)

The gray wolf is listed as a USFS sensitive species, a BLM Type 1 special-status species, and as a Species of Greatest Conservation Need game animal by IDFG. The Proposed Action is within the range of the Northern Rocky Mountain Distinct Population Segment of gray wolves, which includes wolves in Montana, Idaho, Wyoming, the eastern one-third of Washington and Oregon, and a small part of north-central Utah. In March 2009, this entire distinct population segment (except for the Wyoming portion) was removed from ESA listing by the U.S. Fish and Wildlife Service (USFWS). This delisting was temporarily overturned by court decisions in 2010, but as of May 2011, the Northern Rocky Mountain Distinct Population Segment of gray wolves has again been removed from listing under the ESA.

Gray wolves use a variety of habitats, including coniferous forests, montane meadows, and shrub-steppe. Key components of suitable habitat include a sufficient year-round prey base of ungulates and alternative prey; suitable and semi-secluded denning and rendezvous sites; and sufficient space with minimal exposure to humans. Preferred wolf prey species, including deer, elk, and moose, are all found in and adjacent to the North and South alternative corridors (USFWS 2002).

Neither alternative corridor provides significant habitat for gray wolves, but there may be some foraging and migratory habitat. Neither wolf packs nor den sites have been documented in southeast Idaho (IDFG 2011b), but sightings of wolves (usually single animals) have been documented. The project area is within dispersal distance of wolves from packs in northeast Idaho and northwest Wyoming; specifically, the packs south of Yellowstone National Park have ranges that are close to southeast Idaho and the Caribou Zone of C-TNF.

No wolves, wolf tracks, or signs of denning activity were found during surveys conducted in the project area.

Vegetation impacts to forested vegetation associated with access road construction have the potential to impact suitable gray wolf foraging and migration habitat through fragmentation. However, gray wolves are not known to use the area as a migratory corridor. The Project would not result in a measurable decrease in available prey species at both the local and range-wide scales to maintain the viability of the species and to allow for functional gray wolf migration. Given the limited extent of potential impacts from further habitat fragmentation and the level of anticipated use of the project area, the construction and operation of the North or South alternatives or Option 3A would have no effect on the gray wolf.

Pygmy Rabbit (*Brachylagus idahoensis*)

The pygmy rabbit is listed as a USFS sensitive species and a BLM Type 3 special-status species. IDFG classifies the species as a Species of Greatest Conservation Need game animal. Pygmy rabbits are a sagebrush obligate species that is uniquely dependent on sagebrush, which composes up to 99 percent of its winter diet (Green and Flinders 1980). Occupied pygmy rabbit

habitats typically have a high cover of shrubs, especially big sagebrush; high forb cover; and sandy soils (Heady et al. 2001). In southeast Idaho, this species occupies sites with dense shrubs, particularly big sagebrush, bitterbrush, and three-tip sagebrush (Green and Flinders 1980). It typically inhabits either big sagebrush and rabbitbrush communities with deep soil for digging burrows, or rocky habitats.

Sagebrush occurs in the North and South alternatives on state and BLM parcels, but most deep soils have been converted to agriculture. This species is documented in adjacent counties to the west, but there is very little tall, dense sagebrush habitat anywhere within the project area. Historical records of pygmy rabbit occurrences within the BLM Pocatello Field Office management area are rare, at only four. Extensive BLM surveys in Idaho in 2002 included lands managed by the Pocatello Field Office and produced two new records; both on BLM land from the Pegram Creek area in Bear Lake County, approximately 40 miles south of the proposed project corridor (Roberts 2003). These surveys did not document any pygmy rabbits within the vicinity of the project area. No occurrence observations are on record with the IDFG Idaho Conservation Data Center within 2 miles of the North or South alternative corridors (IDFG 2011b).

No evidence of pygmy rabbits or pygmy rabbit burrows was documented during vegetation and wildlife surveys conducted in sagebrush-dominated habitats within the North or South alternatives or Option 3A. These habitats likely do provide potentially suitable habitat for pygmy rabbits, but pygmy rabbits are not expected to occur within the project area.

Given the limited extent of potential impacts on potentially suitable habitat and the lack of documented or anticipated use of the project area, the construction and operation of the Project would have no effect on the pygmy rabbit.

Spotted Bat (*Euderma maculatum*)

The spotted bat is listed as a USFS sensitive species, a BLM Type 3 species, and a Species of Greatest Conservation Need protected non-game animal by IDFG. This species ranges from southern British Columbia, south through western and southwestern parts of the United States to central Mexico and east into Texas. They are found in various habitats from desert to montane coniferous forests with an upward range extent of just over approximately 8,000 feet. Extensive surveys in Idaho have only recently located the species in the southwestern part of the state in the canyons of Owyhee County (IDFG 1997).

Because the spotted bat has limited occurrence in the southwestern extent of Idaho and has a low potential for occurrence in the areas of the North or South alternatives and their options, including Option 3A, impacts to this species as a result of project construction are unlikely (IDFG 1997).

Townsend's Big-eared Bat (*Corynorhinus townsendii*)

Townsend's big-eared bats are listed as a USFS sensitive species, a BLM Type 3 species, and a Species of Greatest Conservation Need protected non-game animal by IDFG. This species ranges from British Columbia, south through Mexico, and east into West Virginia. They are fairly widespread in the western United States. On the West Coast, they are regularly found in forested

regions and buildings and are consistently found in areas with canyons or cliffs. In their western range, they prefer cool, damp sites for hibernation. Mating occurs in autumn and winter with young typically appearing in late spring and early summer (IDFG 1997).

Though the Townsend's big-eared bat is relatively widespread in Idaho, it has a low potential for occurrence in the areas of the North or South alternatives and their options, including Option 3A. The corridors do not cross any known caves or abandoned mines that could provide roosting habitat. Therefore, impacts to this species as a result of project construction are unlikely (IDFG 1997).

Western Boreal Toad (*Bufo boreas boreas*)

The western boreal toad is a USFS sensitive species, a BLM Type 3 special-status species, and an IDFG Species of Greatest Conservation Need protected non-game species. The western toad (*Bufo boreas*) is currently recognized as two subspecies ranging from the Rocky Mountains to the Pacific Coast and from Baja Mexico to southeast Alaska and the Yukon Territory (Maxell 2000). The toads are found in a variety of habitats, including wetlands, forests, sagebrush meadows, and floodplains. Western toads inhabit all types of aquatic habitats, ranging from sea level to 12,000 feet in elevation (Maxell 2000). The subspecies of western toad found in Idaho is the western boreal toad.

Western boreal toads are documented from several locations within approximately 1 mile of the project area (IDFG 2011b). There are two documented occurrences along Tincup Creek on C-TNF land, approximately 0.5 mile north of the Lanes Creek Substation. Wetlands and riparian habitats within the North Alternative corridor likely provide potentially suitable habitat for boreal toads.

Surveys were conducted for western boreal toads within wetlands and riparian habitats, but no boreal toads, eggs, or tadpoles were documented.

Impacts on riparian habitats as a result of the North Alternative would mostly be of short duration and would not result in any measurable impacts to potential habitat for the western boreal toad. However, the Proposed Action would result in long-term impacts to forested aquatic influence zones in C TNF, which could reduce habitat suitability for boreal toads. If any western boreal toads were present during construction, limited mortality could occur; however, this would not represent a significant threat to the species. While the North Alternative might affect some individual boreal toads, it would not be expected to result in significant impacts on the species, given the relative availability of high quality habitats present within the project vicinity. Impacts on the western boreal toad associated with the construction and operation of the Proposed Action would be low.

Western boreal toad presence in the area of the South Alternative and Option 3A was not documented during initial surveys or during subsequent surveys conducted in spring/summer 2013.

Other Bureau of Land Management Sensitive and State Review Species

Ferruginous Hawk (*Buteo regalis*)

The ferruginous hawk is a BLM Type 3 special-status species and an IDFG Species of Greatest Conservation Need protected non-game species. Ferruginous hawks occur across southern Idaho in the vicinity of the Snake River Plain, with extensions southward toward Utah and Nevada. Breeding ferruginous hawks consume ground squirrels, black-tailed jackrabbits, pocket gophers, western meadowlarks, and snakes, depending on abundance in their territory (Fitzner et al. 1977; Schmutz 1989; Smith et al. 1981). They nest on cliffs and small trees (typically, junipers less than 30 feet tall) in dry habitats (Bechard et al. 1990). Some research indicates that ferruginous hawks that nest in junipers are more successful at fledging young (Fitzner et al. 1977). They nest at relatively low elevations relatively far from water and human disturbance in a variety of grasslands, shrublands, and juniper forest, even when these areas are interspersed with patches of wheat fields (Bechard et al. 1990; Schmutz 1989).

No ferruginous hawks were documented within the project area. The state, BLM, and BIA parcels within the project area are all close to relatively high levels of human disturbance from mining, grazing, and highway traffic disturbance, and there are few junipers present. Ferruginous hawk nests were not identified within 1 mile of the project area; however, sagebrush and grassland habitats may represent suitable foraging habitat, if ferruginous hawks nest within the project vicinity.

Since ferruginous hawks have not been documented within the project area or vicinity, and are not expected to occur frequently within the vicinity, any potential for impacts associated with the Project is considered discountable. The construction and operation of the Project would have no effect on the ferruginous hawk.

Loggerhead Shrike (*Lanius ludovicianus*)

The loggerhead shrike is a BLM Type 3 special-status species, and an IDFG Species of Greatest Conservation Need protected non-game species. It is a passerine bird that occupies sagebrush-steppe habitats in southern Idaho. Loggerhead shrikes nest in both shrubs and trees across their broad range of distribution (Woods and Cade 1996). Loggerhead shrike nests in Idaho are primarily placed in sagebrush (65 percent) or in large bitterbrush or greasewood shrubs (Woods and Cade 1996). Loggerhead shrikes forage on a broad range of insects, small birds, lizards, and rodents (Craig 1978; Morrison 1980; Groves et al. 1997).

Although sagebrush and grassland habitats within the project area contain suitable nesting and foraging habitat, loggerhead shrikes are not known to occur frequently in Caribou County (Groves et al. 1997). Loggerhead shrikes have not been documented within 2 miles of the project area (IDFG 2011b) and were not observed during wildlife surveys.

Impacts on sagebrush habitats could potentially reduce habitat suitability for ferruginous hawks and loggerhead shrikes, but there is ample suitable foraging habitat at both the local and range-wide scales to maintain the viability of these species. If any individual birds are present during

project construction they could be temporarily displaced, due to temporarily elevated construction noise and increased human presence. Since loggerhead shrikes have not been documented within the project area or vicinity, and are not expected to occur frequently within the vicinity, any potential for impacts associated with the Project is considered discountable. The construction and operation of the Project would have no effect on the loggerhead shrike.

Long-Billed Curlew (*Numenius americanus*)

The long-billed curlew is an IDFG Species of Greatest Conservation Need protected non-game species that inhabits prairies and grassy meadows, often near water (Groves et al. 1997). It prefers areas with both low vertical and horizontal canopy for nesting and breeding displays (McCallum et al. 1977; Pampush and Anthony 1993). Long-billed curlews apparently prefer nest sites with low vegetation, including shortgrass prairie, grazed pastures, areas infested with cheatgrass, and fallow fields, possibly because the young can get tangled in tall-growing vegetation; however, research indicates that nest survival is significantly lower on sites with low vegetation values, such as brome and recent burns, and higher on sites with higher grass and forb cover (Clarke 2006). Long-billed curlews forage on the ground in breeding territories, although they can also probe into loose soil for insect larvae (Groves et al. 1997).

There is one previously documented long-billed curlew breeding area within approximately 1 mile of the North Alternative (IDFG 2011b). Grass-dominated habitats on state and BIA lands within the North Alternative corridor likely represent suitable nesting and foraging habitat for long-billed curlew. However, long-billed curlews typically return to known breeding locations for nesting (Redmond and Jenni 1986), and nesting sites have not been documented within the North Alternative. No long-billed curlews were observed during wildlife surveys.

The South Alternative passes between five known long-billed curlew breeding areas that are within 2 miles of the South Alternative centerline. However, no occurrences are listed within 1 mile of the alternative, including BLM parcels within the corridor.

Short-term impacts to grassland habitats would temporarily reduce habitat suitability for long-billed curlews within the North, South alternatives or Option 3A. The Project would result in only minor amounts of long-term impacts to grassland habitats, and would not significantly reduce the habitat base for long-billed curlews within the project vicinity. Impacts on the long-billed curlew associated with the construction and operation of the Project would be low.

Brewer's Sparrow (*Spizella breweri*)

The Brewer's sparrow is a BLM Type 3 special-status species and an IDFG Species of Greatest Conservation Need protected non-game species that prefers to nest at mid-level in tall, living sagebrush plants (Schroeder and Sturges 1975). Brewer's sparrows select tall, dense sagebrush plants for nest sites to help conceal both the nest and the adults' activities near the nest site (Peterson and Best 1985). This species has widespread distribution across southern Idaho and could potentially occur on any land with relatively dense sagebrush cover. Brewer's sparrows were not observed during wildlife surveys for either alternative.

Short- and long-term impacts on sagebrush habitats would reduce the amount of available sagebrush habitat for the Brewer's sparrow. However, sufficient amounts of suitable sagebrush habitat would remain functional at both the local and range-wide scales to maintain the viability of these species. Any birds present within the immediate vicinity would be displaced temporarily during construction due to temporarily elevated construction noise and increased human presence. While some individual birds may be affected, the Project would not be expected to result in any measurable impact to these species. Impacts to the Brewer's sparrow associated with the construction and operation of the Project would be low.

Sage Sparrow (*Amphispiza belli*)

The sage sparrow is a BLM Type 3 special-status species that is a sagebrush habitat obligate. Sage sparrows typically nest in the canopy of the peripheral smaller branches of larger sagebrush plants (Reynolds 1981; Rich 1980). If large sagebrush plants are in short supply, such as after a range fire, sage sparrows nest on the ground under remnant short sagebrush (Winter and Best 1985). Sage sparrows are distributed throughout southern Idaho where relatively large patches of sagebrush habitats persist (Groves et al. 1997). Although sagebrush habitats within the project area contain suitable nesting and foraging habitat for sage sparrows, they were not documented during wildlife surveys.

Common Garter Snake (*Thamnophis sirtalis*)

The common garter snake is a BLM Type 3 special-status species. Garter snakes are found in a variety of habitats, but are most commonly associated with wetlands or moist sites, such as wet meadows, damp woodlands, streambanks, and the fringes of ponds and lakes. Although they prefer dense cattails, bulrush, and spikerush along pond margins that are near open hillsides where they can sun, feed, and find cover in rodent burrows, they are able to successfully use less optimal sites (Groves et al. 1997). This species primarily feeds on frogs, toads, salamanders, fish, and earthworms, but on rare occasions also eats slugs, leeches, small mammals, birds, and even insects (Groves et al. 1997).

Garter snakes occur throughout the Pocatello BLM Management Area in many habitats, including grasslands and wooded areas, but it prefers moist habitats (BLM 2006). BLM is concerned that this once-common species appears to be decreasing in abundance. Within the project area, wetlands and riparian habitats provide suitable habitat for garter snakes.

Previous surveys have not documented any garter snakes within 2 miles of the project area (IDFG 2011b), and none were observed during field surveys.

However, wetlands and riparian habitats within the project area (including either alternative) do provide potentially suitable habitat for garter snakes. Impacts on riparian and wetland habitats as a result of the Project would mostly be of short duration and would not result in any measurable impacts to potential habitat for the common garter snake. However, the Project would result in some long-term impacts to wetlands and riparian habitats, which would reduce the amount of potentially suitable habitat for the common garter snake. If any garter snakes were present during construction, they could be killed; however, this would not represent a significant threat to the species. While the Project might affect some individual garter snakes, it would not be expected

to result in significant impacts to the species, given the relative availability of high quality habitats present within the project area. Impacts to the common garter snake associated with the construction and operation of the Project would be low.

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Appendix H

Avian Collision Risk Assessment and Marking Plan

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Avian Collision Risk Assessment and Marking Plan

Introduction

High voltage transmission lines do not typically pose an electrocution risk to birds because the spacing between conductors is greater than the wingspan of birds in the project area (APLIC 2006 and USFWS 2005). BPA designs and constructs its transmission lines consistent with Avian Power Line Interaction Committee (APLIC) standards to avoid electrocution risks. However, the presence of transmission towers/poles, conductors, and most importantly overhead ground wires, can create collision hazards for flying birds, especially where the lines cross sensitive flyways or high use areas (APLIC 2012).

During consultation with representatives from Idaho Department of Fish and Game (IDFG), they discussed the potential need to identify movement/migration corridors for some species of raptors, sandhill crane, trumpeter swan, and other waterfowl/waterbird species whose movement or migration patterns could be affected by the proposed action, or who could be subject to increased risk of collisions with power line equipment as a result of the Project. To determine the areas of the Project with the greatest collision risk, an avian collision risk model was developed based on the methodology in “*A Landscape-Scale Model to Predict the Risk of Bird Collisions with Electric Power Transmission Lines in Alberta*” (Heck 2007). The model results determine areas of suitable bird habitat and areas with the highest risk of avian collision fatality.

Methodology

To analyze the potential for avian collisions with the proposed transmission line, an avian collision risk model was created based on a landscape-scale model developed by Nicole Heck (Heck 2007). This model relies on the following:

- identifying biological and environmental risk factors (such as land use, vegetation and topography, and line placement and configuration);
- identifying factors and constraints for potential collision risks; and
- conducting GIS modeling using a “knowledge-based” approach that relies on existing data regarding habitat suitability and risk factors.

This model was primarily developed to identify high-risk areas on existing transmission systems; however, the results can be extrapolated to make recommendations for the construction of new transmission lines. The model can be used to identify and subsequently avoid or mitigate potentially high-risk conditions and areas. Data identifying productive bird areas (Important Bird Areas [IBAs], Idaho bird watching sites, and important wetland habitat areas provided by U.S. Fish and Wildlife Service [USFWS] biologists), surveyed wetland and stream locations, National Wetland Inventory (NWI) maps, and topography were included as part of the model. In addition, one of the driving factors for collision risk was the number of overhead ground wires (because

they are less visible), which was also included in the model; however, because all of the proposed alternatives use the same number of overhead ground wires, this category did not differentiate risk between the alternatives. Seven categories of data were used in the model, as shown in Table 1.

Table 1. Collision Factors

Category	Description of Category	Criteria in Category
Productive Bird Area	These are areas where the largest concentration of waterfowl and water birds are expected to be found in the study area based on known data sets.	IBAs, SE Idaho Bird Watching Guide, Idaho Bird Trail
High Habitat Use Areas	Areas that would attract waterfowl and water birds but would not necessarily support large populations.	State and federal land ownership (Bureau of Land Management [BLM], USFWS, the U.S. Forest Service [USFS], Idaho state land), Idaho Foundation for Parks and Lands
Standing Water	These are areas where waterfowl and water birds would be expected to be found, but are not actually designated as productive bird areas.	Surveyed lakes, ponds, and non-riverine wetlands along the right-of-way (ROW) and access roads, waterbodies, NWI
Moving Water	These are areas where waterfowl and water birds may be found, but less likely than standing water areas and productive bird areas.	Perennial streams, rivers, perennial riverine wetlands
Topography	Areas with a slope greater than 10 percent relief were used as the cutoff for assigning a value.	Steep slopes (>10 percent)
Overhead Ground Wire (OHGW)	Because 90 percent of collisions occur on the OHGW (APLIC 2012), it is important to be able to identify their presence or absence.	Planned Transmission Line (BPA)

Sources of this data are shown in Table 2.

Table 2. GIS Data Used in the Model

Category	Layer	Source
Productive Bird Areas	Gravel Creek IBA (associated with Grays Lake National Wildlife Refuge)	USFWS 2011
Productive Bird Areas	Blackfoot Reservoir IBA	National Audubon Society 2011
Productive Bird Areas	Southeast Idaho Bird Watching Guide	Pioneer Country Travel Council of Southeastern Idaho 2013
Productive Bird Areas	Idaho Birding Trail	Idaho Fish and Game 2013a

Category	Layer	Source
High Habitat Use Areas	Land Ownership (BLM, USFWS, USFS, state land)	BPA
High Habitat Use Areas	Holdings	Idaho Foundation for Parks and Lands 2010
Standing Water	Surveyed and Assessed Wetlands (ROW and access roads)	Field Surveys and Photo Interpretation
Standing Water	National Wetland Inventory	USFWS NWI 2012
Standing Water	National Hydrography Dataset (NHD)	U.S. Geological Survey (USGS) NHD 2012
Moving Water	Streams	USGS NHD 2012
Topography	Steep Slopes (>10%)	USGS, Gesch, D.et al., 2002
OHGW	Planned Transmission Line	BPA

Model Creation

The datasets for the model were prepared by creating spatial proximity indices with a 10 meter resolution using the Euclidean Distance tool in the Spatial Analyst extension in ArcGIS 10.1. The spatial proximity indices were clipped to a 1.6 kilometer (1 mile) corridor centered on the proposed transmission centerline of each alternative because studies have indicated that power lines within 1 mile of suitable bird habitat could have a collision risk (Brown et al. 1987) and the model is not designed to produce meaningful results beyond this buffer. Each spatial proximity index was then reclassified into 200-meter-wide bands, numbered sequentially so that areas closest to a risk feature represented the highest risk, and areas farthest from a risk feature represented the lowest risk.

The resulting variables for the model are detailed in Table 3.

Table 3. Model Input Variables

Variable	Abbreviation	Source	Description
Distance to Productive Bird Area	d2_prod_ba	Multiple Sources	Euclidean distance to productive bird areas (IBA, Bird Watching Guide locations, Idaho Bird Trail locations)
Distance to High Habitat Use Areas	d2_high_hab	Multiple Sources	Euclidean distance to high habitat use areas (surveyed raptor nests, survey waterfowl/waterbird locations, state and federal land ownership [BLM, USFWS, USFS, Idaho state land], Idaho Foundation for Parks and Lands)
Distance to Standing Water	d2_h2o_std	Multiple Sources	Euclidean distance to standing water (surveyed wetlands along the ROW and access roads, waterbodies, Idaho NWI Wetlands)
Distance to Moving Water	d2_h2o_mov	Idaho Department of Water Resources	Euclidean distance to moving water

Variable	Abbreviation	Source	Description
Distance to Steep Slopes	d2_steeps	Derived from USGS 10m DEM	Euclidean distance to steep slopes (>10 percent)
Distance to Power Line with 0 Overhead Shield Wire (OHSW)	d2_ohsw_0	(not present in the study area)	Euclidean distance to power lines with no OHSW
Distance to Power Line with 1 OHSW	d2_ohsw_1	(not present in the study area)	Euclidean distance to power lines with one OHSW
Distance to Power Line with 2 OHSW	d2_ohsw_2	BPA	Euclidean distance to power lines with two OHSW

Final Model Creation

ArcGIS Raster Calculator was used to create the final model according to the formulae outlined in section 4.4.5 of Heck (2007). The five steps in this process were used to create the Final Collision Risk (Figure 1). All project alternatives were run at the same time to provide a result that was comparative across the alternatives, while still showing relative risk within each alternative.

Results

The results of the model indicate that there are a number of areas with high risk for avian collisions along all alternatives and options. Table 4 shows the results of the model for each alternative and option. The higher the risk class, the higher the collision risk relative to the routes analyzed.

Table 4. Model Risk Results

Risk Class	North Alternative	Long Valley Road Option	North Highland Option	South Alternative	Option 1	Option 2	Option 3	Option 3A	Option 4
0 - 0.20	6.01	6.01	6.01	2.52	2.63	2.52	5.02	6.31	4.04
0.20 - 0.35	5.35	9.17	5.25	7.23	8.06	7.24	7.00	6.43	8.03
0.35 - 0.46	8.67	7.88	8.35	8.29	8.01	8.32	5.78	6.46	6.52
0.46 - 0.62	7.20	5.05	7.60	2.55	2.31	2.25	3.59	2.15	2.75
0.62 - 0.81	5.90	5.78	5.90	1.90	2.05	2.02	2.59	2.56	1.89
	33.13	33.90	33.12	22.48	23.06	22.35	23.98	23.91	23.24

Many of these areas are associated with wetland and water features that provide productive bird habitat and the important flyways for swans and cranes from the nearby Grays Lake National Wildlife Refuge and Blackfoot Reservoir, as well as the Blackfoot River Wildlife Management Area (Blackfoot River WMA). Figure 1 shows the Final Collision Risk of all the alternatives and route options. Figures 2 through 10 show the Final Collision Risk by alternative or route option.

Discussion

During consultation with representatives from IDFG, they discussed the potential need to identify movement/migration corridors for some species of raptors, sandhill crane, trumpeter swan, and other waterfowl/waterbird species whose movement or migration patterns could be affected by the Project, or who could be subject to increased risk of collisions with power line equipment as a result of the Project. Results of the model indicate that areas where the proposed alternatives or options cross nearby the Blackfoot Reservoir, Grays Lake National Wildlife Refuge, and Blackfoot River WMA have the highest collision risk.

The Northern Alternative, Long Valley Road Option, and the North Highland Option (Figures 2 through 4) all cross nearby the Blackfoot Reservoir and the Grays Lake National Wildlife Refuge. These areas are IBAs and support crane, swan, and waterfowl populations (National Audubon Society 2011). In addition, topography suggests that these areas can be used as flyways. Grays Lake National Wildlife Refuge hosts a large nesting population of greater sandhill cranes with as many as 1,200 individuals counted in the valley during migration and staging times (USFWS 2011). In addition, the refuge hosts a population of trumpeter swans. The Blackfoot Reservoir provides habitat for nesting American white pelicans, double-crested cormorants, California gulls, and herons (National Audubon Society 2013).

The Southern Alternative and Options 1, 2, 3, and 4 (Figures 5 through 8 and 10) all cross near the Blackfoot River WMA, which is on the Idaho Birding Trail and provides habitat for a number of waterfowl and raptor species. Option 3A (Figure 9) crosses within the Blackfoot River WMA. Bald eagle and trumpeter swan are frequently seen in early spring and late fall; waterfowl including mallard, gadwall, northern pintail, American wigeon, Canada goose, and teal nest in the wildlife management area; and, courtship displays of several pairs of sandhill crane can be seen in the spring (IDFG 2013b). However, the potential collision risks of the South Alternative and route options are higher on C-TNF lands to the southwest of the Blackfoot River WMA than on the wildlife management area itself.

Overall, the North Alternative and its route options (Figures 2 through 4) have the most mileage through areas with the highest collision risk (see Table 4), all crossing through more than 5 miles of high collision risk areas. This is partly due to the longer length of these routes; however, it is also due to the presence of two IBAs and potential flyways. The South Alternative and its route options are shorter and only cross near one large area of particular concern, the Blackfoot River Narrows crossing, including areas of the northern portion of Dry Valley and southern portion of Rasmussen Valley. Of the South Alternative and its route options, Options 3 and 3A have the most miles of high collision risk, because they also cross the Blackfoot River near the Blackfoot Reservoir. Overall, it would be expected that the South Alternative (and its route options) would result in less avian collision risk than the North Alternative.

The presence of transmission towers/poles, conductors, and most importantly overhead ground wires can create collision hazards for flying birds, especially where the lines cross sensitive flyways or high use areas. Because the proposed structures are large and visible to birds, the structures themselves are unlikely to be a large collision risk (APLIC 2012); however, the wires could still pose a risk, in particular the overhead ground wires because they are the highest wire and are harder to see (APLIC 2012).

There are multiple factors that generally influence the risk of collision: the behavior of the species, such as flushing or aerial hunting; the avian species in question including the age and health of the individual; environmental factors such as weather and time of day; and, the configuration and placement of the transmission line itself (APLIC 2012 and USFWS 2005). Raptor collisions are infrequently reported because they are good fliers, have the ability to avoid obstacles, and they do not fly in large flocks; however, large, heavy-bodied birds such as waterfowl and cranes are much more susceptible (APLIC 2012). Therefore, the model is configured to consider waterfowl habitat (wetlands and streams), as opposed to proximity to raptor nests.

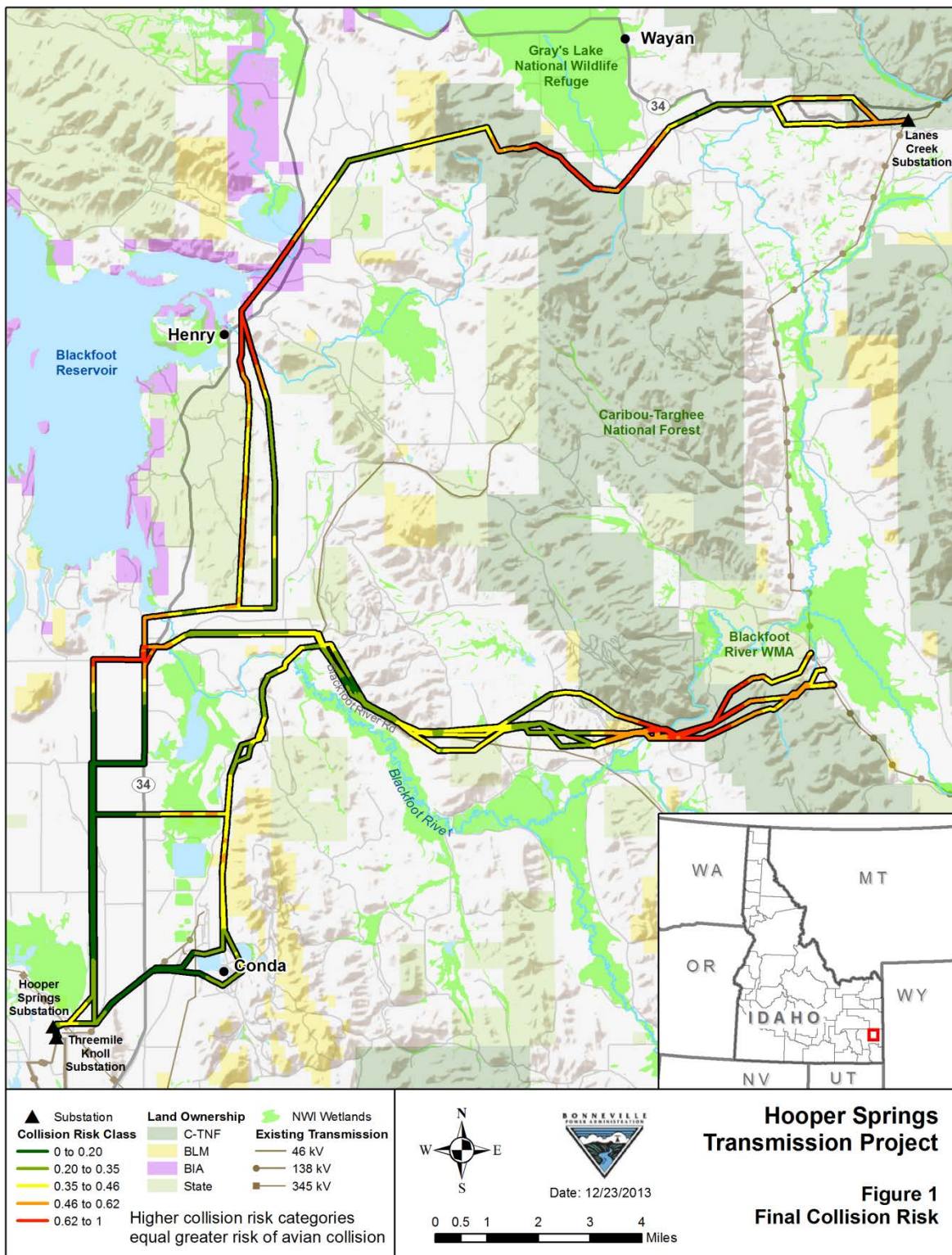
The results of this model assess the risks from the configuration and placement of the various alternatives and options of the proposed transmission line, relative to each other. The placement of the route in terms of proximity of the line to bird use areas, orientation of the line to bird use areas (parallel versus perpendicular), height of nearby vegetation, topography in the area, and placement of the line between foraging and resting or nesting areas all contribute to collision risk. The model is confined to areas within 1 mile of the transmission line routes, because studies have shown that transmission lines within this distance to bird use areas pose a collision risk (Brown 1987). Further, the model weights the distance from transmission lines to bird use areas (Table 2) because risk increases the closer the transmission line is to important habitat. The model also uses steep slopes (> 10 percent slope) to determine potential flight corridors.

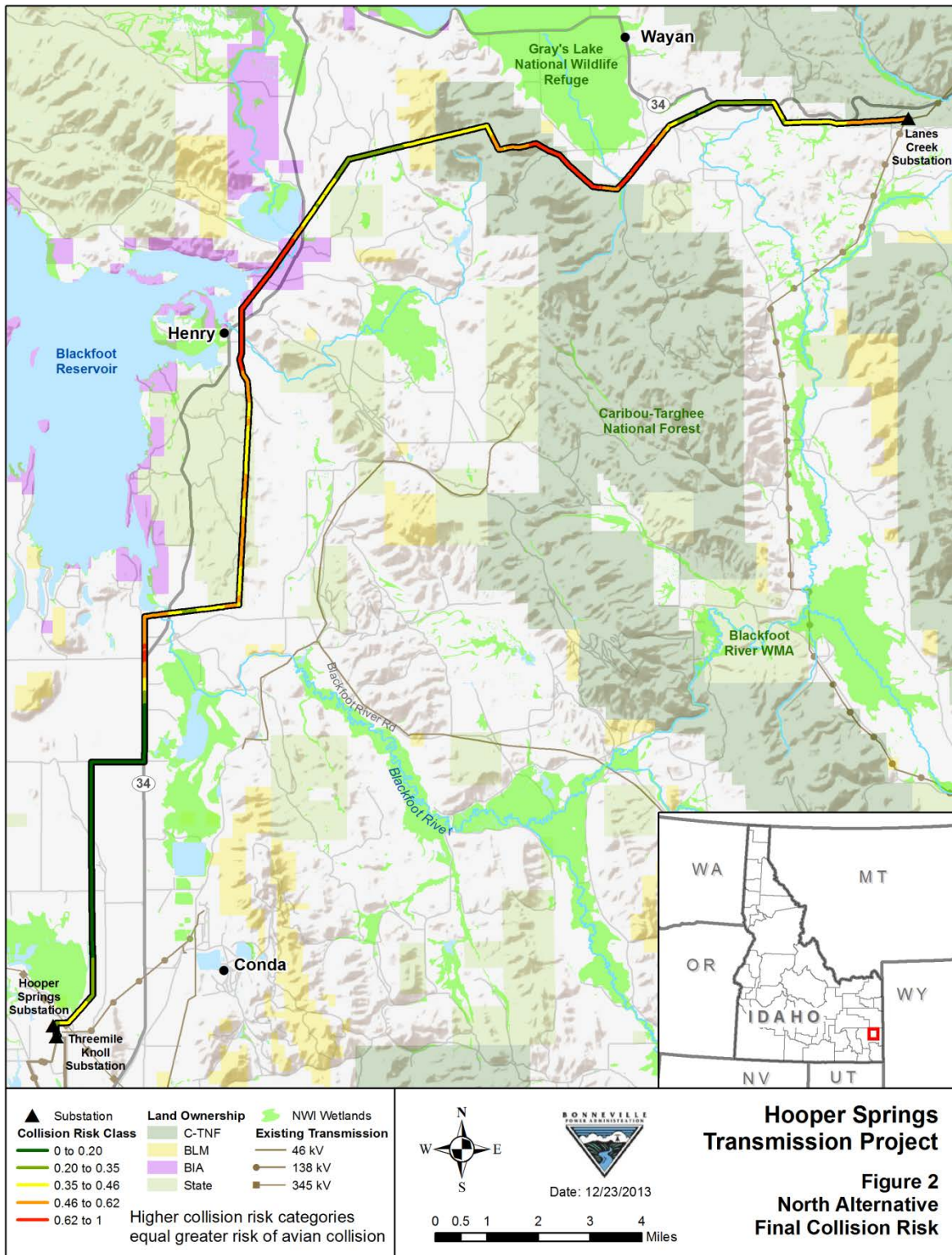
The model, does not, however, at this point consider the height of nearby vegetation, parallel versus perpendicular orientation, or if the line is placed between different habitat use areas (between foraging and nesting areas). Collision risk is reduced if transmission lines are situated at or below the height of nearby trees. These scenarios typically present a lower collision risk because birds fly over the trees, and therefore, over the lines. Although not officially included in the results of the model, both the project alternatives and route options have line portions that are perpendicular to suitable bird habitat (Figure 1), increasing collision risk in these areas. In addition, as discussed below, the portion of the North Alternative with one of the highest collision risks, the area to the southeast of Grays Lake National Wildlife Refuge bisects foraging and nesting habitat for sandhill cranes and other waterfowl that are susceptible to collision. This information further solidifies the model results as being accurate in terms of the areas of the Project with the highest risk.

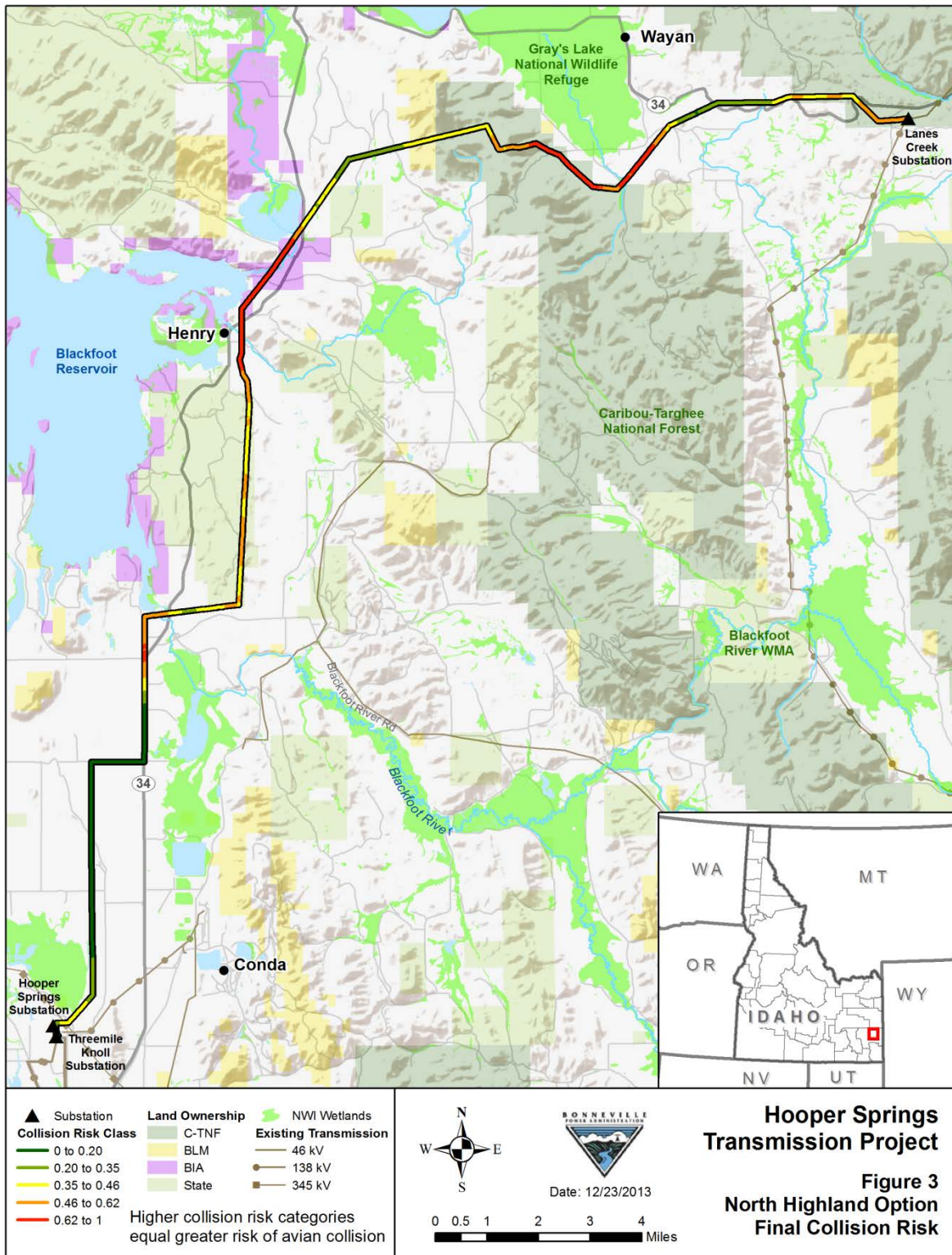
Several sources of data were used in the model to indicate both productive bird areas and high habitat use areas (see Table 1). Since the model, as developed by Heck (2007) relies mainly on existing data, it is, to some extent, only as accurate as the data input into the model. All available sources of data, based on the data type parameters set up in the 2007 model were used, including IBAs and Idaho bird watching guides; however, these data were supplemented with data captured during 2011 and 2013 field surveys. Upon reviewing initial results of the model, it was reviewed for any inaccuracy in the results. Sandhill cranes and other birds were observed during 2011 field studies using the Gravel Creek drainage wetlands near the proposed North Alternative, southwest of the Grays Lake National Wildlife Refuge. Although the initial data included in the model included the political boundaries of the IBAs, in the case Grays Lake National Wildlife Refuge, the productive bird habitat extends outside of the political boundary of the refuge. USFWS provided additional information on productive bird areas associated with the refuge, but outside the refuge boundaries (USFWS 2011). This area includes most of the Gravel

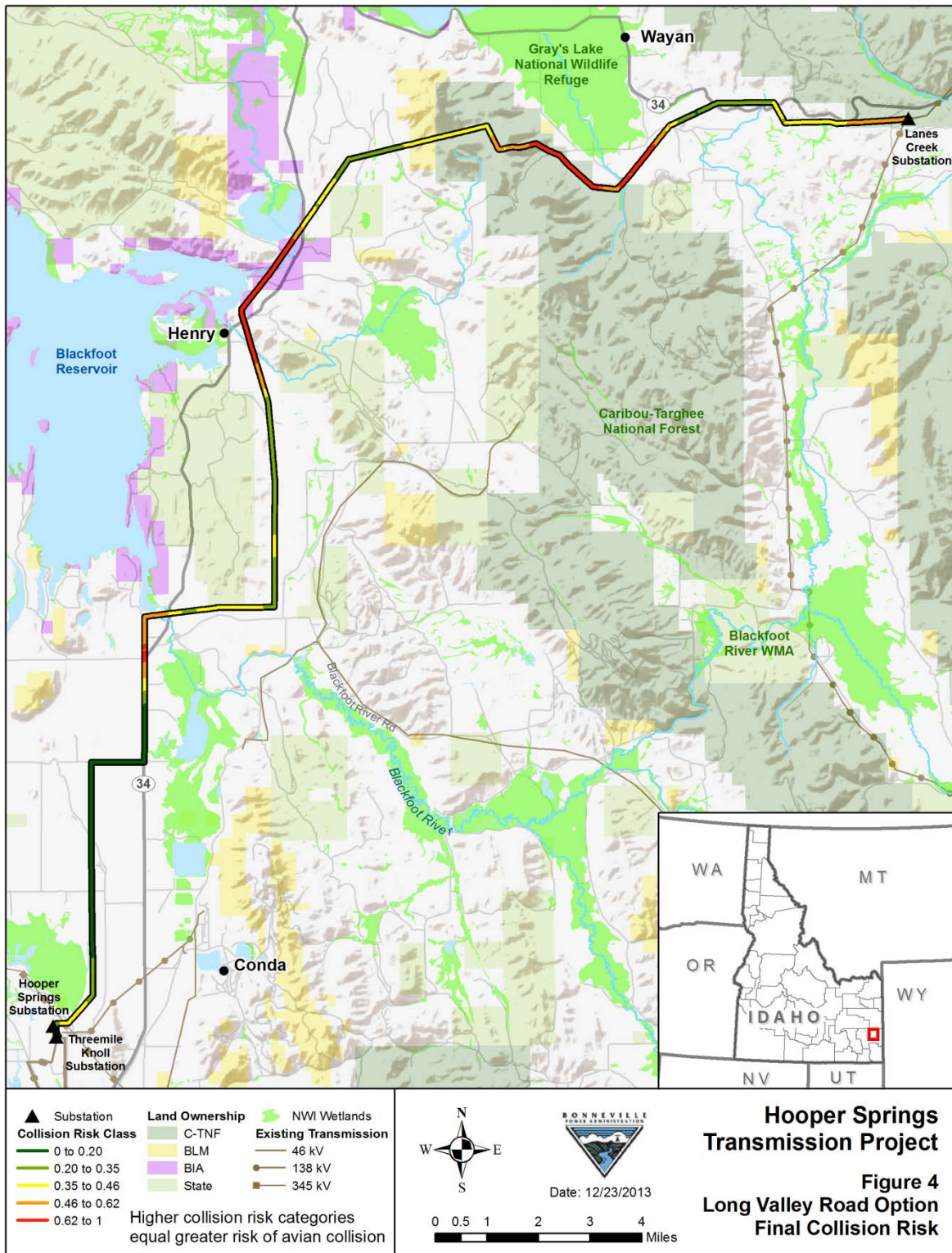
Creek drainage to the southeast of the refuge boundary, including areas in close proximity to the North Alternative corridor. This area does not provide reproductive habitat (unlike the refuge itself which provides extensive nesting habitat), but is an important foraging area. This information was incorporated into the model and the model was rerun. The results (Figures 1 through 4) indicate a more accurate risk in the area where the North Alternative crosses the Gravel Creek drainage.

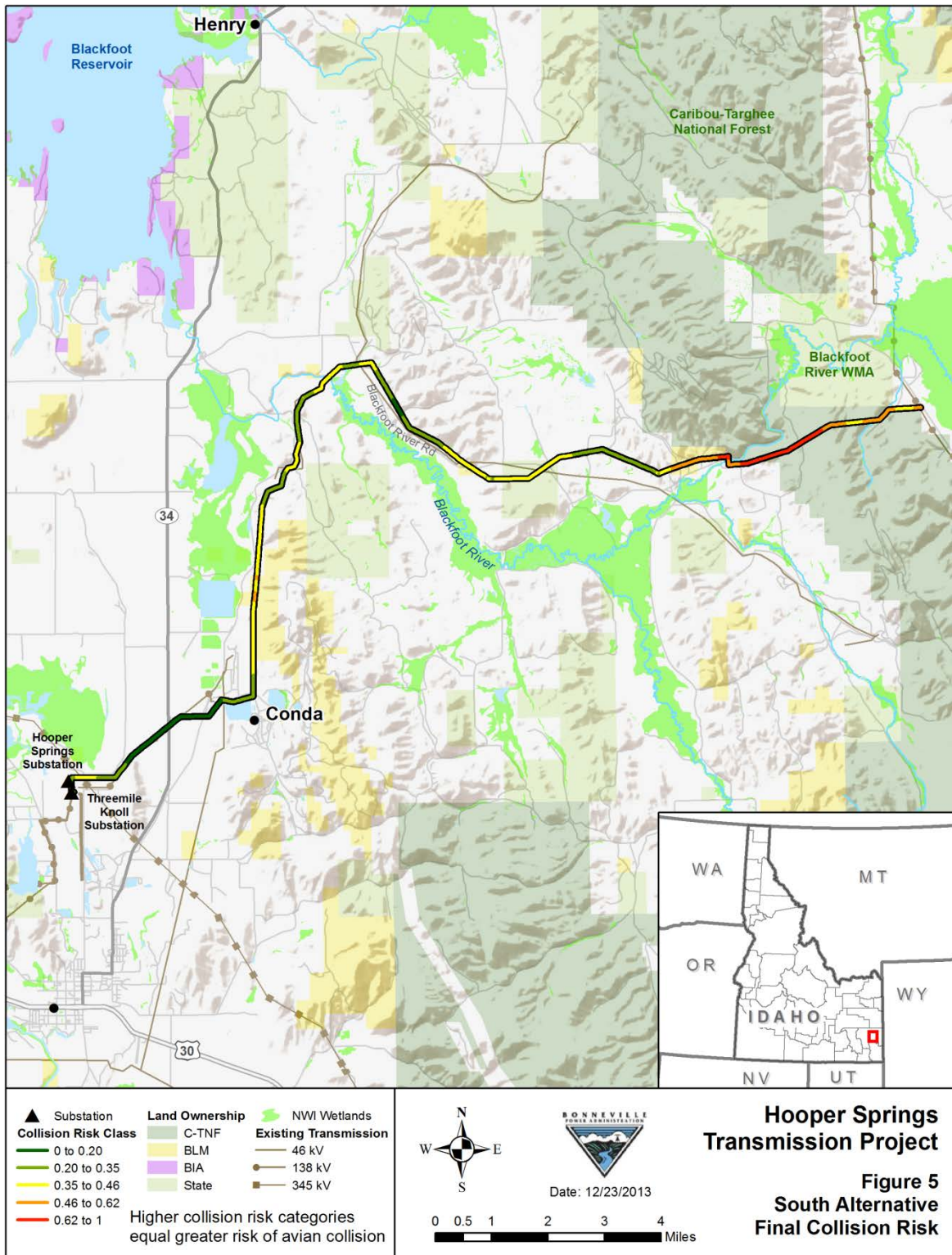
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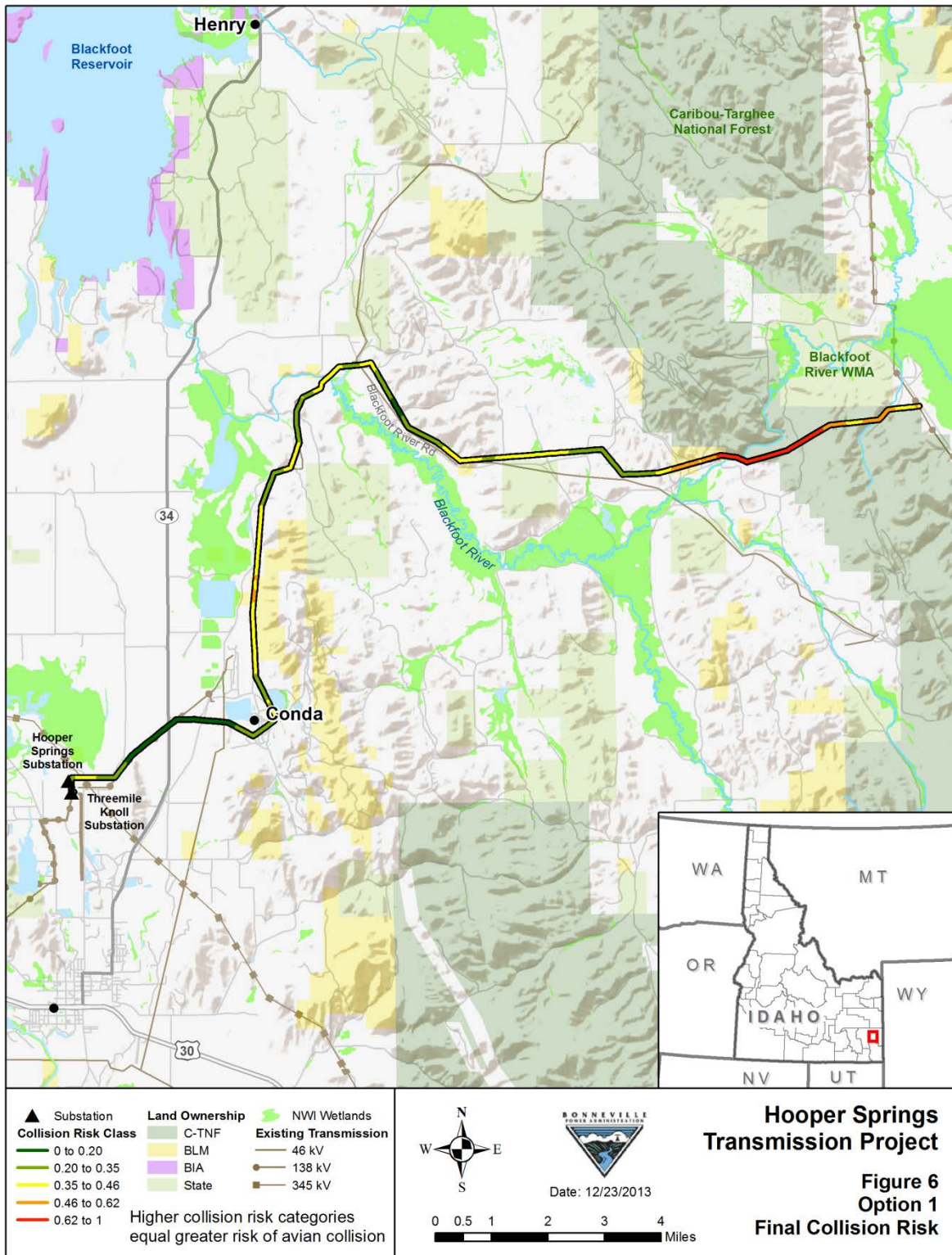


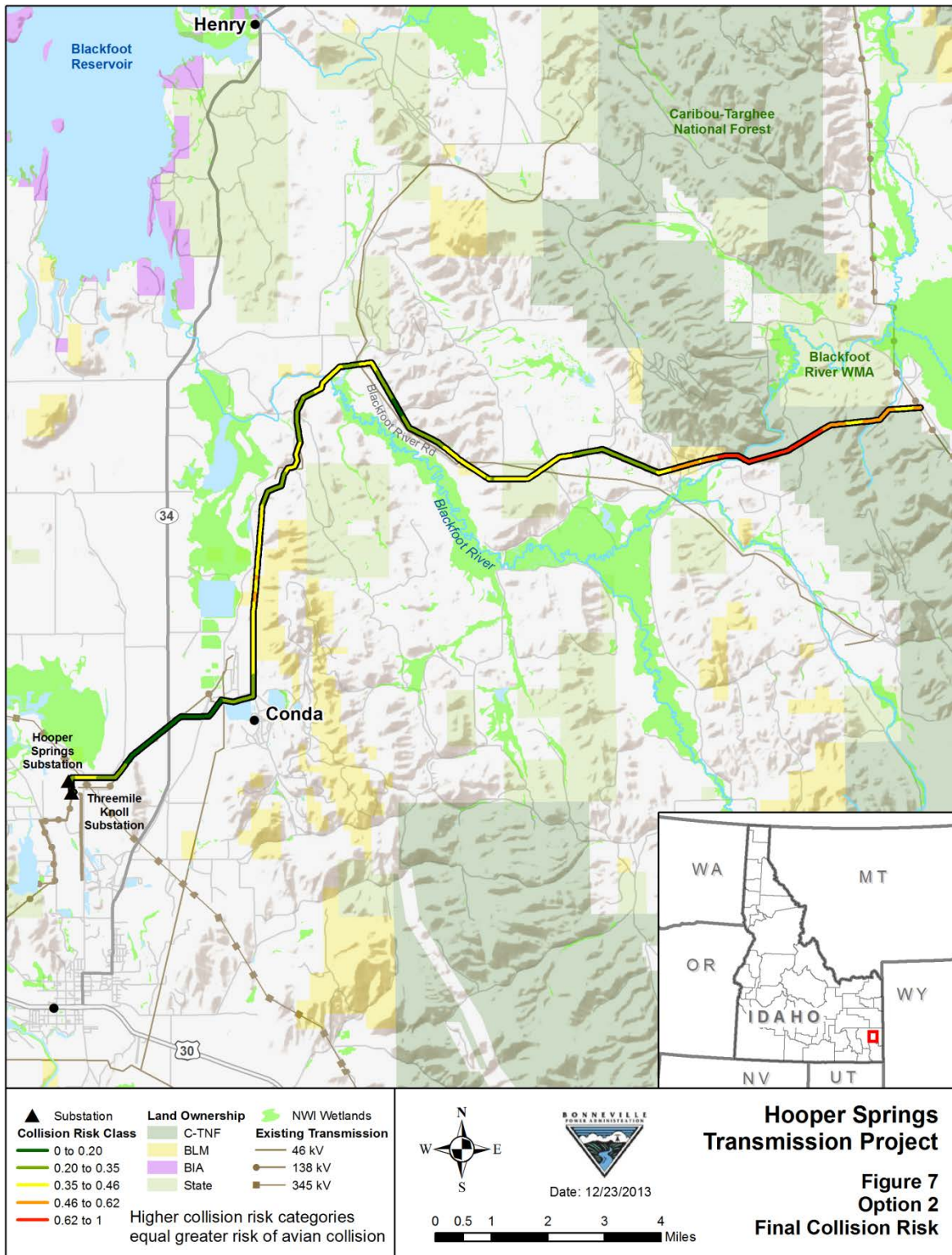


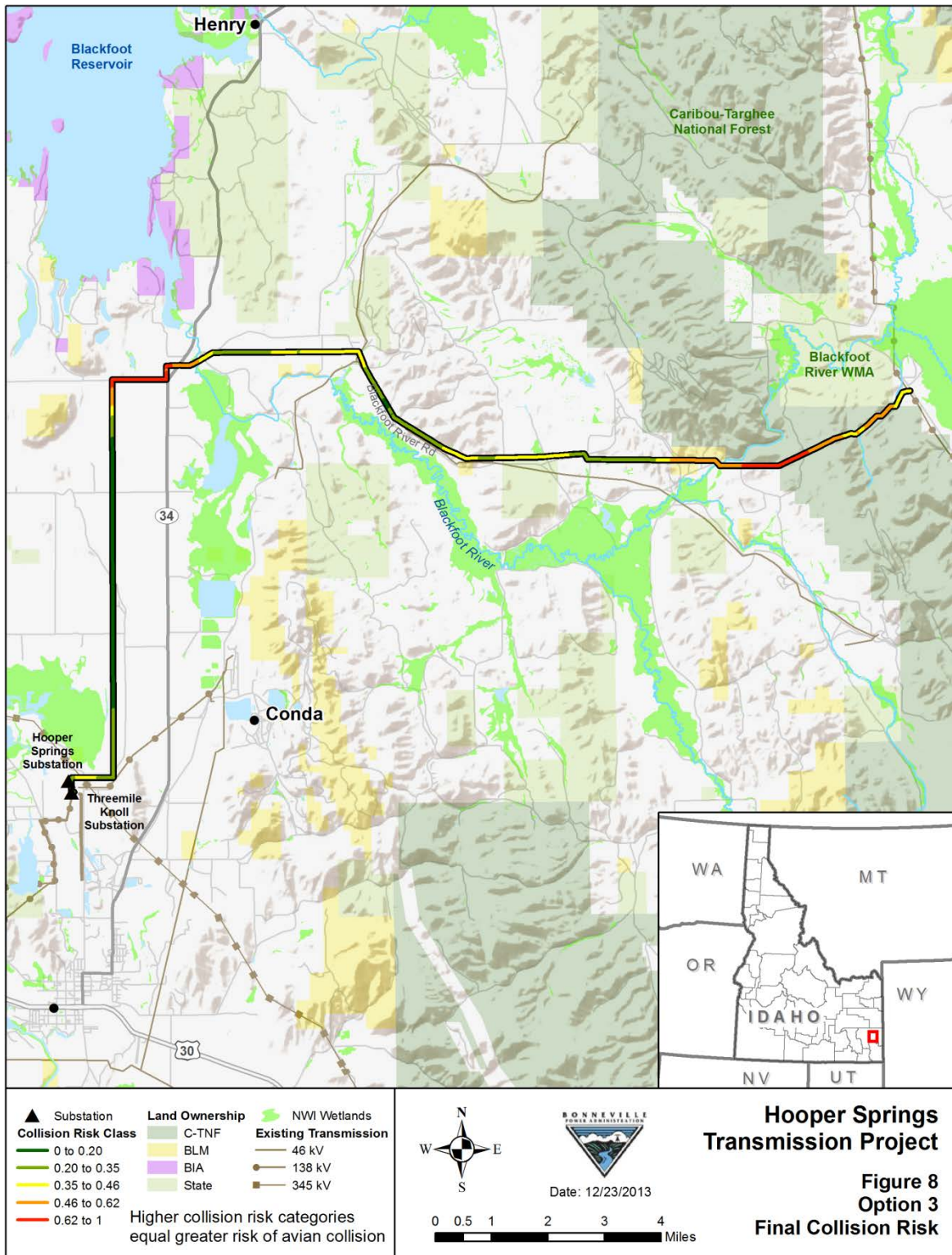


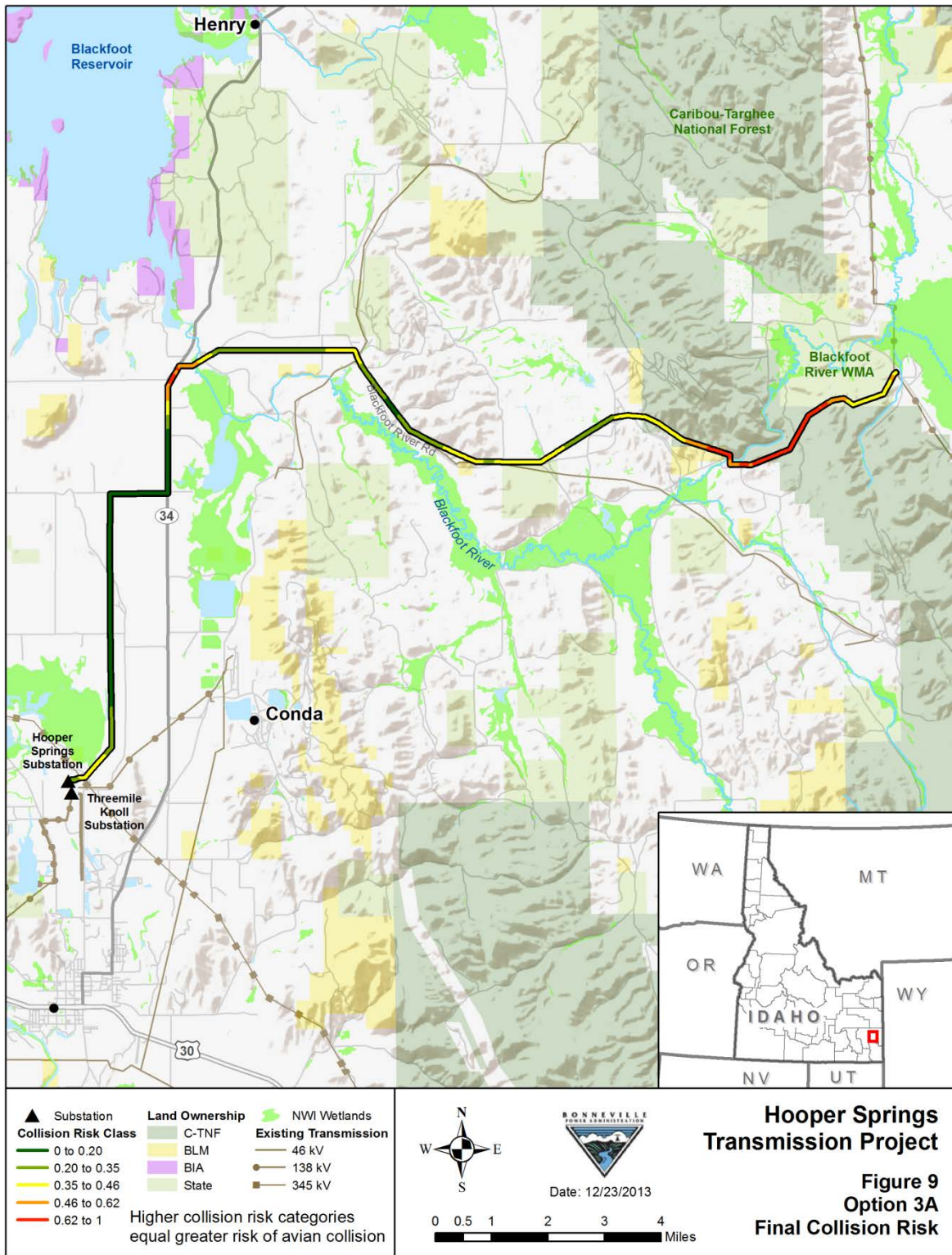


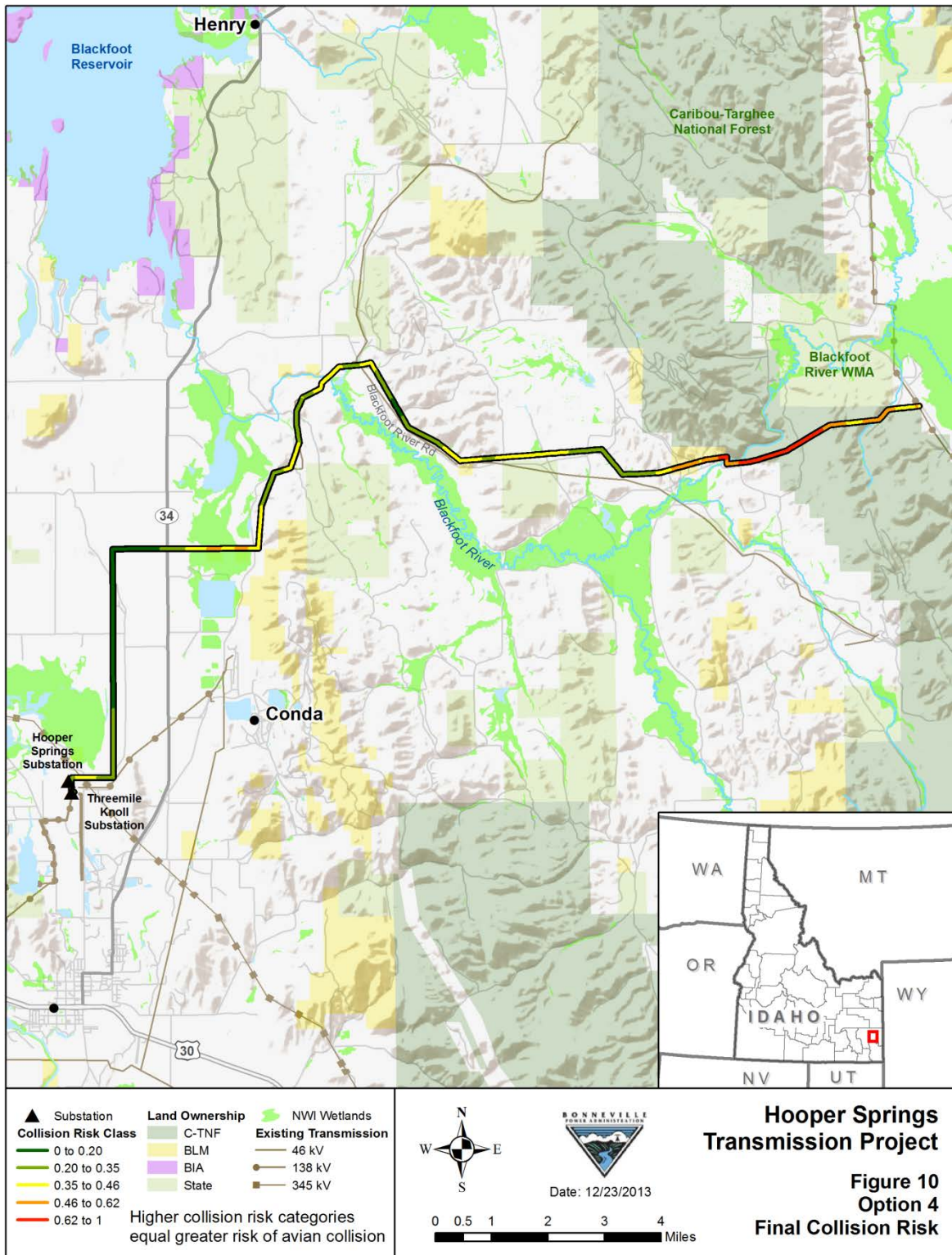












Marking Plan

The construction and operation of transmission lines can pose particular hazards to birds. Several laws apply to the protection of different bird species including the Bald and Golden Eagle Protection Act, Endangered Species Act, and Migratory Bird Treaty Act. Construction-related impacts to birds and proposed mitigation measures are discussed in Chapter 3.

Species found in Caribou County that are more susceptible to increased collision risk include pelicans, cranes and herons, hawks and eagles, and grouse (APLIC 2012). A number of these species are drawn to the area because of the Blackfoot River and Reservoir and the Grays Lake National Wildlife Area, among other features.

As described above, avian collision risk varies along each alternative and their route options. Transmission line alternatives and options have potentially high avian collision impacts in areas near the Blackfoot Reservoir, Grays Lake National Wildlife Refuge, and the Blackfoot River crossing at the Narrows in the northern part of Dry Valley (Figure 1). To minimize collision risk, BPA proposes to install line marking devices in the areas of highest collision risk. Most studies have shown a reduction in collisions and/or an increase in behavioral avoidance at marked lines when compared to unmarked lines, but this can vary with location, type of line marking device, and bird species (APLIC 2012). Overall, it is very difficult to determine just how effective any particular type of marking device would be in any given situation; however, Jenkins et al. (2010 in APLIC 2012) concluded that any sufficiently large line marking device that thickens the appearance of the line for at least 20 centimeters (7.8 inches) in length and is placed with at least 5 to 10 meters (16.4 to 32.8 feet) spacing is likely to lower collision rates by 50 to 80 percent.

As part of the proposed project, BPA would install bird flight diverters (BFD) (see figure 11), on overhead ground wires in areas the model identifies as having the highest risk (the risk category with the highest numbers shown in red in Figures 1 through 10), to reduce the risk of avian collisions. BFDs would be installed every 10 meters (30 feet) on the overhead ground wires. Since each transmission line has two parallel overhead ground wires, diverters would be offset on the two ground wires to take advantage of the visual cues they provide while limiting potential weight on the ground wires. In addition, BPA would conduct assessments of the towers ultimately installed to determine if perch deterrents are warranted to reduce avian interaction with the transmission line and perch hunting of upland birds like grouse by raptors and ravens.



Figure 11. Sample Bird Flight Diverter
(credit Sabre Industries Incorporated)

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Appendix I

**Electric Fields, Magnetic Fields,
Audible Noise, and Radio Noise**

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Acronyms and Abbreviations

AC	Alternating Current
ACGIH	American Conference of Governmental and Industrial Hygienists
AM	Amplitude Modulation
AN	Audible Noise
ANSI	American National Standards Institute
BPA	Bonneville Power Administration
dB(A) or dB(A)	decibels – A weighted
dB μ V/m	decibel relative to 1 microvolt per meter
ELF	Extremely Low Frequency
EMF	Electric and Magnetic Fields
EPA	Environmental Protection Agency
FCC	Federal Communications Commission
FM	Frequency Modulation
G	Gauss
Hz	Hertz (cycles per second)
ICES	International Committee on Electromagnetic Safety
ICNIRP	International Committee on Non-Ionization Radiation Protection
IEEE	Institute of Electrical and Electronics Engineers
kHz	kiloHertz
kV	kiloVolt
kV/m	kiloVolts per meter
LVE	Lower Valley Energy
m	Meter
mG	milliGauss
MHz	Megahertz
RF	Radio Frequency
RN	Radio Noise
ROW	Right-of-Way
USEPA	United States Environmental Protection Agency
V/m	Volts per meter
WHO	World Health Organization
μ V/m	microvolt per meter
μ T	microtesla

Limitations

At the request of the Bonneville Power Administration (BPA), Exponent conducted specific modeling and evaluations of components of the electrical environment of this project. This report summarizes work performed to date and presents the findings resulting from that work. In the analysis, we have relied on transmission line design geometry, usage, specifications, and various other types of information provided by BPA. We cannot verify the correctness of this input data, and rely on the client for the data's accuracy. Although Exponent has exercised usual and customary care in the conduct of this analysis, the responsibility for the design and operation of the project remains fully with the client.

The findings presented herein are made to a reasonable degree of engineering and scientific certainty. Exponent reserves the right to supplement this report and to expand or modify opinions based on review of additional material as it becomes available, through any additional work, or review of additional work performed by others.

The scope of services performed during this investigation may not adequately address the needs of other users of this report, and any re-use of this report or its findings, conclusions, or recommendations presented herein are at the sole risk of the user. The opinions and comments formulated during this assessment are based on observations and information available at the time of the investigation. No guarantee or warranty as to future life or performance of any reviewed condition is expressed or implied.

Executive Summary

The Bonneville Power Administration (BPA) has proposed the construction of a new transmission line in eastern Idaho to address reliability and stability concerns in the southern portion of Lower Valley Energy's (LVE) transmission system and to meet projected load demands in southeastern Idaho and the Jackson Hole region of Wyoming. The proposed project includes a 32-mile-long, single-circuit 115-kilovolt (kV) transmission line between the Hooper Springs Substation and the Lanes Creek Substation.

This report provides calculations of the electric and magnetic fields (EMF) as well as the audible noise (AN) and radio noise (RN) associated with the proposed 115-kV transmission line between Hooper Springs Substation and Lane Creek Substation in Caribou County, Idaho. The calculated values of these parameters are compared to national and international standards and guidelines to assess project-related changes to EMF, AN, and RN levels.

Two types of structures are proposed to support the transmission line on different portions of the route: a steel monopole covering the first approximately 10.8 miles of the line and an H-frame wood structure on the remaining approximately 21.2 miles of the line. The calculated levels of EMF, AN, and RN are quite low at the edge of the right-of-way (ROW) compared to national and international standards and guidelines (ICES, 2002; ICNIRP, 2010), and there is only one residence within 300 feet of the edge of the ROW.

Along the section of the route where H-frame structures are proposed, the highest calculated electric field is 1.50 kilovolts per meter (kV/m) under the line and drops to 0.43 kV/m at the edge of the ROW. The highest calculated magnetic-field on the ROW in this section under the line at average loading is 113.5 milligauss (mG) and at peak loading is 231.8 mG. At the edge of the ROW these magnetic field levels are calculated to decrease to 22.7 mG under average loading and to 46.3 mG under peak loading, respectively.

On the section of the proposed route where the steel monopole structures are proposed, the highest calculated electric field is 1.54 kV/m under the line and drops to 0.31 kV/m or lower at the edge of the ROW. The highest calculated magnetic-field value at average line loading in

this section is 75.3 mG and at peak loading is 153.8 mG. These magnetic-field levels are calculated to decrease at the edge of the ROW to below 20.2 mG at average loading and to 41.3 mG or lower at peak loading, respectively.

Short-term responses to the electric and magnetic fields of the proposed transmission line related to nuisance shocks from induced currents and voltages may be possible. These responses are well understood and are likely to be rare due to the low levels of electric fields from the proposed line. If such a problem is noted and action is necessary, these effects can be effectively mitigated.

The highest levels of corona-generated AN and RN will occur in foul weather and are calculated to be similar for both the H-frame and steel monopole sections of the proposed route. The highest calculated AN on the route is 31 decibels on the A-weighted scale (dBA) or less and occurs under the line. At the edge of the ROW, the highest calculated level of AN is 26 dBA. At a distance of 100 feet from the outermost conductor, the highest calculated level of RN is 33 dB above 1 microvolt per meter (dB μ V/m). These calculated AN and RN levels are far below the Environmental Protection Agency's (EPA) and Institute of Electrical and Electronics Engineers' (IEEE) guidelines, respectively (USEPA, 1974; IEEE, 1971). Under fair weather conditions the levels of both AN and RN would be much lower than for foul weather conditions discussed above.

1. Introduction

The Bonneville Power Administration (BPA) has proposed the construction of a new transmission line in eastern Idaho to address reliability and stability concerns in the southern portion of Lower Valley Energy's (LVE) transmission system and to meet projected load demands in southeastern Idaho and the Jackson Hole region of Wyoming. The proposed project includes a 32-mile-long, single-circuit 115-kilovolt (kV) transmission line between the Hooper Springs Substation and the Lanes Creek Substation.

The proposed route of the 115-kV transmission line begins at the Hooper Springs Substation, runs northeast for about 1 mile, north for another 5 miles, then north-northeast for an additional 10 miles to a point along the eastern side of the Blackfoot Reservoir near Henry, Idaho. From Henry, the line continues in a northeasterly direction for about 8 miles to a point 1 mile west of Wayan, Idaho. From Wayan, the line continues east for about another 8 miles to the LVE's Lane Creek Substation.

An alternative route for the 115-kV transmission line called the Long Valley Road option is also under consideration. This alternative route generally parallels Long Valley Road, but deviates from the proposed route at transmission line mile 11 and rejoins the proposed route at transmission line mile 17 (approximately 6.8 miles). This route would increase the length of the transmission line by approximately 0.6 miles and traverse agricultural and grazing lands.

The proposed 115-kV transmission line would be built on two different support structures over separate portions of the route. A system diagram describing these separate portions of the route is shown in Figure 1 (Appendix A).

The two different support structures are either a single steel monopole structure or an H-frame wood pole structure. Steel monopoles are proposed in certain agricultural areas to minimize impacts to crop cultivation activities, since they have a smaller footprint than H-frame structures.

- **Steel Monopoles** would be used in the first portion of the route¹ (approximately 10.8 miles). The steel monopoles would be between 40 and 48 inches in diameter at the base and range from 70 to 105 feet tall with an average height of 100 feet.
- **H-frame** wood structures would be used in the second portion of the transmission line route (approximately 21.2 miles). Each leg of the wood H-frame structures would be approximately 20 inches in diameter at the base and range from 55 to 105 feet tall with an average height of 70 feet.

Typical steel monopole and H-frame structures are shown in Figure 2 (Appendix A). Both configurations would be strung with ACSR/TW 795 kcmil (0.951" diameter) Toutle conductors and 3/8" EHS shield wire and have a minimum midspan conductor height of 24.5 feet. A summary of both transmission line configurations is shown in Table 1 (Appendix B).

¹ The Long Valley Road Option would also be built on steel monopole structures.

2. Scientific Background

2.1 Electric and Magnetic Fields

Electric and magnetic fields (EMF) are produced by any source that generates, transmits, or uses electricity. Electricity travels as current from distant generating sources on high-voltage transmission lines, to substations, then on to local distribution lines, and finally to our homes and workplaces for consumption. All things connected to our electrical system—power lines; wiring in our homes, businesses, and schools; and all electric appliances and machines—are a source of EMF. In North America, the vast majority of electricity is transmitted as alternating current (AC) at a frequency of 60 cycles per second measured in Hertz (Hz), i.e., 60 Hz. The EMF from these AC sources is commonly referred to as power-frequency or extremely low frequency (ELF) EMF.

Electric fields and magnetic fields are properties of the space near all electrical sources. Electric fields exert a force on electrically charged objects while magnetic fields exert a force on moving electrical charges. Although commonly referred to together as EMF, they each have different properties.

2.1.1 Electric Fields: Basic Concepts

Electric fields are produced by voltage applied to electrical conductors and equipment. The electric field is expressed in measurement units of volts per meter (V/m) or kilovolts per meter (kV/m); 1 kV/m is equal to 1,000 V/m. The electric-field level increases as the voltage increases. Electric fields are present even when an appliance is turned off if it is still connected to the power source.

Since conducting objects such as buildings, fences, and trees easily block electric fields, the major sources of exposure to electric fields indoors are appliances, equipment, and machines within homes, office, and factories. Transmission lines, distribution lines, and other power-related infrastructure are the major source of electric fields outdoors.

Transmission line electric fields emanate radially outward from the charged conductor and terminate at any other conducting object such as trees, fences, vehicles, people, or transmission line towers. Electric fields are vector quantities meaning that they have both a magnitude and direction.

2.1.2 Magnetic Fields: Basic Concepts

Magnetic fields are the result of the flow of electric currents through wires and electrical devices. The strength of a magnetic field is expressed as magnetic flux density in units called gauss (G), or in mG, where $1 \text{ G} = 1,000 \text{ mG}$.² In general, the strength of a magnetic field increases as the current increases, but at any point also depends on characteristics of the source, including the arrangement of and separation of the conductors. Unlike electric fields, magnetic fields are not easily blocked by conducting objects. In addition, a time-varying magnetic field (such as is used in power transmission systems) induces an electric field and currents in nearby conducting objects. Like electric fields, magnetic fields are vector quantities described by both their magnitude and direction.

The intensity of both electric fields and magnetic fields diminishes with increasing distance from the source. In the case of transmission lines, electric and magnetic fields generally decrease with distance from the conductors in proportion to the square of the distance. Since line voltage is quite stable and does not change very much over time, electric-field levels are also stable. Magnetic-field levels, however, can vary depending on load conditions (i.e., the currents flowing in a conductor).

2.2 Corona

The presence of electrical charge on the surface of any conducting surface at a voltage potential produces an electric field. When the electric field at a localized portion of the conductor surface, such as at an irregularity, exceeds the breakdown field of air a tiny amount of energy is released in the form of conductor vibration, light, AN, and RN in a process known as corona.

² Scientists also refer to magnetic flux density at these levels in units of microtesla (μT). Magnetic flux density in milligauss (mG) units can be converted to μT by dividing by 10, i.e., $1 \text{ mG} = 0.1 \mu\text{T}$.

Corona is more often considered on conductors held at a voltage of 345 kV or higher, but may also be present under certain conditions for conductors held at lower voltages.

2.2.1 Corona: Basic concepts

The presence and prevalence of corona are affected by a number of factors such as line voltage, conductor size, conductor material, conductor geometry, and the presence of an irregularity on the surface of the conductor such as a nick or foreign particle. In addition, environmental factors such as air pressure (altitude), presence of water vapor (humidity and precipitation), and presence of incident photoionization also affect corona. Corona can occur in different forms, which depend on the magnitude and polarity of the applied voltage. For instance, negative corona (when the polarity of the conductor during a voltage cycle is negative) includes Trichel pulses, pulseless glow and negative streamers while positive corona (when the polarity of the conductor during a voltage cycle is positive) includes onset pulses, Hermstein's glow, and positive streamers each of which has different characteristics.³ For AC transmission lines such as those considered here both positive and negative corona may be present.

2.2.2 Corona properties

Transmission lines are designed to be free of corona under ideal conditions because the smooth conductor surface will not result in localized electric-field gradients sufficient to lead to the breakdown of air and thus corona. Consequently, corona from AC transmission lines is less frequent and severe during fair-weather conditions than when the conductor surface is covered in water droplets (i.e., during foul weather precipitation). Even in fair weather, however, there are a variety of factors that can contribute to the generation of corona. For instance, nicks and cuts or other imperfections of a conductor surface results in corona. These imperfections are often removed naturally over time due to corona itself since the ionization resulting from corona at these imperfections results in ion bombardment and heating at the site, which tends to dull the jagged edges responsible for the corona in the first place. A more common cause of corona under typical fair-weather conditions is the presence of airborne substances such as dust, leaf

³ For a more in-depth discussion the reader is referred to Corona Phenomena on AC Transmission Lines (Comber et al., 1982).

particles, bird droppings, insects, spider webs, and the oil coating of a new transmission line conductor. In a similar fashion to the removal of conductor imperfections, the corona itself serves to reduce or remove these contaminants. The corona occurrence rate will therefore decrease over time and fair-weather corona will be rare after roughly 1 year of conductor “weathering” (Comber et al., 1982).

As mentioned above, AC transmission line corona is typically a foul-weather phenomenon because the rain drops (or other forms of precipitation) themselves form the protrusions which result in high electric-field gradients and thus corona. The difference in corona rate between fair weather and foul weather is marked enough that corona-related effects such as AN and RN are typically 10 times more intense during foul weather conditions as discussed in more detail below.

2.3 Audible noise

AN is a direct result of corona on the AC transmission line as discussed above. The frequency spectrum of AN for an AC transmission line is primarily broad-band with some discrete pure tones at multiples of the power frequency. AN is thus typically characterized as a hissing, crackling sound that may be accompanied by a 120-Hz hum.

2.3.1 Audible noise: Basic concepts

The sound level from AN is a measure of the pressure of a sound wave which characterizes the ‘loudness’ or ‘volume’ of a particular sound. AN is measured in decibels (dB) referenced to 20 micropascals, which is approximately the pressure threshold of human hearing at 1 kilohertz (kHz). The range of audible frequencies for the human ear is approximately 20 Hz to 20 kHz with a significant difference in hearing sensitivity as a function of frequency and a peak in the sensitivity at about 1-4 kHz. This change in sensitivity of the human ear with frequency is reflected in measurements by weighting the contribution of sound at different frequencies so that sound at frequencies where the ear is less sensitive (20 Hz or 20 kHz) is given much less weight than at frequencies near 1-4 kHz, where the ear is most sensitive. The weighting of

sound over the frequency spectrum to account for the sensitivity of the human ear is called the A-weighted sound level (ANSI S1.4, 1971).

When the A-weighting scale is applied to a sound-pressure measurement, the level is often reported as dBA or dB(A), referenced on a logarithmic scale to the audible pressure threshold of 20 micropascals. The logarithmic scale is important in order to express the ability to hear very quiet sounds as well as very loud sounds. For example the threshold of pain is approximately 128 dBA which represents a sound pressure level (i.e., magnitude of a sound wave) which is more than 2.5 million times higher than the hearing threshold (0 dB). The sound level of typical human speech is approximately 60 dBA, and background levels of noise in rural and urban environments are about 30 to 40 dBA. Specific identifiable noises such as birdcalls, neighborhood activity, and traffic can produce AN levels of 50 to 75 dBA Table 2 (Appendix B) lists the sound intensities of common acoustic sources.

2.4 Radio noise

Overhead transmission lines can generate RN in the bands used for the reception of radio signals. Two potential mechanisms for RN are gap discharges and corona. Corona activity, described above as a source of AN, also induces impulsive currents along a transmission line. These induced currents result in broad-band radiofrequency (RF) “noise” fields that can affect RF signal reception.

2.4.1 Radio noise: Basic concepts

Gap discharges are an intermittent phenomenon that are more common in distribution lines and low-voltage transmission lines. Electrical discharges on these lines can occur where small gaps develop between metallic line hardware, such as insulators, clamps, or brackets. Discharge across these gaps can cause incidental interference to radio communication services, in which event the sources of gap-type interference can be located and repaired. Gap discharges occur less frequently on high-voltage transmission lines, and the proposed line would be constructed with modern hardware that is designed to eliminate gap-type interference.

As in the case with AN, the magnitude of the RN is an important factor in determining the potential for interference. In many cases, however, the characteristics of the RF signal are just as important. In particular, the frequency of the RF signal is of primary importance because the magnitude of RN from a transmission line decreases rapidly with increasing frequency. For instance, the power level of typical corona-generated RN at a distance of 50 feet from the outermost phase conductor and at a frequency of 1 megahertz (MHz) is approximately 50 times higher than at a frequency of 10 MHz and more than 200 times higher than at a frequency of 100 MHz (Comber and Nigbor, 1982).

Therefore, while RN from a transmission line may exist at any frequency between 1 MHz and 1,000 MHz, it more strongly affects devices operating at lower frequencies. For example, RN can produce interference with an amplitude-modulated (AM) signal such as a commercial AM radio audio signal (520-1,720 kHz), but frequency modulated (FM) radio stations (approximately 88-108 MHz) are generally not affected by RN from a transmission line because their frequency of operation is much higher than the frequencies where transmission line corona produces its greatest levels of RN and their mode of operation involves frequency modulation instead of amplitude modulation. In the past, RN was also a concern for the video portion of analog television signals, since it also uses amplitude modulation; however, this is no longer a concern in the United States because commercial broadcast television stations have switched to digital broadcasting and no longer transmit older analog amplitude-modulated video signals.

3. Calculation Methods

3.1 Transmission line electric fields

The most important parameters for determining the electric fields associated with a transmission line are the voltage of the conductors, their height above ground, and the number of conductors used for each phase. The current or load carried on the transmission line does not directly affect the electric field.⁴

Electric-field levels based upon the configurations detailed above were calculated using computer algorithms previously developed by the BPA (BPA 1991) and are based upon fundamental laws of physics. These algorithms have been shown to accurately predict EMF levels measured near power lines. The electric fields were calculated as the resultant of x, y, and z field vectors at a height of 1 meter (m) (3.28 feet) above ground along a transect perpendicular to midspan, in accordance with IEEE Std. C95.3.1-2010 and are expressed in units of kV/m.

3.2 Calculated electric fields

A simplifying assumption in making these calculations is that the conductors of the transmission line are parallel to a flat earth and are infinite in extent. Such an assumption does not reduce the accuracy of the model, but instead ascribes the calculated field levels to a particular location corresponding to a specific conductor height above ground. Choosing this conductor height is therefore an important parameter in the modeling process. Electric-field calculations are performed at the point where the conductors are closest to the ground (a midspan ground clearance of 24.5 feet). A conservative overvoltage condition of 10% was used for calculating the electric fields, AN, and RN from the 115-kV transmission line. Lower levels would result if a lower overvoltage condition, such as 5%, were to be used. These modeling assumptions are made to ensure that the calculated values represent the maximum expected electric field at 1 m (3.28 feet) above ground.

⁴ In contrast, the current or load of the transmission line is a parameter of critical importance for determining the magnetic fields associated with the transmission line as described below.

The results of the electric field calculations are shown in Table 3 (Appendix B) including the maximum electric field on the ROW, as well as at both ROW edges and at 100 feet beyond the edge of the ROW. Along the portion of the route where H-frame structures are used, the highest calculated electric-field level is 1.50 kV/m and drops to 0.43 kV/m at the edge of the ROW. Along the portion of the route where the steel monopole structures are used, the highest calculated electric-field level is 1.54 kV/m which decreases to 0.31 kV/m or less at the edge of the ROW. Figure 3 and Figure 4 (Appendix A) show the electric-field profile as a function of distance from the center of the transmission line ROW.

In practice, the electric-field level at 1 m (3.28 feet) above ground along the entire route will be similar to or lower than the calculated levels. For instance, in a gully under the conductors or at points closer to the structures the height of the conductors above ground increases thereby decreasing the electric field at ground level.

3.3 Transmission line magnetic fields

Like electric fields, magnetic fields depend on the conductor height above ground, however, the most important parameter for determining the magnetic-field level is the transmission line loading (or current), and the relative location of each conductor phase, i.e., the phasing of the circuit. In addition, unlike electric fields, magnetic fields are not blocked by most ordinary materials such as fences or walls.

As with electric fields, the magnetic-field levels were calculated using computer algorithms previously developed by the BPA (BPA 1991). The magnetic fields were calculated as the resultant of x, y, and z field vectors at a height of 1 m (3.28 feet) above ground along a transect perpendicular to midspan, in accordance with IEEE Std. C95.3.1-2010 and are expressed as magnetic flux density in units of milligauss (mG).

3.4 Calculated magnetic fields

Similar to the electric-field calculations, these magnetic-field calculations are made assuming that the conductors of the transmission line are parallel to a flat earth, infinite in extent, and are located at a minimum midspan ground clearance height. These modeling assumptions are made

to ensure that the calculated values represent the maximum expected magnetic field at 1 m (3.28 feet) above ground for a given load.

The results of the magnetic field analysis for average loading are shown in Table 4 (Appendix B) including the maximum magnetic-field level on the ROW as well as at both ROW edges and at 100 feet beyond the edge of the ROW. Along the portion of the route where H-frame structures are used the highest calculated magnetic-field level is 113.5 mG and drops to 22.7 mG at the edge of the ROW. Along the portion of the route where the steel monopole structures are used, the highest calculated magnetic-field level is 75.3 mG which decreases to 20.2 mG or lower at the edge of the ROW. Figure 5 and Figure 6 (Appendix A) show the magnetic-field profile as a function of distance from the center of the transmission line ROW.

It is also important to remember that because electric current is the primary factor that determines the magnitude of magnetic fields around transmission-line conductors, those measurements or calculations of the magnetic-field levels present only a “snapshot” of the magnetic field at only one moment in time determined by the prevailing load conditions. On a given day, throughout a week, or over the course of months and years, the magnetic field can change depending upon the patterns of power demand on the bulk transmission system. For this reason, magnetic fields are calculated both for average load and peak load. Average load is likely to result in the best estimate of the magnetic-field level on any randomly-selected day of the year, and while the peak load (as shown in Table 4, Appendix B) is likely to occur only for a few hours or a few days each year, it represents the maximum expected magnetic field associated with the normal operation of the transmission line.

3.5 Transmission line audible noise

Corona-generated AN varies in time due to variations in the environment as described above. In order to account for fluctuating sound levels, statistical descriptors are used to describe environmental noise. Exceedance levels (L levels) refer to the A-weighted sound level that is exceeded for a specified percentage of the time. Thus, the L_5 level refers to the sound level that is exceeded only 5% of the time. L_{50} refers to the sound level exceeded 50% of the time.

Sound-level measurements in this report are expressed in the L_{50} level (median level) in foul-weather conditions.

As discussed above in reference to corona, the altitude of a particular line is a very important parameter in determining the average level of AN. The average altitude along the proposed route is approximately 6,450 feet above sea-level with a peak height of approximately 7,450 feet. The decreased density of air at this altitude results in increased AN levels compared to an identical configuration constructed at sea-level.

3.6 Calculated audible noise

The calculation of AN levels is carried out assuming foul weather conditions, an altitude of 7,450 feet, a 10% overvoltage condition on the transmission lines, and a measurement height of 5 feet above ground. The combination of these assumptions in the calculation describes an upper-bound for the AN levels that may be encountered along the proposed route. This upper-bound would occur, for example, only at the midspan location between a few towers at the highest portion of the proposed route during foul weather. The AN in all other locations (e.g., away from midspan and at lower altitudes) and in fair weather are expected to be far lower than the calculated values reported below.

The results of the AN analysis shown in

Table 5 (Appendix B) include the maximum AN on the ROW as well as at both ROW edges and at 100 feet beyond the edge of the ROW. Along the portion of the route where H-frame structures are used, the highest median (L_{50}) calculated level of AN on the ROW is 31 dBA near the centerline of the ROW and decreases to 26 dBA at the edge of the ROW. Along the portion of the route where the steel monopole structures are used, the highest calculated level of AN is 28 dBA near the centerline of the ROW and decreases to 24 dBA or lower at the edge of the ROW. Figure 7 and Figure 8 (Appendix A) show the AN profile as a function of distance from the center of the transmission line ROW.

The above calculations are made assuming foul-weather conditions, however, based upon hourly precipitation records from Soda Springs, Idaho during 2008 to 2010 (NOAA, 2012), foul

weather occurred less than 1% of the time in area of the proposed route. During fair weather conditions the AN values are estimated to be 25 dBA lower and will be imperceptible under most conditions.⁵

3.7 Transmission line radio noise

RN levels in this report are expressed as dB above 1 microvolt per meter (dB μ V/m) to describe the electric-field intensity incident upon a reference antenna at 500 kHz as recommended by the IEEE (IEEE, 1971). Weather has a large influence on corona-generated RN, as it does for AN. As with AN, corona-generated RN also varies in time. In order to account for fluctuating noise levels, statistical descriptors are used to describe RN. RN levels in this report are expressed as 50% exceedance values (median or L₅₀ values) during foul weather conditions. RN, like AN, is also more pronounced at higher altitudes.

The RN levels from a transmission line may also be affected by the configuration of the transmission line. At a frequency of 1 MHz for instance, the line geometry plays an important role in the magnitude of RN out to a distance of approximately 50 feet (15 m). Between approximately 130 and 200 feet (40-60 m), the rate at which the RN decreases with distance is affected by the height of the particular transmission line conductor closest to that point, and beyond approximately 200 feet (60 m) the rate of RN decay is relatively independent of transmission line geometry (Comber and Nigbor, 1982).

RN also theoretically can be a source of interference for other communications systems and other sensitive receivers, but RN levels are typically low and effects are typically rare.

3.8 Calculated radio noise

The calculation of RN levels is carried out under the same assumptions as AN; assuming foul weather conditions, an altitude of 7,450 feet, and a 10% overvoltage condition on the transmission lines. In contrast to AN calculations, however, RN calculations are carried out at a height of 1 m (3.28 feet) above ground. The combination of these assumptions in the

⁵ At locations where the foul-weather AN level is below 25 dBA, the fair-weather AN level will be below the threshold of human hearing.

calculation describes an upper-bound for the RN levels which may be encountered along the proposed route. The RN in all other locations (e.g., away from midspan and at lower altitudes) are expected to be similar or lower than the calculated values.

Calculations of RN as a function of distance from the centerline of the transmission line for the H-frame and steel monopole configurations are shown in Figure 9 and Figure 10 (Appendix A), respectively. In addition, the results of the RN analysis at selected locations are shown in Table 6 (Appendix B). These locations include the maximum RN level on the ROW as well as the RN level at both ROW edges and at 100 feet beyond the outermost conductor. Along the portion of the route where H-frame structures are used, the highest median (L_{50}) calculated level of RN is 61 dB μ V/m which decreases to 32 dB μ V/m at a distance of 100 feet from the outermost conductor. Along the portion of the route where the steel monopole structures are used, the calculated level of RN along the ROW is 33 dB μ V/m at a distance of 100 feet from the outermost conductor.

The above calculations are made assuming foul-weather conditions, however, based upon hourly precipitation records from Soda Springs, Idaho during 2008-2010 (NOAA, 2012) foul weather occurred less than 1% of the time in the area of the proposed route. During fair weather conditions, the RN values are estimated to be 16-22 dB μ V/m lower and will likely be imperceptible away from the line.

4. Electric and Magnetic Fields Environment

4.1 Sources and exposure

Electricity plays such an integral role in modern society that we are surrounded by EMF whether at home, at school, or at work. Exposure levels, however, are difficult to calculate. The locations where one spends time regularly influences exposure levels so that no one case can be seen as representative, and while spot exposure to high field levels can be measured accurately, this type of measurement does not take into account a person's overall average exposure over time. General exposure levels can be determined though, which allow scientists to approximate typical background EMF levels.

Figure 11 (Appendix A) illustrates ambient background levels of EMF and common exposure potentials measured in residential and occupational environments, compared to levels measured on or at the edge of typical transmission-line ROW. While EMF levels decrease with distance from the source, any home, school, or office will have an ambient background level that is not attributable to a specific source as a result of the combined effect of the numerous EMF sources.

The World Health Organization (WHO) found that AC magnetic-field exposure in the home does not vary greatly throughout the developed world. In general, the background AC magnetic-field level as estimated from the average of measurements throughout a house away from appliances is typically between 1 to 2 mG, while levels can be hundreds of mG in close proximity to appliances. Background levels of AC electric fields range from 0.01-0.02 kV/m, while appliances produce levels up to several tens of kV/m (NIEHS, 2002; WHO, 2007).

Experimental research has yet to determine an aspect of ELF EMF exposure that may be relevant to biological systems. In health research, the current metric for EMF exposure is long-term, average personal exposure, which is the average of all exposures to the varied electrical sources encountered by an individual going about his or her daily routines. As mentioned, this exposure is difficult to approximate. Exposure assessment in health-related research is a major source of uncertainty in studies of ELF EMF (WHO, 2007). There are some basic conclusions about typical exposure that have resulted from research on the characterization of exposure.

- *Personal magnetic-field exposure:*
 - The vast majority of persons in the United States have a time-weighted average (TWA) exposure to magnetic fields less than 2 mG (Zaffanella and Kalton, 1998).⁶
 - In general, personal magnetic-field exposure is greatest at work and when traveling (Zaffanella and Kalton, 1998).
- *Residential magnetic-field exposure:*
 - The highest magnetic-field levels are typically found directly next to appliances (Zaffanella, 1993). For example, Gauger (1985) reported the maximum AC magnetic field at 3 centimeters from a sampling of appliances as 3,000 mG (can opener), 2,000 mG (hair dryer), 5 mG (oven), and 0.7 mG (refrigerator).
 - The following parameters affect the distribution of personal magnetic-field exposures at home: residence type, residence size, type of water line, and proximity to overhead power lines. Persons living in small homes, apartments, homes with metallic piping, and homes close to three-phase electric power distribution and transmission lines tended to have higher at-home magnetic-field levels (Zaffanella and Kalton, 1998).
 - Residential magnetic-field levels are caused by currents from nearby transmission and distribution systems, pipes or other conductive paths, and electrical appliances (Zaffanella, 1993).

⁶ TWA is the average exposure over a given specified time period (i.e., an 8-hour workday or a 24-hour day) of a person's exposure to a chemical or physical agent. The average is determined by sampling the exposure of interest throughout the time period.

- *Workplace magnetic-field exposure*
 - Some occupations (e.g., electric utility workers, sewing machine operators, telecommunication workers, etc.) have higher exposures due to work near equipment with high EMF levels.⁷
- *Power-line magnetic-field exposure*
 - The EMF levels associated with power lines vary substantially depending on their configuration, current load, and other factors. At a distance of 300 feet and during average electricity demand, however, the magnetic field levels from many lines are often similar to the background levels found in most homes (see also Figure 11, Appendix A).

4.2 Acute short-term effects

There is a greater opportunity for long-term exposure to magnetic fields since electric fields are blocked by common objects. For this reason, among others, research on long-term health effects has focused on magnetic fields rather than electric fields.

Like virtually any exposure, adverse effects can be expected from exposure to very high levels of ELF EMF. If the current density or electric field induced by a very, very strong magnetic field exceeds a certain threshold, excitation of muscles and nerves is possible. Also, strong electric fields can produce charges on the surface of the body that can lead to small shocks, i.e., micro shocks, when touching grounded objects. The effects caused by strong magnetic and electric fields are acute, shock-like effects that cause no long-term damage or health consequences. Limits for the general public and workplace have been set to prevent these effects, but there are no real-life situations where these levels are exceeded on a regular basis, a fact that has been supported by a recent body of literature that investigated specialized occupations where workers are more likely to have the potential of high exposure levels, discussed below (Contessa et al., 2010; Korpinen et al., 2011a, 2011b, 2012; Ubeda et al., 2011).

The recent literature includes a number of studies of workers with the potential for high field exposures that characterize occupational exposure and evaluate compliance with standards. They include a study of spot measurements of EMF during work tasks at 110-kV switching and

⁷ http://www.niehs.nih.gov/health/assets/docs_p_z/emf-02.pdf

transforming stations in Finland to evaluate compliance with ICNIRP reference levels (Korpinen et al., 2011a) and a study of occupational electric field exposure at the same 110-kV switching station that evaluated compliance with the European Union's Directive 2004/40/EC (Korpinen et al., 2012); spot measurements and personal monitoring of magnetic fields in hospital personnel in Spain (Ubeda et al., 2011); spot measurements and personal monitoring of magnetic fields in railway workers in Italy (Contessa et al., 2010); and a study of electric fields, current densities, and contact currents at a 400-kV substation in Finland (Korpinen et al., 2011b). In general, the measured magnetic fields were below the reference values of ICNIRP in these studies. Some electric-field levels exceeded reference levels within the substations (Korpinen et al., 2011a, 2011b), but the induced current density in the central nervous system did not exceed the basic restriction value.

The guidelines to protect against these acute short-term effects are discussed in the following section.

5. Standards and Guidelines

5.1 Electric and magnetic fields

There are currently no health-based standards in the United States at either the federal or state level that apply to EMF from transmission lines or other sources at power frequencies. Some states, such as New York and Florida, have enacted statutory limits on electric or magnetic field levels, or both, at transmission line ROWs (Table 7, Appendix B). The approach of both Florida and New York is one of “prudent avoidance.” These limits, therefore, were designed to apply only to future transmission line facilities in order to maintain the status quo for power line infrastructure throughout the state. They are not health-based standards. Other states have enacted limits for electric fields either on the ROW or at the edge of the ROW to prevent acute effects or in some cases states have limited electric field strength at road crossings to prevent electric shock hazard from electric current induced into metal trucks or buses. Finally, Connecticut and California have established EMF policy guidelines that require no cost or low cost measures to minimize magnetic fields from transmission lines.

Two international scientific organizations, ICNIRP and the ICES, have published guidelines for limiting public exposure to ELF EMF to protect against the acute short-term effects discussed in Section 7.3 (ICES, 2002; ICNIRP, 2010). These guidelines were developed following a weight-of-evidence review of the literature, including epidemiologic and experimental evidence related to both short-term and long-term exposure. Both reviews concluded that the stimulation of nerves and the central nervous system could occur at very high exposure levels immediately upon exposure, but that the research did not suggest any long-term health effects.

To prevent such acute, shock-like effects, ICNIRP recommends screening values for magnetic fields of 2,000 mG for the general public and 4,200 mG for workers (ICNIRP, 2010). The ICES recommends a maximum permissible magnetic-field exposure of 9,040 mG for the general public (ICES, 2002). For reference, in a survey by Zaffanella and Kalton (1998), only about 1.6% of the general public experienced exposure to magnetic fields of at least 1,000 mG during a 24-hour period.

The ICNIRP screening value for exposure to 60-Hz electric fields for the general public is 4.2 kV/m and the ICES screening value is 5 kV/m. Both organizations allow higher exposures if it can be demonstrated that exposures do not produce electric fields within tissues that exceed basic restrictions on internal electric fields. Several other organizations have also published guidelines to prevent short-term effects (Table 8, Appendix B).

As can be seen by comparing the results of the current EMF analysis discussed above and summarized in Table 3 and Table 4 (Appendix B) as well as in Figure 3, Figure 4, Figure 5, and Figure 6 (Appendix A), the calculated electric and magnetic fields due to the proposed Hooper Springs transmission line are much lower than any state or international reference level.

5.2 Audible Noise

The AN from transmission lines is compared to the Environmental Protection Agency's (EPA) guideline value of 55 dBA for the annual average day-night level (L_{dn}) in outdoor areas (USEPA, 1978). In computing this value, a 10 dB correction (penalty) is added to night-time noise between the hours of 10 p.m. and 7 a.m. Table 9 (Appendix B) describes the method by which L_{dn} values are derived from L_{50} values. AN is typically a foul weather phenomenon and therefore the occurrence rate of foul weather significantly affects the day-night sound level (L_{dn}). In addition, the sensitivity to AN is affected by ambient noise conditions. Thus, the same level of AN from a transmission line is perceived differently in quiet conditions (little ambient noise) compared to typical conditions (40 dBA of ambient noise). L_{dn} is calculated from L_{50} values by taking account of the occurrence rate of foul weather and the ambient noise level.

Using an estimated 1% foul weather occurrence rate and no ambient noise (a conservative but unrealistic condition), the correction factor listed in Table 9 (Appendix B) is -12 dBA and the L_{dn} at the edge of the ROW is 14 dBA and 12 dBA for the H-frame and steel monopole portions of the route, respectively. This level is well below the EPA's guideline level of 55 dB even accounting for the 10 dBA penalty imposed during night time.

Along the proposed route there is only one residence within 300 feet of the edge of the ROW. Even during foul weather the AN from the proposed transmission lines would be below 26 dBA

and would be comparable to the noise level in a typical bedroom as shown in Table 2 (Appendix B).

5.3 Radio Noise

Idaho has not enacted a limit for RN. Likewise, the Federal Communication Commission (FCC) Rules and Regulations (2008) contain no guideline regarding the RN levels near high-voltage transmission lines. Power transmission lines fall into the FCC category of “incidental radiator,” which is defined as “a device that generates radio frequency energy during the course of its operation although the device is not intentionally designed to generate or emit radio frequency energy.” Operation of an incidental radiator “is subject to the conditions that no harmful interference is caused and that interference must be accepted that may be caused by the operation of an authorized radio station, by another intentional or unintentional radiator, by industrial, scientific and medical equipment, or by an incidental radiator.” Section 15.1(m) of the FCC regulations defines “harmful interference” as “any emission, radiation or induction that endangers the functioning of a radio navigation service or of other safety services or seriously degrades, obstructs or repeatedly interrupts a radio communications service operating in accordance with this Chapter.”

Historically, transmission-line operators have not had difficulty in operating under the present FCC rules, since most sources of “harmful interference” from power lines in fair weather are due to gap-type discharges that can be identified and repaired (USDOE, 1980). Amplitude-modulated radio reception at residences very near transmission lines, however, may be affected by corona-type RN in foul-weather. For this reason, the IEEE Radio Noise Design Guide (IEEE, 1971) identifies an acceptable level of average fair-weather RN of 40 dB μ V/m at 100 feet (30 meters) from the outside conductor. As shown in Table 6 (Appendix B), even in foul weather the RN values 100 feet from the outer conductor in the proposed configurations are substantially below this recommended level and under fair weather conditions would be 16 to 22 dB μ V/m lower than the foul-weather levels.

6. Summary

This report has assessed the electric and magnetic field levels as well as the AN and RN associated with the proposed 115-kV transmission line between the Hooper Springs Substation and Lane Creek Substation in Caribou County, Idaho. These calculations have been made using well-known techniques, which have been found to match well with measurements and are accepted within the scientific and engineering community.

There are two distinct structures proposed to support the transmission line on different portions of the route: an H-frame wood structure and a steel monopole. The Long Valley Road option, though located approximately 0.4 miles to the east of the proposed route, would also be constructed on the same steel monopole structures and resulting calculations of EMF, AN, and RN are the same. The calculated levels of EMF, AN, and RN are quite low at the edge of the ROW compared to national and international standards and guidelines (ICES, 2002; ICNIRP 2010) and there is only one residence within 300 feet.

Along the section of the route where H-frame structures are proposed, the highest calculated electric field is 1.50 kV/m under the line and drops to 0.43 kV/m at the edge of the ROW. The highest calculated magnetic field on the ROW in this section under the line at average loading is 113.5 mG and at peak loading is 231.8 mG. At the edge of the ROW these magnetic-field levels are calculated to decrease to 22.7 mG under average loading and to 46.3 mG under peak loading, respectively.

On the section of the proposed route where the steel monopole structures are proposed, the highest calculated electric field is 1.54 kV/m under the line and drops to 0.31 kV/m or lower at the edge of the ROW. The highest calculated magnetic-field value at average line loading in this section is under the line is 75.3 mG and at peak loading is 153.8 mG. These magnetic-field levels are calculated to decrease at the edge of the ROW to below 20.2 mG at average loading and to 41.3 mG or lower at peak loading, respectively.

Short-term responses to the electric and magnetic fields of the proposed transmission line related to nuisance shocks from induced currents and voltages may be possible. These

responses are well understood and are likely to be rare due to the low levels of electric fields from the proposed line. If such a problem is noted and action is necessary these effects can be effectively mitigated. The highest levels of corona-generated AN and RN will occur in foul weather and are calculated to be similar for both the H-frame and steel monopole sections of the proposed route. The highest calculated AN on the route is 31 dBA or less and occurs under the line. At the edge of the ROW the highest calculated level of AN is 26 dBA. At a distance of 100 feet from the outermost conductor, the highest calculated level of RN is 33 dB μ V/m. These calculated AN and RN levels are far below the EPA and IEEE guidelines, respectively (USEPA 1974; IEEE 1971). Under fair weather conditions the levels of both AN and RN would be much lower than for foul weather conditions discussed above.

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Appendix A

Figures

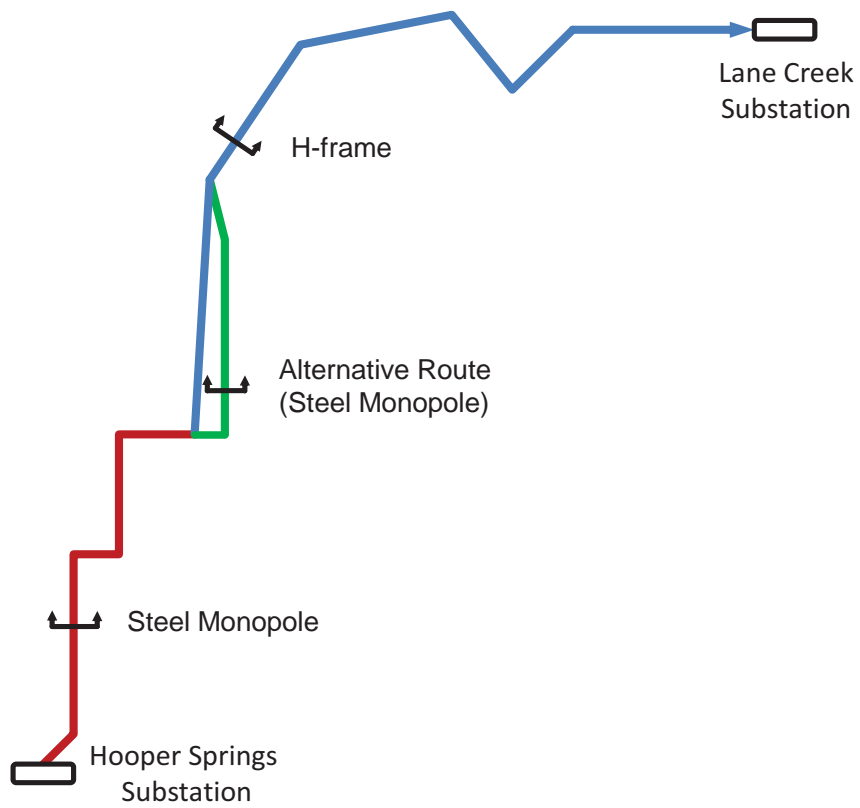


Figure 1. System diagram of proposed transmission line route

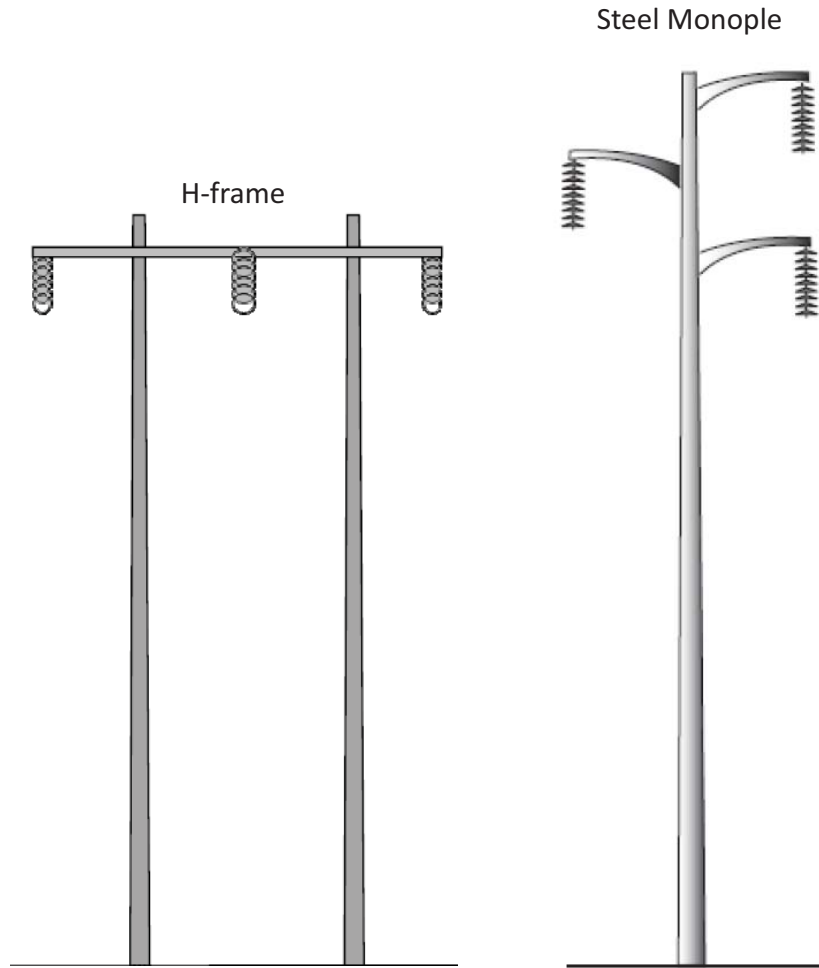


Figure 2. Transmission line structures used in the two portions of the proposed route

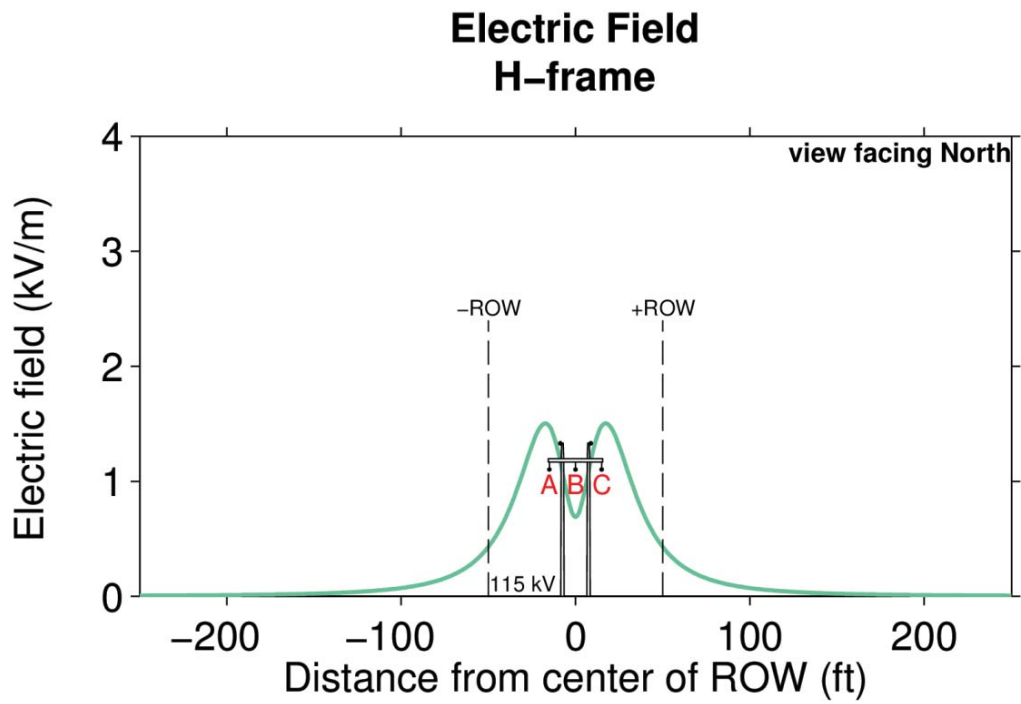


Figure 3. Calculated electric field for the H-frame tower configuration

Electric Field Steel Monopole

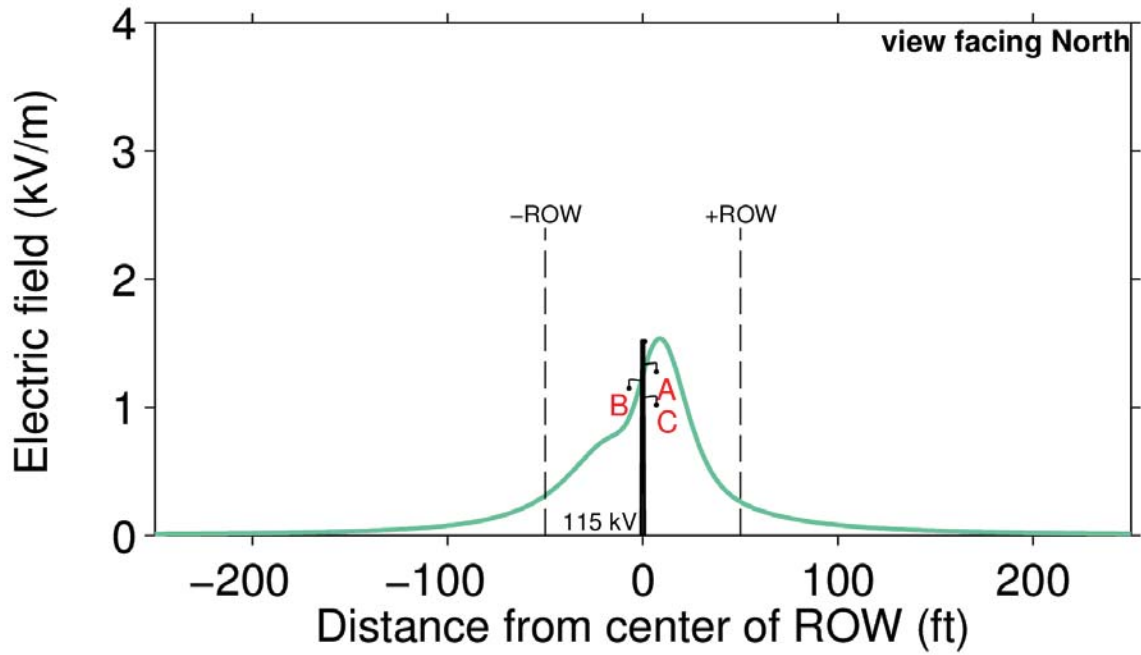


Figure 4. Calculated electric field for the steel monopole tower configuration

Magnetic Field H-frame

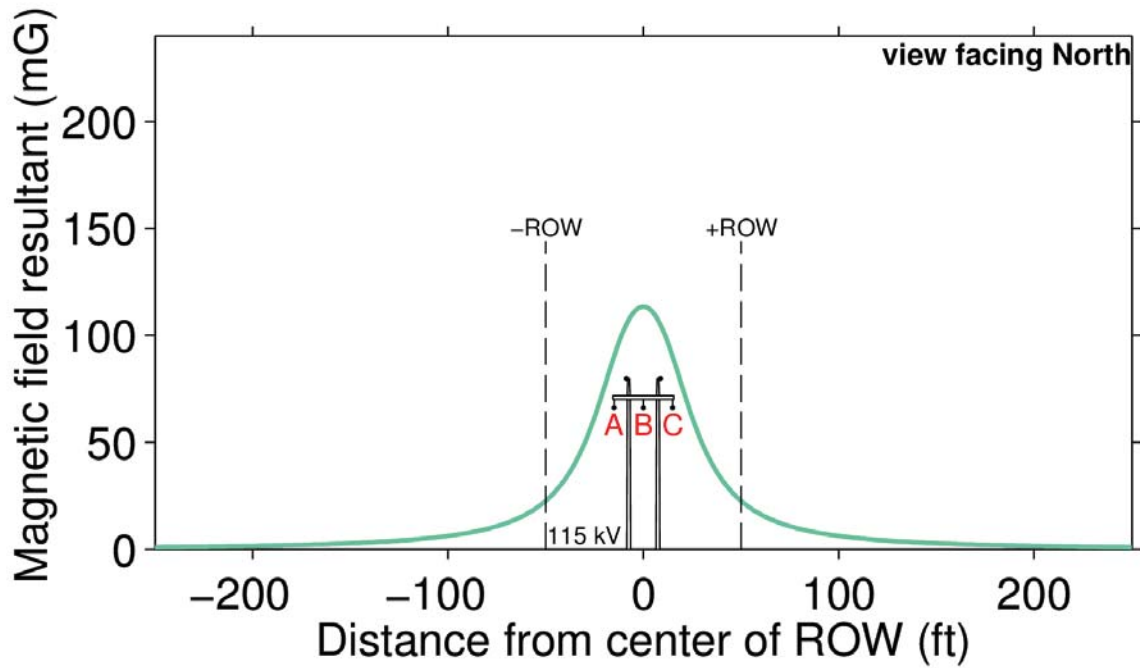


Figure 5. Calculated magnetic field for the H-frame tower configuration at average line load loading

Magnetic Field Steel Monopole

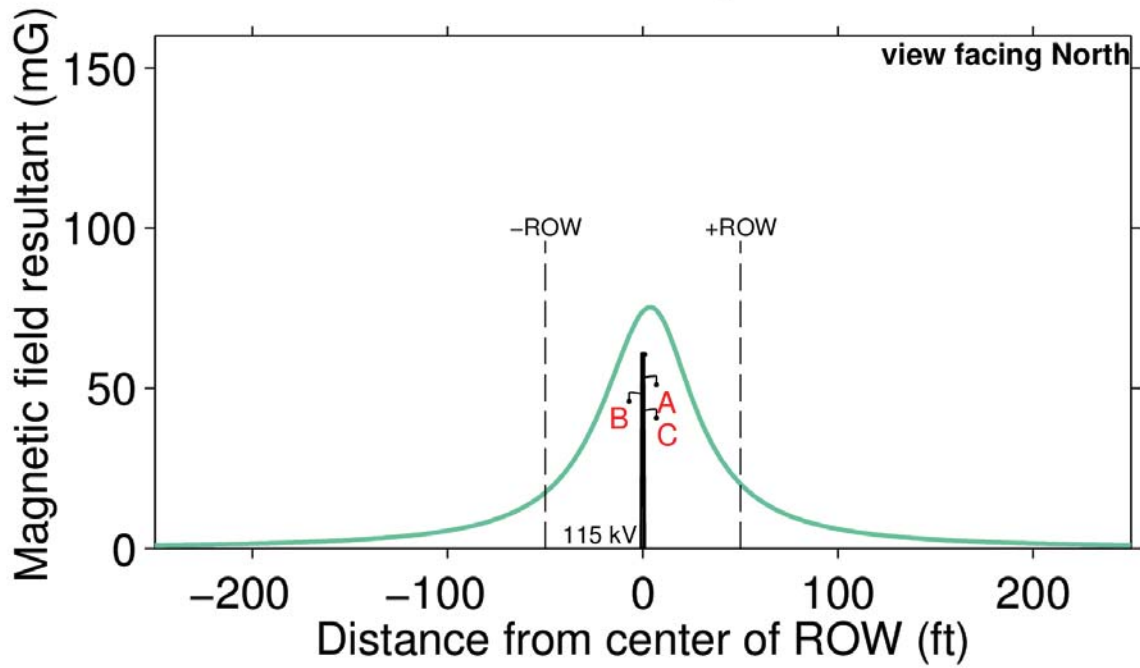


Figure 6. Calculated magnetic field for the steel monopole tower configuration at average line load loading

Audible Noise H-frame

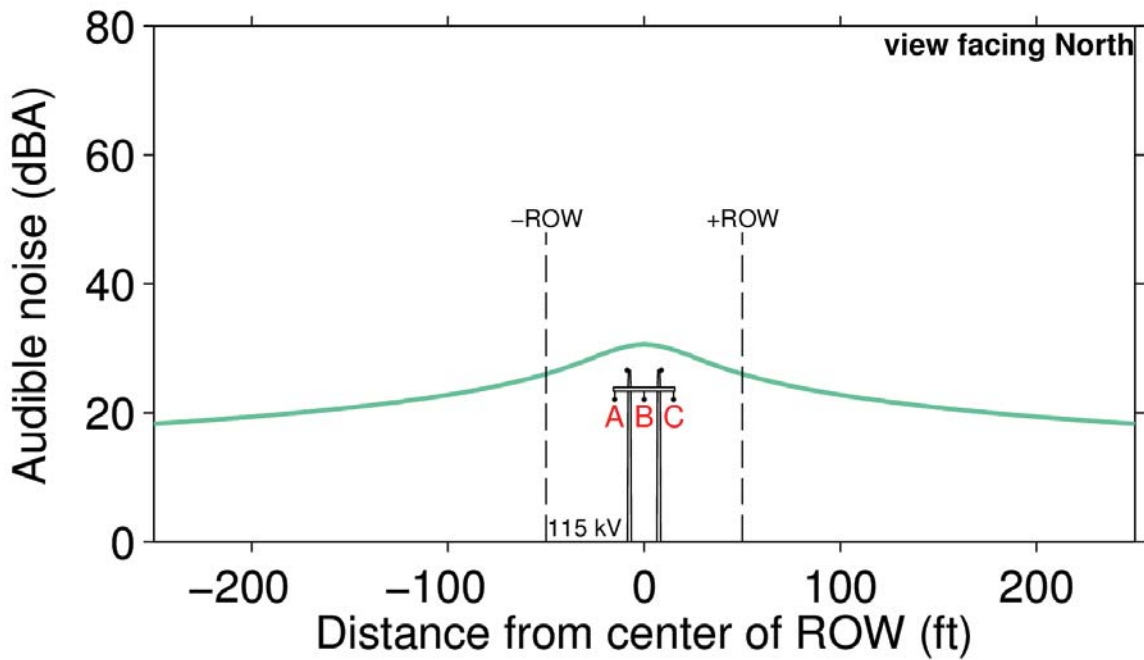


Figure 7. Calculated audible noise for the H-frame tower configuration for foul weather conditions

Audible Noise Steel Monopole

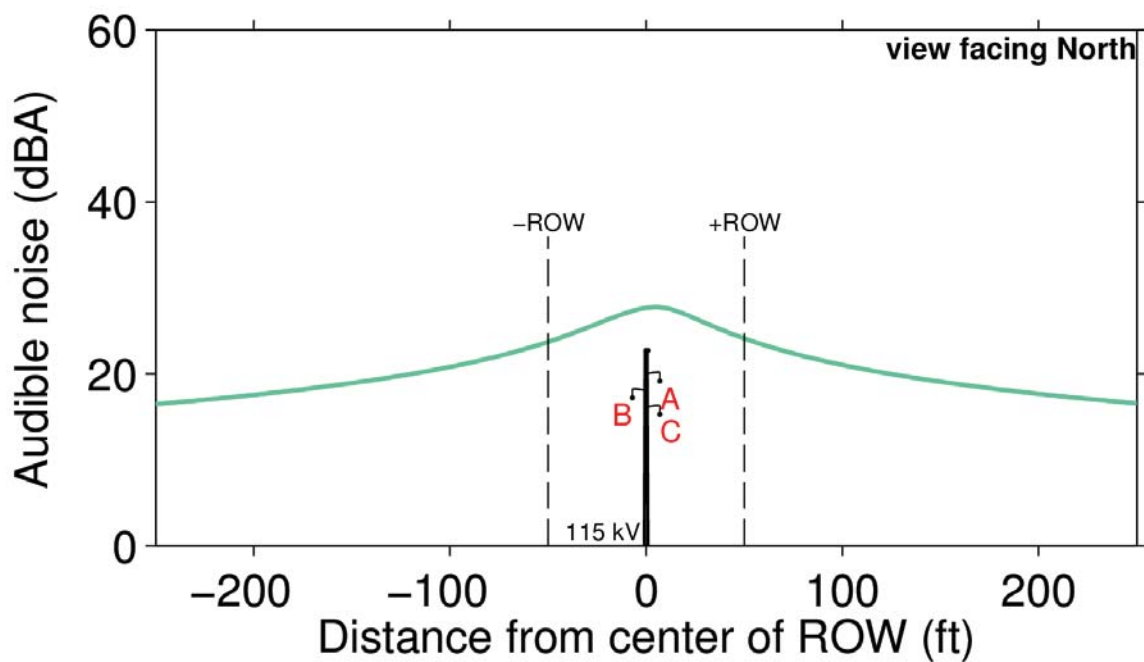


Figure 8. Calculated audible noise for the steel monopole tower configuration for four weather conditions

Radio Noise H-frame

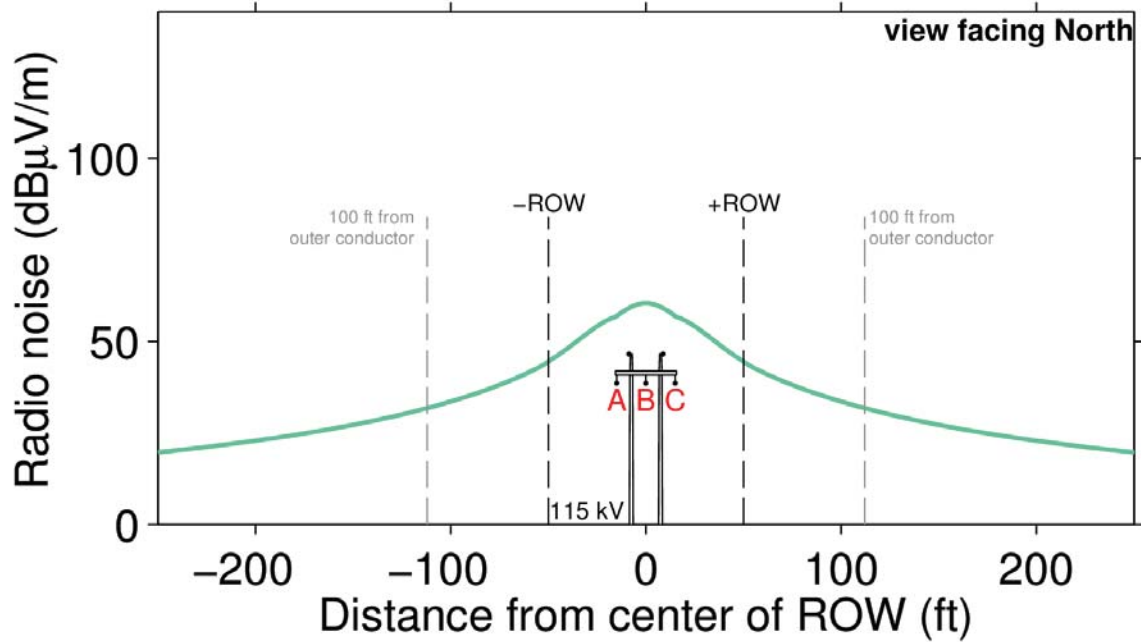


Figure 9. Calculated radio noise for the H-frame tower configuration for foul weather conditions

Radio Noise Steel Monopole

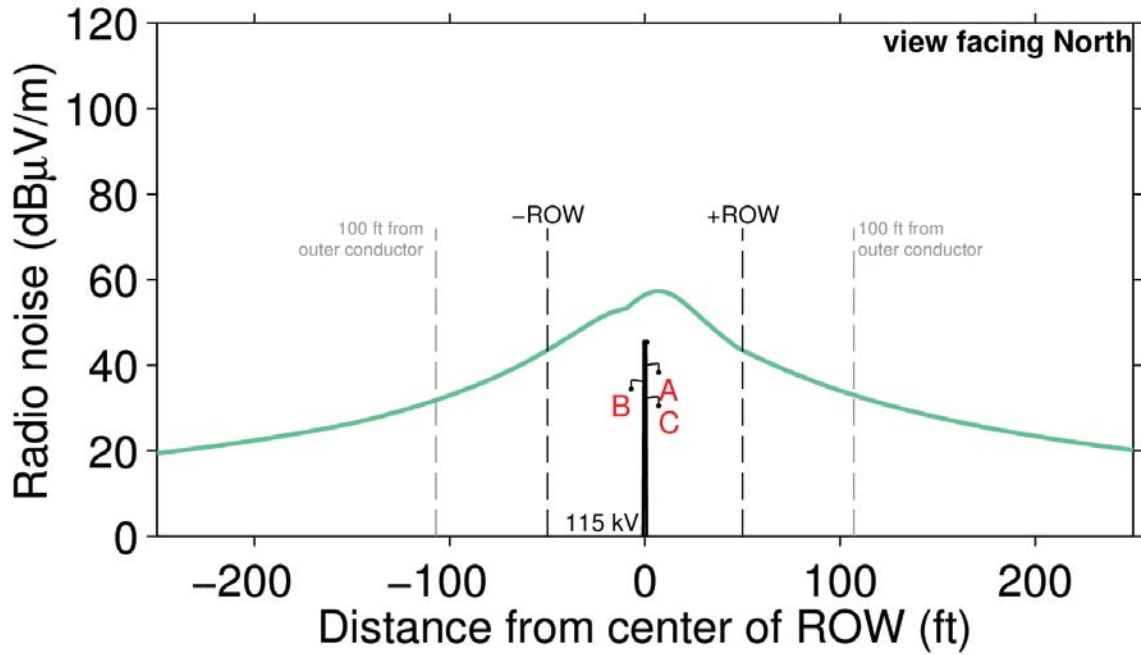
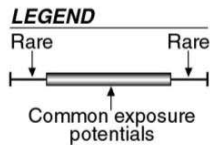
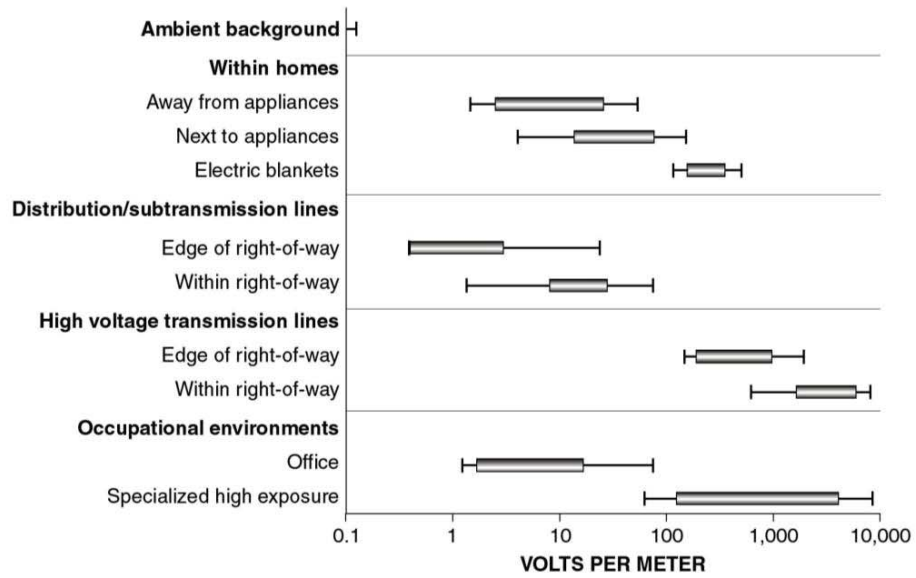
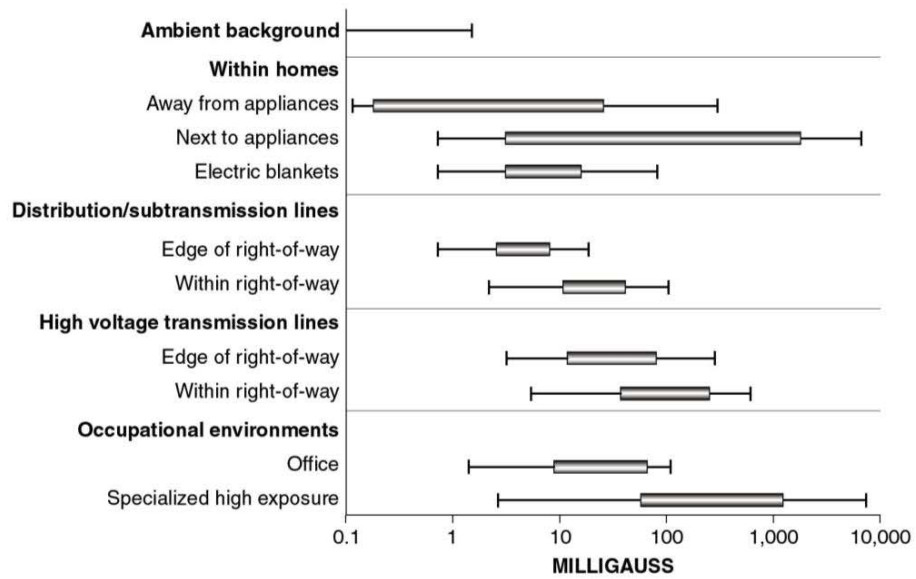


Figure 10. Calculated radio noise for the steel monopole tower configuration for four weather conditions



Source: Savitz et al. (1989)

Figure 11. Electric and magnetic field levels in the environment

Appendix B

Tables

Table 1. Circuit Configuration Summary

	H-frame	Steel Monopole
Voltage ¹ [kV]	115	115
Average Current	470	470
Maximum Current	960	960
Phasing	A-B-C ²	A-B-C ³
Min. Conductor Height	24.5	24.5
Phase Spacing ⁴ [ft]	12 H	14 H 8.5V
Conductor Diameter [in]	0.951	0.951

¹ Electric fields are modeled assuming a 10% overvoltage

² H-frame phasing is reported left-to-right,

³ Steel Monopole phasing is top-to-bottom

⁴ H = horizontal spacing, V = vertical spacing

Table 2. Commonly encountered acoustic sources and audible noise levels

Noise Source	A-weighted sound level (dBA)
Pain Threshold	128
Auto horn	110
Inside subway	95
Traffic	75
Conversation	65
Office	55
Living Room	45
Library	35
Bedroom	24
Hearing Threshold	0

Adapted from USDOE, 1996

Table 3. Calculated electric field values (kV/m)

Configuration	Location				
	100 ft beyond		Max	100 ft beyond	
	-ROW Edge	-ROW Edge		+ROW Edge	+ROW Edge
H-frame	0.02	0.43	1.50	0.43	0.02
Steel Monopole	0.03	0.31	1.54	0.26	0.04

Table 4. Calculated magnetic-field values (mG) for average and peak loading

Configuration	Loading	Location				
		100 ft beyond		Max	100 ft beyond	
		-ROW Edge	-ROW Edge		+ROW Edge	+ROW Edge
H-frame	average	2.8	22.7	113.5	22.7	2.8
	peak	5.7	46.3	231.8	46.3	5.7
Steel Monopole	average	2.6	17.4	75.3	20.2	2.8
	peak	5.3	35.6	153.8	41.3	5.7

Table 5. Calculated audible noise values in foul weather (dBA)

Configuration	Location				
	100 ft beyond		Max	100 ft beyond	
	-ROW Edge	-ROW Edge		+ROW Edge	+ROW Edge
H-frame	21	26	31	26	21
Steel Monopole	19	24	28	24	19

Table 6. Calculated radio noise values in foul weather (dB μ V/m)

Configuration	Location				
	100 ft beyond		Max	100 ft beyond	
	-outside conductor	-ROW Edge		+ROW Edge	+ outside conductor
H-frame	32	45	61	45	32
Steel Monopole	32	44	57	44	33

Table 7. State standards and guidelines for transmission lines and substations

State	Transmission Line Rating	Property Boundary at Substation		At Edge of Transmission Line ROW		On Transmission Line ROW	
		Electric Field (kV/m)	Magnetic Field (mG)	Electric Field (kV/m)	Magnetic Field (mG)	Electric Field (kV/m)	Magnetic Field (mG)
New York	All	--	--	1.6	200	--	--
Florida	≤230 kV	2	150	2	150	8	--
	>230 kV - ≤ 500	2	200	2	200	10	--
	>500	5.5	250	5.5	250	15	--
Minnesota	All					8	
Montana	All			1 ^a		7 ^b	
New Jersey	All					3	
Oregon	All					9	

^aCan be waived by landowner; ^bMaximum for highway crossings.
Source: NIEHS, 2002, p. 46

Table 8. Reference levels for whole body exposure to 60-Hz fields

Organization recommending limit	Occupational Limit		General Public Limit	
	Magnetic Field (mG)	Electric Field (kV/m)	Magnetic Field (mG)	Electric Field (kV/m)
ICNIRP	4,200	4.2	2,000	
ICES			9,040	5 or 10 ^a
American Conference of Governmental and Industrial Hygienists (ACGIH)	10,000	25		
Institute of Electrical and Electronics Engineers (IEEE) Standard C95.6			9,040	5
Australian Radiation Protection and Nuclear Safety Agency			3,000	5

^aThis is an exception within transmission line ROWs because people do not spend a substantial amount of time in ROWs and very specific conditions are needed before a response is likely to occur (i.e., a person must be well insulated from ground and must contact a grounded conductor) (ICES, 2002, p. 27).

Table 9. Correction factors to obtain day-night sound level (Ldn) from median (L50) foul weather transmission line sound level

% Foul weather	L _{dn} -L ₅₀ foul	
	40 dBA ambient	No ambient
0	-7.6	-17.6
1	-6.6	-12.0
5	-4.0	-6.0
10	-2.0	-2.9
100	+6.7	+6.7

Source: Dietrich (1982)

Appendix J

**Research on Extremely Low Frequency
Electric and Magnetic Fields and Health**

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Health Sciences

**Research on Extremely Low
Frequency Electric and
Magnetic Fields and Health**

Research on Extremely Low Frequency Electric and Magnetic Fields and Health

Prepared for:

The Bonneville Power Administration

Prepared by:

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New York, NY 10170

January 2011

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Acronyms and Abbreviations

AC	Alternating current
ACGIH	American Conference of Governmental Industrial Hygienists
ALL	Acute lymphoblastic leukemia
AML	Acute myeloid leukemia
BNU	n-butylnitrosourea
BPA	Bonneville Power Administration
CI	Confidence interval
DMBA	7,12-dimethylbenz[a]anthracene
G	Gauss
ELF	Extremely low frequency
EMF	Electric and magnetic fields
EMI	Electromagnetic interference
ENU	ethylnitrosourea
EPRI	Electric Power Research Institute
HR	Hazard ratio
Hz	Hertz
IARC	International Agency for Research on Cancer
ICD	Implanted cardiac device
ICNIRP	International Commission on Non-Ionizing Radiation Protection
IGF-1	Insulin-like growth factor 1
m	Meter
mG	Milligauss
MPD	Myeloproliferative disorder
NIEHS	National Institute of Environmental Health Sciences
NHL	Non-Hodgkin's lymphoma
NK	Natural killer
OR	Odds Ratio
ROW	Right-of-way
RR	Relative risk
SCENIHR	Scientific Committee on Emerging and Newly Identified Health Risks

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SES	Socioeconomic status
SSI	Swedish Radiation Protection Authority
TWA	Time-weighted average
WHO	World Health Organization

Introduction

Electrical objects produce two field types—electric fields and magnetic fields. The term field is used to describe the way an object influences its surrounding area. A temperature field, for example, surrounds a warm object, such as a space heater or campfire. Electric and magnetic fields (EMF) surround any object that generates, transmits, or uses electricity, including appliances, electrical wiring, office equipment, generators, and any other electrical devices. These fields are invisible, and they cannot be felt or heard.

Electric fields occur as a result of the electric potential (i.e., voltage) on these objects, and **magnetic fields** occur as a result of current flow through these objects.¹ Just like a temperature field, both electric fields and magnetic fields can be measured, and their levels depend on the properties of the source of the field (e.g., voltage, current, and configuration) and the distance from the source of the field, among other things.

Both electric fields and magnetic fields decrease rapidly with distance from the source, such that a magnetic field of 300 milligauss (mG) within 6 inches of a vacuum cleaner diminishes to 1 mG at 4 feet (NIEHS, 2002). This is similar to the way that the heat generated by a space heater or a campfire lessens as a person moves farther away from it. Although ordinary objects do not block magnetic fields, objects such as trees and buildings easily block electric fields.

The electrical power system in the United States produces alternating current (AC) EMF that changes direction and intensity 60 times per second—i.e., a frequency of 60 Hertz (Hz).² This frequency is in the extremely low frequency (ELF) range of the electromagnetic spectrum. Electricity produced by generating stations flows as 60-Hz current through transmission and distribution lines and provides power to the many appliances and electrical devices that we use in our homes, schools, and workplaces. Magnetic fields are found throughout our environment

¹ The electric field is expressed in measurement units of volts per meter (V/m) or kilovolts per meter (kV/m); 1 kilovolt per meter is equal to 1,000 V/m. The strength of magnetic fields is expressed as magnetic flux density in units called gauss (G), or in milligauss (mG), where 1 G is equal to 1,000 mG.

² Europe's electrical system produces 50-Hz EMF. Since 50-Hz EMF is also in the ELF range, research on 50-Hz EMF is relevant to questions on 60-Hz EMF.

because electricity is needed for so many things in our daily lives, from lighting, heating, and cooling our homes to powering our refrigerators and computers.

Questions about whether these ubiquitous exposures could affect our health began to be raised in the 1970s. Since then, researchers from many different scientific disciplines have investigated this question, and hundreds of studies have been conducted. The public frequently expresses concern about ELF EMF, particularly in the context of new transmission lines. The intent of this report is to describe what this large body of research has told us about ELF EMF and the precautions, if any, recommended by public health agencies

In July 2007, Exponent provided a report to the Bonneville Power Administration (BPA) that described the conclusions of a comprehensive, weight-of-evidence review published by the World Health Organization (WHO) in June 2007; the portion of Exponent's 2007 report that describes the conclusions of the WHO report is attached as Appendix 1 for reference.³ The WHO review still represents the most recent comprehensive review of the literature by a multidisciplinary scientific panel. The WHO organized a multidisciplinary Task Group of 21 scientists from around the world to draft a Monograph that summarized the research and provided conclusions as to whether there are risks associated with ELF EMF and, if so, at what exposure levels (WHO, 2007a). The report concluded that the only established effects of ELF EMF exposure are acute neurostimulatory effects (i.e., shock-like effects) that occur at very high levels of exposure; these exposure levels are not encountered in ordinary residential or occupational environments. The fact sheet from the WHO review is attached as Appendix 2 (WHO, 2007b) and can be found at <http://www.who.int/mediacentre/factsheets/fs322/en/print.html>.

Research is a constantly evolving process. Despite the volume of research available on ELF EMF and the large reduction in uncertainty that research has achieved over the years, scientists continue research in this area with the goal of clarifying and replicating old findings and testing new hypotheses. New studies on ELF EMF are published every month. While the WHO review provides a comprehensive and relatively up-to-date summary of the status of research on

³ Exponent. Assessment of Research Regarding EMF and Health and Environmental Effects. Olympic Peninsula Reinforcement Transmission Line Project. July 2007.

this topic, new research has the potential to modify or strengthen conclusions. The BPA has, therefore, requested an update on the research with regard to ELF EMF and health. This report provides an overview of the cumulative body of research published since the WHO review (January 1, 2006-October 1, 2010) and provides the reader with perspective on if, and how, recent research changes the WHO's conclusions.

A summary of the methods scientists use to conduct studies and make decisions about health risks is included in Section 1 as a framework for understanding later discussions. In Section 2, the discussion of new research is broadly grouped by health outcome—cancer, reproductive effects, developmental effects, and neurodegenerative diseases. This discussion summarizes two types of research—epidemiology studies and experimental studies in animals (*in vivo*)—within each health outcome category. Experimental studies in cells and tissues (*in vitro*) of carcinogenesis are discussed briefly in Section 2. Other areas of research not reviewed by WHO are discussed in Section 3, including the possible effects of ELF EMF on the functioning of pacemakers, on flora and fauna, and on marine life. Finally, guidelines for ELF EMF exposure developed by scientific organizations to prevent against established health effects are summarized in Section 4.

1 Scientific Methods

Weight-of-evidence review

Most of what we encounter in our every day environment has no effect on our health. Other exposures, however, may affect our health in either a beneficial or a harmful way, including such ubiquitous interactions with our environment as the air we breathe, the water we drink, and our exposure to sunlight. Much time and money is spent by scientists around the world designing, conducting, and publishing research to determine what factors may affect our health, including environmental exposures (like ELF EMF), infectious agents, and our genetics. The process for arriving at a conclusion about whether there is a health risk associated with any of these factors often is not straightforward or definitive. Rather, it is a long process that requires repeated hypothesis generation and testing.

The process begins when a scientist forms a hypothesis and conducts a study to test that hypothesis. Studies are conducted by scientists at academic universities and scientific institutions around the world. Once a study is complete, the authors submit it to a scientific journal for publication, where it undergoes peer review prior to publication. The evidence to evaluate any health risk includes all of the relevant studies published in the peer-reviewed literature.

These individual research studies can be thought of as puzzle pieces. When all of the research is placed together, we have some understanding of possible health effects; no conclusions can be reached, however, by looking at only one study, just as no picture can be formed with just one puzzle piece. Each study provides a different piece of information to the puzzle because of its unique strengths and weaknesses—if the study used valid methods and had no obvious sources of bias, it may provide a wealth of information or, if the study was not well conducted, it may add little or no information to our understanding.

This process of evaluating all of the research together to determine whether something poses either a health benefit or health risk is referred to as a weight-of-evidence review. There are

three types of research that are considered in a weight-of-evidence review: epidemiology studies of people, experimental studies in animals (*in vivo* research), and experimental studies in cells and tissues (*in vitro* research). It is important to consider all three types of research together because they provide complementary information:

- Epidemiology studies collect observational data about human populations in their every day environments to determine whether there are patterns between exposures and diseases. These studies measure statistical associations to evaluate whether a disease and exposure occur together more often than expected. An important limitation of these studies is that, if an association is measured, they do not tell scientists how the exposure is truly related to the disease. That conclusion can only be reached by considering the entire body of research. Most of the studies evaluating ELF EMF examine whether people with a particular disease have had higher estimates of ELF EMF exposure in the past compared to people without that disease.
- Experimental studies in which scientists expose animals (*in vivo*) to varying levels of electric or magnetic fields (some as high as 50,000 mG) are an important source of information. These studies compare the amount of disease they observe in exposed animals to the amount of disease they observe in animals that have not been exposed. The strength of animal studies is that scientists are able to control all aspects of the animals' lives to minimize the potential confounding effects of factors other than the exposure of interest. The most valuable experimental studies for understanding disease are those in which the animals receive life-long exposures.
- Experimental studies *in vitro* involve the exposure of isolated cells and tissues to the agent of interest, in this case ELF EMF, and compare the characteristics of exposed and unexposed samples to look for differences that are indicative of a disease process. These studies are limited because what occurs to exposed cells or tissues outside of a human body may not be the same as what occurs to cells and tissues inside a body.

The weight-of-evidence approach is the standard process used worldwide by scientists, scientific organizations, and regulatory agencies to assess the possible health benefits and risks associated with exposures. A weight-of-evidence review begins with a systematic review of published, peer-reviewed epidemiology, *in vivo*, and *in vitro* research. The weight that individual studies provide to the overall conclusions is not equal—studies vary widely in terms of the sophistication and validity of their methods. Therefore, each study from each discipline must be evaluated critically and assigned a weight. A final conclusion is then reached by considering the cumulative body of research, giving more weight to studies of higher quality (Figure 1).

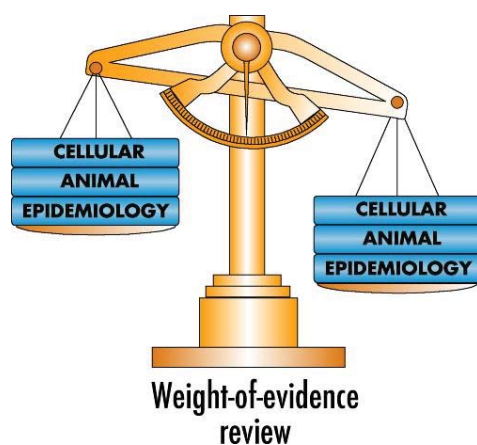


Figure 1. Weight-of-evidence reviews consider three types of research

Continuing with the puzzle example from above, the picture that is formed when the individual studies are assembled can take on many different shapes. In some cases (e.g., smoking and lung cancer), a clear picture of an adverse health effect was presented by the research within a relatively short time. In most cases, however, the picture is unclear and more questions are raised than answered. It is impossible to prove the negative in science—i.e., to say that any exposure is completely safe—therefore, research studies can only reduce the uncertainty that there is a health effect through continued research. The only way to reduce this uncertainty is to conduct high quality studies with meaningful results that are replicated across study populations (in the case of epidemiology studies) and by different laboratories (in the case of *in vivo* and *in vitro* research). Thus, in most areas of research, unless the data clearly indicate an increased

risk at defined exposure levels, scientific panels will conclude that the research is inadequate or limited and requires further study until the uncertainty has been reduced below an acceptable level. While the public may interpret this conclusion as indicating concern, it is natural for scientists to recommend future research to reduce uncertainty around a largely negative body of research or to replicate findings that appear positive.

Scientific and health organizations put together panels of scientists to conduct weight-of-evidence reviews. These panels consist of experts from around the world in the areas of interest (e.g., epidemiology, neurophysiology, toxicology, etc.) and they follow standard scientific methods for arriving at conclusions about possible health risks. The conclusions of these reviews are looked to for the current scientific consensus on a particular topic and form the basis of recommendations made by organizations and governments on exposure standards and precautionary measures.

Scientific reviews on ELF EMF

Numerous national and international organizations responsible for public health have convened multidisciplinary panels of scientists to conduct weight-of-evidence reviews and arrive at conclusions about the possible risks associated with ELF EMF. These organizations include the following (in ascending, chronological order of their most recent publication):

- The **National Institute for Environmental Health Sciences (NIEHS)** in the United States assembled a 30-person Working Group to review the cumulative body of epidemiologic and experimental data on ELF EMF and provide conclusions and recommendations to the government (NIEHS, 1998, 1999).
- The **International Agency for Research on Cancer (IARC)** completed a full carcinogenic evaluation of ELF EMF in 2002 (IARC, 2002).
- The **World Health Organization (WHO)** released a review in June 2007 as part of its International EMF Program to assess the scientific evidence related to ELF EMF in the frequency range from 0 to 300 GHz (WHO, 2007a). Appendix 1 summarizes the conclusions of this review.

- The **Swedish Radiation Protection Authority (SSI)**,⁴ using other major scientific reviews as a starting point, evaluated new studies in consecutive annual reports (SSI, 2007; SSI, 2008).
- The **Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR)** issued a report in March 2007 and March 2009 (SCENIHR, 2007; SCENIHR, 2009) updating previous conclusions (SSC, 1998; CSTE, 2001) to the Health Directorate of the European Commission.
- The **National Radiological Protection Board (NRPB)**⁵ of the United Kingdom issued full evaluations of the research in 1992, 2001, and 2004, with supplemental updates (NRPB, 1993; NRPB, 1994a) and topic-specific reports (NRPB, 1994b; NRPB, 2001b; HPA, 2006) published in the interim. In a letter addressing a related topic, the Director of the Health Protection Agency of Great Britain (HPA) reiterated their position on ELF EMF and appropriate precautionary measures (HMG, 2009).
- The **International Commission on Non-Ionizing Radiation Protection (ICNIRP)**, the formally recognized organization for providing guidance on standards for non-ionizing radiation exposure for the WHO, published a review of the cumulative body of epidemiologic and experimental data on ELF EMF in 2003. The ICNIRP released draft exposure guidelines for ELF EMF in July 2009 (ICNIRP, 2009). While the ICNIRP panel stated that they relied heavily on previous reviews of the literature related to long-term ELF EMF exposures, they provided relevant conclusions as part of the drafting of these guidelines. Final guidelines for ELF EMF exposure were issued in late 2010 (ICNIRP, 2010).

⁴ The Swedish Radiation Safety Authority (Strål säkerhets myndigheten [SSM]) has superseded the SSI, which ceased to exist on 30 June 2008. The SSM is a managing authority of Sweden's Ministry of the Environment and has "national collective responsibility within the areas of radiation protection and nuclear safety," which includes EMF research (<http://www.stralsakerhetsmyndigheten.se>).

⁵ The NRPB merged with the Health Protection Agency in April 2005 to form its new Radiation Protection Division.

Dissenting opinion on ELF EMF

In August 2007, an *ad hoc* group of 14 scientists and public health and policy consultants published an on-line report titled “*The BioInitiative Report: A Rationale for a Biologically-based Public Exposure Standard for Electromagnetic Fields (ELF and RF)*.” The group’s objective was to “assess scientific evidence on health impacts from electromagnetic radiation below current public exposure limits and evaluate what changes in these limits are warranted now to reduce possible public health risks in the future” (p. 4). The report was followed by several publications related to ELF EMF that summarized some of the online report’s conclusions (Hardell and Sage, 2008; Davanipour and Sobel, 2009; Johansson 2009). The individuals who comprised this group did not represent any well-established regulatory agency nor were they convened by a recognized scientific authority. The report has been criticized by scientific agencies because it did not follow the methods of a standard weight-of-evidence review and, for this reason, its conclusions and recommendations are not considered further in this report (Danish National Board of Health, 2007; ACRBR, 2008; HCN, 2008).⁶ Appendix 3 provides a full criticism of the report.

Epidemiology basics

This section briefly describes the main types of epidemiology studies and the major issues that are relevant to evaluating their results. The two, main types of epidemiology studies are cohort studies and case-control studies (Figure 2).

⁶ <http://www.gezondheidsraad.nl/en/publications/bioinitiative-report-0>

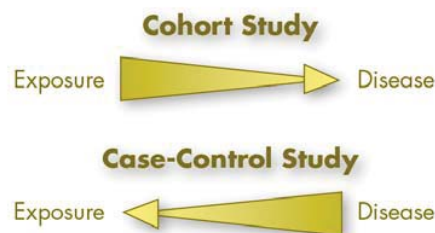


Figure 2. Basic design of cohort and case-control studies

A case-control study compares the characteristics of people that have been diagnosed with a disease (i.e., cases) to a similar group of people who do not have the disease (i.e., controls). The prevalence and extent of past exposure to a particular agent is estimated in both groups and compared to assess whether the cases have a higher exposure level than the controls, or vice versa.

In a case-control study, this comparison (or statistical association) is estimated quantitatively with an odds ratio (OR). An OR is the ratio of the odds of exposure among persons with a disease to the odds of exposure among persons without a disease. The general interpretation of an OR equal to 1.0 is that the odds of exposure are the same in the case and control groups (i.e., there is no statistical association between the exposure and disease). If the OR is greater than 1.0, the inference is that the odds of exposure are greater in the case group or, in other words, the exposure may increase the risk of the disease (Figure 3).

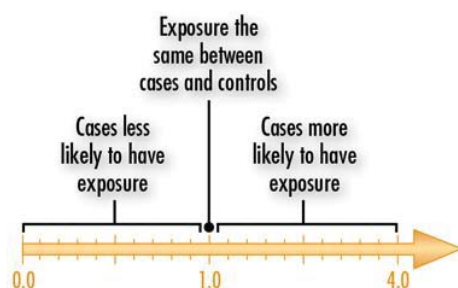


Figure 3. Interpretation of an odds ratio in a case-control study

Each OR is reported with a confidence interval (CI), which is a range of OR values that have a specified probability of occurring if the study is assumed to be repeated a large number of times. A 95% CI, for example, provides the range of values that are likely to occur in 95% of repeated experiments. In short, a CI indicates how certain (or confident) the researcher is about the OR calculated from his or her data; if the CI includes 1.0, the researcher cannot statistically exclude the possibility that the OR is 1.0, meaning the odds of exposure are the same in the case and control groups.

A cohort study is conducted in the reverse manner—in the most traditional sense, researchers study a population *without disease* and follow them over time to see if persons with a certain exposure develop disease at a higher rate than unexposed persons. The comparisons conducted in cohort studies are similar to the comparisons conducted in case-control studies, although the risk estimate is referred to as a relative risk (RR) rather than an OR. The RR is equal to rate of disease in the exposed group divided by the rate of disease in the unexposed group, with values greater than 1.0 suggesting that the exposed group has a higher rate of disease.

The resulting RR or OR is simply a comparative measure of how often a disease and exposure occur together in exposed and unexposed study populations—it does not mean that there is a known or causal relationship. Before any conclusions can be drawn, all studies considering a particular exposure and disease must be identified, and each study must be evaluated to

determine the possible role that factors such as chance, bias, and confounding may have played in the study's results.

- *Chance* refers to a random event, i.e., a coincidence. An association can be observed between an exposure and disease that simply is the result of a chance occurrence. Statistics, such as the CI, are calculated to determine whether chance is a likely explanation for the findings.
- *Bias* refers to any error in the design, conduct, or analysis of a study that would cause a distorted estimate of an exposure's effect on the risk of disease. There are many different types of bias; for example, selection bias may occur if the characteristics of persons that participate in a study differ in a meaningful way from the characteristics of those subjects that do not participate (e.g., cases living near power lines might be more likely to participate than controls because the cases are concerned about this possible exposure).
- *Confounding* is a situation in which an association is distorted because the exposure being studied is associated with other risk factors for the disease. For example, a link between coffee drinking in mothers and low birth weight babies may be observed in a study, but some women who drink coffee also smoke cigarettes. When the smoking habits of mothers are taken into account, coffee drinking may not be associated with low birth weight babies because the confounding effect of smoking has been removed.

As part of the weight-of-evidence review process, each study's design and methods are evaluated critically to determine if and how chance, bias, and confounding may have affected the results and, subsequently, the weight that should be placed on the study's findings.

IARC classifications

This section briefly describes the method that the IARC uses following a weight-of-evidence review to classify exposures based on the evidence in support of carcinogenicity. The WHO adopted this method in their 2007 review on ELF EMF, and other scientific agencies refer to this classification system, as well.

First, each research type (epidemiology, *in vivo*, and *in vitro*) is evaluated to determine the strength of evidence in support of carcinogenicity (as defined in Figure 4). Epidemiology studies are characterized as having *sufficient evidence* for carcinogenicity if an association is found and chance, bias, and confounding can be ruled out with “reasonable confidence.” *Limited evidence* is used to describe a body of research where the findings are inconsistent or where an association is observed but there are outstanding questions about study design or other methodological issues that preclude making strong conclusions. *Inadequate evidence* describes a body of research where it is unclear whether the data is supportive or unsupportive of causation because there is a lack of data or there are major quantitative or qualitative issues. The same overall categories apply for *in vivo* research. *In vitro* research is not described in Figure 4 because it provides ancillary information and, therefore, is used to a lesser degree in evaluating carcinogenicity and is classified simply as strong, moderate, or weak.

Agents are then classified into five overall categories using the combined categories from epidemiology, *in vivo*, and *in vitro* research (listed from highest to lowest risk): (1) known carcinogen, (2) probable carcinogen, (3) possible carcinogen, (4) non-classifiable, and (5) probably not a carcinogen.

As summarized in Figure 4, the category possible carcinogen typically denotes exposures for which there is limited evidence of carcinogenicity in epidemiology studies, and *in vivo* studies provide limited or inadequate evidence of carcinogenicity.

The IARC has reviewed over 900 substances and exposure circumstances to evaluate their potential carcinogenicity. Figure 5 provides examples of some of the more common exposures that have been classified in each category. As Figure 5 shows, over 80% of exposures fall in the categories possible carcinogen (27%) or non-classifiable (55%). This occurs because, as described above, it is nearly impossible to prove that something is completely safe and few exposures show a clear-cut or probable risk, so most agents will end up in either of these two categories. Throughout the history of the IARC, only one agent has been classified as probably not a carcinogen, which illustrates the conservatism of the evaluations and the difficulty in proving the absence of an effect beyond all doubt.

Over half of the agents are non-classifiable in terms of carcinogenicity, i.e., it is unclear whether they can cause cancer—hair coloring products, jet fuel, and tea are included in this category. Possible carcinogens include occupation as a firefighter, coffee, and pickled vegetables, in addition to magnetic fields. Exposures identified as probable carcinogens include high temperature frying and occupation as a hairdresser. Finally, known carcinogens include benzene, asbestos, solar radiation, use of tanning beds, and tobacco smoking. As Figure 5 shows, there is much uncertainty about whether certain agents will lead to cancer, and possible and probable carcinogens include substances to which we are commonly exposed or are common exposure circumstances.

	Epidemiology Studies				Animal Studies			
	Sufficient evidence	Limited evidence	Inadequate evidence	Evidence suggesting lack of carcinogenicity	Sufficient evidence	Limited evidence	Inadequate evidence	Evidence suggesting lack of carcinogenicity
Known Carcinogen	✓							
Probable Carcinogen		✓			✓			
Possible Carcinogen		✓				✓	✓	
Not Classifiable			✓			✓	✓	
Probably not a Carcinogen				✓				✓

<p>Sufficient evidence in epidemiology studies—A positive association is observed between the exposure and cancer in studies, in which chance, bias and confounding were ruled out with “reasonable confidence.”</p> <p>Limited evidence in epidemiology studies—A positive association has been observed between the exposure and cancer for which a causal interpretation is considered to be credible, but chance, bias or confounding could not be ruled out with “reasonable confidence.”</p> <p>Inadequate evidence in epidemiology studies—The available studies are of insufficient quality, consistency or statistical power to permit a conclusion regarding the presence or absence of a causal association between exposure and cancer, or no data on cancer in humans are available.</p> <p>Evidence suggesting a lack of carcinogenicity in epidemiology studies—There are several adequate studies covering the full range of levels of exposure that humans are known to encounter, which are mutually consistent in not showing a positive association between exposure to the agent and any studied cancer at any observed level of exposure. The results from these studies alone or combined should have narrow confidence intervals with an upper limit close to the null value (e.g. a relative risk of 1.0). Bias and confounding should be ruled out with reasonable confidence, and the studies should have an adequate length of follow-up.</p>	<p>Sufficient evidence in animal studies—An increased incidence of malignant neoplasms is observed in (a) two or more species of animals or (b) two or more independent studies in one species carried out at different times or in different laboratories or under different protocols. An increased incidence of tumors in both sexes of a single species in a well-conducted study, ideally conducted under Good Laboratory Practices, can also provide sufficient evidence.</p> <p>Limited evidence in animal studies—The data suggest a carcinogenic effect but are limited for making a definitive evaluation, e.g. (a) the evidence of carcinogenicity is restricted to a single experiment; (b) there are unresolved questions regarding the adequacy of the design, conduct or interpretation of the studies; etc.</p> <p>Inadequate evidence in animal studies—The studies cannot be interpreted as showing either the presence or absence of a carcinogenic effect because of major qualitative or quantitative limitations, or no data on cancer in experimental animals are available</p> <p>Evidence suggesting a lack of carcinogenicity in animal studies—Adequate studies involving at least two species are available which show that, within the limits of the tests used, the agent is not carcinogenic.</p>
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Figure 4. Basic IARC method for classifying exposures based on potential carcinogenicity

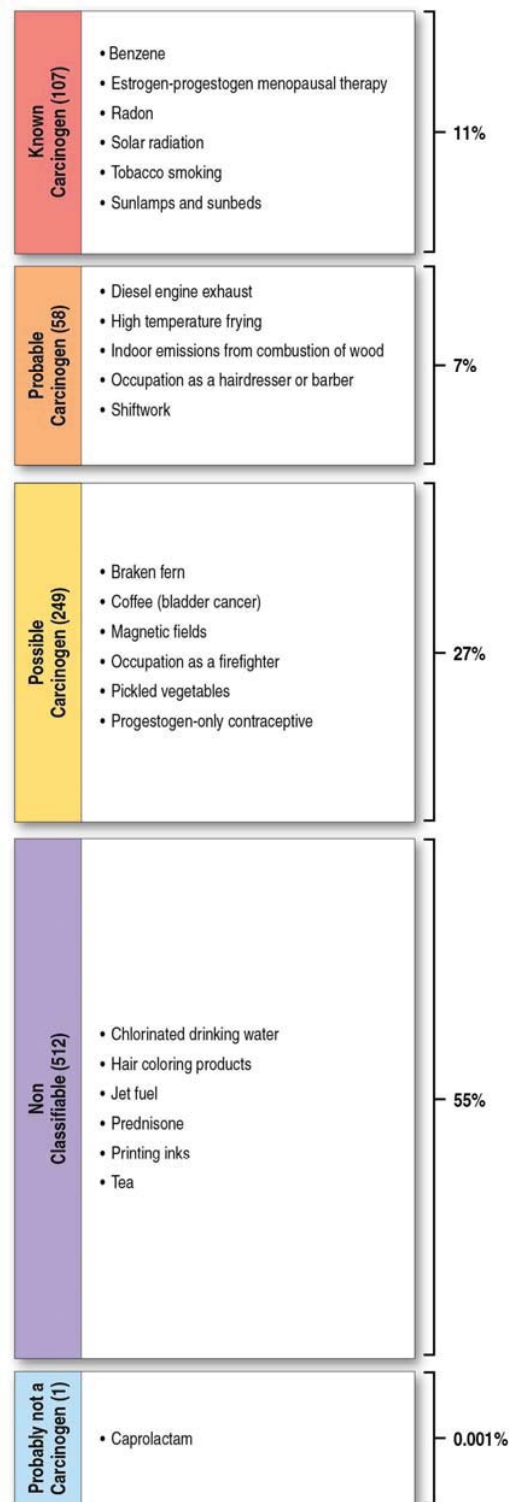


Figure 5. Percentage of substances classified in each IARC category with examples

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2 Human Health Research

The following sections provide an overview of peer-reviewed research published between January 1, 2006 and October 1, 2010. A literature review was conducted to identify new epidemiologic, *in vivo*, and *in vitro* research published on 50 or 60-Hz ELF EMF. A large number of search strings referencing the exposure and diseases of interest, as well as authors who regularly publish in this area, were included as search terms in the PubMed database, a service of the U.S. National Library of Medicine that includes over 17 million citations from MEDLINE and other life science journals for biomedical articles dating to the 1950s.⁷ A scientist with experience in this area reviewed the search results to identify relevant studies.

This report focuses on the diseases that have received the most attention—cancer, reproductive effects, developmental effects, and neurodegenerative diseases. Other health effects have been studied (i.e., rare cancer types, suicide, depression, electrical hypersensitivity, and cardiovascular effects), but for brevity and because research on these topics evolves slowly, these topics are not summarized here. The WHO review provides a good resource for the status of research on these additional health effects.

This update focuses on identifying and summarizing new epidemiologic and major *in vivo* research, since these study types are the most informative for risk assessment in this field; for the status of *in vitro* research, we include our discussion from the July 2007 report.

Cancer

Childhood leukemia

What was previously known about childhood leukemia and what did the WHO review conclude?

Scientific panels have concluded consistently that magnetic fields are a possible carcinogen largely because of findings from studies of childhood leukemia. Since 1979, approximately 35

⁷ PubMed includes links to full text articles and other related resources (<http://www.ncbi.nlm.nih.gov/PubMed/>).

studies conducted in the United States, Canada, Europe, New Zealand, and Asia have evaluated the relationship between childhood leukemia and magnetic fields using various methods to estimate exposure. These methods have included long-term (48-hour) personal monitoring; spot or long-term (24- or 48-hour) measurements in structures and outdoors; calculations using loading, line configuration, and distance of nearby power installations to estimate historical, residential exposure; and wire code categories.⁸ As a group of independent studies, they did not show a clear or consistent association between magnetic fields and childhood leukemia. The largest and most methodologically sound case-control studies to estimate personal magnetic field exposure directly did not report a consistent relationship (Linnet et al., 1997; McBride et al., 1999; UKCCS, 2000). When two independent pooled analyses combined the data from these case-control studies, however, a statistically significant association was observed between rare average magnetic field exposure above 3-4 mG and childhood leukemia (Ahlbom et al., 2000; Greenland et al., 2000). Both pooled analyses indicated that children with leukemia were about two times more likely to have had estimated magnetic field exposures above 3-4 mG. Average exposures at this level are uncommon; according to the WHO, results from several extensive surveys showed that approximately 0.5–7.0% of children had time-averaged exposures in excess of 3 mG and 0.4–3.3% had time-averaged exposures in excess of 4 mG (WHO, 2007a). While these analyses provide a valuable quantitative summary of the data, pooled analyses are limited by the disparate methods used to collect the underlying data. Questions have been raised as to whether the original studies, particularly those that are large and estimated exposure directly, provide a more valid estimate of the association than the pooled analyses (Elwood, 2006).

Despite the association observed in these pooled analyses, health agencies have not concluded that magnetic fields are a known or probable cause of childhood leukemia. The studies are of insufficient strength to rule out with “reasonable confidence” the role that chance, bias, and confounding may have had on the observed statistical association. In other words, researchers do not have enough confidence in the way these studies were conducted to conclude that the measured statistical association represents a true relationship between magnetic fields and childhood leukemia. Furthermore, experimental data do not provide evidence for a risk in the

⁸ Wire code categories are categories used to classify the potential magnetic field exposures at residences based on the characteristics of nearby power installations.

more highly-controlled *in vivo* studies, and *in vitro* studies do not provide evidence of a plausible biological mechanism whereby magnetic fields lead to carcinogenesis.

Since chance, bias, and confounding could not be ruled out as an explanation for the association, the IARC concluded in 2002 that the data on childhood leukemia provided limited evidence of carcinogenicity (IARC, 2002). In 2007, the WHO reviewed studies on childhood leukemia and magnetic field exposure published since the 2002 IARC review (WHO, 2007a). They concluded that the new epidemiologic studies were consistent with the classification of limited epidemiologic evidence in support of carcinogenicity and, together with the largely negative *in vivo* and *in vitro* research, consistent with the classification of magnetic fields as a possible carcinogen (Figure 4).⁹

Since it is unclear whether the association is real, the WHO review evaluated other factors that might be partially, or fully, responsible for the association, including chance, control selection bias, confounding from hypothesized or unknown risk factors, and misclassification of magnetic field exposure (Figure 6). The following is a summary of their evaluation:

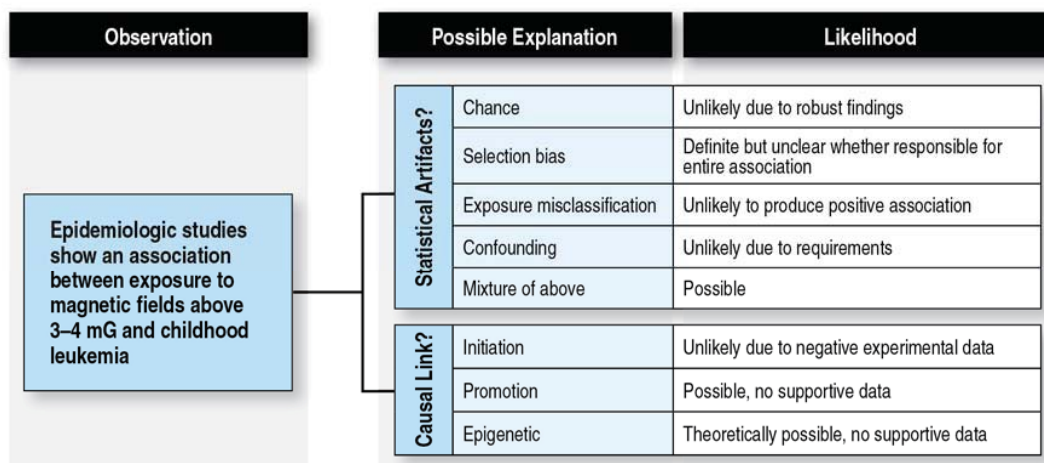
- ✓ The WHO review concluded that **chance** is an unlikely explanation since the pooled analyses had a large sample size and decreased variability.
- ✓ **Control selection bias** occurs when the controls that decide to participate in the study do not represent the true exposure experience of the non-diseased population. In the case of magnetic fields, the WHO speculates that controls with a higher socioeconomic status (SES) may participate in studies more often than controls with a lower SES. Since persons with a higher SES may have lower magnetic field exposures or tend to live farther from transmission lines, the control group's magnetic field exposure may be artificially low. Thus, when the exposure experience of the control group is compared to the case group, there is a difference between the case and control group that does not exist in the source population. The WHO concluded that **control selection bias** is

⁹ The WHO concluded the following: "Consistent epidemiological evidence suggests that chronic low intensity ELF magnetic field exposure is associated with an increased risk of childhood leukaemia. However, the evidence for a causal relationship is limited, therefore exposure limits based upon epidemiological evidence are not recommended, but some precautionary measures are warranted" (p. 355-6, WHO, 2007a).

probably occurring in these studies and would result in an overestimate of the true association, but would not explain the entire observed statistical association

- ✓ The WHO panel concluded that **confounding** is less likely to be causing the observed association than other factors, although the possibility that some yet-to-be identified confounder is responsible for the association cannot be excluded completely. Suggested risk factors that may be confounding the relationship include SES, residential mobility, contact currents, and traffic density.¹⁰
- ✓ The WHO stated that the possible effects of **exposure misclassification** are the most difficult to predict. EMF presents unique challenges in exposure assessment because it is ubiquitous, imperceptible, and has many sources (Kheifets and Oksuzyan, 2008). No target exposure or exposure window has been identified, and the numerous methods of estimating exposure likely result in a different degree of error within and between studies. Most reviews have concluded that exposure misclassification would likely result in an underestimate of the true association, meaning the association we observe is lower than the true value; however, the extent to which this might occur varies widely and is difficult to assess (Greenland et al., 2000). The WHO concluded that exposure misclassification likely is present in these studies, but is unlikely to provide an entire explanation for the association.

¹⁰ For example, if dwellings near power lines encounter higher traffic density and pollution from traffic density causes childhood leukemia, traffic density may cause an association between magnetic field exposure and childhood leukemia, where a relationship does not truly exist.



Source: Adapted from Schüz and Ahlbom (2008)

Figure 6. Possible explanations for the observed association between magnetic fields and childhood leukemia

The WHO review stated that reconciling the epidemiologic data on childhood leukemia and the negative (i.e., no hazard or risk observed) experimental findings through innovative research is currently the highest priority in the field of ELF EMF research. Given that few children are expected to have average magnetic field exposures greater than 3-4 mG, however, the WHO stated that the public health impact of magnetic fields on childhood leukemia would be low if the association was determined to be causal.

What relevant studies have been published since the WHO review?

A number of studies investigating childhood leukemia and magnetic fields have been published since the WHO review (Table 1). Recent studies continue to support a weak association between elevated magnetic field levels and childhood leukemia, but they lack the methodological improvements required to advance this field; the evidence remains limited and the observed statistical association is still unexplained. Some scientists have opined that epidemiology has reached its limits in this area and any future research must demonstrate a significant methodological advancement (e.g., an improved exposure metric or a large sample size in high exposure categories) to be justified (Savitz, 2010; Schmiedel and Blettner, 2010).

Most notably, Kheifets et al. (2010a) conducted a pooled analysis of studies published between 2000 and 2010 that was intended to mirror the earlier pooled analyses of studies published between 1974 and 1999 (Ahlbom et al., 2000; Greenland et al., 2000). Kheifets et al. identified six studies for the main analysis that met their inclusion criteria (i.e., population-based studies of childhood leukemia that measured or calculated magnetic fields inside a home); three of the studies in this analysis were considered in the WHO review, while two are described here (Kroll et al., 2010; Malagoli et al., 2010).¹¹ An additional Brazilian study remains unpublished, but the results were provided via personal communication to Kheifets et al. (Wunsch Filho, personal communication, 2009).¹² A large number of cases were identified by Kheifets et al. (10,865), but a relatively small number of cases (23) were classified in the highest exposure category (>3 mG). A positive association was reported (OR=1.44), but it was weaker than the previous pooled estimates and not statistically significant (95% CI=0.88–2.36); a dose-response relationship was apparent and the association was stronger when the Brazilian study was excluded.

The largest number of cases in Kheifets et al. (2010a) was from a large, case-control study conducted in the United Kingdom by Kroll et al. (2010). Kroll et al. expands upon an earlier study (Draper et al., 2005) by replacing residential distance to nearby transmission lines as the exposure metric with calculated magnetic fields from nearby transmission lines; both studies included all children diagnosed with cancer in the United Kingdom from 1962 through 1995. Draper et al. (2005) reported that children with leukemia were more likely to have lived at birth within 600 meters (m) of a high-voltage transmission line, although the authors questioned the significance of this finding since magnetic fields from power lines do not extend to distances of 600 m.¹³ Kroll et al. calculated average yearly residential magnetic-field levels for children

¹¹ A seventh study was included in Kheifets et al. (2010a), but only in the pooled analysis of childhood leukemia and residential distance to power lines (Lowenthal et al., 2007). This study is not discussed further in this section because published findings only report on a combined category of lymphoproliferative and myeloproliferative disorders for both adults and children combined.

¹² The study evaluated acute lymphoblastic leukemia among children less than 8 years of age and measured exposure using 24-hour measurements in the children's bedrooms.

¹³ The WHO concluded the following with respect to the Draper et al. (2005) findings: “[the] observation of the excess risk so far from the power lines, both noted by the authors and others, is surprising. Furthermore, distance is known to be a very poor predictor of magnetic field exposure, and therefore, results of this material based on calculated magnetic fields, when completed, should be much more informative” (p. 270, WHO 2007a).

living within 400 m of power lines at birth; modeling estimated that magnetic field levels above 1 mG could be predicted reliably only at residences within 400 m of a transmission line. Only 1% of children had a residence at birth within 400 m of a transmission line and only 0.07% had calculated exposures greater than 1 mG. Furthermore, nearly 25% of the residences within 400 m of a transmission line lacked data to calculate residential magnetic-field levels. An OR of 2.0 was calculated for the two cases of childhood leukemia and one control with calculated magnetic fields greater than 4 mG (95% CI=0.18 to 22.04); no dose-response relationship was apparent. As a result of small numbers and incomplete information, no strong conclusions can be drawn from this study. The authors stated that the study “slightly strengthens” the evidence for an association between magnetic fields and childhood leukemia.

Malagoli et al. (2010) was also included in the pooled analysis. This Italian study identified all childhood hematological malignancies diagnosed between 1967 and 2007 in two Italian municipalities (64 cases) and recruited four controls per case matched on sex, age, and municipality of residence.¹⁴ Exposure was defined as having lived for at least 6 months prior to diagnosis at a residence with calculated power-line magnetic field levels above 1 mG or above 4 mG; magnetic-field levels were calculated using 2001 average line loading, rather than loading during the year of birth or diagnosis. Few children lived in a residence with power-line magnetic field levels above 1 mG (2 cases and 5 controls) or 4 mG (1 case and 2 controls); thus, estimated associations were unstable. The RR for leukemia and residence in an area with exposure ≥ 1 mG was 3.2 (6.7 adjusting for SES), but the estimate was statistically unstable (95% CI=0.4-23.4), and there was no indication of a dose-response relationship. Similar to Kroll et al. (2010), this study’s strength is the lack of participation required, but it is limited by small numbers, the related imprecision, and the lack of an exposure-response relationship.

Three studies published since the WHO review confirmed an association with residential distance to power lines and childhood leukemia in countries with populations living in closer proximity to power lines (Feizi and Arabi, 2007 [< 500 m vs. >500 m]; Abdul Rahman et al., 2008 [< 200 m vs. >200 m]; Sohrabi et al., 2010 [<400 m vs. >400 m]). The consistency of the association between childhood leukemia and residential distance to power lines is noteworthy,

¹⁴ Hematological cancers include all types of leukemias, lymphomas, and Hodgkin’s disease.

but these studies do not provide strong evidence of a relationship between magnetic fields and childhood leukemia because of their limited quality, e.g., lack of control for SES. While these three studies were excluded from the pooled analysis because they were hospital-based, Kheifets et al. (2010a) pooled data on distance and childhood leukemia from other studies and confirmed an elevated OR at distances less than 200 m. The association remains unexplained, however, and a recent study confirms that distance is a poor proxy for measurements of residential magnetic fields; Maslanyj et al. (2009) reported that only 13% of homes in a 100 m corridor of 220-440-kV power lines had a measured magnetic field level above 2 mG.

Other recent studies were not included in the pooled analysis because they reported on leukemia subgroups and magnetic fields. These studies reported that children with leukemia and estimates of average magnetic-field exposures greater than 3-4 mG had poorer survival (Foliart et al., 2006, 2007; Svendsen et al., 2007); children with Down syndrome and childhood leukemia were more likely to have spot measurements at the door of their home greater than 6 mG compared to children with Down syndrome only (Mejia-Arangure et al., 2007); and one genetic polymorphism related to DNA repair (but with no known relationship to leukemia) was reported to be more common among children with leukemia living close to an electrical installation compared to children with leukemia living at a distance (Yang et al., 2008). The results of these recent studies were limited by small numbers, incomplete adjustment for potential risk factors, and the lack of a biological explanation to explain the observed associations, among other methodological issues. Additional epidemiologic and biological research is required in these new fields of inquiry.

Another new field of inquiry is the relevance of pre- or post-conception EMF exposure of a parent to cancer in their offspring. Hug et al (2010) studied the pre-conception occupational exposures of parents of children with leukemia and compared them to the exposures of parents of healthy children. No association was found between childhood leukemia and magnetic-field exposure pre-conception in either parent. Another recent study reported an association between childhood leukemia and a paternal history of electrical work, but is limited because exposure is based solely on occupational title (Pearce et al., 2007).

Scientists have also pursued the influence of bias and confounding in recent years. Recent studies confirmed that control selection bias appears to be operating in case-control studies of childhood leukemia and magnetic fields, although the exact degree of its influence is still unknown (Mezei and Kheifets, 2006; Mezei et al., 2008a, 2008b). A study has also found that contact currents from residential grounding systems show characteristics of a confounding variable (Kavet and Hooper, 2009). Finally, a recent study confirmed that the time of day when magnetic-field measurement are made is not contributing to exposure misclassification; no difference in the magnitude or pattern of results was found for nighttime vs. 24-hour or 48-hour measurements, refuting the hypothesis that nighttime exposures are more strongly associated with childhood leukemia because magnetic fields might affect carcinogenesis through a melatonin-driven pathway (Schüz et al., 2007).

In summary, the studies conducted since the WHO review support an association with magnetic fields and childhood leukemia. In particular, scientific data published since the WHO review:

- confirms the rarity of living in close proximity to a power line or having estimated or measured exposures greater than 1 mG;
- confirms a positive association between average magnetic field levels greater than 3 mG and childhood leukemia, but the association cannot be distinguished from chance due to small numbers;
- confirms an association with residential proximity to power lines and childhood leukemia, but reports that distance is not a reliable predictor of in-home magnetic field levels; and,
- suggests that control selection bias may play some role in the observed association.

These findings do not alter previous conclusions that the epidemiologic evidence on magnetic fields and childhood leukemia is limited. Chance, confounding, and several sources of bias cannot be ruled out. Conclusions from reviews (Kheifets and Oksuzyan, 2008; Schüz and Ahlbom, 2008) and scientific organizations (SSI, 2007; SSI, 2008; HCN, 2009; SCENIHR, 2009) published since the WHO review support this conclusion.

Table 1. Relevant studies of childhood leukemia published after the WHO review

Author	Year	Study Title
Abdul Rahman et al.	2008	A case-control study on the association between environmental factors and the occurrence of acute leukemia among children in Klang Valley, Malaysia.
Fezei and Arabi	2007	Acute childhood leukemias and exposure to magnetic fields generated by high voltage overhead power lines – a risk factor in Iran
Foliart et al.	2006	Magnetic field exposure and long-term survival among children with leukaemia
Foliart et al.	2007	Magnetic field exposure and prognostic factors in childhood leukemia
Hug et al.	2010	Parental occupational exposure to extremely low frequency magnetic fields and childhood cancer: a German case-control study
Kavet and Hooper	2009	Residential magnetic fields and measures of neutral-to-earth voltage: variability within and between residences
Kheifets et al.	2010a	Pooled analysis of recent studies on magnetic fields and childhood leukaemia
Kroll et al.	2010	Childhood cancer and magnetic fields from high-voltage power lines in England and Wales: a case-control study
Malagoli et al.	2010	Risk of hematological malignancies associated with magnetic fields exposure from power lines: a case control study in two municipalities in northern Italy
Maslanyj et al.	2009	Power frequency magnetic fields and risk of childhood leukaemia: Misclassification of exposure from the use of the 'distance from power line' exposure surrogate
Mejia-Arangure et al.	2007	Magnetic fields and acute leukemia in children with Down syndrome
Mezei and Kheifets	2006	Selection bias and its implications for case-control studies: A case study of magnetic field exposure and childhood leukaemia
Mezei et al.	2008a	Assessment of selection bias in the Canadian case-control study of residential magnetic field exposure and childhood leukemia
Pearce et al.	2007	Paternal occupational exposure to electro-magnetic fields as a risk factor for cancer in children and young adults: A case-control study from the North of England
Schüz et al.	2007	Nighttime exposure to electromagnetic fields and childhood leukemia: An extended pooled analysis
Sohrabi et al.	2010	Living near overhead high voltage transmission power lines as a risk factor for childhood acute lymphoblastic leukemia: a case-control study
Svendson et al.	2007	Exposure to magnetic fields and survival after diagnosis of childhood leukemia: An extended pooled analysis
Yang et al.	2008	Case-only of interactions between DNA repair genes (hMLH1, APEX1, MGMT, XRCC1, and XPD) and low frequency electromagnetic fields in childhood acute leukemia

Childhood brain cancer

What was previously known about childhood brain cancer and what did the WHO review conclude?

The research related to magnetic fields and childhood brain cancer has been less consistent than that observed for childhood leukemia. The WHO review recommended the following:

As with childhood leukaemia, a pooled analysis of childhood brain cancer studies should be very informative and is therefore recommended. A pooled analysis of this kind can inexpensively provide a greater and improved insight into the existing data, including the possibility of selection bias and, if the studies are sufficiently homogeneous, can offer the best estimate of risk (p. 18, WHO 2007a).

What relevant studies have been published since the WHO review?

The relevant studies of childhood brain cancer and magnetic field exposure are listed in Table 2 below. In response to the WHO recommendation above, a meta-analysis (Mezei et al., 2008b) and a pooled analysis (Kheifets et al., 2010b) of studies on childhood brain tumors and residential magnetic field exposure were conducted. In the meta-analysis, thirteen epidemiologic studies were identified that used various proxies of magnetic field exposure (distance, wire codes, calculated magnetic fields, and measured magnetic fields). The combined effect estimate was close to 1.0 and not statistically significant, indicating no association between magnetic field exposure and childhood brain tumors. A sub-group of five studies, however, with information on childhood brain tumors and calculated or measured magnetic fields greater than 3-4 mG reported a combined OR that was elevated but not statistically significant (OR=1.68, 95% CI=0.83-3.43). The authors suggested two explanations for this elevated OR. First, they suggested that an increased risk of childhood brain tumors could not be excluded at high exposure levels (i.e., >3-4 mG). Second, they stated that the similarity of this result to the findings of the pooled analyses of childhood leukemia suggests that control selection bias is operating in both analyses. Similar to the meta-analysis, some categories of high exposure in the pooled analysis of studies with measured or calculated magnetic-field levels had an OR ≥ 1.0 , but none of the findings were statistically significant and enhanced calculations showed inconsistency in the results of subgroup analyses and no dose-response pattern (Kheifets et al., 2010b). The main analysis reported no association between childhood brain cancer and magnetic-field exposure >4 mG, compared to

magnetic-field exposure <1 mG (OR=1.14, 95% CI=0.61-2.13). Both the authors of the meta-analysis and the pooled analysis concluded that their results provide little evidence for an association between magnetic fields and childhood brain tumors.

The pooled analysis included two case-control studies published after the WHO 2007 review (Kroll et al., 2010; Saito et al., 2010). In their study of 55 cases of childhood brain cancer, Saito et al. (2010) reported that children with brain cancer were more likely to have average magnetic-field exposure levels greater than 4 mG, compared to children without brain cancer.¹⁵ The association was based on three cases and one control; interpretations of the data were, therefore, limited by small numbers in the upper exposure category. The strength of this study is the exposure assessment; measurements were taken continuously over a weeklong period in the child's bedroom approximately 1 year after diagnosis. An important limitation, however, is the very poor participation rates among study subjects; poor participation rates introduce the possibility of selection bias, among other biases. As described above, Kroll et al. (2010) included 6,584 cases of brain cancer diagnosed over a 33-year period in the United Kingdom. No associations were reported in any analysis of brain cancer, including calculated magnetic fields \geq 1-2 mG, 2-4 mG, and 4mG.

Studies of parental occupational magnetic field exposure and childhood brain tumors have produced inconsistent results. In a recent pooled analysis of two Canadian case-control studies, Li et al. (2009) calculated individual maternal occupational magnetic field exposure pre- and post-conception and analyzed these estimates in relation to brain cancer in offspring. Associations were reported between childhood brain cancer and average magnetic-field exposures greater than approximately 3 mG for exposure in the 2 years prior to conception and during conception; no associations were found using the cumulative and peak exposure metrics. More research is required in this area.

Recent studies provide some suggestion of an association between magnetic field exposures prior to diagnosis or *in utero* and the development of childhood brain cancer. The data receive little weight in an overall assessment, however, due to methodological shortcomings. The recent data do not alter the classification of the epidemiologic data in this field as inadequate.

¹⁵ The unpublished results of this study were included in Mezei et al. (2008b).

Table 2. Relevant studies of childhood brain cancer published after the WHO review

Authors	Year	Study
Kheifets et al.	2010b	A pooled analysis of extremely low-frequency magnetic fields and childhood brain tumors
Kroll et al.	2010	Pooled analysis of recent studies on magnetic fields and childhood leukaemia
Li et al.	2009	Maternal occupational exposure to extremely low frequency magnetic fields and the risk of brain cancer in the offspring
Mezei et al.	2008b	Residential magnetic field exposure and childhood brain cancer: a meta-analysis
Saito et al.	2010	Power frequency magnetic fields and childhood brain tumors: A case-control study in Japan

Breast cancer

What was previously known about breast cancer and what did the WHO review conclude?

The WHO reviewed studies of breast cancer and residential magnetic field exposure, electric blanket usage, and occupational magnetic field exposure. These studies did not report consistent associations between magnetic field exposure and breast cancer, and the WHO concluded that, since the recent body of research was higher in quality compared with previous studies, it provided strong support to previous consensus statements that magnetic field exposure does not influence the risk of breast cancer.¹⁶ The WHO recommended no further research with respect to breast cancer and magnetic field exposure.

What relevant studies have been published since the WHO review?

Two case-control studies (McElroy et al., 2007; Ray et al., 2007) and one cohort study (Johansen et al., 2007) have been published, all of which evaluated occupational magnetic field exposure.¹⁷ In addition, a meta-analysis of 15 studies of breast cancer and occupational

¹⁶ The WHO concluded, “Subsequent to the IARC monograph a number of reports have been published concerning the risk of female breast cancer in adults associated with ELF magnetic field exposure. These studies are larger than the previous ones and less susceptible to bias, and overall are negative. With these studies, the evidence for an association between ELF exposure and the risk of breast cancer is weakened considerably and does not support an association of this kind” (p. 307, WHO 2007a).

¹⁷ In addition to the studies described in the text, another study was identified. Peplonska et al. (2007) is a case-control study of female breast cancer reporting associations for a wide range of occupations and industries. It is not considered in depth in this report because no qualitative or quantitative estimates of magnetic field exposure were made, beyond occupation and industry titles.

magnetic field exposure was published (Chen et al., 2010), which included one of the case-control studies (McElroy et al 2007).

Ray et al. (2007) was a nested case-control study in a cohort of approximately 250,000 textile workers in China followed for breast cancer incidence, and McElroy et al. (2007) evaluated occupational exposures to high, low, medium, or background EMF levels in a large number of breast cancer cases and controls. Neither study observed a significant association between breast cancer and higher estimated magnetic field exposure. A large cohort study of utility workers in Denmark also reported that women exposed to higher occupational magnetic field levels did not have higher rates of breast cancer (Johansen et al., 2007).

Chen et al. (2010) published a meta-analysis of all published case-control studies of female breast cancer and magnetic field exposure meeting defined inclusion criteria. Fifteen studies published between 2000 and 2009 were identified examining residential and occupational exposure and electric blanket usage. The authors crudely re-categorized data from the original studies to reflect a common comparison of <2 mG and >2mG and reported an overall OR of 0.988 (95% CI = 0.898–1.088). The advantage of this meta-analysis is its very large size. Its main limitation is that data from a wide range of exposure definitions and cut-points were combined.

These studies, particularly the large cohort of utility workers, add to growing support against a causal role for magnetic fields in breast cancer. This is consistent with the conclusion by the SCENIHR, which stated that an association is “unlikely” (p. 7, SCENIHR 2007).

Table 3. Relevant studies of breast cancer published after the WHO review

Authors	Year	Study
Chen et al.	2010	Extremely low-frequency electromagnetic fields exposure and female breast cancer risk: a meta-analysis based on 24,338 cases and 60,628 controls
Johansen et al.	2007	Risk for leukaemia and brain and breast cancer among Danish utility workers: A second follow-up
McElroy et al.	2007	Occupational exposure to electromagnetic field and breast cancer risk in a large, population-based, case-control study in the United States
Ray et al.	2007	Occupational exposures and breast cancer among women textile workers in Shanghai

Other adult cancers

What was previously known about other adult cancers and what did the WHO review conclude?

In general, scientific panels have concluded that there is not a strong or consistent relationship between other adult cancers (leukemia, lymphoma, or brain cancers) and exposure to magnetic fields; however, the possibility cannot be entirely ruled out because the findings have been inconsistent (IARC, 2002; WHO, 2007a). Stronger findings have not been observed in studies with better exposure assessment methods, which have led scientific panels to conclude that the evidence for an association is weak. The IARC classified the epidemiologic data with regard to adult leukemia, lymphoma, and brain cancer as “inadequate” in 2002, and the WHO confirmed this classification in 2007, with much of the remaining uncertainty attributed to limitations in exposure assessment methods.

Much of the research on EMF and adult cancers is related to occupational exposures, given the higher range of exposures encountered in the occupational environment. The main limitation of these studies, however, has been the methods used to assess exposure, with early studies relying simply on a person’s occupational title (often taken from a death certificate) and later studies linking a person’s full or partial occupational history to representative average exposures for each occupation (i.e., a job exposure matrix). The latter method, while advanced, still has some important limitations, as highlighted in a review summarizing an expert panel’s findings by Kheifets et al. (2009).¹⁸ While a person’s occupation may provide some indication of the overall magnitude of their occupational magnetic field exposure, it does not take into account the possible variation in exposure due to different job tasks within occupational titles, the frequency and intensity of contact to relevant exposure sources, or variation by calendar time. Furthermore, since scientists do not know any mechanism by which magnetic fields could lead to cancer, an appropriate exposure metric is unknown.

¹⁸ Kheifets et al. (2009) reports on the conclusions of an independent panel organized by the Energy Networks Association in the United Kingdom in 2006 to review the current status of the science on occupational EMF exposure and identify the highest priority research needs.

In order to reduce the remaining uncertainty about whether there is an association between magnetic fields and these cancers, researchers have recommended (1) meta-analyses to clarify inconsistencies and (2) better exposure assessment methods that incorporate a greater level of detail on tasks and exposure characteristics such as spark discharge, contact current, harmonics, etc. (WHO, 2007a; Kheifets et al., 2009).

Adult brain cancer

What was previously known about adult brain cancer and what did the WHO review conclude?

As described above, the WHO classified the epidemiologic data on adult brain cancer as inadequate and recommended (1) updating the existing cohorts of occupationally-exposed individuals in Europe and (2) pooling the epidemiologic data on brain cancer and adult leukemia to confirm the absence of an association.¹⁹

What relevant studies have been published since the WHO review?

Epidemiologic studies published after 2006 on adult brain cancer and EMF exposure are listed in Table 6 and include two case-control studies, two cohort studies, and a meta-analysis, all of which are related to occupational magnetic field exposure.

In response to the WHO's recommendation, two cohorts of approximately 20,000 occupationally-exposed persons each were updated: a cohort of utility workers in Denmark and a cohort of railway workers in Switzerland (Johansen et al., 2007; Rössli et al, 2007a). In both cohorts, brain cancer rates were similar between jobs with high magnetic field exposure and jobs with lower exposures. A case-control study of gliomas was conducted in Australia and reported no associations with higher estimated magnetic field exposure, using a standard job-exposure matrix (Karipidis et al., 2007a). Forssén et al. (2006) performed a large registry-based case-control study of acoustic neuroma and reported no association between higher occupational magnetic field exposures and this benign and rare brain cancer type. Another large case-control study was recently published of gliomas and meningiomas in the United States (Coble et al.,

¹⁹ The WHO concluded, "In the case of adult brain cancer and leukaemia, the new studies published after the IARC monograph do not change the conclusion that the overall evidence for an association between ELF [EMF] and the risk of these disease remains inadequate" (p. 307, WHO 2007a).

2009). For the first time, the exposure metric in this study incorporated the frequency of exposure to EMF sources, as well as the distance people worked from these sources, on an individual basis. The authors also evaluated exposure metrics in addition to the time-weighted average (TWA) exposure (maximum exposed job, total years of exposure above 1.5 mG, cumulative lifetime exposure, and average lifetime exposure). No association was reported between any of these exposure metrics and brain cancer.

As recommended in the WHO review, a meta-analysis of occupationally-exposed cohorts was performed by Khefets et al. (2008). All relevant publications of occupational EMF exposure and adult leukemia or brain cancer were collected and summary risk estimates were calculated using various schemes to weight and categorize the study data. The authors reported a small and statistically significant increase of leukemia and brain cancer in relation to the highest estimate of magnetic field exposure in the individual studies. Several findings, however, led the authors to conclude that magnetic field exposure is not responsible for the observed associations, including the lack of a consistent pattern among leukemia subtypes when the past and new meta-analyses were compared. In addition, for brain cancer, the recent meta-analysis reported a weaker association than the previous meta-analysis, whereas a stronger association would be expected since the quality of studies has increased over time. The authors concluded, “the lack of a clear pattern of EMF exposure and outcome risk does not support a hypothesis that these exposures are responsible for the observed excess risk” (p. 677).

Recent studies have reduced possible exposure misclassification by improving exposure assessment methods (i.e., the expanded job-exposure matrix in Coble et al., 2009) and attempted to clarify inconsistencies by updating studies and meta-analyzing data (Johansen et al., 2007; Rössli et al., 2007a; Kheifets et al., 2008); however, despite these advancements, no association has been observed. While an association still cannot be *entirely* ruled out because of the remaining deficiencies in exposure assessment methods, the current database of studies provides

weak evidence of an association between magnetic fields and brain cancer.²⁰ The recent report by the SCENIHR described the data on brain cancers as “uncertain” (p. 43, SCENIHR 2009).

Table 4. Relevant studies of adult brain cancer published after WHO review

Authors	Year	Study
Coble et al.	2009	Occupational exposure to magnetic fields and the risk of brain tumors
Forssén et al.	2006	Occupational magnetic field exposure and the risk of acoustic neuroma
Johansen et al.	2007	Risk for leukaemia and brain and breast cancer among Danish utility workers: A second follow-up
Karipidis et al.	2007a	Occupational exposure to low frequency magnetic fields and the risk of low grade and high grade glioma
Kheifets et al.	2008	Occupational electromagnetic fields and leukemia and brain cancer: An update to two meta-analyses
Röösli et al.	2007a	Leukaemia, brain tumours and exposure to extremely low frequency magnetic fields: cohort study of Swiss railway employees

Adult leukemia and lymphoma

What was previously known about adult leukemia/lymphoma and what did the WHO review conclude?

The same issues discussed above with regard to adult brain cancer are relevant to research on adult leukemia and lymphoma. The WHO classified the epidemiologic evidence as “inadequate” and recommended updating the existing occupationally-exposed cohorts in Europe and the meta-analysis on occupational magnetic field exposure (p. 307, WHO 2007a).²¹

What relevant studies have been published since the WHO review?

Two cohorts of occupationally-exposed workers and a meta-analysis of occupational magnetic field exposure (all of which were described above) reported on the possible association of occupational magnetic field exposure and adult leukemia. Also, a case-control study described patterns of estimated residential magnetic field exposure and combined lymphoma and leukemia diagnostic categories (Lowenthal et al., 2007).

²⁰ A recent consensus statement by the National Cancer Institute’s Brain Tumor Epidemiology Consortium confirms this statement. They classified residential power frequency EMF in the category “probably not risk factors” and described the epidemiologic data as “unresolved” (p. 1958, Bondy et al., 2008).

²¹ No specific conclusions were provided by the WHO with regard to lymphoma.

In the occupational cohort of Swiss railway workers, the authors noted a stronger association among occupations with higher estimates of magnetic field exposures, but the associations were not statistically significant (Röösli et al, 2007a). In the study of Danish utility workers, no increases in leukemia rates were observed in job titles that involved higher exposures to magnetic fields (Johansen et al., 2007). As described above, the updated meta-analysis by Kheifets et al. (2008) reported a weak association between estimated occupational magnetic field exposure and leukemia, but the authors felt that the data was not indicative of a true association.

Lowenthal et al. (2007) grouped cases in five diagnostic categories as lymphoproliferative disorders (LPD) (including acute lymphoblastic leukemia [ALL]) and cases in three diagnostic categories (including acute myeloid leukemia [AML] and other leukemias) as myeloproliferative disorders (MPD). These groups included both adults and children of all ages. The authors estimated exposure by obtaining a lifetime residential history and assessing distance of residences from 88-kV, 110-kV, and 220-kV power lines. They reported elevated, but not statistically significant, ORs for those who lived within 50 m of any of these power lines, and an indication of decreasing ORs with increasing distance. This study adds very little to the existing database of information on adult leukemia and residential exposure, however, because of fundamental limitations. For example, different cancer types were combined as were different ages of diagnosis. It is well known that cancer etiology varies by cancer type, cancer subtype, and diagnostic age.²²

Very little is known about the etiology of Non-Hodgkin lymphoma (NHL), and few studies have been conducted in relation to magnetic field exposure. In one of the first studies to estimate cumulative occupational magnetic field exposure among NHL cases, Karipidis et al. (2007b) reported a statistically significant association between NHL and the highest category of exposure (OR=1.59, 95% CI=1.07-2.36). Overall, the study was well conducted, with its most significant limitation being the possibility of uncontrolled confounding. In another case-control study of NHL, Wong et al. (2010) identified 649 cases from a hospital in Shanghai. Among numerous questions in the interview, cases and controls were asked whether they had ever lived

²² The recent meta-analysis by Kheifets et al. (2010) implies that data are available from Lowenthal et al. (2007) for childhood leukemia as a separate diagnostic category. This information is not publicly accessible, however.

within 100 m of a high-voltage power line. Results showed no association (i.e., no differences in residential history between cases and controls), but the strength of the study is limited by the use of distance as a proxy for exposure. Another recent case-control study did not report an association between NHL and self-report of occupations likely to involve EMF exposure derived from a JEM (Richardson et al., 2008).

Of note, the cohort of railway workers in Switzerland did not report an increase in NHL deaths among the more highly exposed workers (Röösli et al, 2007a). Further research in this area is required.

The recent literature also includes a novel study examining whether there are differences in the activity of the natural killer (NK) cell, a cytotoxic immune cell which attacks tumor cells and cells infected with viruses, among persons occupationally exposed to magnetic fields (Gobba et al., 2008). Higher measured magnetic field levels (i.e., >10 mG) during three complete work shifts were associated with reduced NK activity. Future studies are required to replicate this finding and understand the potential significance of NK activity in cancer.

A number of studies of adult leukemia have attempted to clarify inconsistencies by updating studies and meta-analyzing data (Johansen et al., 2007; Kheifets et al., 2008; Röösli et al, 2007a); however, despite these advancements, no clear or statistically significant association has been observed. While an association still cannot be *entirely* ruled out because of the remaining deficiencies in exposure assessment methods, the current database of studies provides weak evidence of an association between magnetic fields and leukemia. Preliminary results related to NHL have been published and require further investigation.

Table 5. Relevant studies of adult leukemia/lymphoma published after the WHO review

Authors	Year	Study
Gobba et al.	2008	Extremely low frequency-magnetic fields (ELF-EMF) occupational exposure and natural killer activity in peripheral blood lymphocytes
Johansen et al.	2007	Risk for leukaemia and brain and breast cancer among Danish utility workers: A second follow-up
Karipidis et al.	2007b	Occupational exposure to power frequency magnetic fields and risk of non-Hodgkin lymphoma
Kheifets et al.	2008	Occupational electromagnetic fields and leukemia and brain cancer: An update to two meta-analyses
Lowenthal et al.	2007	Residential exposure to electric power transmission lines and risk of lymphoproliferative and myeloproliferative disorders: a case-control study
Richardson et al.	2008	Occupational risk factors for non-Hodgkin's lymphoma: a population-based case-control study in northern Germany
Röösli et al.	2007a	Leukaemia, brain tumours and exposure to extremely low frequency magnetic fields: cohort study of Swiss railway employees
Wong et al.	2010	A hospital-based case-control study of non-Hodgkin lymphoid neoplasms in Shanghai: Analysis of personal characteristics, lifestyle, and environmental risk factors by subtypes of the WHO classification

***In vivo* studies of carcinogenesis**

What was previously known about *in vivo* studies of carcinogenesis and what did the WHO review conclude?

It is standard procedure to conduct studies on laboratory animals to determine whether exposure to a specific agent leads to the development of cancer (USEPA, 2005). This approach is used because all known human carcinogens cause cancer in laboratory animals. In the field of ELF EMF research, a number of research laboratories have exposed rodents, including those with a particular genetic susceptibility to cancer, to high levels of magnetic fields over the course of the animals' lifetime and performed tissue evaluations to assess the incidence of cancer in many organs. In these studies, magnetic field exposure has been administered alone (to test for the ability of magnetic fields to act as a complete carcinogen), in combination with a known carcinogen (to test for a promotional or co-carcinogenetic effect), or in combination with a known carcinogen and a known promoter (to test for a co-promotional effect).

The WHO review described four large-scale, long-term studies of rodents exposed to magnetic fields over the course of their lifetime that did not report increases in any type of cancer (Mandeville et al., 1997; Yasui et al., 1997; Boorman et al., 1999a, 1999b; McCormick et al., 1999). No directly relevant animal model for childhood ALL existed at the time of the WHO

report. Some animals, however, develop a type of lymphoma similar to childhood ALL and studies exposing predisposed transgenic mice to ELF magnetic fields did not report an increased incidence of lymphoma (Harris et al., 1998; McCormick et al., 1998; Sommer and Lerchel, 2004).

Studies investigating whether exposure to magnetic fields can promote cancer or act as a co-carcinogen used known cancer-causing agents, such as ionizing radiation, ultraviolet radiation, or other chemicals. No effects were observed for studies on chemically-induced preneoplastic liver lesions, leukemia or lymphoma, skin tumors, or brain tumors; however, the incidence of 7,12-dimethylbenz[a]anthracene (DMBA)-induced mammary tumors was increased with magnetic field exposure in a series of experiments in Germany (Löscher et al., 1993, 1994, 1997; Baum et al., 1995; Löscher and Mevissen, 1995; Mevissen et al., 1993a, 1993b, 1996a, 1996b, 1998), suggesting that magnetic field exposure increased the proliferation of mammary tumor cells. These results were not replicated in a subsequent series of experiments in a laboratory in the United States (Anderson et al., 1999; Boorman et al. 1999a, 1999b), possibly due to differences in experimental protocol and the species strain. In Fedrowitz et al. (2004), exposure enhanced mammary tumor development in one sub-strain (Fischer 344 rats), but not in another sub-strain that was obtained from the same breeder, which argues against a promotional effect of magnetic fields.²³

Some studies have reported an increase in genotoxic effects among exposed animals (e.g., DNA strand breaks in the brains of mice [Lai and Singh, 2004]), although the results have not been replicated.

In summary, the WHO concluded the following with respect to *in vivo* research: “There is no evidence that ELF exposure alone causes tumours. The evidence that ELF field exposure can enhance tumour development in combination with carcinogens is inadequate” (p. 322, WHO 2007a). Recommendations for future research included the development of a rodent model for childhood ALL and the continued investigation of whether magnetic fields can act as a promoter or co-carcinogen.

²³ The WHO concluded with respect to the German studies of mammary carcinogenesis, “Inconsistent results were obtained that may be due in whole or in part to differences in experimental protocols, such as the use of specific substrains” (p. 321, WHO 2007a).

What relevant studies have been published since the WHO review?

In view of the available evidence that exposure to magnetic fields *alone* does not increase the occurrence of cancer, the literature published following the WHO review includes numerous *in vivo* studies testing different hypotheses of cancer promotion, including effects on brain cancer (Chung et al., 2008), breast cancer (Fedrowitz and Löscher, 2008), and lymphoma or leukemia (Bernard et al., 2008; Negishi et al., 2008; Chung et al., 2010), as referenced below. Studies of genotoxicity and oxidative damage *in vivo* have also been published since 2006, but these studies are just conceptually linked to carcinogenicity; this summary focuses on studies of tumor progression since these studies are the most relevant. In most of these studies, the animals were treated first with chemicals known to initiate the cancer process. Initiated animals are more likely to develop cancer, and a subsequent exposure, known as a promoter, is often needed for an initiated cell to reproduce into many cancer cells. Several studies treated the animals with the initiators ethylnitrosourea (ENU) (Chung et al., 2008), n-butylnitrosourea (BNU) (Bernard et al., 2008), and DMBA (Fedrowitz and Löscher, 2008; Negishi et al., 2008). In Chung et al. (2010), mice that are genetically predisposed to develop thymic lymphoblastic lymphoma were exposed to magnetic fields to assess whether such exposure increased incidence of lymphoma or reduced survival. An additional study by Sommer and Lerchel (2006) tested whether magnetic fields alone increased the incidence of lymphoma in mice virally predisposed to lymphoblastic lymphoma.

Chung et al. (2008) examined the possible role of 60-Hz magnetic fields in promoting brain tumors initiated by ENU injections *in utero*; the authors concluded that there was no evidence that exposure to 60-Hz magnetic fields up to 5,000 mG promoted tumor development in this study.

Fedrowitz and Löscher (2008) is the most recent study from the German laboratory that previously reported increases in DMBA-induced mammary tumors with high magnetic field exposure. In this recent study, the researchers exposed DMBA-treated Fischer 344 rats (the strain of inbred rats used in previous experiments) to either high levels of magnetic fields (1,000 mG) or no exposure for 26 weeks and reported that the incidence of mammary tumors was significantly elevated in the group exposed to magnetic fields (Fedrowitz and Löscher, 2008).

No independent replication of this experiment has yet occurred and questions still remain about the effect of experimental protocol and species strain.

Sommer and Lerchl (2006) is a follow-up to an earlier study (Sommer and Lerchl, 2004) that reported no increases in lymphoma among predisposed animals chronically exposed to magnetic fields (up to 1,000 mG for 24 hours per day for 32 weeks). Sommer and Lerchl (2006) increased magnetic field exposure to 10,000 mG and exposed some of the animals only during the night to test the hypothesis that nighttime exposure may have a stronger effect than continuous exposure. Magnetic fields did not influence body weight, time to tumor, cancer incidence, or survival time in this study. In another study of lymphatic system cancers, researchers treated newborn mice with DMBA and magnetic fields up to 3,500 mG (Negishi et al., 2008). The authors reported that the percentage of mice with lymphoma or lymphatic leukemia was not higher in magnetic field-exposed groups, compared to the sham-exposed group.

In another study of lymphoid leukemia, Chung et al (2010) evaluated the effect of magnetic fields on AKR mice, which are genetically predisposed to thymic lymphoblastic lymphoma. Exposures ranged from 50-500 mG for 21 hours per day for 40 weeks, and cancer incidence was compared with a sham-exposed control group. Potential confounding variables (such as temperature, humidity, and magnetic-field variations) were monitored daily. The experiment was performed blind to ensure that biases were not introduced by investigator knowledge of exposure conditions. Magnetic-field exposures were not associated with changes in body weight, survival time, or the incidence of lymphoma compared to sham-treated controls. Exposure also did not affect components of the blood, micronuclei formation, or gene expression in the thymus.

A study by Bernard et al. (2008) provides a significant development, in that it is the first study to use an animal model of ALL, the most common leukemia type in children. All rats were exposed to BNU to initiate the leukemogenic process, and a sub-group of rats was exposed to magnetic fields of 1,000 mG for 18 hours per day for 52 weeks. No difference in leukemia incidence was observed between the BNU-treated group exposed to magnetic fields and the BNU-treated unexposed group. This study supports the hypothesis that magnetic fields do not

affect the development of ALL and provides additional support to the conclusion that experimental data is not supportive for a role of magnetic fields in the incidence of childhood leukemia. The researchers followed guidelines for the experimentation and care of laboratory animals and conducted the analyses blind to the treatment group. Experience with this strain of rat is limited, however, so it is unclear whether the results are more or less reliable than other animal models; replication is required.

Thus, aside from the most recent replication of enhanced mammary carcinogenesis in a specific sub-strain of rats in a German laboratory, recent studies provide further evidence against a role for magnetic fields as a co-carcinogen. These studies strengthen the conclusion that there is inadequate evidence of carcinogenicity from *in vivo* research, although independent confirmation of the German results is of high priority.

Table 6. Relevant *in vivo* studies of carcinogenesis published after the WHO review

Authors	Year	Study
Bernard et al.	2008	Assessing the potential Leukemogenic effects of 50 Hz and their harmonics using an animal leukemia model
Chung et al.	2008	Lack of a co-promotion effect of 60 Hz rotating magnetic fields on n-ethyl-n-nitrosourea induced neurogenic tumors in F344 rats
Chung et al.	2010	Lack of co-promotion effect of 60 Hz circularly polarized magnetic fields on spontaneous development of lymphoma in AKR mice
Fedrowitz and Löscher	2008	Exposure of Fischer 344 rats to a weak power frequency magnetic field facilitates mammary tumorigenesis in the DMBA model of breast cancer
Negishi et al.	2008	Lack of promotion effects of 50 Hz magnetic fields on 7,12-dimethylbenz(a)anthracene-induced malignant lymphoma/lymphatic leukemia in mice
Sommer and Lerchl	2006	50 Hz magnetic fields of 1 mT do not promote lymphoma development in AKR/J mice

***In vitro* studies of carcinogenesis**

What did the WHO and other scientific panels conclude with respect to *in vitro* studies of carcinogenesis?

In vitro studies are widely used to investigate the mechanisms for effects that are observed in humans and animals. The relative value of *in vitro* tests to human health risk assessment, however, is much less than that of *in vivo* and epidemiology studies. Responses of cells and tissues outside the body may not always reflect the response of those same cells if maintained in a living system, so the relevance of *in vitro* studies cannot be assumed (IARC, 1992).

The IARC and other scientific review panels that systematically evaluated *in vitro* studies concluded that there is no clear evidence indicating how ELF magnetic fields could adversely affect biological processes in cells (IARC, 2002; ICNIRP, 2003; NRPB, 2004). The WHO panel reviewed the *in vitro* research published since the time of these reviews and reached the same conclusion. The WHO noted that previous studies have not indicated a genotoxic effect of ELF magnetic fields on mammalian cells, however a series of experiments reported DNA damage in human fibroblasts exposed intermittently to 50 Hz magnetic fields (Ivancsits et al., 2002a, 2002b; Ivancsits et al., 2003a, 2003b). These findings have not been replicated by other laboratories (Scarfi et al., 2005), and the WHO recommended continued research in this area. Recently, investigators reported that they were unable to confirm any evidence for damage to DNA in cells exposed to magnetic fields over a range of exposures from 50 to 10,000 mG (Burdak-Rothkamm et al., 2009). Research in the field of *in vitro* genotoxicity of magnetic fields combined with known DNA-damaging agents is also recommended, following suggestive findings from several laboratories. As noted by the SSI, however, the levels at which these effects were observed are much higher than the levels to which we are exposed in our everyday environments and are, therefore, not directly relevant to questions about low-level, chronic exposures (SSI, 2007). *In vitro* studies investigating other possible mechanisms, including gene activation, cell proliferation, apoptosis, calcium signaling, intercellular communication, heat shock protein expression, and malignant transformation have produced “inconsistent and inconclusive” results, according to the WHO (p. 347, WHO, 2007a).

Reproductive and developmental effects

What was previously known about reproductive and developmental effects and what did the WHO review conclude?

Two studies received considerable attention because of a reported association between peak magnetic field exposure greater than approximately 16 mG and miscarriage: a prospective cohort study of women in early pregnancy (Li et al., 2002) and a nested case-control study of women who miscarried compared to their late-pregnancy counterparts (Lee et al., 2002).

These two studies improved on the existing body of literature because average exposure was assessed using 24-hour personal magnetic field measurements (early studies on miscarriage

were limited because they used surrogate measures of exposure, including visual display terminal use, electric blanket use, or wire code data). Following the publication of these two studies, however, a hypothesis was put forth that the observed association may be the result of behavioral differences between women with “healthy” pregnancies that went to term (less physically active) and women who miscarried (more physically active) (Savitz, 2002). It was proposed that physical activity is associated with an increased opportunity for peak magnetic field exposures, and the nausea experienced in early, healthy pregnancies and the cumbersomeness of late, healthy pregnancies would reduce physical activity levels, thereby decreasing the opportunity for exposure to peak magnetic fields. Furthermore, nearly half of the miscarriages reported in the cohort by Li et al. had magnetic field measurements taken after miscarriage occurred, when changes in physical activity may have already occurred, and all measurements in Lee et al. occurred post-miscarriage.

The scientific panels that have considered these two studies concluded that the possibility of this bias precludes making any conclusions about the effect of magnetic fields on miscarriage (NRPB, 2004; FPTRPC, 2005; WHO, 2007a). The WHO concluded, “There is some evidence for increased risk of miscarriage associated with measured maternal magnetic field exposure, but this evidence is inadequate” (p. 254, WHO 2007a). The WHO stated that, given the potentially high public health impact of such an association, further epidemiologic research is recommended.

What relevant studies have been published since the WHO review?

No new original studies on magnetic field exposure and miscarriage have been conducted; however, recent methodological studies evaluated the likelihood that the observed association was due to bias. Epidemiologic and *in vivo* studies of ELF EMF and reproductive and developmental effects are summarized in Table 7.

It is not possible to directly “test” for the effects of this bias in the original studies, but two recent analyses examined whether reduced physical activity was associated with a lower probability of encountering peak magnetic fields (Mezei et al., 2006; Savitz et al., 2006). In a 7-day study of personal magnetic field measurements in 100 pregnant women, Savitz et al. (2006)

reported that active pregnant women were more likely to encounter peak magnetic fields. In addition, an analysis by Mezei et al. (2006) of pre-existing databases of magnetic field measurements among pregnant and non-pregnant women found that increased activity levels were associated with peak magnetic fields. These findings are broadly supportive of the hypothesis that reduced activity among women in early pregnancies because of nausea and in later pregnancies because of clumsiness may explain the observed association between peak magnetic fields and miscarriage. As noted in a recent commentary on this issue, however, the possibility that there is a relationship between peak magnetic field exposure and miscarriage still cannot be excluded and further research that accounts for this possible bias should be conducted (Neutra and Li, 2008; Mezei et al., 2006). There remains no biological basis, however, to indicate that magnetic field exposure increases the risk of miscarriage (WHO, 2007a).

Two additional studies were published related to developmental outcomes and growth. Fadel et al. (2006) conducted a cross-sectional study in Egypt of 390 children 0-12 years of age living in an area within 50 m of an electrical power line and 390 children 0-12 years of age living in a region with no power lines in close proximity. Measurements were taken as proxies of growth retardation, and radiological assessments were performed on carpal bones. The authors reported that children living in the region near power lines had a statistically significant lower weight at birth and a reduced head and chest circumference and height at all ages. The authors concluded that “exposure to low frequency electromagnetic fields emerged [*sic*] from high voltage electric power lines increases the incidence of growth retardation among children” (p. 211). This conclusion, however, fails to adequately take into account the many limitations of their cross-sectional analysis (namely, inadequate control for the possible confounding effects of nutritional and SES status) and the pre-existing body of literature, which does not support such an association (WHO, 2007a). Public health statistics indicate that detrimental birth outcomes, including pre-term birth, low birth weight, or small for gestational age, occur more frequently in populations of lower SES (HHS, 2004); thus, analyses of adverse birth outcomes should be adjusted for these factors.

Auger et al. (2010) studied whether maternal residence near transmission lines was associated with adverse birth outcomes, adjusting for socioeconomic factors, among all live births in

Montreal and Canada between 1990 and 2004. Maternal residential distances were measured within 400 m of nearby transmission lines for over 700,000 live births, and the proportion of adverse events was compared between mothers living >400 m and within 400 m, adjusting for mother's age, education, household income, and other potential confounding factors. The analysis found no association with distances in 50 m increments for any of the outcomes: pre-term birth, low birth weight, small for gestational age, or proportion of male births. The use of distance as a surrogate of EMF exposure limits the value of this study.

Among recent *in vivo* reproductive studies of ELF EMF, seven examined effects on the female reproductive system (Aksen et al., 2006; Roushanger and Soleimani Rad, 2007; Al-Akhras et al., 2008; Anselmo et al., 2009; Aydin et al., 2009; De Bruyen and De Jager, 2010; Rajaei et al., 2010). In most of these studies, the researchers did not clarify whether they incorporated blinding to minimize bias and failed to indicate whether they used appropriate statistical analyses (e.g., use of the litter, rather than the pup, as the unit for analysis since littermates are known to be more similar to each other than offspring derived from separate litters). Other limitations included the use of animals with extremely deficient diets and the use of only one magnetic field level so that dose-response could not be assessed. Although some of the studies reported biological changes, none of the studies reported strong evidence of adverse reproductive outcomes.

Studies of reproductive effects on males were conducted across a broad range of exposures and duration and reported various responses of the male reproductive and accessory sex organs, as well as alterations in sex hormone concentrations (Akdag et al., 2006; Al-Akhras et al., 2006; Mostafa et al., 2006; Saad El-Din et al., 2006; Erpek et al., 2007; Farkhad et al., 2007; Khaki et al., 2008; Geng et al., 2009; Kim et al., 2009; Rajaei et al., 2009; Bernabo et al., 2010; De Bruyn and de Jager, 2010). These studies also suffered from flaws that affect validity; most failed to report methods to ensure blinding, few studies examined dose-response patterns, and some used only short-term exposures to extremely high fields. In a study involving exposure to two generations of mice, De Bruyn and de Jager (2010) reported decreases in sperm motility; however, these did not translate to functional decrements in reproductive capacity. Although these studies suggest possible male reproductive system alterations from EMF exposure, the

evidence is not strong and no firm conclusions can be drawn due to the conflicting nature of the reported responses.

Studies also were conducted of exposure during pregnancy (Anselmo et al., 2006, 2008; Okudan et al., 2006; Yao et al., 2007; Dundar et al., 2009; De Bruyn and De Jager, 2010). The studies entailed high and short-term exposures and had specific and narrow goals, e.g., evaluating changes in the eye or bone. Of note, De Bruyn and De Jager (2010) continuously exposed mice to a randomly varying 50-Hz magnetic field between 5 mG and 770 mG from conception through two generations of offspring in a double-blind study. Both the treated and sham-exposed groups consisted of ten pairs of mice in each generation. No effects of exposure were observed on mean gestational and generational days, mean litter size, or total number of stillborn pups. Like the other studies, however, the authors did not indicate whether appropriate statistical methods were used to control for potential litter effects.

Thus, the recent epidemiologic research does not provide sufficient evidence to alter the conclusion that the evidence for reproductive or developmental effects is inadequate. Recent studies of animals *in vivo* also do not provide evidence to change the conclusions expressed by the WHO. Various deficiencies in the methods and reporting of these studies limit their use in health risk assessment.

Table 7. Relevant studies of reproductive and developmental effects published after the WHO review

Authors	Year	Study
Akdag et al.	2006	Effect of ELF magnetic fields on lipid peroxidation, sperm count, p53 and trace elements
Aksen et al.	2006	Effect of 50-Hz 1-mT magnetic field on the uterus and ovaries of rats (electron microscopy evaluation)
Al-Akhras et al.	2006	Influence of 50 Hz magnetic field on sex hormones and other fertility parameters of adult male rats
Al-Akhras et al.	2008	Influence of 50 Hz magnetic field on sex hormones and body, uterine, and ovarian weights of adult female rats
Anselmo et al.	2006	Influence of a 60 Hz, 3 microT, electromagnetic field on the reflex maturation of Wistar rats offspring from mothers fed a regional basic diet during pregnancy
Anselmo et al.	2008	Influence of a 60 Hz, microT, electromagnetic field on the somatic maturation of wistar rat offspring fed a regional basic diet during pregnancy
Anselmo et al.	2009	Effects of the electromagnetic field, 60 Hz, 3 microT, on the hormonal and metabolic regulation of undernourished pregnant rats

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Authors	Year	Study
Auger et al.	2010	The relationship between residential proximity to extremely low frequency power transmission lines and adverse birth outcomes
Aydin et al.	2009	Evaluation of hormonal change, biochemical parameters, and histopathological status of uterus in rats exposed to 50-Hz electromagnetic field
Bernabó et al.	2010	Extremely low frequency electromagnetic field exposure affects fertilization outcome in swine animal model
De Bruyen and De Jager	2010	Effect of long-term exposure to a randomly varied 50 Hz power frequency magnetic field on the fertility of the mouse
Dundar et al.	2009	The effect of the prenatal and post-natal long-term exposure to 50 Hz electric field on growth, pubertal development and IGF-1 levels in female Wistar rats
Erpek et al.	2007	The effects of low frequency electric field in rat testis
Fadel et al.	2006	Growth assessment of children exposed to low frequency electromagnetic fields at the Abu Sultan area in Ismailia (Egypt)
Farkhad et al.	2007	Effects of extremely low frequency electromagnetic field on testes in guinea pig
Geng et al.	2009	Effects of electromagnetic field of UHV transmission lines exposure on testis tissue in mice
Khaki et al.	2008	The effects of electromagnetic field on the microstructure of seminal vesicles in rat: a light and transmission electron microscope study
Kim et al.	2009	Effects of 60 Hz 14 μ T magnetic field on the apoptosis of testicular germ cell in mice
Mezei et al.	2006	Analyses of magnetic-field peak-exposure summary measures
Mostafa et al	2006	Sex hormone status in male rats after exposure to 50 Hz, mT magnetic field
Neutra and Li	2008	Letter to the Editor – Magnetic fields and miscarriage: A commentary on Mezei et al., JESEE 2006
Okudan et al.	2006	DEXA analysis on the bones of rats exposed in utero and neonatally to static and 50 Hz electric fields
Rajaei et al.	2009	Effects of extremely low-frequency magnetic field on mouse epididymis and deferens ducts
Rajaei et al.	2010	Effects of extremely low-frequency electromagnetic field on fertility and heights of epithelial cells in pre-implantation stage, endometrium and fallopian tube in mice
Roushanger and Soleimani Rad	2007	Ultrastructural alterations an occurrence of apoptosis in developing follicles exposed to low frequency electromagnetic field in rat ovary
Saad El-Din et al.	2006	Evaluation of the structural changes of extremely low frequency electromagnetic fields on brain and testes of adult male mice
Savitz et al.	2006	Physical activity and magnetic field exposure in pregnancy
Yao et al.	2007	Absence of effect of power-frequency magnetic fields on exposure on mouse embryonic lens development

Neurodegenerative disease

What was previously known about neurodegenerative disease and what did the WHO review conclude?

Research into the possible effect of magnetic fields on the development of neurodegenerative diseases began in 1995, and the majority of research since then has focused on Alzheimer's disease and a specific type of motor neuron disease called amyotrophic lateral sclerosis (ALS), which is also known as Lou Gehrig's disease. The inconsistency of early Alzheimer's disease studies prompted the NRPB to conclude that there is "only weak evidence to suggest that it [ELF magnetic fields] could cause Alzheimer's disease" (p. 20, NRPB, 2001). Early studies on ALS, which had no obvious biases and were well conducted, reported an association between ALS mortality and estimated occupational magnetic field exposure. The review panels, however, were hesitant to conclude that the associations provided strong support for a causal relationship. Rather, they felt that an alternative explanation (i.e., electric shocks received at work) may be the source of the observed association.

The majority of the more recent studies discussed by the WHO reported statistically significant associations between occupational magnetic field exposure and mortality from Alzheimer's disease and ALS, although the design and methods of these studies were relatively weak (e.g., disease status was based on death certificate data, exposure was based on incomplete occupational information from census data, and there was no control for confounding factors). Furthermore, there was no biological data to support an association between magnetic fields and neurodegenerative diseases. The WHO panel concluded that there is "inadequate" data in support of an association between magnetic fields and Alzheimer's disease or ALS.²⁴ The panel recommended more research in this area using better methods; in particular, studies that enrolled incident Alzheimer's disease cases (rather than ascertaining cases from death certificates) and studies that estimated electrical shock history in ALS cases were recommended.

²⁴ After considering the entire body of literature and its limitations, the WHO report concluded, "When evaluated across all the studies, there is only very limited evidence of an association between estimated ELF exposure and [Alzheimer's] disease risk" (p. 194, WHO 2007a).

What relevant studies have been published since the WHO review?

Six studies have been published since the WHO review. Two occupational cohorts were followed for neurodegenerative diseases—approximately 20,000 railroad workers in Switzerland (Röösli et al., 2007b) and over 80,000 electrical and generation workers in the United Kingdom (Sorahan and Kheifets, 2007). Two case-control studies collected incident cases of Alzheimer’s disease and estimated occupational magnetic field exposure (Davanipour et al., 2007; Seidler et al., 2007), and a meta-analysis was conducted of occupational magnetic field exposure and Alzheimer’s disease studies (García et al., 2008). The first study of non-occupational exposure followed the Swiss population to evaluate associations with residential distance to power lines and death due to neurodegenerative diseases (Huss et al., 2009).

García et al. (2008) identified 14 epidemiologic studies with information on Alzheimer’s disease and occupational EMF exposure; the WHO considered the majority of these studies in their 2007 review. A statistically significant association between Alzheimer’s disease and occupational EMF exposure was observed for both case-control and cohort studies (OR =2.03, 95% CI=1.38-3.00 and RR =1.62, 95% CI=1.16-2.27, respectively), although the results from the individual studies were so different that the authors cautioned against the validity of these combined results. While some subgroup analyses had statistically significant increased risks and were not significantly heterogeneous between studies, the findings were contradictory between study design types (e.g., elevated pooled risk estimates were reported for *men* in cohort studies and elevated pooled risk estimates were reported for *women* in case-control studies). The authors concluded that their results suggest an association between Alzheimer’s disease and occupational magnetic field exposure, but noted the numerous limitations associated with these studies, including the difficulty of assessing EMF exposure during the appropriate time period, case ascertainment issues due to diagnostic difficulties, and differences in control selection. They recommended further research that uses more advanced methods.

An earlier publication by the same group of investigators documented the relatively poor quality of the studies included in the meta-analysis. Santibáñez et al. (2007) evaluated studies related to occupational exposure and Alzheimer’s disease, which included seven of the studies in the García et al. meta-analysis. Two epidemiologists blindly evaluated each of these studies using a

questionnaire to assess the possibility of a number of biases, with a score assigned to each study that represented the percentage of possible points that the study obtained (range 0-100%). Only one of the seven studies obtained a score above 50% (a retrospective cohort study by Savitz et al. in 1998), and disease and exposure misclassifications were the most prevalent biases.

Davanipour et al. (2007) extended an earlier hypothesis-generating study by Sobel et al. (1996) by collecting cases from eight California Alzheimer's Disease Diagnostic and Treatment Centers. Self-reported primary occupation was collected from patients with verified diagnoses of Alzheimer's disease and compared to occupational information collected from persons diagnosed with other dementia-related problems at the Centers. The results of this study were consistent with the previous studies by Sobel et al.; cases were approximately twice as likely to be classified as having medium/high magnetic field exposures, compared with controls. The strengths of this study included its large size and self-reported occupational information. The main limitation of this study was that the exposure assessment only considered a person's primary occupation, classified as low, medium, or high magnetic field exposure. The WHO noted limitations of the 1996 publication that are relevant to this publication as well, including the use of controls with dementia (which some studies report have an increased risk of Alzheimer's disease) and the classification of seamstresses, dressmakers, and tailors as "high exposure" occupations, which drives the increase in risk.

Seidler et al. (2007) conducted a similar case-control study in Germany, except cases included all types of dementia (55% of which had Alzheimer's disease). Cumulative magnetic field exposure was estimated from occupational histories taken from proxy respondents, and no difference was reported between cases of dementia or probable Alzheimer's disease and controls, although an association was reported among electrical and electronics workers. The authors reported that exposure misclassification was likely to be a significant problem and concluded that their results indicate a strong effect of low-dose EMF is "rather improbable" (p. 114).

Sorahan and Kheifets (2007) followed a cohort of approximately 84,000 electrical and generation workers in the United Kingdom for deaths attributed to neurodegenerative disease on death certificates. Cumulative magnetic field exposure was calculated for each worker, using

job and facility information. The authors reported that the cohort did not have a significantly greater number of deaths due to Alzheimer's disease or motor neuron disease compared to the general population in the United Kingdom. They also reported that persons with higher estimated magnetic field exposures did not have a consistent excess of death due to Alzheimer's disease or motor neuron disease compared to persons with lower estimated magnetic field exposure. A statistically significant excess of deaths due to Parkinson's disease was observed in the cohort, although there was no association between calculated magnetic field exposure and Parkinson's disease. The authors concluded "our results provide no convincing evidence for an association between occupational exposure to magnetic fields and neurodegenerative disease" (p. 14). This result is consistent with two other Alzheimer's mortality follow-up studies of electric utility workers in the United States (Savitz et al., 1998) and Denmark (Johansen and Olsen, 1998). The findings may be limited by the use of death certificate data, but are strengthened by the detailed exposure assessment.

Death from several neurodegenerative conditions was also evaluated in the cohort of more than 20,000 Swiss railway workers described above (Röösli et al., 2007b). Magnetic field exposure was characterized by specific job titles as recorded in employment records; stationmasters were considered to be in the lowest exposure category and were, therefore, used as the reference group. Train drivers were considered to have the highest exposure, and shunting yard engineers and train attendants were considered to have exposure intermediate to stationmasters and train drivers. Cumulative magnetic field exposure was also estimated for each occupation using on-site measurements and modeling of past exposures. The authors reported an excess of senile dementia disease among train drivers, compared to station masters, however, the difference was not statistically significant. The association was larger when restricted to Alzheimer's disease, but was still not statistically significant (hazard ratio [HR]=3.15, 95% CI=0.90-11.04); an association was observed between cumulative magnetic field exposure and Alzheimer's disease/senile dementia. No elevation in mortality was reported for multiple sclerosis, Parkinson's disease, or ALS among train drivers, shunting yard engineers, or train attendants, compared with stationmasters, nor were more deaths from these causes observed for higher estimated magnetic field exposures. Similar to another recent Swedish study (Feychting et al., 2003), the authors reported that recent exposure was more strongly associated with Alzheimer's disease than past exposure.

There are several strengths of this study relative to the existing body of data. First, there is little turnover among Swiss railway employees, which means that study participants are enrolled in the cohort and possibly exposed for long periods of time. The wide variation in exposure levels between different occupations in the same industry allows for comparison of similar workers with different levels of exposure. Another advantage is that the company kept detailed registers of employees, which means there is less potential for bias in the enumeration of the cohort and reconstruction of exposures. Finally, the authors reported that exposures to chemicals or electric shocks, which often occur in other occupational settings (for example, in electric utility workers or welders), are rare in this occupation.

Another cohort study conducted in Switzerland linked all persons older than 30 years of age at the 2000 census with a national database of death certificates from 2000 through 2005 (Huss et al., 2009). Residential location was also extracted from 1990 and 2000 census data and the closest distance of a person's home in 2000 to nearby 220-380 kV transmission lines was calculated. The authors reported that persons living within 50 m of these high-voltage transmission lines were more likely to have died from Alzheimer's disease, compared to those living farther than 600 m, although chance could not be ruled out as an explanation (HR=1.24, 95% CI=0.80-1.92). The association was stronger for persons that lived at the residence for at least 15 years (HR=2.00, 95% CI=1.21-3.33). Associations of similar magnitude were reported for senile dementia and residence within 50 m of a high-voltage line. No associations were reported beyond 50 m for Alzheimer's disease or senile dementia, and no associations were reported at any distance for Parkinson's disease, ALS, or multiple sclerosis.

The study's main limitation is the use of residential distance from transmission lines as a proxy for magnetic-field exposure (Maslanyj et al., 2009). It is also limited by the use of death certificate data, which are known to under-report Alzheimer's disease, and the lack of a full residential and occupational history. Furthermore, while the underlying cohort was very large, relatively few cases of Alzheimer's disease lived within 50 m of a high-voltage transmission line—20 cases total and 15 cases who lived at the residence for at least 15 years. This means that misclassification of a small number of cases could have a large impact on the risk estimate.

Another recent study used Sweden's large twin registry to assess whether occupational exposure to EMF was associated with dementia or Alzheimer's disease (Andel et al., 2010). Twins over the age of 65 were interviewed by phone to screen for possible dementia, and cases were identified for further evaluation to determine whether they had dementia or Alzheimer's disease (cases); study subjects without either diagnosis were considered the control group. Study subjects or their proxies were asked to identify their major lifetime occupation, which was linked with a job-exposure matrix to categorize EMF exposure into three, broad categories. In the overall twin population, EMF exposure was not associated with either dementia or Alzheimer's disease. An association with EMF was observed for those employed in manual labor and for those with early onset dementia (≤ 75 years at diagnosis), but not Alzheimer's disease. This study's strength is the recruitment of living cases; however, small numbers limited the subgroup analyses and robust associations were not found.

In summary, two cohort studies of the Swiss population of relatively high quality were followed for death due to neurodegenerative disease. Rösli et al. (2007b) reported an association between Alzheimer's disease or senile dementia and occupational magnetic-field exposure, while Huss et al. (2009) reported an association between Alzheimer's disease or senile dementia and living within 50 m of a high-voltage transmission line for at least 15 years. Neither study reported an association with any other neurodegenerative disease, including ALS. A cohort of utility workers, however, did not confirm an association with Alzheimer's disease mortality and magnetic field exposure. The meta-analysis and supporting evaluation of study quality by García, Santibáñez, and colleagues confirmed that the associations reported in previous occupational studies are highly inconsistent and the studies have many limitations (Santibáñez et al., 2007; García et al., 2008).

The main limitations of these studies include the difficulty in diagnosing Alzheimer's disease; the difficulty of identifying a relevant exposure window given the long and nebulous course of this disease; the difficulty of estimating magnetic field exposure prior to the appearance of the disease; the under-reporting of Alzheimer's disease on death certificates; crude exposure evaluations that are often based on the recollection of occupational histories by friends and family given the cognitive impairment of the study participants; and the lack of consideration of both residential and occupational exposures or confounding variables.

The recent epidemiologic studies do not alter the conclusion that there is inadequate data on Alzheimer's disease or ALS. While a good number of studies have been published since the WHO review, little progress has been made on clarifying these associations. Further research is still required, particularly on electrical occupations and ALS (Kheifets et al., 2008). There is currently no body of *in vivo* research to suggest an effect and two studies reported no effect of magnetic fields on ALS progression (Seyhan and Canseven, 2006; Poullietier de Gannes et al., 2009). These conclusions are consistent with the recent review by the SCENIHR (SCENIHR, 2009).

Table 8. Relevant studies of neurodegenerative disease published after the WHO review

Authors	Year	Study
Andel et al.	2010	Work-related exposure to extremely low-frequency magnetic fields and dementia: Results from the population-based study of dementia in Swedish twins
Davanipour et al.	2007	A case-control study of occupational magnetic field exposure and Alzheimer's disease: results from the California Alzheimer's Disease Diagnosis and Treatment Centers
García, et al.	2008	Occupational exposure to extremely low frequency electric and magnetic fields and Alzheimer disease: a meta-analysis
Huss, et al.	2009	Residence near power lines and mortality from neurodegenerative diseases: longitudinal study of the Swiss population
Poullietier de Gannes et al.	2009	Amyotrophic lateral sclerosis (ALS) and extremely-low frequency (ELF) magnetic fields: a study in the SOD-1 transgenic mouse model
Röösli, et al.	2007b	Mortality from neurodegenerative disease and exposure to extremely low-frequency magnetic fields: 31 years of observations on Swiss railway employees
Santibáñez, et al.	2007	Occupational risk factors in Alzheimer's disease: a review assessing the quality of published epidemiological studies
Seidler et al.	2007	Occupational exposure to low frequency magnetic fields and dementia: a case-control study
Seyhan and Canseven	2006	In vivo effects of ELF MFs on collagen synthesis, free radical processes, natural antioxidant system, respiratory burst system, immune system activities, and electrolytes in the skin, plasma, spleen, lung, kidney, and brain tissues
Sorahan and Kheifets	2007	Mortality from Alzheimer's, motor neurone and Parkinson's disease in relation to magnetic field exposure: findings from the study of UK electricity generation and transmission workers, 1973-2004

3 Other Areas of Research

Pacemakers and implanted cardiac devices

The sensing system of pacemakers and other implanted cardiac devices (ICD) is designed to be responsive to the heart's electrical signal. For this reason, other electrical signals potentially can interfere with the normal functioning of pacemakers and ICDs, a phenomenon called electromagnetic interference (EMI). Most sources of EMF are too weak to affect a pacemaker or ICD; however, EMF from certain sources, e.g., some appliances and industrial equipment, may cause interference. This section considers potential EMI with implanted cardiac devices such as pacemakers and defibrillators.

In the presence of electromagnetic fields, pacemakers and ICDs can respond in different ways, defined as modes. The probability of interference occurring and the mode of the response depend on the strength of the interference signal, the patient's orientation in the electromagnetic field, the exact location of the device, and the variable parameters of the device that are specific to a patient.

There are a number of experimental studies dating back to the 1990s that were conducted to assess whether interference may occur when currents are induced in the patient's body by electric or magnetic fields (e.g., Toivonen et al., 1991; Astridge et al., 1993; Scholten and Silny, 2001). In general, pacing abnormalities in these tests occurred at magnetic field levels that are much higher than the levels a person would encounter on a daily basis. Electric fields did produce interference at levels that can be produced by certain electrical sources, but most pacemakers were not affected by high levels of electric fields (up to 20 kV/m) and did not exhibit any pacing abnormalities. Unipolar (single lead) pacemakers tended to be more sensitive to electric fields compared to bipolar (two lead) devices, which are designed specifically to reduce the effects of EMI.

A recent study by Joosten et al. (2009) confirmed earlier work by Scholten and Silny (2001). Both studies found that the performance of a pacemaker in the presence of external ELF electric fields varied considerably based on anatomical and physiological conditions. The 15 study

subjects in Joosten et al. experienced a variance of up to 200% when the interference voltage was applied at the input of their cardiac pacemakers. This variance was due to individual, personal factors such as state of respiration, systole and diastole of the heart, filling of the stomach, and muscle activity. The authors' analyses further suggested that for a 50-Hz electric field to affect the function of the most sensitive unipolar pacemaker, the field levels would have to be between 4.3 kV/m and 6.2 kV/m. Unipolar pacemakers are less and less common today; the study authors found that in Germany, only 6% of the pacemakers in use have a unipolar sensing system.

Suggested exposure levels have been determined by the American Conference of Governmental Industrial Hygienists (ACGIH) and the Electric Power Research Institute (EPRI) to prevent against pacemaker EMI. Both organizations suggest that exposures be kept below 1.5-2 kV/m for electric fields and the ACGIH recommends an exposure level not to exceed 1 G for magnetic fields (ACGIH 2001, EPRI 2004). These recommendations are general in nature and do not address that classes of pacemakers from some manufacturers are quite immune to interference even at levels much greater than these recommended guidelines. Both the ACGIH and EPRI recommend that patients consult their physicians and the respective pacemaker manufacturers before following these organizations' guidelines.

In addition, the Food and Drug Administration's Center for Devices and Radiological Health has issued guidelines for both the development of pacemakers and the design of new electrical devices to minimize susceptibility to electrical interference from any source. Pacemakers are designed to filter out electrical stimuli from sources other than the heart, e.g., the muscles of the chest, currents encountered from touching household appliances, or currents induced by external electric or magnetic fields. Used in both temporary and permanent pacemakers, these electrical filters increase the pacemaker's ability to distinguish extraneous signals from legitimate cardiac signals (Toivonen et al., 1991). Furthermore, most circuitry of modern pacemakers is encapsulated by titanium metal, which insulates the device by shielding the pacemaker's pulse generator from electric fields. Some pacemakers also may be programmed to pace the heart automatically if interference from electric or magnetic fields is detected (fixed pacing mode). This supports cardiac function and allows the subject to feel the pacing and move away from the source.

Due to recent design improvements, many pacemakers currently in use would not be susceptible to low intensity electric fields. There remains a very small possibility that some pacemakers, particularly those of older design and with single-lead electrodes, may sense potentials induced on the electrodes and leads of the pacemaker and provide unnecessary stimulation to the heart.

In summary, interference from strong electric fields is theoretically possible under certain circumstances. The likelihood of interference occurring is low, however, particularly with respect to sources that produce low levels of electric fields and when modern devices are implanted. It is recommended that concerned patients contact their doctors to discuss the make and model of their implanted device, their clinical condition, and any lifestyle factors that put them in close contact with strong electric or magnetic fields.

Flora

Electric currents are involved in cell to cell communication in plants (Framm and Lautner, 2007). For this reason, numerous laboratory and on-site studies over the past 35 years have been conducted to assess the possible effects of exposure to ELF EMF from transmission lines on flora—including agricultural crops, trees, and forest and woodland vegetation (e.g., Hodges et al., 1975; Bankoske et al., 1976; McKee et al., 1978; Miller et al., 1979; Rogers et al., 1980; Lee and Clark, 1981; Warren et al., 1981; Rogers et al., 1982; Greene 1983; Hilsen et al., 1983; Hodges and Mitchell, 1984; Brulfert et al., 1985; Parsch and Norman, 1986; Conti et al., 1989; Krizaj and Valencic 1989; Ruzic et al., 1992; Reed et al., 1993; Smith et al., 1993; Mihai et al., 1994; Davies 1996; Zapotosky et al., 1996). Researchers have found no adverse effects on plant responses from exposure to EMF levels comparable to that produced by high-voltage transmission lines, including seed germination, seedling emergence and growth, leaf area per plant, flowering, seed production, longevity, and biomass production. The one confirmed adverse effect was damage to the tops of trees growing under or within 40 feet of an *experimental* transmission line operating at a voltage of 1,200 kV, attributable to corona-induced damage to branch tips. The right-of-way (ROW) clearance on *operational* transmission lines is typically a 100 to 200 foot clearance on each side of the line; this area would be cleared of trees or the branches trimmed back sufficiently to prevent flashover and other interference. This effect is not relevant to trees growing at greater distances from the ROW clearance area.

Experimental studies of plants have suggested that magnetic fields increased plant size and weight for radish and barley but not mustard plants (Davies, 1996). A group of studies evaluated the influence of ELF EMF on germination, seedling growth, and subsequent yield. Huang and Wang (2008) evaluated the effects of magnetic fields on the early seed germination of mung beans. The exposures from an inverter system were applied at six different frequencies between 10 Hz and 60 Hz, producing magnetic-field levels from 6 mG to 20 mG. The authors found that magnetic-field exposure at frequencies of 20 and 60 Hz enhanced early mung bean growth, while magnetic fields induced by 10, 30, 40, and 50 Hz frequencies had an inhibitory effect on early mung bean growth. Costanzo (2008) performed a similar study of soy beans exposed *in vitro* to 50-Hz electric fields at strengths of 1.3 kV/m and 2.5 kV/m (root mean square). The author found that this exposure increased soy bean growth in length. In addition, this same study reported that direct current (DC) electric fields of the same peak to peak value had no effect (Costanzo, 2008). A study of 60 Hz magnetic-field treatments of 80,000-200,000 mG on tomato seeds found exposure significantly improved seed performance *in vitro* and plant yield in the soil (De Souza et al., 2010).

Thus, researchers have found no adverse effects on plant responses at the levels of EMF produced by typical high- or low-voltage transmission lines.

Fauna

Since the 1970s, research has been conducted on the possible effect of EMF on wild and domestic animals in response to concerns about the effects of high-voltage and ultra-high-voltage transmission lines in the vicinity of farms and the natural habitat of wild animals. National agencies and universities have conducted research on an assortment of fauna using a variety of study designs including observational studies of animals in their natural habitats and highly-controlled experimental studies. The research to date does not suggest that AC magnetic or electric fields (or any other aspect of high-voltage transmission lines, such as audible noise) result in adverse effects on the health, behavior, or productivity of fauna, including livestock (e.g., dairy cows, sheep, and pigs) and a variety of other species (e.g., small mammals, deer, elk, birds, and bees).

Dairy Cattle and Deer

Burchard et al. (2007) is the most recent publication in a long-term series of controlled studies conducted at McGill University (e.g., Rodriquez et al., 2002, 2003, 2004; Burchard et al., 2003; 2004) on the possible effects of strong and continuous EMF exposure on the health, behavior, and productivity of dairy cattle. The broad goal of this research program was to assess whether EMF exposure could mimic the effect of days with long periods of light and increase milk production and feed intake through a hormonal pathway involving melatonin. In previous studies, some differences were reported between EMF-exposed and unexposed cows; however, they were not reported consistently between studies, the changes were still within the range of what is considered normal, and it did not appear that the changes were adverse in nature.

The study by Burchard et al. in 2007 differed from previous studies in that the exposure was restricted to magnetic fields; the outcomes evaluated included the hormones progesterone, melatonin, prolactin, and insulin-like growth factor 1 (IGF-1), as well as feed consumption. No significant differences in melatonin levels, progesterone levels, or feed intake were reported. Significant decreases in prolactin and IGF-1 levels were reported. Thus, similar to the previous studies by this group of investigators, Burchard et al. (2007) did not report findings that suggest magnetic fields cause changes in the melatonin pathway that could result in effects on reproduction or milk production.

The research does indicate that some species of animals are able to detect and orient to DC magnetic fields at levels associated with the earth's static geomagnetic field (~ 500 mG), and this detection may be important for navigational purposes (in particular for species such as birds). Based upon the characteristics of the major hypothesized detection mechanisms and testing in some species, it seems unlikely that a weak 60-Hz magnetic field would be detected or that it would perturb navigational functions.

Along these lines, two studies, both of which received considerable press attention, published analyses of the orientation of cattle and deer using satellite images and field observations that identify a possible geomagnetic component influencing the animals' behavior. A report by Begall et al. (2008) found that domestic cattle and red and roe deer tend to orient their bodies pointing in a northerly direction. The authors' hypothesize that this body orientation is related

to the earth's static geomagnetic field because in areas where the earth's magnetic North Pole can be distinguished more easily from the geographic North Pole's high magnetic declination, body orientation appeared to point more towards the magnetic north rather than the geographic north. This northerly body orientation was not correlated with time of day or the position of the sun, and although the authors speculated that the orientation of the animals was not influenced by wind, no analyses were presented. Based on these limited and indirect data the authors raised the possibility that these species can detect the earth's geomagnetic field.

In the second study, Burda et al. (2009) also explored the possible magnetic basis for the northerly orientation of cattle and deer by analyzing their behavior in the vicinity of high-voltage power lines. They report that cattle within 150 m and deer within 50 m of high-voltage power lines exhibit a random body orientation with respect to magnetic north. Some of the effect might be attributed to the deflection of the geomagnetic field by steel towers close to the line, but the authors did not test this possibility. Other analyses indicated that the orientation of cattle differed around power lines running in an east-west or north-south direction, which suggests that neither sun nor wind cues explain the orientation of these animals with respect to magnetic north. If the observed orientations of cattle and deer are attributable to the earth's geomagnetic field, the biological significance is not clear and the authors suggest additional experimental study. With respect to deer, the authors commented that deer prefer to locate near power lines, perhaps because of the browse or shelter afforded.

Wild Bees and Honey Bees

Wild bees have an important role in natural plant and forest ecosystems. Research on wild bees was conducted at a site near a United States Navy communications system in Northern Michigan where two species of honeybees were observed living in the vicinity of this facility. The researchers studied the bees' exposure to 76-Hz electric and magnetic fields produced by the facility's communications system and compared the mortality, foraging behavior, and nest architecture to a group of honeybees living at a distance from the facility. A few differences were found in nesting parameters, although the effects were small, inconsistent, and likely due to other factors. Although a small increase in the overwinter mortality was reported in one of the two species studied, the researchers concluded that since the reported differences were small

and inconsistent between experiments, there were no findings that raised concern about ELF EMF exposures to wild bees (Zapotosky et al., 1996). This conclusion was confirmed in a review by the United States National Academy of Sciences (NAS, 1997).

More research has focused on commercial honeybees since farmers often place hives on fields near transmission lines. Greenberg et al. (1981) studied the effect of a 765-kV transmission line on honeybee colonies placed at varying distances from the transmission line's centerline, with some hives exposed to EMF from the line and some shielded. Differences between the shielded and unshielded hives were reported at exposures above 4.1 kV/m, including decreases in hive weight, abnormal amounts of propolis at hive entrances, increased mortality and irritability, loss of the queen in some hives, and a decrease in the hive's overwinter survival.

These adverse effects were reported only in the unshielded group. Since the shielding only prevented exposure to electric fields, not magnetic fields, the results indicate that these adverse effects are attributable to electric field exposure. These results have been replicated by other investigators (Rogers et al., 1980, 1981, 1982). Further studies indicated that the effects were indirect, i.e., the electric fields were not affecting the bees directly, and that field levels greater than 200 kV/m were required to affect the behavior of free-flying bees. Thus, heating of the hive by induced currents caused some of the adverse effects and the rest were attributed to shocks within the hive (Bindokas et al., 1988a, 1988b, 1989). Prevention is easily accomplished by placing a grounded metal cover on top of the hive.

Since the nests of wild bees in the ground or in trees contain no metal or highly conductive materials, there appears to be little relevance of such effects to wild bees. At these locations, wild bees also are naturally shielded from electric fields. Laboratory studies indicate that bees are unable to discriminate 60-Hz magnetic fields reliably at intensities less than 4,300 mG, although they can detect fluctuations in the earth's static geomagnetic field as weak as 0.26 mG (Kirschvink et al., 1997). The difference in the sensitivity of honey bees is an illustration that a sensory mechanism has developed to detect static magnetic fields that effectively rejects extraneous signals, in this case AC (60-Hz) magnetic fields.

Birds

A recent study by Dell'omo et al. (2009) analyzed the effects of exposure to magnetic fields from high-voltage power lines during the embryonic and post-hatching period of kestrel nestling. The authors found that exposure does not have any significant short-term physiological effects on these birds.

The ability of birds to detect and use of the earth's geomagnetic field during migration does not translate to a capability to detect 60-Hz magnetic fields. Scientists have hypothesized that the mechanism for detection of the earth's geomagnetic field by birds (and bees), for which there is the most evidence, indicates they would be far less sensitive to 60-Hz magnetic fields. The WHO suggested that power frequency fields at intensities much less than the earth's geomagnetic field of around 500 mG are unlikely to be of much biological significance in relation to birds' navigational abilities because the changes produced by ELF magnetic fields and static magnetic fields are similar (WHO, 2007).

Finally, in a study by Elmusharaf et al. (2007), veterinarians in the Netherlands noted the beneficial effects of AC magnetic fields in poultry. The researchers infected broiler chickens with coccidiosis and reported that exposure to a 50 mG AC magnetic field for 30 minutes each day for a course of 15 days prior to infection provided significant protection against intestinal lesions and reduced growth characteristic of this disease.

Overall, the research over the course of the past 35 to 40 years does not suggest that electric or magnetic fields result in any adverse effects on the health, behavior, or productivity of fauna, including livestock, small mammals, deer, elk, birds, and bees.

Marine Life

Although transmission lines mostly traverse the land they also frequently cross water bodies as well. Therefore, the potential for effects on certain marine ecological systems are evaluated regarding the potential impact of EMF on aquatic species in rivers and creeks. To date, there is little or no evidence that fish, mammals, or birds exhibit any harmful effects when exposed to EMF of frequencies close to or at power frequencies (50-60 Hz) at levels found under

transmission lines, even for a prolonged period of time (e.g., NRC, 1997a, 1997b; NIEHS 1998; WHO, 2007a). Thus, there is no concern that EMF would have any direct toxic effects on the marine biota.

A number of fish species, however, are reported to make use of the earth's geomagnetic field in navigation and migration, including Pacific salmon (*Oncorhynchus spp.*); the chinook salmon (*O. tshawytscha*) and the steelhead (*O. mykiss*) species particularly spend their adult lives in estuarine or oceanic environments and are well known for their annual spawning runs into freshwater, returning to the home streams and rivers where they were spawned and spent the first few months of their lives (Groot and Margolis, 1998). Pacific salmon are an important part of the history, ecology, and economy of the Pacific Northwest region.

Transmission lines will be a source of potential exposure to 60-Hz magnetic fields in rivers and streams below the conductors, but not electric field exposure because the water shields the fish from electric fields. Since the level of EMF decreases with distance from the source, maximum magnetic-field exposures of fish will occur when they are directly under the lines. The magnetic field levels in rivers and streams below transmission lines would be expected to be significantly lower than for spans on land because clearances for river and stream crossings are usually much higher. Additionally, prolonged exposure is not a critical issue as the fish species of most interest are migratory by nature and will only be exposed to magnetic fields during the relatively short time they take to spawn or travel down or up the river during their life cycle.

The Pacific salmon have been thought to navigate by several mechanisms: detecting and orienting to the earth's geomagnetic field, using a celestial compass (i.e., based on the position of the sun in the sky), and using their innate ability to imprint on their home stream by odor (Groot and Margolis, 1998, Quinn et al, 1981).

Generally, scientific studies have reported that, along with other cues or biological mechanisms, certain species of birds, bees, and fish may have magnetite in certain organs in their bodies, and use magnetite crystals as an aid in navigation (Bullock, 1977; Wiltchko and Wiltchko, 1991, Kirschvink et al, 1993, Walker et al. 1988). Crystals of magnetite have been found in Pacific salmon (Mann et al, 1998; Walker et al, 1998). These magnetite crystals are believed to serve as a compass that orients to the earth's magnetic field. Other studies, however, have not found

magnetite in sockeye salmon (*Oncorhynchus nerka*) fry (Quinn et al., 1981). While salmon can apparently detect the geomagnetic field, their behavior is governed by multiple stimuli as demonstrated by the ineffectiveness of magnetic field stimuli in the daytime (Quinn et al., 1982) and the inability of strong magnetic fields from permanent magnets attached to sockeye salmon (Ueda et al., 1998) or other salmon (Yano et al., 1997) to alter their migration behavior.

An important consideration is that the earth's geomagnetic field is static (0 Hz), in contrast to the oscillating magnetic field created by AC transmission lines, which produce current that changes direction and intensity 60 times per second. Static magnetic fields have fixed polarity, i.e. the earth's magnetic north and south poles. AC transmission lines produce magnetic fields that do not have fixed polarity.

No studies have been conducted to date that specifically examine the effects of AC magnetic fields on the salmon's ability to orient to the earth's geomagnetic field. Theoretical calculations do not suggest that 60-Hz magnetic fields could affect magnetite at levels less than 50 mG (Adair 1994). Studies on the response of other organisms that also use magnetite crystals as one means of navigation can, however, provide useful insight regarding salmon. Kirschvink et al. (1993) reports studies of the effects of AC magnetic fields on honey bees, which use magnetite crystals to navigate. In this study, the honey bees only oriented to an AC magnetic field when it was one million times greater in intensity than the DC field needed to elicit the same orientation response. This difference in intensity indicates that the AC magnetic field is less influential than the DC magnetic field in the navigation of honey bees and potentially other organisms that orient to the earth's geomagnetic field using magnetite crystals (Kirschvink et al., 1993). The level of AC magnetic fields under transmission lines are well below the levels reported in that study.

The scientific literature does not support the conclusion that the EMF associated with the proposed transmission line will have an adverse impact on the survival, growth, and reproduction of organisms in a marine ecosystem. There are no data on the effects of AC EMF on salmon navigation, but based on a study with honey bees, it appears that organisms that use magnetite crystals to orient to the earth's geomagnetic field would be affected only when the field levels are very much greater than the levels expected from a transmission line. Given this

evidence and the salmon's ability to navigate using multiple sensory cues, overhead transmission lines are unlikely to have an adverse impact on these species of interest and the aquatic ecosystems of these creeks.

4 Standards and Guidelines

Scientific agencies develop exposure standards and guidelines to protect against known health effects following a thorough review of the relevant research. One of the main objectives of weight-of-evidence reviews is to identify the lowest exposure level below which no health hazards have been found (i.e., a threshold level). Exposure limits are then set *well below* the threshold level established by these reviews to take into account individual variability and sensitivity that may exist in susceptible populations.

The only effects known to be produced in humans by exposure to ELF EMF are seen at very high field levels to which the average person is not typically exposed. The effects are short-term, immediate, perceptible reactions to the electrical stimulation of the muscle and the nervous system. These effects are neither severe nor life-threatening.

Two international scientific organizations, ICNIRP and ICES, have published guidelines for limiting public exposure to ELF EMF to protect against these effects (ICNIRP, 1998, 2010; ICES, 2002). ICNIRP is an independent organization of scientists from various disciplines with expertise in the field of non-ionizing radiation assembled from around the world. It is the formally recognized, non-governmental organization that develops safety guidance for non-ionizing radiation for the WHO, the International Labour Organization, and the European Union.

The ICES is sponsored by the American National Standards Institute and IEEE. The mandate for ICES is the “Development of standards for the safe use of electromagnetic energy in the range of 0 Hz to 300 GHz relative to the hazards of exposure to man ... to such energy.”²⁵ The ICES encourages a balanced international volunteer participation from several sectors: the interested general public; the scientific, health and engineering communities; agencies of governments; energy producers; and energy users.

²⁵ The ICES is a 50-year-old internationally recognized, EMF standard-setting organization, which is sponsored by the IEEE that itself was established in 1884. The ICES should not be confused with a group of scientists who have acted together as an advocacy group and banded together under the similar name of the International Commission for Electromagnetic Safety in 2003.

Although both organizations have the same objectives and use similar methods, their recommended exposure limits to 60-Hz EMF for the general public differ (Table 9). The ICNIRP recommends screening values for magnetic fields of 2,000 mG for the general public and 10,000 mG for workers (ICNIRP, 2010). The ICES recommends maximum permissible exposure of 9,040 mG for magnetic fields (ICES, 2002). The ICNIRP's screening value for exposure to 60-Hz electric fields for the general public is 4.2 kV/m and the ICES screening value is 5 kV/m. Both organizations allow higher exposures if it can be demonstrated that exposures do not produce current densities or electric fields within tissues that exceed basic restrictions on internal current densities or electric fields.

Table 9. Reference levels for whole body exposure to 60-Hz fields: general public

Organization recommending limit	Magnetic fields	Electric fields
ICNIRP restriction level	2,000 mG	4.2 kV/m
ICES maximum permissible exposure (MPE)	9,040 mG	5 kV/m 10 kV/m ^a

^a This is an exception within transmission line ROWs because people do not spend a substantial amount of time in ROWs and very specific conditions are needed before a response is likely to occur (i.e., a person must be well insulated from ground and must contact a grounded conductor) (ICES, 2002, p. 27).

These guidelines were developed following a weight-of-evidence review of the literature by each organization, including epidemiologic and experimental evidence related to both short-term and long-term exposure. Both reviews concluded that the stimulation of nerves and the central nervous system could occur at very high exposure levels immediately upon exposure. While ICNIRP and ICES reference levels for electric fields are similar, the reference levels for magnetic fields differ by a factor of 10. As explained by Reilly (2005), this difference results from the way the two guidelines have extrapolated responses of the retina of the eye to magnetic fields at around 20 Hz to higher frequencies and other tissues. Their reviews also concluded that there was not sufficient evidence to support a causal role for EMF in the development of cancer or other long-term adverse health effects. Therefore, neither organization found a basis to recommend quantitative exposure guidelines to prevent effects at lower exposure levels.

Following the publication of their 1998 guidelines, the ICNIRP published an evaluation of the epidemiologic literature (ICNIRP, 2001) and a full weight-of-evidence evaluation of health

research on EMF (ICNIRP, 2003), concluding again that there is no basis for exposure restrictions for long-term health effects. In June 2009, the ICNIRP published an updated review of the scientific literature related to potential short- and long-term adverse effects, and *draft* guidelines to replace their 1998 ELF EMF exposure guidelines (ICNIRP, 2009). The final guideline was published in December 2010 and those screening values are listed in Table 9.

There are no national or state standards in the United States limiting exposures to ELF EMF based on health effects. Two states, Florida and New York, have enacted standards to limit magnetic fields at the edge of transmission line ROWs (150 mG and 200 mG, respectively) (NYPSC, 1978, 1990; FDER, 1989; FDEP, 1996). The basis for limiting magnetic fields from transmission lines was to maintain the status quo so that fields from new transmission lines would be no higher than those produced by existing transmission lines.

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Appendix 1

World Health Organization International EMF Project Summary of Conclusions

Overview

The World Health Organization (WHO) is a scientific organization within the United Nations system whose mandate includes providing leadership on global health matters, shaping the health research agenda, and setting norms and standards. WHO established the International EMF Project in 1996, in response to public concerns about exposures to electric and magnetic fields (EMF) and possible adverse health effects. The Project's membership includes 8 international organizations, 8 collaborating institutions, and over 54 national authorities. The overall purpose of the project is to assess health and environmental effects of exposure to static and time-varying EMF in the frequency range 0-300 gigahertz (GHz). A key objective is to evaluate the scientific literature and make a status report on health effects, to be used as the basis for a coherent international response, including the identification of important research gaps and the development of internationally acceptable standards for EMF exposure. This status report was published in June 2007 as part of WHO's Environmental Health Criteria (EHC) Programme.

The Monograph used standard scientific procedures, as outlined in the Preamble, to conduct its weight-of-evidence review.¹ The Task Group responsible for the report's overall conclusions consisted of 21 scientists from around the world with expertise in a wide range of disciplines. The Task Group relied on the conclusions of previous weight-of-evidence reviews, where possible, and (with regard to cancer) mainly focused on evaluating studies published after the IARC review in 2002. Specific terms were used by the Task Group to describe the strength of the evidence in support of causality. *Limited evidence* describes a body of research where the findings are inconsistent or there are outstanding questions about study design or other methodological issues that preclude making strong conclusions. *Inadequate evidence* describes a body of research where it is unclear whether the data is supportive or unsupportive of causation because there is a lack of data or there are major quantitative or qualitative issues.

The following sections describe the conclusions of the WHO by health outcome (cancer, reproductive effects, and neurodegenerative diseases). The conclusions and perspectives of

¹ The term "weight-of-evidence review" is used in this report to denote a systematic review process by a multidisciplinary, scientific panel involving experimental and epidemiologic research to arrive at conclusions about possible health risks. The WHO Monograph on EMF does not specifically describe their report as a weight-of-evidence review. Rather, they describe conducting a health risk assessment. Although the two terms are similar, a health risk assessment differs from a weight-of-evidence review in that it also incorporates an exposure assessment and an exposure-response assessment.

weight-of-evidence reviews conducted by other scientific organizations are discussed, where appropriate, to highlight consistencies and inconsistencies in conclusions.

Conclusions

Cancer

The overwhelming majority of health research related to EMF has focused on the possibility of a relationship with cancer, including leukemia, lymphoma, breast cancer, and brain cancer. The vast majority of epidemiologic studies in this field enrolled persons with a specific cancer type (*cases*); selected a group of individuals similar to the cancer cases (*controls*); estimated past magnetic or electric field exposures, or both; and compared these exposures between the cases and controls to test for statistical differences. Some of these studies looked for statistical associations of these diseases with magnetic fields produced by nearby power lines (estimated through calculations or distance) or appliances, while other studies actually measured magnetic field levels in homes or estimated personal magnetic field exposures from all sources. In studies of adult cancers, occupational magnetic field exposures were estimated in some studies, as well. *In vivo* studies in this field exposed animals to high levels of magnetic fields (up to 50,000 milligauss [mG]) over the course of their entire lifetime to observe whether exposed animals had higher rates of cancer than unexposed animals. Some of these studies exposed animals to magnetic fields in tandem with a known carcinogen to test whether magnetic field exposure promoted carcinogenesis. Since there is relatively low energy associated with extremely low-frequency (ELF) EMF, researchers believe it is highly unlikely that electric or magnetic fields can directly damage DNA. Therefore, *in vitro* studies in this field have largely focused on investigating whether ELF EMF could promote damage from other known carcinogens or cause cancer through a pathway other than DNA damage (e.g., hormonal or immune effects or alterations in signal transduction).

The International Agency for Research on Cancer (IARC) is the division of the WHO with responsibility to coordinate and conduct research on the causes of human cancer and the mechanisms of carcinogenesis and to develop scientific strategies for cancer control. The IARC convened a scientific panel in 2001 to conduct an extensive review and arrive at a conclusion about the possible carcinogenicity of EMF (IARC, 2002). The IARC has a standard method for classifying exposures based on the strength of the scientific research in support of carcinogenicity.

Categories include (from highest to lowest risk): carcinogenic to humans, probably carcinogenic to humans, possibly carcinogenic to humans, unclassifiable, and probably not carcinogenic to humans. As a result of two pooled analyses reporting an association between high, average magnetic field exposure and childhood leukemia, the epidemiology data was classified as providing “limited evidence of carcinogenicity”² in relation to childhood leukemia. With regard to all other cancer types, the epidemiology evidence was classified as inadequate. The IARC panel also reported that there was “inadequate evidence of carcinogenicity” in studies of experimental animals. Overall, magnetic fields were evaluated as “possibly carcinogenic to humans.” The IARC usage of “*possible*” denotes an exposure in which epidemiologic evidence points to a statistical association, but other explanations cannot be ruled out as the cause of that statistical association (e.g., bias and confounding)³ and experimental evidence does not support a cause-and-effect relationship. Considering recently published epidemiology, *in vivo*, and *in vitro* research, the WHO concluded that the classification of “possible carcinogen” remains accurate (WHO, 2007).

Childhood Leukemia

The issue that has received the most attention is childhood leukemia. Research in this area was prompted by an epidemiology study of children in the United States that reported a statistical association between childhood leukemia and a higher predicted magnetic field level in the home based on characteristics of nearby distribution and transmission lines (Wertheimer and Leeper, 1979). Subsequently, some epidemiologic studies reported that children with leukemia were more likely to live closer to power lines or have higher estimates of magnetic field exposure (compared to children without leukemia), while other epidemiologic studies did not report this statistical association. Of note, the largest epidemiology studies of childhood leukemia that actually measured personal magnetic field exposure (as opposed to estimating exposure through

² Each type of evidence is categorized based on the strength of the evidence in support of carcinogenicity. The categories include: sufficient evidence of carcinogenicity, limited evidence of carcinogenicity, inadequate evidence of carcinogenicity, and evidence suggesting lack of carcinogenicity. If a positive association between an exposure and cancer is found (although factors such as chance, bias and confounding cannot be ruled out with reasonable confidence), the epidemiologic evidence is rated as “limited evidence of carcinogenicity.” If chance, bias and confounding can be ruled out with reasonable confidence, then the evidence is classified as “sufficient evidence of carcinogenicity.” The *in vivo* studies are ranked using a similar system, and the totality of the evidence is then considered to reach a conclusion about a particular exposure’s carcinogenicity.

³ Bias refers to any systematic error in the design, implementation or analysis of a study that results in a mistaken estimate of an exposure’s effect on the risk of disease. A confounder is something that is related to both the disease under study and the exposure of interest such that we cannot be sure what causes the observed association - the confounder or the exposure of interest.

calculations or distance) did not report evidence to support a causal relationship, nor did they report a dose-response relationship with exposure to higher magnetic field levels (Linnet et al., 1997; McBride et al., 1999; UKCCS, 1999).

In 2000, researchers combined the data from previously published epidemiology studies of magnetic fields and childhood leukemia that met specified criteria (Ahlbom et al., 2000; Greenland et al., 2000). The researchers pooled the data on the individuals from each of the studies, creating a study with a much larger number of subjects and, as a result, greater statistical power to detect an effect (should one exist) than any single study. In both pooled analyses, a weak association was reported between childhood leukemia and estimates of average magnetic field exposures greater than 3-4 mG. The authors were appropriately cautious in the interpretation of their analyses, and noted the uncertainty related to pooling estimates of exposure obtained by different methods from studies of diverse design, as did other researchers (e.g., Elwood, 2006). Because of the inherent uncertainty associated with observational epidemiologic studies, the results of these pooled analyses were not considered to provide strong epidemiologic support for a causal relationship. Furthermore, *in vivo* studies have not found that magnetic fields induce or promote cancer in animals exposed under highly controlled conditions for their entire lifespan, nor have *in vitro* studies found a cellular mechanism by which magnetic fields could induce carcinogenesis. As discussed above, these findings resulted in the classification of magnetic fields as a possible carcinogen (IARC, 2002).

The WHO evaluated two more recently published studies related to childhood leukemia and magnetic fields (Draper et al, 2005; Kabuto et al., 2006). Draper et al. conducted a case-control study of childhood cancer, which included 9,700 children with leukemia (i.e., cases) and an equal number of children that did not have leukemia (i.e., controls). The study compared the distance of birth address to high-voltage transmission lines among cases and controls and reported a weak association between childhood leukemia and birth addresses within 600 feet of high-voltage transmission lines. Kabuto et al. conducted a smaller case-control study in Japan that measured the average weekly magnetic field in the bedrooms of 312 children with leukemia and 603 children without leukemia. The investigators reported that children with leukemia were more likely to have average magnetic field levels >4 mG compared to children without leukemia.

The WHO did not assign a high weight or significance to these studies in their overall evaluation, stating that the low participation rate in Kabuto et al. and the use of distance as a proxy for magnetic field exposure in Draper et al. were important limitations. Less weight should be placed on these studies relative to studies that used good exposure assessment techniques and had high participation rates. The WHO described the results of these two studies as consistent with the classification of limited epidemiologic evidence in support of carcinogenicity and, together with the largely negative *in vivo* and *in vitro* research, consistent with the classification of magnetic fields as a possible carcinogen.

The WHO concluded that several factors might be fully, or partially, responsible for the consistent association observed between high, average magnetic fields and childhood leukemia, including misclassification of magnetic field exposure due to poor exposure assessment methods, confounding from unknown risk factors, and selection bias.⁴ The WHO concluded that reconciling the epidemiologic data on childhood leukemia and the negative (i.e., no hazard) experimental findings through innovative research is currently the highest priority in the field of ELF EMF research. Given that few children are expected to have average magnetic field exposures greater than 3-4 mG, however, the WHO stated that the public health impact of magnetic fields on childhood leukemia would be low if the association were causal.

Breast Cancer

Research on breast cancer has examined the possible effects of ELF EMF from three sources: workplace exposures, residential exposure from power lines, and electric blankets. Some of the early epidemiology studies in this field reported a weak association between breast cancer and higher magnetic field exposures, while others did not; however, the conclusions that could be drawn from this initial body of research were limited because of study quality issues (e.g., poor exposure assessment, inadequate control for confounding variables, and small sample sizes within subgroups with reported associations). Review panels evaluating this initial body of research

⁴ Selection bias arises if there are differences in the persons who participate in a study compared to the persons who do not participate in a study that are related to the exposure and differential by case/control status. For example, if the parents of a child with leukemia were informed that the study was investigating magnetic field exposure and they resided close to a transmission line, they may be more likely to participate than a family that lived far from a transmission line. As a result, children with leukemia that lived closer to transmission lines (and with a presumably higher magnetic field exposure) would be over-represented in the study population compared to the source population. In this scenario, the study may report that children with leukemia are more likely to have higher magnetic field exposure when, if the entire source population of leukemia cases were to be considered, there would be no difference in the exposure levels between leukemia cases and controls.

concluded that the evidence in support of an association was weak, but should be further evaluated with higher quality studies (NRPB, 2001; IARC, 2002; ICNIRP, 2003).

A large number of studies on breast cancer and magnetic field exposure have been conducted since the publication of the IARC review in 2002. These studies were systematically reviewed by the WHO and included seven studies that estimated residential magnetic field exposure, four studies reporting associations with electric blanket usage, and nine studies that estimated occupational magnetic field exposure. No consistent associations between magnetic field exposure and breast cancer were reported in these studies. The WHO concluded that this recent body of research was higher in quality compared with previous studies, and, for that reason, provides strong support to previous consensus statements that magnetic field exposure does not influence the risk of breast cancer. In summary, the WHO stated “With these [recent] studies, the evidence for an association between ELF magnetic field exposure and the risk of female breast cancer is weakened considerably and does not support an association of this kind” (p. 9). The WHO recommended no further research with respect to breast cancer and magnetic field exposure.

Breast cancer has received additional attention because of some initial epidemiologic and experimental findings suggesting that magnetic fields may depress levels of the hormone melatonin (which is believed to have anti-carcinogenetic effects), leading to the development of breast cancer. A comprehensive weight-of-evidence review by the Health Protection Agency of Great Britain (HPA) in 2006 concluded that the evidence to date did not support the hypothesis that exposure to magnetic fields affects melatonin levels, or the risk of breast cancer in general (HPA, 2006). The WHO also considered this body of research, concluding “Overall, these data do not indicate that ELF electric and/or magnetic fields affect the neuroendocrine system in a way that would have an adverse impact on human health and the evidence is thus considered inadequate” (p. 186).

Adult leukemia and brain cancer

A large number of studies of variable quality and using a wide range of techniques have been conducted in both occupational and residential settings to explore the possible relationship between EMF exposure and adult brain cancer and leukemia. The scientific committees assembled by the IARC, NRPB, and ICNIRP concluded that the evidence is weak and does not support a role for electric or magnetic fields in the etiology of brain cancer or leukemia among adults (NRPB, 2001a; IARC, 2002; ICNIRP, 2003). The WHO reviewed the body of research published since the time of these reviews, including three studies estimating residential exposure, four cohort studies estimating occupational exposures, and eight case-control studies reported on occupation and brain cancer or leukemia risk. The WHO concluded, “In the case of adult brain cancer and leukaemia, the new studies published after the IARC monograph do not change the conclusion that the overall evidence for an association between ELF [EMF] and the risk of these disease remains inadequate” (p. 307). The WHO panel recommended updating the existing European cohorts of occupationally exposed individuals and then pooling the epidemiologic data on brain cancer and adult leukemia to confirm the absence of an association.

***In vivo and in vitro* research on carcinogenesis**

It is standard procedure to conduct studies of laboratory animals to determine whether exposure to a specific agent leads to the development of cancer (USEPA, 2005). This approach is used because all known human carcinogens cause cancer in laboratory animals. In the field of ELF EMF research, a number of research laboratories have exposed rodents with a particular genetic susceptibility to cancer to high levels of magnetic fields over the course of their lifetime and performed tissue evaluations to assess the incidence of cancer in many organs. In these studies, magnetic field exposure has been administered alone (to test for the ability of magnetic fields to act as a complete carcinogen), in combination with a known carcinogen (to test for a promotional or co-carcinogenetic effect), or in combination with a known carcinogen and a known promoter (to test for a co-promotional effect). The WHO described four large-scale, long-term studies of rodents exposed to magnetic fields over the course of their lifetime that did not report increases in any type of cancer (Mandeville et al., 1997; Yasui et al., 1997; Boorman et al., 1999a, 1999b; McCormick et al., 1999). No directly relevant animal model for childhood acute lymphoblastic leukemia (ALL) currently exists. Some animals, however, develop a type of lymphoma similar to

childhood ALL and studies exposing transgenic mice predisposed to this lymphoma to power-frequency magnetic fields have not reported an increased incidence of lymphoma associated with exposure (Harris et al., 1998; McCormick et al., 1998; Sommer and Lerchel 2004). Based on this body of research, the WHO panel concluded that exposure to ELF magnetic fields, does not appear to cause cancer alone, although it is a high priority to identify and perform studies on an animal model that is more directly relevant to childhood ALL.

Studies investigating whether exposure to magnetic fields can promote cancer or act as a co-carcinogen used known cancer-causing agents, such as ionizing radiation, ultraviolet radiation, or other chemicals. No effects were observed for studies on chemically-induced preneoplastic liver lesions, leukemia/lymphoma, skin tumors, or brain tumors; however, the incidence of DMBA-induced mammary tumors was increased with magnetic field exposure in a series of experiments (Löscher et al., 1993, 1994, 1997; Baum et al., 1995; Löscher and Mevissen, 1995; Mevissen et al., 1993a, 1993b, 1996a, 1996b, 1998), suggesting that magnetic field exposure increased the proliferation of mammary tumor cells. These results were not replicated in subsequent series of experiments in another laboratory (Anderson et al., 1999; Boorman et al. 1999; NTP, 1999), possibly due to differences in experimental protocol and the species strain (Fedrowitz et al., 2004). Some studies have reported an increase in genotoxic effects among exposed animals (e.g., DNA strand breaks in the brains of mice [Lai and Singh, 2004]), although the results have not been replicated.

In summary, the WHO concluded with respect to *in vivo* research, “There is no evidence that ELF exposure alone causes tumours. The evidence that ELF field exposure can enhance tumour development in combination with carcinogens is inadequate.” Recommendations for future research include the development of a rodent model for childhood ALL and the continued investigation of whether magnetic fields can act as a co-carcinogen.

In vitro studies are widely used to investigate the mechanisms for effects that are observed in humans and animals. The relative value of *in vitro* tests to human health risk assessment, however, is much less than that of *in vivo* and epidemiology studies. Responses of cells and tissues outside the body may not always reflect the response of those same cells if maintained in a living system, so the relevance of *in vitro* studies cannot be assumed (IARC, 1992).

The IARC and other scientific review panels that systematically evaluated *in vitro* studies concluded that there is no clear evidence indicating how ELF magnetic fields could adversely affect biological processes in cells (IARC, 2002; ICNIRP, 2003; NRPB, 2004). The WHO panel reviewed the *in vitro* research published since the time of these reviews and reached the same conclusion. The WHO noted that previous studies have not indicated a genotoxic effect of ELF magnetic fields on mammalian cells, however a recent series of experiments reported DNA damage in human fibroblasts exposed intermittently to 50-Hz magnetic fields (Ivancsits et al., 2002a, 2002b; Ivancsits et al., 2003a, 2003b). These findings have not been replicated by other laboratories (Scarfi et al., 2005), and the WHO recommended continued research in this area. Research in the field of *in vitro* genotoxicity of magnetic fields combined with known DNA-damaging agents is also recommended, following suggestive findings from several laboratories. As noted by the Swedish Radiation Protection Authority, the levels at which these effects were observed are much higher than the levels we are exposed to in our everyday environments and therefore are not directly relevant to questions about low-level, chronic exposures (SSI, 2007). *In vitro* studies investigating other possible mechanisms, including gene activation, cell proliferation, apoptosis, calcium signaling, intercellular communication, heat shock protein expression and malignant transformation, have produced “inconsistent and inconclusive” results (p. 347, WHO, 2007).

Reproductive Effects

Epidemiology studies have been conducted to observe whether maternal or paternal EMF exposures are associated with adverse reproductive effects, including effects on fertility, reproduction, miscarriage, and prenatal and postnatal growth and development. A body of *in vivo* literature is also available on this topic. Early studies on the potential effect of EMF exposures on reproductive outcomes were limited because the majority of the studies used surrogate measures of exposure (including visual display terminal use, electric blanket use, or wire code data) or assessed exposure retrospectively.

Two recent studies related to miscarriage improved exposure assessment by directly measuring magnetic field exposure. These two studies reported a positive association between miscarriage and exposure to high maximum, or instantaneous, peak magnetic fields (Li et al., 2002; Lee et al., 2002). No consistent associations were reported, however, with high, average magnetic field

levels, the typical method for assessing magnetic field exposure. The WHO noted several issues that have been raised by other investigators and scientific review panels concerning the validity of these associations (HCN, 2004; NRPB, 2004; Feychting et al., 2005; Mezei et al., 2005; Savitz et al., 2006). First, the studies had a low response rate, which means that the case and control groups may not be comparable because those who participated in the study may have differed from those who declined (i.e., selection bias). Second, in the study by Lee et al. (2002), magnetic field measurements were taken 30 weeks after a woman's last menstrual period. Some of these women had already miscarried at 30 weeks when magnetic field exposure was measured. This introduces the possibility for bias because pregnancy may alter physical activity levels and physical activity may be associated with magnetic field exposure in pregnant women, as recently confirmed in a study by Savitz et al. (2006). It is possible that the women who miscarried prior to 30 weeks in the study by Lee et al. (2002) subsequently increased their physical activity levels (i.e., returned to work or their normal routine), which resulted in greater opportunities to encounter higher peak magnetic field levels. Furthermore, there is no biological basis to indicate that EMF increases the risk of reproductive effects. *In vivo* studies exposed animals to high levels of electric and magnetic fields and reported no significant, adverse developmental effects. The WHO stated that *in vivo* studies on other reproductive outcomes are inadequate at this time.

The WHO concluded that, overall, the body of research does not suggest that maternal or paternal exposures to ELF EMF cause adverse reproductive outcomes. The evidence from epidemiology studies on miscarriage is inadequate, and further research on this possible association is recommended, although low priority was given to this recommendation.

Neurodegenerative Diseases

Research into the possible effect of magnetic fields on the development of neurodegenerative diseases began in 1995, and the majority of research since then has focused on Alzheimer's disease and a specific type of motor neuron disease called amyotrophic lateral sclerosis (ALS) or Lou Gehrig's disease. The inconsistency of the Alzheimer's studies prompted the National Radiological Protection Board of Great Britain (NRPB)⁵ to conclude that there is "only weak evidence to suggest that it [i.e., extremely low frequency magnetic fields] could cause Alzheimer's

⁵ The NRPB merged with the Health Protection Agency in April 2005 to form its new Radiation Protection Division.

disease” (p. 20, NRPB, 2001b). Early studies on ALS, which had no obvious biases and were well conducted, reported an association between ALS mortality and estimated occupational magnetic field exposure. The review panels, however, were hesitant to conclude that the associations provided strong support for a causal relationship between ALS and occupational magnetic field exposure. The scientific panels felt that an alternative explanation (i.e., electric shocks received at work) may be the source of the observed association. The NRPB concluded: “In summary, the epidemiological evidence suggests that employment in electrical occupations may increase the risk of ALS, possibly, however, as a result of the increased risk of receiving an electric shock rather than from the increased exposure to electromagnetic fields” (p.20, NRPB, 2001b).

Most recent studies reported associations between occupational magnetic field exposure and mortality from Alzheimer’s disease and ALS, although the design and methods of these studies were relatively weak (disease status based on death certificate data, exposure based on incomplete occupational information from census data, and no control for confounding factors). There is currently no biological data to support an association between magnetic fields and neurodegenerative diseases. The WHO concluded that there is inadequate data in support of an association between magnetic fields and Alzheimer’s disease or ALS. The panel highly recommended that further studies be conducted in this area, particularly studies where the association between magnetic fields and ALS is estimated while controlling for the possible confounding effect of electric shocks.

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Appendix 2

WHO Fact Sheet

Fact sheet N°322
June 2007

Electromagnetic fields and public health

Exposure to extremely low frequency fields

The use of electricity has become an integral part of everyday life. Whenever electricity flows, both electric and magnetic fields exist close to the lines that carry electricity, and close to appliances. Since the late 1970s, questions have been raised whether exposure to these extremely low frequency (ELF) electric and magnetic fields (EMF) produces adverse health consequences. Since then, much research has been done, successfully resolving important issues and narrowing the focus of future research.

In 1996, the World Health Organization (WHO) established the International Electromagnetic Fields Project to investigate potential health risks associated with technologies emitting EMF. A WHO Task Group recently concluded a review of the health implications of ELF fields (WHO, 2007).

This Fact Sheet is based on the findings of that Task Group and updates recent reviews on the health effects of ELF EMF published in 2002 by the International Agency for Research on Cancer (IARC), established under the auspices of WHO, and by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) in 2003.

ELF field sources and residential exposures

Electric and magnetic fields exist wherever electric current flows - in power lines and cables, residential wiring and electrical appliances. **Electric** fields arise from electric charges, are measured in volts per metre (V/m) and are shielded by common materials, such as wood and metal. **Magnetic** fields arise from the motion of electric charges (i.e. a current), are expressed in tesla (T), or more commonly in millitesla (mT) or microtesla (μ T). In some countries another unit called the gauss, (G), is commonly used (10,000 G = 1 T). These fields are not shielded by most common materials, and pass easily through them. Both types of fields are strongest close to the source and diminish with distance.

Most electric power operates at a frequency of 50 or 60 cycles per second, or hertz (Hz). Close to certain appliances, the magnetic field values can be of the order of a few hundred microtesla. Underneath power lines, magnetic fields can be about 20 μ T and electric fields can be several thousand volts per metre. However, average residential power-frequency magnetic fields in homes are much lower - about 0.07 μ T in Europe and 0.11 μ T in North America. Mean values of the electric field in the home are up to several tens of volts per metre.

Task group evaluation

In October 2005, WHO convened a Task Group of scientific experts to assess any risks to health that might exist from exposure to ELF electric and magnetic fields in the frequency range >0 to 100,000 Hz (100 kHz). While IARC examined the evidence regarding cancer in 2002, this Task Group reviewed evidence for a number of health effects, and updated the evidence regarding cancer. The conclusions and recommendations of the Task Group are presented in a WHO Environmental Health Criteria (EHC) monograph (WHO, 2007).

Following a standard health risk assessment process, the Task Group concluded that there are no substantive health issues related to ELF electric fields at levels generally encountered by members of the public. Thus the remainder of this fact sheet addresses predominantly the effects of exposure to ELF magnetic fields.

Short-term effects

There are established biological effects from acute exposure at high levels (well above 100 μ T) that are explained by recognized biophysical mechanisms. External ELF magnetic fields induce electric fields and currents in the body which, at very high field strengths, cause nerve and muscle stimulation and changes in nerve cell excitability in the central nervous system.

Potential long-term effects

Much of the scientific research examining long-term risks from ELF magnetic field exposure has focused on childhood leukaemia. In 2002, IARC published a monograph classifying ELF magnetic fields as "possibly carcinogenic to humans". This classification is used to denote an agent for which there is limited evidence of carcinogenicity in humans and less than sufficient evidence for carcinogenicity in experimental animals (other examples include coffee and welding fumes). This classification was based on pooled analyses of epidemiological studies demonstrating a consistent pattern of a two-fold increase in childhood leukaemia associated with average exposure to residential power-frequency magnetic field above 0.3 to 0.4 μ T. The Task Group concluded that additional studies since then do not alter the status of this classification.

However, the epidemiological evidence is weakened by methodological problems, such as potential selection bias. In addition, there are no accepted biophysical mechanisms that would suggest that low-level exposures are involved in cancer development. Thus, if there were any effects from exposures to these low-level fields, it would have to be through a biological mechanism that is as yet unknown. Additionally, animal studies have been largely negative. Thus, on balance, the evidence related to childhood leukaemia is not strong enough to be considered causal.

Childhood leukaemia is a comparatively rare disease with a total annual number of new cases estimated to be 49,000 worldwide in 2000. Average magnetic field exposures above 0.3 μ T in homes are rare: it is estimated that only between 1% and 4% of children live in such conditions. If the association between magnetic fields and childhood leukaemia is causal, the number of cases worldwide that might be attributable to magnetic field exposure is estimated to range from 100 to 2400 cases per year, based on values for the year 2000, representing 0.2 to 4.95% of the total incidence for that year. Thus, if ELF magnetic fields actually do increase the risk of the disease, when considered in a global context, the impact on public health of ELF EMF exposure would be limited.

A number of other adverse health effects have been studied for possible association with ELF magnetic field exposure. These include other childhood cancers, cancers in adults, depression, suicide, cardiovascular disorders, reproductive dysfunction, developmental disorders, immunological modifications, neurobehavioural effects and neurodegenerative disease. The WHO Task Group concluded that scientific evidence supporting an association between ELF magnetic field exposure and all of these health effects is much weaker than for childhood leukaemia. In some instances (i.e. for cardiovascular disease or breast cancer) the evidence suggests that these fields do not cause them.

International exposure guidelines

Health effects related to short-term, high-level exposure have been established and form the basis of two international exposure limit guidelines (ICNIRP, 1998; IEEE, 2002). At present, these bodies consider the scientific evidence related to possible health effects from long-term, low-level exposure to ELF fields insufficient to justify lowering these quantitative exposure limits.

WHO's guidance

For high-level short-term exposures to EMF, adverse health effects have been scientifically established (ICNIRP, 2003). International exposure guidelines designed to protect workers and the public from these effects should be adopted by policy makers. EMF protection programs should include exposure measurements from sources where exposures might be expected to exceed limit values.

Regarding long-term effects, given the weakness of the evidence for a link between exposure to ELF magnetic fields and childhood leukaemia, the benefits of exposure reduction on health are unclear. In view of this situation, the following recommendations are given:

- Government and industry should monitor science and promote research programmes to further reduce the uncertainty of the scientific evidence on the health effects of ELF field exposure. Through the ELF risk assessment process, gaps in knowledge have been identified and these form the basis of a new research agenda.
- Member States are encouraged to establish effective and open communication programmes with all stakeholders to enable informed decision-making. These may include improving coordination and consultation among industry, local government, and citizens in the planning process for ELF EMF-emitting facilities.
- When constructing new facilities and designing new equipment, including appliances, low-cost ways of reducing exposures may be explored. Appropriate exposure reduction measures will vary from one country to another. However, policies based on the adoption of arbitrary low exposure limits are not warranted.

Further reading

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Appendix 3

Comment on the BioInitiative Report

Background

In August 2007, an *ad hoc* group of 14 scientists and public health and policy consultants published an on-line report titled “*The BioInitiative Report: A Rationale for a Biologically-based Public Exposure Standard for Electromagnetic Fields (ELF and RF)*.” The group’s objective was to “assess scientific evidence on health impacts from electromagnetic radiation below current public exposure limits and evaluate what changes in these limits are warranted now to reduce possible public health risks in the future” (p. 4). The individuals who comprised this group did not represent any well-established regulatory agency, nor were they convened by a recognized scientific authority. The report is a collection of 17 sections on various topics each authored by 1 to 3 persons from the working group. The research on both ELF and radio frequency (RF) EMF was addressed, with major portions of the report focused largely or entirely on RF research. Epidemiologic literature related to ELF EMF and childhood cancers, Alzheimer’s disease, and breast cancer was discussed, as well as experimental data for a number of mechanistic hypotheses.

Conclusions and comments

The authors of the BioInitiative Report contended that the standard procedure for developing exposure guidelines—i.e., to set guidelines where adverse health effects have been established by using a weight-of-evidence approach—is not appropriate and should be replaced by a process that sets guidelines at exposure levels where biological effects have been reported in some studies, but not substantiated in a rigorous review of the science or linked to adverse health effects.

Based on this argument, the main conclusion of the BioInitiative Report was that existing standards for exposure to ELF EMF are insufficient because “effects are now widely reported to occur at exposure levels significantly below most current national and international limits” (Table 1-1). Specifically, the authors concluded that there was strong evidence to suggest that magnetic fields were a cause of childhood leukemia based on epidemiologic findings.

The report recommended the following:

ELF limits should be set below those exposure levels that have been linked in childhood leukemia studies to increased risk of disease, plus an additional safety factor ... While new ELF limits are being developed and implemented, a reasonable approach would be a 1 mG (0.1 μ T) planning limit for habitable space adjacent to all new or upgraded power lines and a 2 mG (0.2 μ T) limit for all other new construction. It is also recommended that a 1 mG (0.1 μ T) limit be established for existing habitable space for children and/or women who are pregnant. (p. 22)

The recommendations made in the BioInitiative Report are not based on appropriate scientific methods and, therefore, do not warrant any changes to the conclusions from the numerous scientific agencies that have already considered this issue. These organizations are consistent in their conclusions that the research does not support the setting of exposure standards at these low levels of magnetic field exposure.

The World Health Organization (WHO) published the most recent weight-of-evidence review in June 2007 and concluded the following:

Everyday, low-intensity ELF magnetic field exposure poses a possible increased risk of childhood leukaemia, but the evidence is not strong enough to be considered causal and therefore ELF magnetic fields remain classified as possibly carcinogenic. (p. 357)

The report continued:

Given the weakness of the evidence for a link between exposure to ELF magnetic fields and childhood leukaemia and the limited potential impact on public health, the benefits of exposure reduction on health are unclear and thus the cost of reducing exposure should be very low. (p. 372)

The WHO made no recommendations for exposure standards at the magnetic field levels where an association has been reported in some epidemiologic studies of childhood leukemia. In a fact sheet created for the general public and published on their website, the WHO stated,

When constructing new facilities and designing new equipment, including appliances, low-cost ways of reducing exposures may be explored...However, policies based on the adoption of arbitrary low exposure limits are not warranted (WHO, 2007b).

As stated, the conclusions in the BioInitiative Report deviate substantially from those of reputable scientific organizations because they were not based on standard, scientific methods. Valid

scientific conclusions are based on weight-of-evidence reviews, which entail a systematic evaluation of the entire body of scientific evidence in three areas of research (i.e., epidemiology, *in vivo* research, and *in vitro* research), by panels of experts in these relevant disciplines. The report by the BioInitiative working group does not represent a valid weight-of-evidence review for the following key reasons:

1. **Review panels should consist of a multidisciplinary team of experts that reach consensus statements by collaboratively contributing to and reviewing the final work product.** This process ensures that overall conclusions represent a valid and balanced view of each relevant area of research. The document released by the BioInitiative working group was a compilation of sections, with each authored by one to three members of the group. It does not appear that the report was developed collaboratively or reviewed in its entirety by each member.
2. **Valid conclusions about causality are based on systematic evaluations of three lines of evidence—epidemiology, *in vivo* research, and *in vitro* research.** The conclusions in the BioInitiative Report are not based on this multidisciplinary approach. In particular, little attention is provided to the results from *in vivo* studies on cancer and disproportionate weight is given to the results of *in vitro* studies reporting biological effects.
3. **The entire body of evidence to date should be considered when drawing conclusions regarding the strength of evidence in support of a hypothesis.** The BioInitiative Report is not a comprehensive review of the cumulative evidence. Rather, results from specific studies are cited, but no rationale is provided for their inclusion relative to the many other relevant, published studies.
4. **The evidence from each study must be evaluated critically to determine its validity and the degree to which it is relevant and able to support or refute the hypothesis under question.** The significance of the results reported in any study depends on the validity of the methods used in that study, so weight-of-evidence reviews must include an evaluation of the strengths and limitations of each study. In some discussions, the report claimed to use a weight-of-evidence approach, but the individual sections of the report provide little evidence that the strengths and limitations of individual studies (e.g., the quality of exposure assessment, sample size, biases, and confounding factors) were evaluated systematically.

5. **Support for a causal relationship is based on consistent findings from methodologically sound epidemiology studies that are coherent with the results reported from *in vivo* and *in vitro* studies.** The BioInitiative group often arrived at conclusions about causality by considering only a few studies from one discipline, with no consideration of the significance and validity of the study's results.

In summary, the authors of this report largely ignored basic scientific methods that should be followed in the review and evaluation of scientific evidence. These methods are fundamental to scientific inquiry and are not, as the BioInitiative Report states, “unreasonably high.”

The policy responses proposed in the report are cast as consistent with the precautionary principle, i.e., taking action in situations of scientific uncertainty before there is strong proof of harm. A central tenet of the precautionary principle is that precautionary recommendations are proportional to the perceived level of risk and that this perception is founded largely on the weight of the available scientific evidence. The BioInitiative Report recommends precautionary measures on the basis of argument, rather than the basis of sound peer-reviewed scientific evidence.

Unlike the BioInitiative Report, the WHO review was the product of a multidisciplinary scientific panel assembled by an established public health agency that followed appropriate scientific methods, including the systematic and critical examination of all the relevant evidence. The recommendations from the WHO report (pp. 372-373) are presented below:

- *Policy-makers should establish guidelines for ELF field exposure for both the general public and workers. The best source of guidance for both exposure levels and the principles of scientific review are the international guidelines.*
- *Policy-makers should establish an ELF EMF protection programme that includes measurements of fields from all sources to ensure that the exposure limits are not exceeded either for the general public or workers.*
- *Provided that the health, social and economic benefits of electric power are not compromised, implementing very low-cost precautionary procedures to reduce exposures is reasonable and warranted.*

- *Policy-makers and community planners should implement very low-cost measures when constructing new facilities and designing new equipment including appliances.*
- *Changes to engineering practice to reduce ELF exposure from equipment or devices should be considered, provided that they yield other additional benefits, such as greater safety, or involve little or no cost.*
- *When changes to existing ELF sources are contemplated, ELF field reduction should be considered alongside safety, reliability and economic aspects.*
- *Local authorities should enforce wiring regulations to reduce unintentional ground currents when building new or rewiring existing facilities, while maintaining safety. Proactive measures to identify violations or existing problems in wiring would be expensive and unlikely to be justified.*
- *National authorities should implement an effective and open communication strategy to enable informed decision-making by all stakeholders; this should include information on how individuals can reduce their own exposure.*
- *Local authorities should improve planning of ELF EMF-emitting facilities, including better consultation between industry, local government, and citizens when siting major ELF EMF-emitting sources.*
- *Government and industry should promote research programmes to reduce the uncertainty of the scientific evidence on the health effects of ELF field exposure.*

Appendix K

Greenhouse Gases

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Greenhouse Gases

Introduction

Greenhouse gases (GHG) are chemical compounds found in the Earth's atmosphere that absorb and trap infrared radiation as heat. They are released both naturally and through human activities such as deforestation, soil disturbance, and burning of fossil fuels. These activities disrupt the natural cycle by increasing the GHG emission rate over the storage rate, which results in a net increase of GHGs in the atmosphere. The resulting buildup of heat in the atmosphere due to increased GHG levels causes warming of the planet through a greenhouse-like effect (EIA 2009a). Increasing levels of GHGs could increase the Earth's temperature by up to 7.2 degrees Fahrenheit by the end of the 21st century (EPA 2010a).

The principal GHGs emitted into the atmosphere through human activities are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases (EPA 2010a).

- **Carbon dioxide** is the major GHG emitted (EPA 2010a; Houghton 2010). CO₂ enters the atmosphere as a result of such activities as land use changes, the burning of fossil fuels (e.g., coal, natural gas, oil, and wood products), and the manufacturing of cement. CO₂ emissions resulting from the combustion of coal, oil, and gas constitute 81 percent of all U.S. GHG emissions (EIA 2009b). Before the industrial revolution, CO₂ concentrations in the atmosphere were roughly stable at 280 parts per million. By 2005, CO₂ levels had increased to 379 parts per million, a 36 percent increase, as a result of human activities (IPCC 2007).
- **Methane** is emitted during the processing and transport of fossil fuels, through intensive animal farming, and by the degradation of organic waste. Concentrations of CH₄ in the atmosphere have increased 148 percent above preindustrial levels (EPA 2010a).
- **Nitrous oxide** is emitted during agricultural and industrial activities and during the combustion of fossil fuels and solid waste. Atmospheric levels of N₂O have increased 18 percent since the beginning of industrial activities (EPA 2010a, 2010b).
- **Fluorinated gases**, including hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆), are synthetic compounds emitted through industrial processes. They are replacing ozone-depleting compounds such as chlorofluorocarbons (CFCs) in insulating foams, refrigeration, and air conditioning. Although they are emitted in small quantities, fluorinated gases have the ability to trap more heat than CO₂ and are considered gases with a high climate change potential. Atmospheric concentrations of fluorinated gases have been increasing over the last 20 years and this trend is expected to continue (EPA 2010a).

While models predict that atmospheric concentrations of all GHGs will increase over the next century due to human activity, the extent and rate of change is difficult to predict, especially on a global scale. As a response to concerns over the predicted increase of global GHG levels, various federal and state mandates address the need to reduce GHG emissions, including those described below.

- The federal **Clean Air Act** establishes regulations to control emissions from large generation sources such as power plants: limited regulation of GHG emissions occurs through a review of new sources.
- The U.S. Environmental Protection Agency (EPA) has issued the **Final Mandatory Reporting of Greenhouse Gases Rule** that requires reporting of GHG emissions from large sources. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHGs are required to submit annual reports to EPA (EPA 2010b), although no other action is required (40 Code of Federal Regulations Parts 86, 87, 89.).
- **Executive Orders 13423 and 13514** require federal agencies to measure, manage, and reduce GHG emissions by agency-defined target amounts and dates.
- In **Idaho, Executive Order 2007-05** requires the Idaho Department of Environmental Quality to coordinate GHG reduction activities between state agencies, produce a greenhouse gas emissions inventory and to “provide recommendations to the Governor on how to reduce greenhouse gas emissions in Idaho, recognizing Idaho's interest in continued growth, economic development and energy security.”

Activities that Would Contribute to Greenhouse Gas Emissions

The Project would involve building a new 115-kV transmission line and a 138-kV transmission line plus a substation. Under the No Action Alternative, the transmission line would not be built and no operation and maintenance activities would occur. Implementation of the Project would contribute to an increase in GHG concentrations through the following activities, each discussed in more detail below:

- **Construction:** use of gasoline and diesel-powered vehicles, including cars, trucks, construction equipment, and helicopters
- **Ongoing operation and maintenance:** use of gasoline and diesel-powered vehicles for routine patrols, maintenance project work (vegetation management and site-specific repairs of roads and transmission line structures and associated hardware), emergency maintenance, and resource review, use of helicopters for aerial inspections of the transmission line corridor, and vegetation management

Methods Used to Calculate Greenhouse Gas Emissions

Construction

Project construction for each of the alternatives or route options would take about 16 months over a two year construction period. Non-peak construction activities would include installing and removing best management practice measures, establishing staging areas, moving equipment and materials into and out of the project area, and site preparation and restoration work.

The transportation components of GHG emissions were estimated based on the approximate number of vehicles that would be used during project construction and the approximate distance those vehicles would travel. GHG emissions were calculated for both the 6-month-long peak construction period and the 3-month-long non-peak period based on estimates of vehicle round trips per day.

The number of round trips was conservatively estimated using the following assumptions.

- All workers would travel in separate vehicles to and within the project area each day.
- A maximum number of workers would be required to construct the Project.
- The round-trip distance to the project area is the distance from Idaho Falls to Soda Springs and back (about 214 miles round trip).
- All workers would travel the full length of the project area each day. Although this is true for some workers such as inspectors, other workers could be localized.
- Fuel consumption is based on the average fuel economy for standard pickup trucks of 18 miles per gallon. Again, this is likely an overestimation as more efficient vehicles may be occasionally used.
- Average helicopter fuel consumption is estimated by BPA pilots at 1 mile per gallon.

Up to 50 construction workers would be at work on the transmission line during the peak construction period and an estimated 10 workers could be present during the non-peak construction period.

BPA staff would travel to the transmission line for various purposes, such as road inspection, work inspection, staff meetings, environmental compliance monitoring, and meetings with landowners. An estimated two round trips per week from the Spokane, Washington, BPA offices during the 9-month-long construction period would result in a total of 77 round trips at an estimated 1,228 miles per trip.

Helicopters may be used to replace the conductor. After the equipment (puller and tensioner) is positioned, a sock line (usually a rope) is strung through all of the structures using a helicopter. It was assumed that the helicopter would be used for approximately 1 month (20 work days) to conduct this work. An estimated two round trips from Soda Springs each day would result in a total of 40 round trips at an estimated 72 miles per trip.

Fuel consumption and GHG emissions would also result from operation of on-site heavy construction equipment. Heavy construction equipment may include augers, bulldozers, excavators, graders, heavy-duty trucks, and front-end-loaders. Similar to the transportation activities listed above, increased use of heavy construction equipment would occur during peak construction.

Although it is difficult to develop an accurate estimation of total fuel consumption associated with heavy construction equipment operation, the following assumptions were used.

- A maximum of 50 equipment machines would be in operation during peak construction and 25 equipment machines would be in operation during off-peak construction.
- The average size of the equipment would not exceed 250 horsepower. All equipment would operate at maximum power for 8 hours per day and 5 days per week throughout the construction phase. This is a significant overestimation because equipment commonly operates in idle or at reduced power.
- Equipment would operate at approximately 35 percent efficiency, representing the percentage of productive energy extracted from the diesel fuel relative to the maximum potential energy within the fuel (i.e., 138,000 British thermal units per gallon of diesel) (DOE and EPA 2011).

GHG emissions associated with equipment operation were overestimated to account for all potential construction activities and associated material deliveries to and from the construction site. They are also expected to account for the low levels of GHG emissions related to temporary soil disruption and damaged vegetation from construction activities, which were not estimated separately in this analysis. GHG emissions that result from soil disturbance are short-lived and return to background levels within several hours (Kessavalou et al. 1998). Emissions from decomposing vegetation would also be relatively short-lived where vegetation would be allowed to reestablish following construction.

Permanent Vegetation Removal

The permanent removal of trees and other vegetation would occur as a result of the construction of roads and ROW clearing. Although permanent tree removal would not immediately emit any GHGs, it would reduce the level of solid carbon storage in the area. Tree growth and future carbon sequestration rates are highly variable and depend on several factors, including the species of tree, age of tree, climate, forest density, and soil conditions. In the Rocky Mountain region, the average carbon storage associated with a forest is 125,000 pounds of carbon per acre (USFS 1992).

In total, approximately 174.6 acres of tree cover would be permanently converted from construction of the North Alternative and about 86.3 acres from the South Alternative. Approximately 51.8 acres of tree cover would be permanently converted from construction of Option 3A. The operation of tree removal equipment to clear new road areas of trees was included within the construction section analysis described above.

Operations and Maintenance

During operation and maintenance of the transmission line, the following annual activities would result in GHG emissions:

- Routine patrols (access road, structure, and vegetation inspections): 1 round trip per year, from the BPA Idaho Falls office, 214 miles round trip;
- Maintenance of roads and structures and associated hardware: 1 round trip every other year, from the BPA Idaho Falls office, 214 miles;

- Emergency maintenance to address line outages, landslides, and other unpredicted events: 0.25 round trips per year (approximately 1 trip every 4 years), from BPA Idaho Falls office, 214 miles round trip;
- Natural resource review: 0.25 round trips per year (approximately 1 trip every 4 years), from the BPA Kalispell MT office, 1,046 miles round trip; and
- Aerial inspections by helicopter: 2 round trips from Idaho Falls to Soda Springs, 194 miles round trip.

Vegetation management activities, including mowing along roadsides and weed control, would be conducted during most years. Because vegetation management does not include permanent vegetation removal, this activity was not included in GHG calculations.

Calculations of GHG emissions include operations and maintenance work for the estimated 50-year life span of the rebuilt transmission line.

Results

GHG emissions were calculated using the estimated values described above for two types of activities: construction and ongoing annual operations and maintenance for the estimated 50-year life span of the transmission lines. Each type of activity is discussed separately below. Calculations were not completed for any of the route options except Option 3A as design information related to roads and towers have not been completed to date; however, they are compared in relationship to the North and South alternatives, respectively.

Construction Emissions

Table K-1 displays the results of calculations for the construction activities that would contribute to GHG emissions. Construction of the North Alternative would result in an estimated 12,244 metric tons of CO₂e (equivalent carbon dioxide) emissions. CO₂e is a unit of measure used by the Intergovernmental Panel on Climate Change (IPCC) that takes into account the global warming potential of each of the emitted GHGs using global warming potential factors. While, the construction assumptions for the North Alternative were used to calculate GHG emissions for the South Alternative, the South Alternative is approximately two-thirds the distance of the North Alternative, and assuming that GHG emissions as a result of construction activities would be proportional to distance the estimated emissions for the South Alternative would be 8,081, as presented in Table K-3.

All GHG emissions associated with construction activities would occur in the first year. The Project's contribution to GHG emissions during construction would be *low*.

Permanent Vegetation Removal Emissions

Assuming each affected acre contains the average carbon content for the Rocky Mountain Region, the net carbon footprint associated with the removal of trees under the North Alternative would be an estimated 9,952 metric tons of CO₂e. Under the same assumption for the South

Alternative, the net carbon footprint associated with the removal of trees would be an estimated 4,919 metric tons of CO₂e. The net carbon footprint associated with the removal of trees for Option 3A would be lower than both alternatives at about 2,953 metric tons of CO₂e. Given these estimates, the impact of vegetation removal on GHG emissions from the implementation of either alternative or Option 3A would be considered *low*.

Operations and Maintenance Emissions

Table K-2 displays the contribution to GHG emissions that would result from operations and maintenance activities for the North Alternative. North Alternative operations and maintenance would result in an estimated 126.5 metric tons of CO₂e emissions over the life of the Project (see Table K-2). Similarly, to construction emissions, operation and maintenance assumptions and emissions for the South Alternative would be the same as those presented for the North Alternative, but would be proportional to distance with estimated emissions of 84 metric tons of CO₂e emissions over the life of the Project (see Table K-4) Option 3A is similar in distance to the South Alternative with emissions from operation and maintenance of about 91 metric tons of CO₂e over the life of the Project (see Table K-6).

Given this estimate, the impact of operations and maintenance activities on GHG emissions would be *low*.

Table K-1. North Alternative Estimated Greenhouse Gas Emissions from Project Construction

Estimated GHG Emissions of Construction Activities	CO ₂ (metric tons)	CH ₄ (CO ₂ e) ¹ (metric tons)	N ₂ O (CO ₂ e) ¹ (metric tons)	Total CO ₂ e (metric tons) ³
Peak construction transportation	438.8	304.4	1,819.3	2,562.4
Off-peak construction transportation	109.7	76.1	454.8	640.6
BPA employee transportation	47.3	32.8	196.0	276.0
Helicopter operation	6.5	0.1	0.0	6.6
Peak construction: equipment operation	6,952.6	7.3	46.7	7,006.7
Off-peak construction: equipment operation	1,738.2	1.8	11.7	1,751.7
Total³	9,293.1	422.5	2,528.5	12,244.0

¹ CO₂ emission factors calculated from DOE and EIA 2005. CH₄ and N₂O emission factors from EPA 2007.

² CH₄ and N₂O emissions have been converted into units of equivalent carbon dioxide (CO₂e) using the IPCC global warming potential (GWP) factors of 21 GWP for CH₄ and 310 GWP for N₂O (ICBE 2000).

³ The sum of the individual entries may not sum to the total depicted due to rounding.

Table K-2. North Alternative Estimated Greenhouse Gas Emissions from Operations and Maintenance for the Life of the Project

Type of Operation and Maintenance Activity	CO ₂ (metric tons)	CH ₄ (CO ₂ e) ¹ (metric tons)	N ₂ O (CO ₂ e) ¹ (metric tons)	Total CO ₂ e (metric tons) ³
Routine patrols	5.3	1.5	21.9	28.7
Maintenance work	2.6	0.7	10.9	14.3
Emergency maintenance	1.3	0.4	5.5	7.2
Natural resource review	6.5	1.8	26.8	35.0
Helicopter surveys	40.4	0.7	0.2	41.3
Total³	56.1	5.1	65.2	126.5

¹ CO₂ emission factors calculated from DOE and EIA 2005. CH₄ and N₂O emission factors from EPA 2007.

² CH₄ and N₂O emissions have been converted into units of equivalent carbon dioxide (CO₂e) using the IPCC global warming potential (GWP) factors of 21 GWP for CH₄ and 310 GWP for N₂O (ICBE 2000).

³ The sum of the individual entries may not sum to the total depicted due to rounding.

Table K-3. South Alternative Estimated Greenhouse Gas Emissions from Project Construction

Estimated GHG Emissions of Construction Activities	CO ₂ (metric tons)	CH ₄ (CO ₂ e) ¹ (metric tons)	N ₂ O (CO ₂ e) ¹ (metric tons)	Total CO ₂ e (metric tons) ³
Peak construction transportation	289.6	200.9	1,200.7	1,691.2
Off-peak construction transportation	72.4	50.2	300.2	422.8
BPA employee transportation	31.2	21.7	129.4	182.3
Helicopter operation	4.3	0.1	0.0	4.4
Peak construction: equipment operation	4,588.7	4.8	30.8	4,624.3
Off-peak construction: equipment operation	1,147.2	1.2	7.7	1,156.1
Total³	6,133.4	278.9	1,668.8	8,081.1

¹ CO₂ emission factors calculated from DOE and EIA 2005. CH₄ and N₂O emission factors from EPA 2007.

² CH₄ and N₂O emissions have been converted into units of equivalent carbon dioxide (CO₂e) using the IPCC global warming potential (GWP) factors of 21 GWP for CH₄ and 310 GWP for N₂O (ICBE 2000).

³ The sum of the individual entries may not sum to the total depicted due to rounding.

Table K-4. South Alternative Estimated Greenhouse Gas Emissions from Operations and Maintenance for the Life of the Project

Type of Operation and Maintenance Activity	CO ₂ (metric tons)	CH ₄ (CO ₂ e) ¹ (metric tons)	N ₂ O (CO ₂ e) ¹ (metric tons)	Total CO ₂ e (metric tons) ³
Routine patrols	3.5	1.0	14.5	19.0
Maintenance work	1.7	0.5	7.2	9.4
Emergency maintenance	0.9	0.3	3.6	4.8
Natural resource review	4.3	1.2	17.7	23.2
Helicopter surveys	26.7	0.5	0.1	27.3
Total³	37.1	3.5	43.1	83.7

¹ CO₂ emission factors calculated from DOE and EIA 2005. CH₄ and N₂O emission factors from EPA 2007.

² CH₄ and N₂O emissions have been converted into units of equivalent carbon dioxide (CO₂e) using the IPCC global warming potential (GWP) factors of 21 GWP for CH₄ and 310 GWP for N₂O (ICBE 2000).

³ The sum of the individual entries may not sum to the total depicted due to rounding.

Table K-5. Option 3A Estimated Greenhouse Gas Emissions from Project Construction

Estimated GHG Emissions of Construction Activities	CO ₂ (metric tons)	CH ₄ (CO ₂ e) ¹ (metric tons)	N ₂ O (CO ₂ e) ¹ (metric tons)	Total CO ₂ e (metric tons) ³
Peak construction transportation	315.9	219.1	1,309.7	1,844.8
Off-peak construction transportation	79.0	54.8	327.5	461.2
BPA employee transportation	34.0	23.6	141.2	198.7
Helicopter operation	4.7	0.1	0.0	4.8
Peak construction: equipment operation	5,005.4	5.2	33.6	5,044.4
Off-peak construction: equipment operation	1,251.4	1.4	8.4	1,261.1
Total³	6,690.4	304.2	1,820.4	8,815.0

¹ CO₂ emission factors calculated from DOE and EIA 2005. CH₄ and N₂O emission factors from EPA 2007.

² CH₄ and N₂O emissions have been converted into units of equivalent carbon dioxide (CO₂e) using the IPCC global warming potential (GWP) factors of 21 GWP for CH₄ and 310 GWP for N₂O (ICBE 2000).

³ The sum of the individual entries may not sum to the total depicted due to rounding.

Table K-6. Option 3A Estimated Greenhouse Gas Emissions from Operations and Maintenance for the Life of the Project

Type of Operation and Maintenance Activity	CO ₂ (metric tons)	CH ₄ (CO ₂ e) ¹ (metric tons)	N ₂ O (CO ₂ e) ¹ (metric tons)	Total CO ₂ e (metric tons) ³
Routine patrols	3.8	1.1	15.8	20.7
Maintenance work	1.8	0.5	7.8	10.2
Emergency maintenance	1.0	0.3	3.9	5.2
Natural resource review	4.7	1.3	19.2	25.2
Helicopter surveys	29.0	0.5	0.1	29.7
Total³	40.3	3.8	46.9	91.0

¹ CO₂ emission factors calculated from DOE and EIA 2005. CH₄ and N₂O emission factors from EPA 2007.

² CH₄ and N₂O emissions have been converted into units of equivalent carbon dioxide (CO₂e) using the IPCC global warming potential (GWP) factors of 21 GWP for CH₄ and 310 GWP for N₂O (ICBE 2000).

³ The sum of the individual entries may not sum to the total depicted due to rounding.

Summary of Results

To summarize, the North Alternative would result in an estimated total of 12,244 metric tons of CO₂e emissions during the construction phase, and an estimated 126.5 metric tons of CO₂e emissions from ongoing operation and maintenance activities over the life of the Project. The South Alternative would result in an estimated total of 8,081 metric tons of CO₂e emissions during the construction phase, and an estimated 84 CO₂e emissions from ongoing operation and maintenance activities. Finally, Option 3A would result in an estimated total of 8,815 metric tons of CO₂e emissions during the construction phase, and an estimated 91 metric tons of CO₂e emissions from ongoing operation and maintenance activities over the life of the Project. Vegetation removal would result in lost carbon storage equivalent to 9,952 metric tons of CO₂ for the North Alternative, 4,919 tons of CO₂ for the South Alternative, and 2,953 tons of CO₂ for Option 3A.

To provide context for this level of emissions, EPA's mandatory reporting threshold for annual CO₂ emissions from major sources (not including vegetation removal effects) is 25,000 metric tons of CO₂e, roughly the amount of CO₂ generated by 4,400 passenger vehicles per year. The North Alternative construction emissions would be equivalent to the emissions from approximately 2,156 passenger vehicles per year, with the South Alternative be equivalent to 1,423 passenger vehicles and Option 3A equivalent to 1,552 passenger vehicles. Project operation and maintenance emissions for the North Alternative would be equivalent to the emissions from approximately 22 passenger vehicles per year, the South Alternative would equate to 15 passenger vehicles, while Option 3A would equate to 16 passenger vehicles. Vegetation removal would result in a loss of carbon storage equivalent to 1,755 passenger vehicles per year for the North Alternative, 868 for the South Alternative, and 520 for Option 3A. All levels of GHG emissions are significant in that they contribute to global GHG

concentrations and climate change, but given the small anticipated contribution from the Project, the Project's impact on GHG concentrations would be *low*.

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Appendix L

Living and Working Safely Around High-voltage Power Lines

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LIVING AND WORKING SAFELY

AROUND HIGH-VOLTAGE POWER LINES



High-voltage power lines can be just as safe as the electrical wiring in our homes — or just as dangerous. The key is learning to act safely around them.

This booklet is a basic safety guide for those who live and work around power lines. It deals primarily with nuisance shocks caused by induced voltages and with possible electric shock hazards from contact with high-voltage lines.

In preparing this booklet, the Bonneville Power Administration has drawn on more than 70 years of experience with high-voltage power lines. BPA operates one of the world's largest networks of long-distance, high-voltage lines, ranging from 69,000 volts to 500,000 volts. This system has more than 200 substations and more than 15,000 miles of power lines.

BPA's lines make up the main electrical grid for the Pacific Northwest. The grid delivers large blocks of power to substations located near load centers. Public and investor-owned utilities and



rural cooperatives take delivery of the power at these points and deliver it to the ultimate customers.

BPA's lines cross all types of property: residential, agricultural, industrial, commercial and recreational.

If you have questions about safe practices near power lines, call BPA.

Due to safety considerations many of the practices suggested in this booklet are restrictive. This is because they attempt to cover all possible situations, and the worst conditions are assumed. In certain circumstances, the restrictions can be re-evaluated. To determine what practices are applicable to your case, contact BPA at 1-800-836-6619 or find the contact information for the local BPA office at www.transmission.bpa.gov/LanCom/Real_Property.cfm.

USING THE RIGHT-OF-WAY

Before a power line is built, BPA negotiates with the landowner for the right to cross the land as required for the construction, operation and maintenance of the line. Usually, BPA acquires right-of-way rights to construct, operate and maintain a power line and the right to keep the right-of-way clear of all structures, fire hazards, vegetation and any other use that may interfere with the operation or maintenance of the line. Most crops, less than 10 feet in height, can be grown safely under power lines. Orchards, Christmas trees and structure-supported crops (i.e., trellises) require special consideration.

Call BPA if you plan to use the right-of-way for any use.

BPA's "Landowner's Guide for Compatible Use of BPA Rights-of-Way" explains how to apply for permission to use a portion of a BPA right-of-way for approved purposes. This document can be found online at www.transmission.bpa.gov/LanCom/Real_Property.cfm or by contacting BPA at 1-800-836-6619.

Construction and maintenance of any structures are specifically prohibited within a BPA right-of-way. Coordinating with BPA early in your planning process can keep you safe and avoid wasting time and money.



Most crops, less than 10 feet in height, can be grown safely under power lines.

GENERAL SAFE PRACTICES

BPA designs and maintains its facilities to meet or exceed the rules set forth in the National Electrical Safety Code. BPA provides information on safe practices because serious accidents involving power lines can be avoided if simple precautions are taken. Every kind of electrical installation — from the 110-volt wiring in your home to a 500,000-volt power line — must be treated with respect.

The most significant risk of injury from a power line is the danger of electrical contact. Electrical contact between an object on the ground and an energized wire can occur even though the two do not actually touch. In the case of high-voltage lines, electricity can arc across an air gap. The gap distance varies with the voltage at which the line is

operated. Unlike the wiring in a home, the wires of overhead power lines are not enclosed by electrical insulating material.

The most important safe practice is this:

Avoid bringing yourself, or any object you are holding, too close to an overhead power line.

In other words, do not lift, elevate, build or pass under a power line with any object, equipment, facility or vehicle that could come close to the energized wires.

BPA does not recommend that anyone attempt to calculate how close they can come to a power line. As a general precaution, when under a line, never put yourself or any object any higher than 14 feet above the ground.

The National Electrical Safety Code specifies a minimum safe clearance for each operating voltage. BPA builds its lines so the clearance between the wires of a power line and the ground meets or exceeds the minimum safe clearance set forth in the code. Therefore, do not alter the ground elevation; without first applying to BPA, call 1-800-836-6619 to ensure safe distances are maintained.

Vehicles and large equipment that do not extend more than 14 feet in height, such as harvesting combines, cranes, derricks and booms, can be operated safely under all BPA lines that pass over

roads, driveways, parking lots, cultivated fields or grazing lands.

For your safety, coordinate with BPA if you need to exceed the 14-foot limitation.

POSSIBLE SHOCK HAZARDS

The previous section discussed dangerous electrical contact conditions that can occur when getting too close to the high-voltage wires. This section

Farm equipment or large machinery 14 feet or less in height may be operated safely under all BPA lines in cultivated fields.

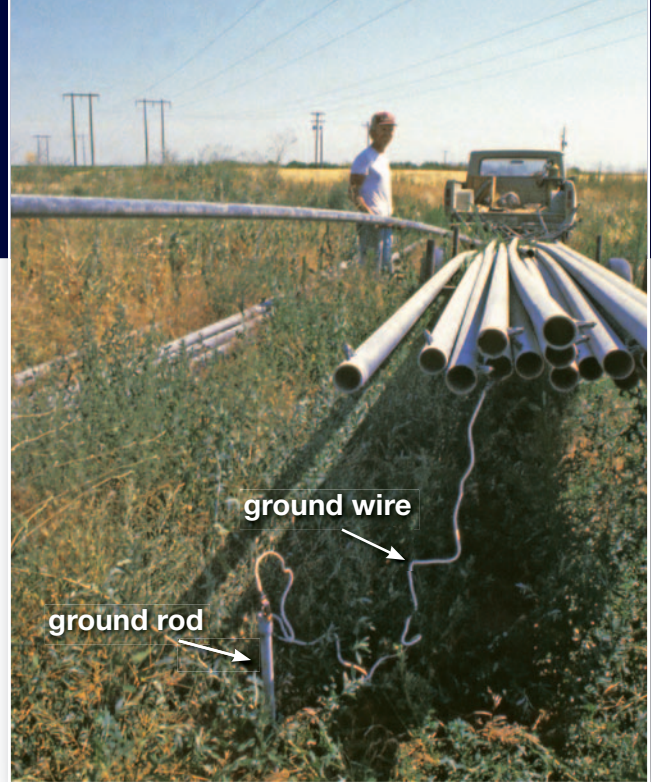


will discuss the possible electrical shock hazards that can occur when touching transmission towers or metallic objects near the power line but away from the high-voltage wires.

These types of shocks are caused by a voltage induced from the power line into the nearby metallic objects. Typically the shocks can be avoided when the nearby metallic objects are grounded or connected to earth. The severity of these shocks depends on the operating voltage of the power line, the distance from the conductor, the size or length of the object, its orientation to the line and how well the object is grounded.

Normally, shocks do not occur when BPA's guidance is followed (see the following sections). However, under certain conditions, non-hazardous nuisance shocks can still occur and possibly cause discomfort.

The severity of nuisance shocks can vary in sensation from something similar to a shock you might receive when you cross a carpet and then touch a door knob to touching the spark-plug ignition wires on your lawnmower or car. The nuisance shock, however, would be continuous as long as you are touching the metallic object. Such objects include vehicles, fences, metal buildings or roofs and irrigation systems that are near the line or parallel the line for some distance.



The possibility of nuisance shocks can be eliminated by grounding metal pipe when unloading near BPA lines.

IRRIGATION SYSTEMS

All types of irrigation systems have been operated safely near BPA power lines for years. Nonetheless, caution should be used in storing, handling and installing irrigation pipe, and in operating spray irrigation systems near power lines.

To avoid electrical contact with power lines, two very important safety practices should be observed at all times:

1. While moving irrigation pipe under or near power lines, keep the equipment in a horizontal position to keep it away from overhead wires.
2. Electricity can be conducted through water so never allow the irrigation system to spray a continuous stream onto power lines or towers.

In addition, central pivot circular irrigation systems installed near or under power lines can develop hazardous shock potentials during operation and maintenance. To eliminate these hazards:

- Provide a good electrical ground for the pivot point.
- Do not touch the sprinkler pipe or its supporting structures when the system is operating under or parallel to and near a power line.
- Perform repairs/maintenance of the system with the sprinkler pipe perpendicular to the power line.



For more information on storing, handling, installing or operating an irrigation system on BPA rights-of-way and to apply to use BPA's right-of-way please contact BPA at 1-800-836-6619. A copy of "Guidelines for Installation and Operation of Irrigation Systems" will be provided when you contact BPA for approval. This document describes methods for safely installing and operating an irrigation system under high-voltage power lines. This document also can be obtained at www.transmission.bpa.gov/LanCom/Real_Property.cfm.

Irrigation pipe should be moved in a horizontal position under and near all power lines to keep it away from the lines overhead.



UNDERGROUND PIPES, TELEPHONE CABLES AND ELECTRIC CABLES

Underground pipes and cables may be compatible with power lines provided installation and maintenance are done properly. Pipes and cables should not be installed closer than 50 feet to a BPA tower, any associated guy wires or grounding systems. These grounding systems are long, buried wires that are sometimes attached to the structures and can run up to 300 feet along the right-of-way. These grounding systems are not visible above ground and must be located before installing any underground utilities.

Proper positioning of underground utilities is required to prevent an accident in an extreme case when an unusual condition might cause electricity to arc from the high-voltage wire to the tower and then to ground. This could produce a dangerous voltage on underground piping or cable system. Contact BPA at 1-800-836-6619 to apply before installing any underground utilities within a BPA power line right-of-way.

FENCES

BPA strongly discourages locating fences within the right-of-way as they can cause a potential safety hazard and an access problem (particularly in high-density subdivisions). Contact BPA at 1-800-836-6619 if you are interested in submitting an application to place a fence on the right-of-way using the guideline that the location must be a



minimum of 50 feet from BPA structures as well as other considerations discussed below.

WIRE FENCES

Barbed wire and woven wire fences insulated from ground on wood posts can assume an induced voltage when located near power lines. If you are having a shock-related problem, call BPA for an investigation. The fence may need to be grounded if:

- it is located within the right-of-way;
- it parallels the line within 125 feet of the outside wire and is longer than 150 feet; or
- it parallels the line 125 to 250 feet from the outside wire and is longer than 6,000 feet.

These fences should be grounded at each end and every 200 feet with a metal post driven at least 2 feet into the ground. Attach all wire strands of the fence to the metal post. Install the ground-

ing posts at least 50 feet from the nearest transmission tower. If shocks are experienced when contacting a fence or gate, or if you have any questions about the need for grounding, call BPA at 1-800-836-6619.

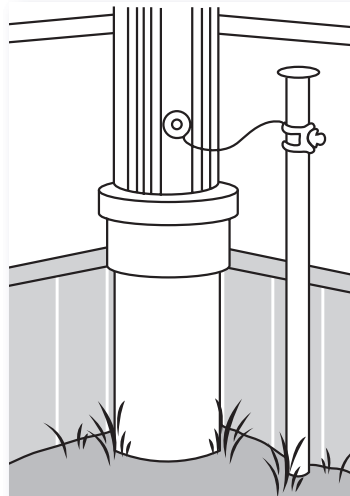
ELECTRIC FENCES

In situations where a fence cannot be grounded (electric fences, for example), a filter may be installed to remove voltages induced by the power lines. BPA may provide this filter after an investigation has been conducted. Do not use fence chargers that are not approved by Underwriters' Laboratories, Inc. They may carry voltages and currents that are hazardous to anyone touching the fence — even if power lines are not present. For more information about fences, fence chargers or filters, call BPA at 1-800-836-6619.

BUILDINGS

This section applies to buildings outside BPA's rights-of-way, since BPA prohibits buildings within a right-of-way.

Buildings located off BPA's rights-of-way may collect an induced voltage. This voltage is often drained through the building's plumbing, electrical service, metal sheeting or metal frame. If the



Example of grounding a metal building at a down spout.

voltage does not drain through the systems described above, then it can result in a nuisance shock situation.

BPA recommends grounding metallic components on buildings near a power line when:

- the building is within 100 feet of the outside wire;
- the building has more than 2,000 square feet of metal surface and is within 100 to 150 feet of the outside wire; or
- the building is used to store flammable materials and is within 250 feet of the outside wire.

BPA will assist in grounding metallic objects after receiving a request and an investigation has been conducted. Call BPA at 1-800-836-6619 if you are having shock-related problems or if you have any question on grounding a building.

VEHICLES

Under some high-voltage lines, vehicles can collect an induced voltage. This is particularly true if the vehicle is parked on a nonconductive surface such as asphalt or dry rock. You can drain the voltage from your vehicle to the ground by attaching a chain that reaches the ground or by leaning a metal bar against your vehicle. The only way to be sure you won't get shocked is to park your car away from the high-voltage power line.

BPA has specific restrictions for parking and roads within the right-of-way to keep possible shocks at a low level. Contact BPA at 1-800-836-6619 to apply before locating roads and parking areas within the BPA right-of-way.

Refueling vehicles is not allowed on BPA rights-of-way because there is a chance that a spark from an induced voltage could ignite the fuel.

LIGHTNING

Lightning will usually strike the highest nearby object, which might be a power line tower or wire. Transmission facilities are designed to withstand lightning strikes by channeling them to ground at the tower.

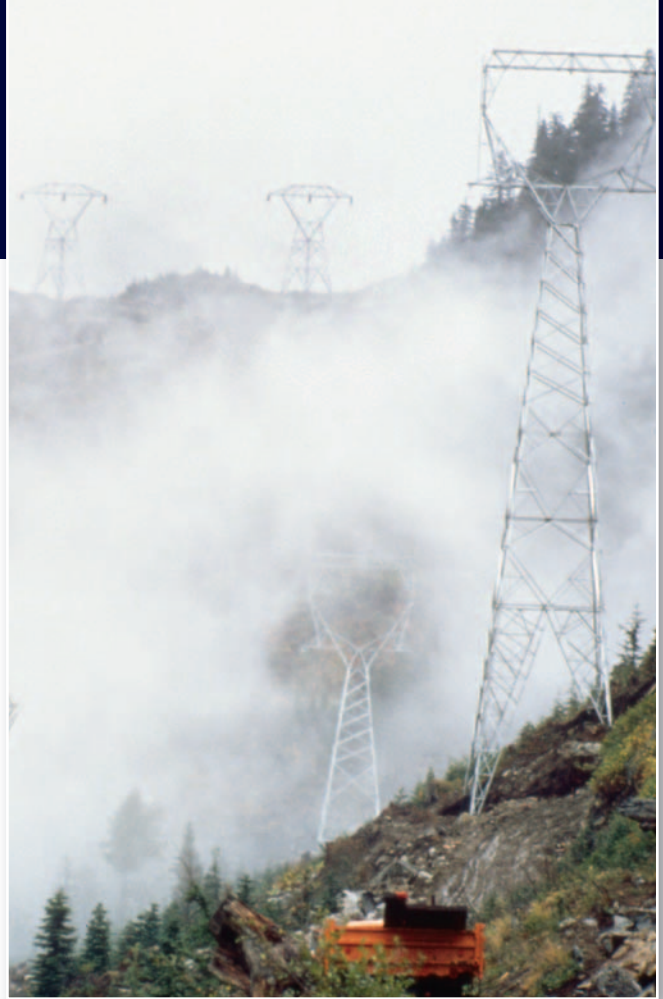
Play it safe. Stay away from power lines and other tall objects during electrical storms. Lightning is dangerous if you are standing near where it enters the ground.

FIRES

Smoke and hot gases from a large fire can create a conductive path for electricity. When a fire is burning under a power line, electricity could arc from the wire, through the smoke and to the ground, endangering people and objects near the arc. BPA does not permit burning within the right-of-way.

Field burning and other large fires in and around power lines can damage power lines and cause power outages. Water and other chemicals used to extinguish those fires should never be directed toward a power line.

Contact BPA at 1-800-836-6619 if you need to burn near a BPA right-of-way.



A fire burning under a power line can create a dangerous situation. Stay away from lines if a fire is nearby.

KITE FLYING AND MODEL AIRPLANES

BPA strongly discourages anyone from flying a kite or model airplane anywhere near a power line. The electricity from the line can travel through the string or hand line and electrocute a person on the other end. If your kite or model airplane is about to touch a power line, drop the string or hand line instantly, before it touches the line. Do not try to pull the kite or airplane down or climb up after it. Call the nearest electric utility.

VANDALISM, SHOOTING AND TRESPASSING

People entering high-voltage electrical facilities, such as substations and power line rights-of-way,

for the purpose of vandalism or theft, run the risk of serious injury or death. For example, when hunting, do not shoot at transmission facilities. Gunshot damage can cause flashovers or may cause the wire to fall to the ground. This could be a serious hazard to anyone close to the power line. It could also cause a power outage and a fire.

Removal of equipment from substations or power line facilities can result in unsafe operating conditions and put people nearby at risk of serious injury or death. Those who cause willful damage to BPA transmission facilities or associated property can be prosecuted by the federal government, the property owner, or both.

Please report damage to transmission facilities to BPA's Crime Witness Program at 1-800-437-2744. The Crime Witness Program allows you to confidentially report an illegal activity that you witness against BPA's transmission system, property or personnel. This includes:

- Shooting at power lines, transmission towers or substation equipment.



- Dumping any waste or material on BPA property.
- Vandalism to BPA property, buildings and vehicles.
- Theft of BPA equipment, supplies, tools or materials.

This program offers rewards of up to \$25,000 for information leading to the arrest and conviction of the perpetrator(s).

TALL OBJECTS

Facilities

Temporary or permanent facilities within the right-of-way such as, light standards, signs, above-ground utilities, etc., can create unsafe situations when constructed too close to BPA power lines and structures. Permissible heights for such facilities can vary depending on site specific conditions. Call BPA at 1-800-836-6619 to apply for these uses.

Activities

As a precautionary practice, do not raise any metal object more than 14 feet in the air underneath a power line. For example, when you mount an antenna on a vehicle that you plan to operate on a BPA right-of-way, do not let it extend more than 14 feet above the ground.

Before you sail a boat on a lake or river, check the allowable clearance under any power line. We recommend that all masts or guy wires above the deck be connected electrically to an underwater metallic part such as the keel or centerboard.

This precaution, which protects against lightning or accidental contact with a power line, may save your life.

Remember, if you plant, dig or build within the right-of-way an application is required. Any activities or use with a reach capacity greater than 14 feet (eg. cranes, dump trucks, irrigation systems, etc.) may cause safety concerns. Please specifically identify these uses and equipment in your application. Contact BPA to apply at 1-800-836-6619.

POOLS

BPA does not permit the building of swimming pools within BPA rights-of-way because it impedes our ability to operate and maintain the power line and presents a potential safety hazard to the public. Hazards range from possible electrical contact with the wires (with pool skimmers or rescue poles, for example) to dangers that can be encountered during and after lightning strikes on transmission facilities.

CLIMBING

Climbing on power line towers or guy wires can be extremely hazardous. Do not do it under any circumstance. It is dangerous and illegal.

PACEMAKERS

Under some circumstances, voltages and currents from power lines and electrical devices can interfere with the operation of some implanted cardiac



Cutting trees within power line rights-of-way can be dangerous. It is safer to have BPA do it for you.

pacemakers. However, we know of no case where a BPA line has harmed a pacemaker patient.

As a precaution, people who may have reason to be very near high-voltage facilities should consult with a physician to determine whether their particular implant may be susceptible to power line interference.

If a person with a pacemaker is in an electrical environment and the pacemaker begins to produce a regularly spaced pulse that is not related to a normal heartbeat, the person should leave the environment and consult a physician.

TREES AND LOGGING

No logging or tree cutting should be done within BPA's right-of-way without first contacting BPA at 1-800-836-6619 to apply. In many cases, BPA owns the timber within its rights-of-way.

Additionally, logging or tree cutting near power lines can be very hazardous and requires special caution. Since trees conduct electricity, if one should fall into or close to a power line, the current could follow the tree trunk to the ground and endanger anyone standing near its base. Here are two simple rules:

1. If you come upon a tree that has fallen into a power line, stay away from it.
2. If you accidentally cause a tree to fall into a power line, run for your life! Do not go back to retrieve your saw or equipment. Call BPA or your local utility immediately.

If you have trees either on or close to the right-of-way that need to be cut, contact BPA at 1-800-836-6619. It is unsafe to do it yourself.

Since power line rights-of-way usually are not owned by BPA but are acquired through easements from landowners, trees or logs stacked within or alongside the rights-of-way are not public property. People removing trees and logs without permission are stealing and can be prosecuted.

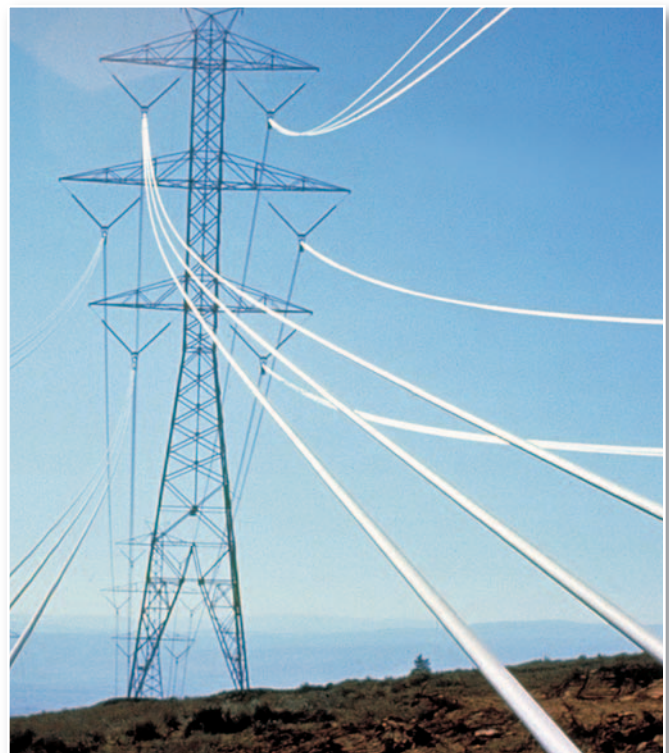
EXPLOSIVES

If you plan to detonate explosives near a BPA power line, apply to BPA well in advance by calling 1-800-836-6619 or find the contact information for your local office at www.transmission.bpa.gov/LanCom/Real_Property.cfm. BPA will tell you if any special precautionary measures must be taken at a particular blasting site.

Any blasting near or within BPA rights-of-way must not damage any BPA facilities or permitted uses within the rights-of-way. Do not use electric detonating devices when blasting within 1,000 feet of a power line. Use of non-electric methods of detonation will avoid the danger of accidentally discharging an electric blasting cap due to induced voltages from energized transmission facilities.

TOWERS AND WIRES

- Do not climb towers.
- Do not shoot or otherwise damage transmission facilities.
- Never touch a fallen wire.
- Do not attempt to dismantle towers.
- Do not attach anything to towers.
- Stay away from towers and lines during extreme windstorms, thunderstorms, ice storms or under other extreme conditions.





Preventive measures include:

- Report any suspicious activities to BPA at 1-800-437-2744 or to your nearest electrical utility.
- Stay away from and report damage to transmission facilities to BPA at 1-800-437-2744 or your nearest electrical utility.
- Stay away from and report broken, damaged or abnormally low-hanging wires to BPA at 1-800-437-2744 or your nearest electrical utility.

CONCLUSION

We live in an age of electric power. Almost everything we do requires it. Consequently, high-voltage power lines have become about as commonplace as the wiring in our homes. Nevertheless, every year people are killed or seriously injured by power lines and home wiring. In almost every case, lives could have been saved and injuries avoided if the basic safety practices outlined in this booklet had been followed. BPA and your local utilities make every effort to design and build power lines that are safe to live and work around. Ultimately, however, the safety of high-voltage lines depends on people behaving safely around them. No line can practicably be made safe from a person who,

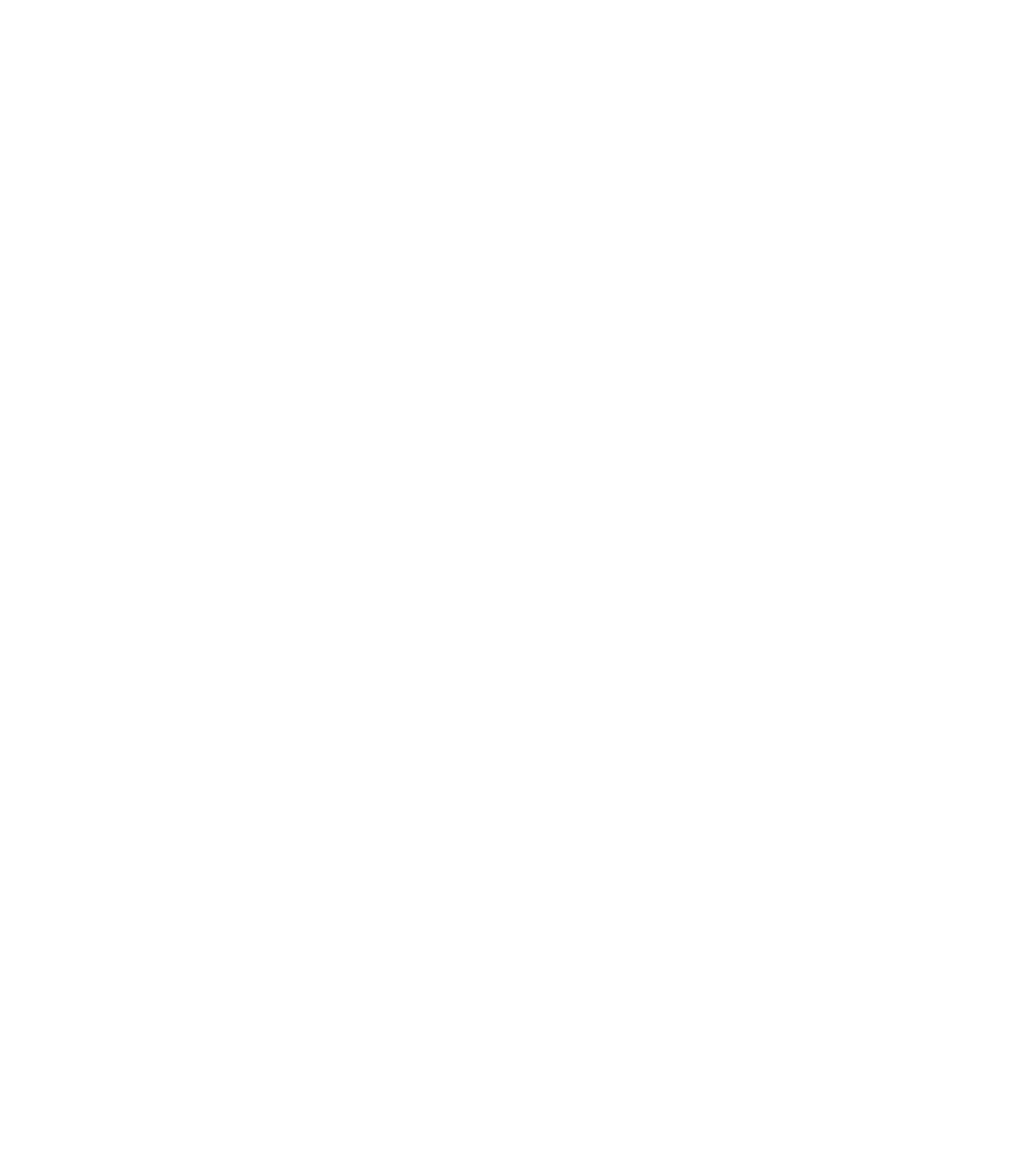
through ignorance or foolishness, violates the basic principles of safety. Please take time now to learn the practices outlined in this booklet and share your knowledge with your family, friends and colleagues. Your own life, or that of a loved one, might well hang in the balance.

RELATED BPA PUBLICATIONS AND GUIDELINES

For more information, call BPA at 1-800-836-6619 for the following publications:

1. **“Landowner’s Guide for Compatible Use of BPA Rights-of-Way”** (DOE/BP-3657)
2. **“Landowner’s Guide to Trees and Transmission Lines”** (DOE/BP-3076)
3. **“Keeping the Way Clear for Better Service”** (DOE/BP-2816)
4. **“Guidelines for Installation and Operation of Irrigation Systems”**

These documents also can be found at www.transmission.bpa.gov/LanCom/Real_Property.cfm.



BONNEVILLE POWER ADMINISTRATION

PO Box 3621 Portland, Oregon 97208-3621

DOE/BP-3804 • October 2007 • 3M

Appendix M

Disclosure Forms

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**NEPA Financial Disclosure Statement for Preparation of the
Environmental Impact Statement for the Proposed
Hooper Springs Transmission Project**

CEQ regulations at 40 CFR 1506.5(c), which have been adopted by DOE (10 CFR 1021), require contractors who will prepare an EIS to execute a disclosure specifying that they have no financial or other interest in the outcome of the project. The term "financial interest or other interest in the outcome of the project," for the purposes of this disclosure, is defined in the March 23, 1981 guidance "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," 46 FR 18026-18038 at Question 17a and b.

Financial or other interest in the outcome of the project 'includes' any financial benefit such as a promise of future construction or design work in the project, as well as indirect benefits the contractor is aware of (e.g., if the project would aid proposals sponsored by the firm's other clients)." 46 FR 18026- 18038 at 18031.

In accordance with these requirements, the offeror and any proposed subcontractors hereby certify as follows: [check either (a) or (b) to assure consideration of your proposal]

(a) Offeror and any proposed subcontractor have no financial interest in the outcome of the project.

(b) _____ Offeror and any proposed subcontractor have the following financial or other interest in the outcome of the project and hereby agree to divest themselves of such interest prior to award of this contract.

Financial or Other Interests:

- 1.
- 2.
- 3.

Certified by:

William H. Bailey
Signature

William H. Bailey
Name

2/5/2013
Date

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Financial or Other Interests:

- 1.
- 2.
- 3.

Certified by:



Signature

Michel S. Mayer

Name

02/05/13

Date

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Financial or Other Interests:

- 1.
- 2.
- 3.

Certified by:



Signature

Zachary Gustafson

Name

2/11/13

Date

