



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

PUBLIC AFFAIRS

April 28, 2010

In reply refer to: DK-7

Richard van Dijk  
Better Way for BPA  
19521 NE 212th Avenue  
Brush Prairie, WA 98606

### **RE: BPA-2010-01108-F**

Dear Mr. van Dijk:

This is Bonneville Power Administration's (BPA) final response to your request for information to BPA under the Freedom of Information Act (FOIA), 5 U.S.C. 552.

#### **You requested the following:**

1. All versions and revision dates of the Agency Decision Framework (ADF) of the I-5 Corridor prior to version 6 (which was released in FOIA #BPA-2010-00630-F).
2. Which version was presented to Administrator Stephen Wright and when?
3. Asking that no financial data be excluded as it is germane to the request.

#### **Response:**

BPA is releasing all versions of the ADF for the I-5 Corridor Project (only ADF "Version 6" was given an actual number; all of the other ADFs have the same date on the header). The only portion of the ADF being withheld is a separate legal analysis prepared to support the ADF. This document, which is entitled "Legal Analysis", is being withheld pursuant to Exemption 5, because it expresses opinions and recommendations that fall within the deliberative process privilege, and within the attorney-client privilege. It includes a legal analysis regarding the I-5 Corridor Reinforcement Project. Release of the material exchanged between attorneys and their clients could deter an open and candid exchange between the two parties. Moreover, attorneys would not feel they could adequately advise and represent their clients if the information is disclosed.

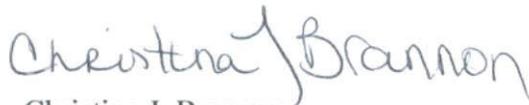
BPA has conducted a review of the Legal Analysis document for any factual or otherwise non-protected material that could be segregated and released. Because this document consists entirely of legal opinions, analysis, and recommendations, there is no such non-protected or segregable material in this document. For your convenience, we are providing a copy of this document with its contents redacted.

Your second request is a question, and not a FOIA request for documents. BPA has responded to your third request in its release of responsive documents.

If you choose to appeal this determination, it must be made within thirty (30) calendar days of receipt of this letter. The appeal should be sent to the Director, Office of Hearings and Appeals, HG-1, U.S. L'Enfant Plaza Building, U.S. Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585-1615. The written appeal, including the envelope, must clearly indicate that a Freedom of Information Act Appeal is being made. The appeal must contain all the elements required by 10 CFR 1004.8, to the extent applicable.

Please contact Laura M. Atterbury, FOIA/Privacy Act Specialist at (503) 230-7305 with any questions about this letter.

Sincerely,

A handwritten signature in cursive script that reads "Christina J. Brannon". The signature is written in dark ink and is positioned above the typed name and title.

Christina J. Brannon  
Freedom of Information Act/Privacy Act Officer

Enclosures: Responsive Documents

Agency Decision Framework (Abbreviated)  
**I-5 Corridor Reinforcement Project Route Alternatives**

Transmission Services  
September 10, 2009

**Objective:** Determine if the routing alternatives to Pearl should be included when we start NEPA.

**Key Principles:**

- Ensure all proposed alternatives meet the electrical needs of the I-5 project.
- Ensure all alternatives presented to public are reasonable and feasible.
- Ensure compliance with NEPA and carefully consider potential impacts to natural, human and built environments.
- Meet the requirements of project schedule and budget.

**Background:**

- February 2009, BPA completed the 2008 NOS process and approved funding for the I-5 Corridor Reinforcement preliminary engineering and NEPA process.
- Spring 2009, Senior Project Manager Mark Korsness assembled a project team and developed a schedule.
- Summer 2009, BPA contracted Mike Johns and Lou Driessen as the core of a siting team to develop reasonable routing alternatives from a new substation near Castle Rock, Washington to a new substation in Troutdale, Oregon and to the existing Pearl Substation in Wilsonville, Oregon. Both alternatives meet the electrical needs of the project.
- August/September 2009 the siting team reviewed the routes developed and determined that the routes to Troutdale represented a wide range of reasonable alternatives to consider and take to the public in the NOI scheduled for October 2, with public meetings to follow in late October and early November.
- The siting team also reviewed the routes developed to Pearl and determined that they added no advantage to the Troutdale routes, and actually held several significant disadvantages that made them unreasonable to consider further.
- September 9, 2009 the siting team decided to take just the Troutdale routes to the public and analyze fully to the end of the EIS process (ROD May 2012). The team shared its recommendation with Transmission management.
- Transmission Services determined it supports this approach, along with EF&W staff, External Affairs, and Hub Adams.
- The Project Manager was tasked with developing a brief ADF to take to the Administrator with this recommendation.

**Alternatives:**

1. **Take the routes from Castle Rock to Troutdale, and the routes from Castle Rock to Pearl to the public and analyze fully to the end of the EIS process.**
2. **Take only the routes from Castle Rock to Troutdale to the public and analyze fully to the end of the EIS process.**
3. **Take the routes from Castle Rock to Troutdale, and the routes from Castle Rock to Pearl to the public, but plan on dropping the routes to Pearl after the scoping meetings.**

Evaluation of Alternatives

	<b>Alternative #1</b> Troutdale and Pearl through scoping and final EIS	<b>Alternative #2</b> Troutdale only through scoping and final EIS	<b>Alternative #3</b> Troutdale and Pearl through scoping, only Troutdale through final EIS
<b>Business/Finance</b>			
<b>Ability to meet the electrical needs of the project</b>	Fully meets the needs	Fully meets the needs	Fully meets the needs
<b>Cost to agency of implementing alternative</b>	Troutdale \$265M to \$342M Pearl \$391M to \$464 M	Troutdale \$265M to \$342M	Troutdale \$265M to \$342M
<b>Legal</b>			
See separate legal analysis			
<b>Public and Stakeholder Interest/Relationship</b>			
<b>Tribes</b>			
<b>Environmental groups</b>			
<b>Customers</b>			

Alternative #1 Troutdale and Pearl through scoping and final EIS	Alternative #2 Troutdale only through scoping and final EIS	Alternative #3 Troutdale and Pearl through scoping, only Troutdale through final EIS
<b>Department of Justice</b>		
<b>Environmental Issues</b>		
<b>BPA People and Process Factors</b>		



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Privileged: Confidential Attorney-Client Communication/Attorney Work Product – Not For Public Dissemination

**Agency Decision Framework - Attachment**  
**I-5 Corridor Reinforcement Project**  
*Legal Analysis*

***Legal Framework***

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Exemption 5 (Deliberative Process-Attorney/Client Privilege)

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Privileged: Confidential Attorney-Client Communication/Attorney Work Product – Not For Public Dissemination

*Legal Evaluation of Alternatives*

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Exemption 5 (Deliberative Process-Attorney/Client Privilege)

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**Agency Decision Framework**  
**I-5 Corridor Reinforcement Project**

Presentation to the Administrator  
**Sept. 10, 2009**

*Presenters: Mark Korsness and Larry Bekkedahl*

**Objective: Determine whether BPA should continue to further consider routing options to Pearl Substation for the proposed I-5 Project.**

**Key Principles:**

- Ensure any alternative that is proposed meets the electrical needs of the I-5 project and provides a cost-effective plan of service
- Ensure that our consideration under NEPA of potential routing options complies with NEPA requirements
- Carry out our environmental responsibilities in an effective yet cost-efficient manner
- Meet established targets for the project schedule and budget

**Context:**

- BPA has been contemplating various versions of an I-5 Corridor transmission reinforcement project since at least 2001, when it was part of the “G20” set of projects for potential infrastructure additions/improvements.
- This project would ease transmission system congestion in the northwest Oregon and southwest Washington area, improve overall system reliability, and help meet continued load growth.
- Since at least 2002, two main corridors have been under consideration for a potential I-5 Corridor reinforcement project: (1) a corridor that starts at a proposed BPA substation near Castle Rock, Washington and heads generally southeast to our existing Troutdale substation in Oregon (i.e., the “Troutdale corridor”); and (2) a corridor that starts at this same proposed substation and heads generally south to our existing Pearl substation near Wilsonville, Oregon (i.e., the “Pearl corridor”).
- For various reasons, the I-5 project essentially went dormant for several years; however, due to requests for transmission service that BPA received as part of its 2008 Network Open Season (NOS) process, this project was included for consideration in the 2008 NOS.
- In February 2009, BPA completed its 2008 NOS process and approved funding for preliminary engineering and NEPA work for this project.
- In spring 2009, BPA staff began strategizing on public outreach approaches for the project and initial contacts were made with local officials.
- In June and July 2009, project schedule and budget information was provided to the Administrator for use in conversations with DOE Secretary Chu, who had expressed an strong desire for BPA to move forward with its consideration of the I-5 project (and other BPA proposed infrastructure projects with links to the Recovery Act) on aggressive schedules, with the expectation that these schedules be met.

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- During summer 2009, BPA set up a project siting team (led by ex-BPAers Mike Johns and Lou Driessen) that conducted extensive field work to identify potential routing options within the two main transmission corridors discussed above.
- In late August 2009, the project siting team had completed its work to identify potential routing options. A total of 45 route segments, totaling about 242 miles with about 11,600 parcels of land affected and 7,750 associated landowners, have been identified for the Troutdale corridor. A total of 43 route segments, totaling about 253 miles with about 5,900 parcels of land affected and 3,100 associated landowners, have been identified for the Pearl corridor.
- In reviewing the various route segments, the project siting team developed an opinion that the routes in the Troutdale corridor, taken just by themselves, represent a very wide range of reasonable routing options for the project. The siting team also believes that the routing options in the Pearl corridor provide no significant advantage to the routing options in the Troutdale corridor, and actually hold several significant disadvantages, including:
  - all Pearl routing alternatives would require a new Columbia River crossing near Longview where there are no existing utilities crossings of the river;
  - all Pearl routing alternatives would require very tall towers (up to 450 foot) at the Columbia river crossing that would have lights and overhead ground wire marker-balls;
  - two Pearl routing options would require new towers and right of way on wildlife refuge island or similarly managed Columbia River lands;
  - to get to the Columbia River, all Pearl routing alternatives would need to go through some residential areas;
  - all Pearl routing alternatives would either go through managed timber lands or high use farm/crop fields; and
  - The most direct route to Pearl would go through or near established wildlife areas and near or over private airstrips.
  - One round about route to Pearl would likely take no homes; however, it is likely that at least one home and possibly up to ten homes may need to be taken depending on which route segment is chosen.
  - The estimated construction cost of a routing alternative in the Pearl corridor ranges from \$391-464 million depending on alignment, whereas the estimated construction cost of a Troutdale routing alternative ranges from \$265-342 million
- The current schedule for the project has BPA issuing our Notice of Intent (NOI) to prepare an EIS on October 2, with public scoping meetings for the EIS to follow in late October and early November.
- NEPA regulations require that the NOI identify potential alternatives under consideration for the EIS; a determination concerning the routing options to Pearl substation this is a critical path item at this point in time.

### **Alternatives:**

1. **Continue to Consider Both Corridors.** Under this alternative, BPA would keep both the Troutdale corridor and the Pearl corridor under consideration. Both corridors and their associated routing options would be included in information presented to the public,

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and routing options in both corridors would be included and considered in the EIS that will be prepared for the project.

2. **Decide Now to Continue to Consider Only Troutdale Corridor.** Under this alternative, BPA would eliminate the Pearl corridor from further consideration at this time and limit further project consideration to only routing options in the Troutdale corridor. Public materials would present information only on the Troutdale corridor routing options. The EIS would consider the Troutdale corridor routing options in detail, and would identify the Pearl corridor as considered but eliminated from further study in the EIS. A full explanation of why this corridor was eliminated would be included in the EIS.
3. **Decide After Scoping Whether to Continue to Consider Only Troutdale Corridor.** Under this alternative, BPA would continue to consider both the Troutdale and Pearl corridors for now. All public information and EIS scoping materials would include information on both corridors. After the EIS scoping process is complete, BPA could decide to eliminate the Pearl corridor from further consideration at that time, particularly if additional information came forth from the scoping process to further justify its elimination. Like alternative #2, the EIS would consider the Troutdale corridor routing options in detail, and would discuss how the Pearl corridor was considered but eliminated from further study in the EIS.

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**Evaluation of Alternatives**

		<b>Alternative #1 Continue Both Corridors</b>	<b>Alternative #2 Troutdale Corridor Only – Decide Now</b>	<b>Alternative #3 Troutdale Corridor Only – Decide After Scoping</b>
<b>Business/Finance</b>				
<b>Ability of alternative to meet the electrical needs of the system</b>	A new line in either corridor would fully meet our electrical needs	A new line in this corridor would fully meet our electrical needs	Same as Alternative #2	
<b>Effect of alternative on our ability to meet established project schedule</b>	High risk of not being able to meet schedule. The logistics of completing the environmental analysis and document preparation for 500 plus miles of line, associated access roads and other facilities, is a major undertaking and while the level of analysis won't be the same on all 500 miles, it is still enormous and time consuming. Likewise or even more importantly, the issues, problems, and challenges potentially faced are multiplied, again, not only by the volume of miles but by the added jurisdictions of another state, 4 additional counties, and a myriad of additional local city/town jurisdictions. These are the types of things that you cannot throw money at to complete like some would argue that you could do with the analysis/document preparation. These might be things that require negotiations, relationship building, equity partnerships, etc., ultimately,	Moderate risk of not being able to meet schedule. By allowing us to focus on just the Troutdale Corridor, there is a lower risk that we would not be able to meet the schedule. This does have the potential for the longest schedule, as we could feel forced, part way through the NEPA process to start all over and begin analysis of the Pearl Corridor.	Moderate to high risk of not being able to meet schedule. This alternative likely increases the risk of not being able to meet the schedule because potential more time would be required after scoping to explain our rationale, and we may receive more comments on the draft EIS from angry individuals along the Troutdale routes. Also, has an even greater potential than Alternative #2 for the longest schedule, as having alerted landowners on both Corridors about the Pearl option, we could feel forced, part way through the NEPA process to start all over and begin analysis of the Pearl Corridor.	

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<b>Alternative #1 Continue Both Corridors</b>	<b>Alternative #2 Troutdale Corridor Only – Decide Now</b>	<b>Alternative #3 Troutdale Corridor Only – Decide After Scoping</b>
time. It's worth noting too that some of the communities on the west side (Pearl) have organized opposition to the LNG pipeline.		
<b>Cost to agency of implementing alternative</b>	30 to 40% reduction in NEPA and preliminary engineering costs compared with Alternative #1.	Same as Alternative #2
<b>Legal</b>		
See separate legal analysis		
<b>Public and Stakeholder Interests/relationships</b>		
<b>Tribes</b>	The Confederated Tribes of the Grand Ronde (OR) and the Cowlitz Indian Tribe (WA) will be the primary tribal contacts. The majority of their concerns will be surrounding the potential impacts to cultural and natural resources. Their concerns will be general until specific routes are chosen.	The Confederated Tribes of the Grand Ronde (OR) will be the primary tribal contact. The majority of their concerns will be surrounding the potential impacts to cultural and natural resources. Their concerns will be general until specific routes are chosen.
<b>State constituents</b>	The preliminary position of the WA Department of Natural Resources is that they oppose the routes that cross state lands. (DNR staff report to the elected Commissioner of Public Lands; they do not report to Governor	The preliminary position of the WA Department of Natural Resources is that they oppose the routes that cross state lands. Governor Gregoire supports the RPS law, wants more renewable energy development (and

	<p align="center"><u>Alternative #1</u> Continue Both Corridors</p>	<p align="center"><u>Alternative #2</u> Troutdale Corridor Only – Decide Now</p>	<p align="center"><u>Alternative #3</u> Troutdale Corridor Only – Decide After Scoping</p>
<p><b>Local constituents</b></p>	<p>Gregoire.) Governor Gregoire supports the RPS law, wants more renewable energy development (and integration) and her agency staff are proposing an energy plan to push fossil fuel energy uses to the electricity grid.</p> <p>Elected officials are likely to band together geographically to push for an OR or WA route; making it a bit more challenging to engage locals in a thoughtful deliberation of the specific alternative segments. It will simultaneously 1) raise concerns among elected officials in OR and WA, and 2) raise hopes and expectations that the line will get built “in the <i>other</i> state.”</p> <p>However, proposing and thoroughly analyzing up to 88 segments will send a clear message that we considered all possible routes and have selected the very best alternative.</p>	<p>integration) and her agency staff are proposing an energy plan to push fossil fuel energy uses to the electricity grid.</p> <p>Mark Korsness and Liz Klumpp have provided briefings on the proposed I-5 line to the following.</p> <ul style="list-style-type: none"> <li>• Vancouver Mayor and staff</li> <li>• Camas Mayor &amp; staff</li> <li>• Clark County Commissioner Chairman &amp; County Administrator</li> </ul> <p>These elected officials recognize the need for additional transmission capacity to support local economic development. In concept, the local governments are supportive of a new transmission line that provides additional capacity in their region as they seem to have some experience with wanting access to additional power</p>	<p>The limited awareness that exists among WA non-utility constituents is that BPA is considering the construction of a transmission line that runs north and south from Castle Rock to Portland; they have no expectations regarding the location of routes.</p> <p>Introducing Oregon and Washington routes with the intention of dropping one quickly will confuse and distract local officials and state officials. It will have the political downsides of Alternative #1, without the benefit of knowing all routes were analyzed before selection was final.</p>

	<p align="center"><u>Alternative #1</u> Continue Both Corridors</p>	<p align="center"><u>Alternative #2</u> Troutdale Corridor Only – Decide Now</p>	<p align="center"><u>Alternative #3</u> Troutdale Corridor Only – Decide After Scoping</p>
<p><b>General public</b></p>	<p>Would require 9-10 public meetings at scoping and then again at the draft EIS stage.</p> <p>We have public materials drafted for this approach.</p> <p>Considering both a primarily “Oregon” option and a primarily “Washington” option shows we have considered multiple ways to meet the need. Will likely result in Oregon vs. Washington conversations.</p> <p><b>Media:</b> Current plan includes</p>	<p>service. They recognize that we have an existing ROW in Camas over the Columbia River. They also recognize that this scoping process and selection of a preferred route or route segments will be very challenging.</p> <p>We did not share maps with proposed routes identified; we described the locations of route segments that pass through SW Washington.</p> <p>Would require five public meetings at scoping and then again at the draft EIS stage.</p> <p>Current drafts of public materials can be modified to fit this approach. We would need to add our reasoning for eliminating the Pearl option from further consideration, since we have talked about Pearl as an option in the following materials:</p> <ul style="list-style-type: none"> <li>• <a href="#">Transmission Web site: 2008 NOS project descriptions</a>,</li> <li>• <a href="#">May 2009 factsheet</a>:</li> </ul>	<p>Public Affairs would have to prepare materials to explain the decision to eliminate an option from further consideration. We would anticipate some public resistance to dropping options before performing a complete environmental analysis.</p> <p><b>Media:</b> Current plan would suffice.</p>

Alternative #1 Continue Both Corridors	Alternative #2 Troutdale Corridor Only – Decide Now	Alternative #3 Troutdale Corridor Only – Decide After Scoping
<p>proactive outreach to media outlets from the Puget Sound area to Portland. Plan includes initial news release with targeted calls to energy.</p>	<p><u>Investing in the NW Transmission System</u></p> <p>Older documents:</p> <ul style="list-style-type: none"> <li>• The <u>2002 September BPA Journal</u> listed public meetings in Washington and Oregon.</li> <li>• A <u>2002 factsheet</u> shows two alternative routes to Pearl. We don't know how broadly this was circulated.</li> </ul> <p><b>Media:</b> Proactive outreach would remain the same because the line would still terminate in Troutdale. More attention would need to be paid to media outlets north of the Columbia River. Strategy might necessitate special editorial board meeting with Columbian to set record straight on elimination of Pearl option.</p>	<p>Would start by including approximately 10,859 property owners and then after scoping drop the property owners associated with route segments that BPA decided to remove</p>
<p><b>Property owners</b></p>	<p>Approximately 7,749 associated landowners on the mailing list to receive project materials.</p> <p>We would still expect to receive comments from landowners who</p>	<p>Approximately 10,859 associated landowners on the mailing list to receive project materials.</p> <p>We expect to receive comments</p>

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	<p>from landowners who do not want a transmission line near their property. Presenting both options (Pearl and Troutdale) will demonstrate BPA is willing to consider all possible alternatives.</p>	<p>do not want a transmission line near their property. As long as we have strong and compelling reasons for not considering the Pearl option, we would be able to use those messages with property owners. Lack of those strong reasons, could result in skepticism and distrust of BPA and strained relationships with property owners.</p>	<p>from further consideration.</p> <p>Property owners on the routes still in consideration may express dissatisfaction with our choice to remove the other alternative. This could result in skepticism and distrust of BPA and strained relationships with property owners.</p>
<p><b>Environmental Issues</b></p>			
<p><b>BPA People and Process Factors</b></p> <p>BPA staffing and resource issues</p>	<p>[Nancy to explain staffing and resource concerns of this alternative]</p>	<p>Currently have adequate agency staffing to undertake this alternative and be on target to meet project schedules</p>	<p>Similar to Alternative #2, but more agency staff and resource likely would need to be dedicated to this project after scoping is complete to explain our rationale and handle potentially angry individuals along</p>

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	<b>Alternative #1 Continue Both Corridors</b>	<b>Alternative #2 Troutdale Corridor Only – Decide Now</b>	<b>Alternative #3 Troutdale Corridor Only – Decide After Scoping</b>
			the Troutdale routes

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**Recommendation:**

BPA should follow Alternative #2 and drop the Pearl corridor from further consideration at this time. The project siting team believes that the routes that have been developed in the Troutdale corridor represent a wide range of reasonable alternatives to consider and take to the public. The siting team also believes that the Pearl corridor provides no advantage to the Troutdale corridor, and that the Pearl corridor actually holds several significant disadvantages that make it unreasonable to consider further. In addition, the project siting team believes that further consideration of the Pearl corridor would only unnecessarily infuriate several thousand additional land owners who will be put in a state of limbo for 3+ years with regards to the value of their property, not knowing whether to invest in their homes or sell, etc. when we feel it is highly unlikely we would build to Pearl. BPA should not carry Pearl through scoping and then drop it because that will mobilize the Troutdale option land owners to, in their eyes, the apparent feasibility of building to Pearl instead, which would likely result in a challenge and may force us to bring Pearl back in at some point during the 3 years of scheduled NEPA and a much longer project schedule.

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Agency Decision Framework  
**I-5 Corridor Reinforcement Project**  
Presentation to the Administrator  
Sept. 10, 2009

*Presenters: Mark Korsness and Larry Bekkedahl*

**Objective: Determine whether BPA should continue to further consider routing options to Pearl Substation for the proposed I-5 Project.**

**Key Principles:**

- Ensure any alternative that is proposed meets the electrical needs of the I-5 project and provides a cost-effective plan of service
- Ensure that our consideration under NEPA of potential routing options complies with NEPA requirements
- Carry out our environmental responsibilities in an effective yet cost-efficient manner
- Meet established targets for the project schedule and budget

**Context:**

- BPA has been contemplating various versions of an I-5 Corridor transmission reinforcement project since at least 2001, when it was part of the “G20” set of projects for potential infrastructure additions/improvements.
- This project would ease transmission system congestion in the northwest Oregon and southwest Washington area, improve overall system reliability, and help meet continued load growth.
- Since at least 2002, two main corridors have been under consideration for a potential I-5 Corridor reinforcement project: (1) a corridor that starts at a proposed BPA substation near Castle Rock, Washington and heads generally southeast to our existing Troutdale substation in Oregon (i.e., the “Troutdale corridor”); and (2) a corridor that starts at this same proposed substation and heads generally south to our existing Pearl substation near Wilsonville, Oregon (i.e., the “Pearl corridor”).
- For various reasons, the I-5 project essentially went dormant for several years; however, due to requests for transmission service that BPA received as part of its 2008 Network Open Season (NOS) process, this project was included for consideration in the 2008 NOS.
- In February 2009, BPA completed its 2008 NOS process and approved funding for preliminary engineering and NEPA work for this project.
- In spring 2009, BPA staff began strategizing on public outreach approaches for the project and initial contacts were made with local officials.
- In June and July 2009, project schedule and budget information was provided to the Administrator for use in conversations with DOE Secretary Chu, who had expressed an strong desire for BPA to move forward with its consideration of the I-5 project (and other BPA proposed infrastructure projects with links to the Recovery Act) on aggressive schedules, with the expectation that these schedules be met.

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- During summer 2009, BPA set up a project siting team (led by ex-BPAers Mike Johns and Lou Driessen) that conducted extensive field work to identify potential routing options within the two main transmission corridors discussed above.
- In late August 2009, the project siting team had completed its work to identify potential routing options. A total of 45 route segments, totaling about 242 miles with about 11,600 parcels of land affected and 7,750 associated landowners, have been identified for the Troutdale corridor. A total of 43 route segments, totaling about 253 miles with about 5,900 parcels of land affected and 3,100 associated landowners, have been identified for the Pearl corridor.
- In reviewing the various route segments, the project siting team developed an opinion that the routes in the Troutdale corridor, taken just by themselves, represent a very wide range of reasonable routing options for the project. The siting team also believes that the routing options in the Pearl corridor provide no significant advantage to the routing options in the Troutdale corridor, and actually hold several significant disadvantages, including:
  - all Pearl routing alternatives would require a new Columbia River crossing near Longview where there are no existing utilities crossings of the river;
  - all Pearl routing alternatives would require very tall towers (up to 450 foot) at the Columbia river crossing that would have lights and overhead ground wire marker-balls;
  - two Pearl routing options would require new towers and right of way on wildlife refuge island or similarly managed Columbia River lands;
  - to get to the Columbia River, all Pearl routing alternatives would need to go through some residential areas;
  - all Pearl routing alternatives would either go through managed timber lands or high use farm/crop fields; and
  - The most direct route to Pearl would go through or near established wildlife areas and near or over private airstrips.
  - One round about route to Pearl would likely take no homes; however, it is likely that at least one home and possibly up to ten homes may need to be taken depending on which route segment is chosen.
  - The estimated construction cost of a routing alternative in the Pearl corridor ranges from \$355 to 396 million depending on alignment, whereas the estimated construction cost of a Troutdale routing alternative ranges from \$327 to 340 million
- Routing to Troutdale would required construction of a new 500kV substation
- The current schedule for the project has BPA issuing our Notice of Intent (NOI) to prepare an EIS on October 2, with public scoping meetings for the EIS to follow in late October and early November.
- NEPA regulations require that the NOI identify potential alternatives under consideration for the EIS; a determination concerning the routing options to Pearl substation this is a critical path item at this point in time.

### **Alternatives:**

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1. **Continue to Consider Both Corridors.** Under this alternative, BPA would keep both the Troutdale corridor and the Pearl corridor under consideration. Both corridors and their associated routing options would be included in information presented to the public, and routing options in both corridors would be included and considered in the EIS that will be prepared for the project.
2. **Decide Now to Continue to Consider Only Troutdale Corridor.** Under this alternative, BPA would eliminate the Pearl corridor from further consideration at this time and limit further project consideration to only routing options in the Troutdale corridor. Public materials would present information only on the Troutdale corridor routing options. The EIS would consider the Troutdale corridor routing options in detail, and would identify the Pearl corridor as considered but eliminated from further study in the EIS. A full explanation of why this corridor was eliminated would be included in the EIS.
3. **Decide After Scoping Whether to Continue to Consider Only Troutdale Corridor.** Under this alternative, BPA would continue to consider both the Troutdale and Pearl corridors for now. All public information and EIS scoping materials would include information on both corridors. After the EIS scoping process is complete, BPA could decide to eliminate the Pearl corridor from further consideration at that time, particularly if additional information came forth from the scoping process to further justify its elimination. Like alternative #2, the EIS would consider the Troutdale corridor routing options in detail, and would discuss how the Pearl corridor was considered but eliminated from further study in the EIS.

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Evaluation of Alternatives

	<b>Alternative #1 Continue Both Corridors</b>	<b>Alternative #2 Troutdale Corridor Only – Decide Now</b>	<b>Alternative #3 Troutdale Corridor Only – Decide After Scoping</b>
<b>Business/Finance</b>			
<b>Ability of alternative to meet the electrical needs of the system</b>	A new line in either corridor would fully meet our electrical needs	A new line in this corridor would fully meet our electrical needs	Same as Alternative #2
<b>Effect of alternative on our ability to meet established project schedule</b>	High risk of not being able to meet schedule. The logistics of completing the environmental analysis and document preparation for 500 plus miles of line, associated access roads and other facilities, is a major undertaking and while the level of analysis won't be the same on all 500 miles, it is still enormous and time consuming. Likewise or even more importantly, the issues, problems, and challenges potentially faced are multiplied, again, not only by the volume of miles but by the added jurisdictions of another state, 4 additional counties, and a myriad of additional local city/town jurisdictions. These are the types of things that you cannot throw money at to complete like some would argue that you could do with the analysis/document preparation. These might be things that require negotiations, relationship building, equity partnerships, etc., ultimately,	Moderate risk of not being able to meet schedule. By allowing us to focus on just the Troutdale Corridor, there is a lower risk that we would not be able to meet the schedule. This does have the potential for the longest schedule, as we could feel forced, part way through the NEPA process to start all over and begin analysis of the Pearl Corridor.	Moderate to high risk of not being able to meet schedule. This alternative likely increases the risk of not being able to meet the schedule because potential more time would be required after scoping to explain our rationale, and we may receive more comments on the draft EIS from angry individuals along the Troutdale routes. Also, has an even greater potential than Alternative #2 for the longest schedule, as having alerted landowners on both Corridors about the Pearl option, we could feel forced, part way through the NEPA process to start all over and begin analysis of the Pearl Corridor.

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<b>Cost to agency of implementing alternative</b>	time. It's worth noting too that some of the communities on the west side (Pearl) have organized opposition to the LNG pipeline. Full cost of NEPA and preliminary engineering.	30 to 40% reduction in NEPA and preliminary engineering costs compared with Alternative #1.	Same as Alternative #2
<b>Legal</b>  See separate legal analysis			
<b>Public and Stakeholder Interests/relationship</b>			
<b>Tribes</b>	The Confederated Tribes of the Grand Ronde (OR) and the Cowlitz Indian Tribe (WA) will be the primary tribal contacts. The majority of their concerns will be surrounding the potential impacts to cultural and natural resources. Their concerns will be general until specific routes are chosen.	The Cowlitz Indian Tribe (WA) will be the primary tribal contact. The majority of their concerns will be surrounding the potential impacts to cultural and natural resources. Their concerns will be general until specific routes are chosen.	The Confederated Tribes of the Grand Ronde (OR) and the Cowlitz Indian Tribe (WA) will be the primary tribal contact. The majority of their concerns will be surrounding the potential impacts to cultural and natural resources. Their concerns will be general until specific routes are chosen.
<b>State constituents</b>	The preliminary position of the WA Department of Natural Resources is that they oppose the routes that cross state lands. (DNR staff report to the elected Commissioner of Public Lands; they do not report to Governor	The preliminary position of the WA Department of Natural Resources is that they oppose the routes that cross state lands. Governor Gregoire supports the RPS law, wants more renewable energy development (and	See "local constituents" below.

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	<p>Gregoire.) Governor Gregoire supports the RPS law, wants more renewable energy development (and integration) and her agency staff are proposing an energy plan to push fossil fuel energy uses to the electricity grid.</p> <p>Specific routes have not been shared with Oregon state constituents pending this decision. Oregon EFSC, the Governor’s Office and the OPUC all have been generally supportive of BPA’s efforts to add capacity to its transmission system, but many of the proposed Oregon segments would raise concerns and objections.</p>	<p>integration) and her agency staff are proposing an energy plan to push fossil fuel energy uses to the electricity grid.</p> <p>Oregon would likely favor this for obvious reasons, though we have not discussed the crossing at Troutdale with the state.</p>	
<b>Local constituents</b>	<p>Elected officials are likely to band together geographically to push for an OR or WA route; making it a bit more challenging to engage locals in a thoughtful deliberation of the specific alternative segments. It will simultaneously 1) raise concerns among elected officials in OR</p>	<p>Mark Korsness and Liz Klumpp have provided briefings on the proposed I-5 line to the following.</p> <ul style="list-style-type: none"> <li>• Vancouver Mayor and staff</li> <li>• Camas Mayor &amp; staff</li> <li>• Clark County Commissioner Chairman</li> </ul>	<p>The limited awareness that exists among WA non-utility constituents is that BPA is considering the construction of a transmission line that runs north and south from Castle Rock to Portland; they have no expectations regarding the location of routes.</p>

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<p>and WA, and 2) raise hopes and expectations that the line will get built “in the <i>other</i> state.”</p> <p>However, proposing and thoroughly analyzing up to 88 segments will send a clear message that we considered all possible routes and have selected the very best alternative, at least as long as all 88 segments are actually feasible. There is some concern that many of the Oregon segments are so challenging that they would never be used.</p>	<p>&amp; County Administrator</p> <p>These elected officials recognize the need for additional transmission capacity to support local economic development. In concept, the local governments are supportive of a new transmission line that provides additional capacity in their region as they seem to have some experience with wanting access to additional power service. They recognize that we have an existing ROW in Camas over the Columbia River. They also recognize that this scoping process and selection of a preferred route or route segments will be very challenging.</p> <p>We did not share maps with proposed routes identified; we described the locations of route segments that pass through SW Washington.</p>	<p>Introducing Oregon and Washington routes with the intention of dropping one quickly will confuse and distract local officials and state officials. It will have the political downsides of Alternative #1, without the benefit of knowing all routes were analyzed before selection was final.</p> <p>This alternative exposes to the agency to looking like it is caving to political pressure from one state to the detriment of another.</p>

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<p><b>General public</b></p> <p>Would require 9-10 public meetings at scoping and then again at the draft EIS stage.</p> <p>We have public materials drafted for this approach.</p> <p>Considering both a primarily “Oregon” option and a primarily “Washington” option shows we have considered multiple ways to meet the need. Will likely result in Oregon vs. Washington conversations.</p> <p><b>Media:</b> Current plan includes proactive outreach to media outlets from the Puget Sound area to Portland. Plan includes initial news release with targeted calls to energy.</p>	<p>Would allow for more targeted public meetings and outreach to the public that will be most impacted.</p> <p>Current drafts of public materials can be modified to fit this approach. We would need to add our reasoning for eliminating the Pearl option from further consideration, since we have talked about Pearl as an option in the following materials:</p> <ul style="list-style-type: none"> <li>• <u>Transmission Web site: 2008 NOS project descriptions</u>,</li> <li>• <u>May 2009 factsheet: Investing in the NW Transmission System</u></li> </ul> <p>Older documents:</p> <ul style="list-style-type: none"> <li>• The <u>2002 September BPA Journal</u> listed public meetings in Washington and Oregon.</li> <li>• A <u>2002 factsheet</u> shows two alternative routes to Pearl. We don’t know how broadly this was circulated.</li> </ul> <p><b>Media:</b> Proactive outreach</p>	<p>Public Affairs would have to prepare materials to explain the decision to eliminate an option from further consideration. We would anticipate some public resistance to dropping options before performing a complete environmental analysis.</p> <p><b>Media:</b> Current plan would suffice.</p>

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<p><b>Property owners</b></p>	<p>Approximately 10,859 associated landowners on the mailing list to receive project materials.</p> <p>We expect to receive comments from landowners who do not want a transmission line near their property. Presenting both options (Pearl and Troutdale) will demonstrate BPA is willing to consider all possible alternatives.</p>	<p>would remain the same because the line would still terminate in Troutdale. More focus to media outlets north of the Columbia River. We might consider a special editorial board meeting with Columbian to set record straight on elimination of Pearl option.</p> <p>Approximately 7,749 associated landowners on the mailing list to receive project materials.</p> <p>We would still expect to receive comments from landowners who do not want a transmission line near their property. As long as we have strong and compelling reasons for not considering the Pearl option, we would be able to use those messages with property owners. Lack of those strong reasons, could result in skepticism and distrust of BPA and strained relationships with property owners.</p>	<p>Would start by including approximately 10,859 property owners and then after scoping drop the property owners associated with route segments that BPA decided to remove from further consideration.</p> <p>Property owners on the routes still in consideration may express dissatisfaction with our choice to remove the other alternative. This could result in skepticism and distrust of BPA and strained relationships with property owners.</p>
<p align="center"><b>Environmental Issues</b></p>			

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<b>Implications for EIS effort/content</b>	<p>The amount of analysis, and the number of issues, challenges, and problems would be the highest. The NEPA lead can address the volume of the analysis with the use of contractors while meeting the schedule. The challenge is, depending on their nature, it is highly likely that a portion of NEPA staff and resources would be solely dedicated to dealing with all the issues/challenges/problems that would arise with this alternative, requiring additional NEPA staff and resources to manage other parts of the project that cannot be given to contracting staff.</p>	<p>Issues, challenges, and problems will arise on this alternative, also requiring dedicated NEPA staff and resources but because the total line miles are reduced, the amount of analysis will be reduced. Also, w/o the Pearl corridor, entire federal, state, and local agencies would not be involved, likely reducing the number of issues, challenges, and problems. Chances are the existing NEPA staff and resources would be adequate to analyze this alternative and meet project schedules.</p>	<p>Similar to Alternative #2. There may be a need to temporarily increase NEPA staff to thoroughly document and craft the information necessary to drop the Pearl corridor after scoping. After this is done, staffing should return to Alternative #2 levels.</p>
<b>Potential effect on the EIS process from public participation</b>	<p>The number of publics notified and potentially participating in the process is staggering with this alternative. Even with contracting help, the logistics of processing public comments during the scoping and DEIS phase will be complicated and will take time. The potential issues and challenges will likely be greater. Very unlikely that a 2.5 year schedule can be met.</p>	<p>While this alternative still has the potential to evaluate a large number of line miles, it is not only reduced by half but whole groups of landowners and agencies will not be notified and will most likely have no direct interest in this project. While issues and challenges will remain, the quantity and severity might be less, providing a better chance of meeting the schedule.</p>	<p>Chances are this alternative will create an even greater challenge for BPA in the public arena than Alternative 1. While some publics and their issues will choose to go away, some will remain on the Pearl corridor to make sure we don't come back. Our publics on the Troutdale corridor will likely be more aggressive/angry knowing that a choice has been made and it does not benefit them. This will place BPA in a defensive position through the remaining NEPA process possibly affecting the schedule.</p>

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	Alternative #1 Continue Both Corridors	Alternative #2 Troutdale Corridor Only – Decide Now	Alternative #3 Troutdale Corridor Only – Decide After Scoping
<b>BPA People and Process Factors</b>	The number of issues, challenges, and problems would be the highest. Depending on their nature, it is highly likely that a portion of BPA staff and resources would be solely dedicated to this effort requiring additional staff to manage other parts of the project that cannot be given to contracting staff.	Issues, challenges, and problems will arise on this alternative also requiring dedicated agency staff and resources but because the line miles are reduced, we anticipate adequate agency staffing to undertake this alternative and be on target to meet project schedules	Similar to Alternative #2, but more agency staff and resource likely would need to be dedicated to this project after scoping is complete to explain our rationale and handle potentially angry individuals along the Troutdale routes
<b>BPA staffing and resource issues</b>			

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**Recommendation:**

BPA should follow Alternative #2 and drop the Pearl corridor from further consideration at this time. The project siting team believes that the routes that have been developed in the Troutdale corridor represent a wide range of reasonable alternatives to consider and take to the public. The siting team also believes that the Pearl corridor provides no advantage to the Troutdale corridor, and that the Pearl corridor actually holds several significant disadvantages that make it unreasonable to consider further. In addition, the project siting team believes that further consideration of the Pearl corridor would only unnecessarily infuriate several thousand additional land owners who will be put in a state of limbo for 3+ years with regards to the value of their property, not knowing whether to invest in their homes or sell, etc. when we feel it is highly unlikely we would build to Pearl. BPA should not carry Pearl through scoping and then drop it because that will mobilize the Troutdale option land owners to, in their eyes, the apparent feasibility of building to Pearl instead, which would likely result in a challenge and may force us to bring Pearl back in at some point during the 3 years of scheduled NEPA and a much longer project schedule.

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**Agency Decision Framework (version 6)**  
**I-5 Corridor Reinforcement Project**

Presentation to the Administrator

Sept. 10, 2009

*Presenters: Mark Korsness and Larry Bekkedahl*

**Objective: Determine whether BPA should continue to further consider routing options to Pearl Substation for the proposed I-5 Project.**

**Key Principles:**

- Ensure any alternative that is proposed meets the electrical needs of the I-5 project and provides a cost-effective plan of service
- Ensure that our consideration under NEPA of potential routing options complies with NEPA requirements
- Carry out our environmental responsibilities in an effective yet cost-efficient manner
- Meet established targets for the project schedule and budget

**Context:**

- BPA has been contemplating various versions of an I-5 Corridor transmission reinforcement project since at least 2001, when it was part of the “G20” set of projects for potential infrastructure additions/improvements.
- This project would ease transmission system congestion in the northwest Oregon and southwest Washington area, improve overall system reliability, and help meet continued load growth.
- Since at least 2002, two main corridors have been under consideration for a potential I-5 Corridor reinforcement project: (1) a corridor that starts at a proposed BPA substation near Castle Rock, Washington and heads generally southeast to our existing Troutdale substation in Oregon (i.e., the “Troutdale corridor”); and (2) a corridor that starts at this same proposed substation and heads generally south to our existing Pearl substation near Wilsonville, Oregon (i.e., the “Pearl corridor”).
- For various reasons, the I-5 project essentially went dormant for several years; however, due to requests for transmission service that BPA received as part of its 2008 Network Open Season (NOS) process, this project was included for consideration in the 2008 NOS.
- In February 2009, BPA completed its 2008 NOS process and approved funding for preliminary engineering and NEPA work for this project.
- In spring 2009, BPA staff began strategizing on public outreach approaches for the project and initial contacts were made with local officials.
- In June and July 2009, project schedule and budget information was provided to the Administrator for use in conversations with DOE Secretary Chu, who had expressed an strong desire for BPA to move forward with its consideration of the I-5 project (and other BPA proposed infrastructure projects with links to the Recovery Act) on aggressive schedules, with the expectation that these schedules be met.

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- During summer 2009, BPA set up a project siting team (led by ex-BPAers Mike Johns and Lou Driessen) that conducted extensive field work to identify potential routing options within the two main transmission corridors discussed above.
- In late August 2009, the project siting team had completed its work to identify potential routing options. A total of 45 route segments, totaling about 242 miles with about 11,600 parcels of land affected and 7,750 associated landowners, have been identified for the Troutdale corridor. A total of 43 route segments, totaling about 253 miles with about 5,900 parcels of land affected and 3,100 associated landowners, have been identified for the Pearl corridor.
- In reviewing the various route segments, the project siting team developed an opinion that the routes in the Troutdale corridor, taken just by themselves, represent a very wide range of reasonable routing options for the project. The siting team also believes that the routing options in the Pearl corridor provide no significant advantage to the routing options in the Troutdale corridor, and actually hold several significant disadvantages, including:
  - all Pearl routing alternatives would require a new Columbia River crossing near Longview where there are no existing utilities crossings of the river;
  - all Pearl routing alternatives would require very tall towers (up to 450 foot) at the Columbia river crossing that would have lights and overhead ground wire marker-balls;
  - two Pearl routing options would require new towers and right of way on wildlife refuge island or similarly managed Columbia River lands;
  - to get to the Columbia River, all Pearl routing alternatives would need to go through some residential areas;
  - all Pearl routing alternatives would either go through managed timber lands or high use farm/crop fields; and
  - The most direct route to Pearl would go through or near established wildlife areas and near or over private airstrips.
  - One round about route to Pearl would likely take no homes; however, it is likely that at least one home and possibly up to ten homes may need to be taken depending on which route segment is chosen.
  - The estimated construction cost of a routing alternative in the Pearl corridor ranges from \$355 to 396 million depending on alignment, whereas the estimated construction cost of a Troutdale routing alternative ranges from \$327 to 340 million, making Troutdale plan \$15 to \$69 million less expensive
  - Pearl alternatives do not offer a route on existing right of way, whereas the Troutdale plan does.
  - Pearl plan studied with Troutdale plan requires an additional year for NEPA.
  - Pearl plan requires involving twice as many County and City governments
  - Pearl plan requires putting twice as many people's lives on hold in regards to property improvements, value, sales, ownership plans, etc.
- Routing to Troutdale would require construction of a new 500kV substation
- The current schedule for the project has BPA issuing our Notice of Intent (NOI) to prepare an EIS on October 2, with public scoping meetings for the EIS to follow in late October and early November.

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- NEPA regulations require that the NOI identify potential alternatives under consideration for the EIS; a determination concerning the routing options to Pearl substation this is a critical path item at this point in time.

### **Alternatives:**

1. **Continue to Consider Both Corridors.** Under this alternative, BPA would keep both the Troutdale corridor and the Pearl corridor under consideration. Both corridors and their associated routing options would be included in information presented to the public, and routing options in both corridors would be included and considered in the EIS that will be prepared for the project.
2. **Decide Now to Continue to Consider Only Troutdale Corridor.** Under this alternative, BPA would eliminate the Pearl corridor from further consideration at this time and limit further project consideration to only routing options in the Troutdale corridor. Public materials would present information only on the Troutdale corridor routing options. The EIS would consider the Troutdale corridor routing options in detail, and would identify the Pearl corridor as considered but eliminated from further study in the EIS. A full explanation of why this corridor was eliminated would be included in the EIS.
3. **Decide After Scoping Whether to Continue to Consider Only Troutdale Corridor.** Under this alternative, BPA would continue to consider both the Troutdale and Pearl corridors for now. All public information and EIS scoping materials would include information on both corridors. After the EIS scoping process is complete, BPA could decide to eliminate the Pearl corridor from further consideration at that time, particularly if additional information came forth from the scoping process to further justify its elimination. Like alternative #2, the EIS would consider the Troutdale corridor routing options in detail, and would discuss how the Pearl corridor was considered but eliminated from further study in the EIS.

Evaluation of Alternatives

	Alternative #1 Continue Both Corridors	Alternative #2 Troutdale Corridor Only – Decide Now	Alternative #3 Troutdale Corridor Only – Decide After Scoping
<p><b>Business/Finance</b></p> <p><b>Ability of alternative to meet the electrical needs of the system</b></p> <p><b>Effect of alternative on our ability to meet established project schedule</b></p>	<p>A new line in either corridor would fully meet our electrical needs</p> <p>High risk of not being able to meet schedule. The logistics of completing the environmental analysis and document preparation for 500 plus miles of line, associated access roads and other facilities, is a major undertaking and while the level of analysis won't be the same on all 500 miles, it is still enormous and time consuming. Likewise or even more importantly, the issues, problems, and challenges potentially faced are multiplied, again, not only by the volume of miles but by the added jurisdictions of another state, 4 additional counties, and a myriad of additional local city/town jurisdictions. These are the types of things that you cannot throw money at to complete like some would argue that you could do with the analysis/document preparation. These might be things that require negotiations, relationship building, equity partnerships, etc., ultimately,</p>	<p>A new line in this corridor would fully meet our electrical needs</p> <p>Moderate risk of not being able to meet schedule. By allowing us to focus on just the Troutdale Corridor, there is a lower risk that we would not be able to meet the schedule. This does have the potential for the longest schedule, as we could feel forced, part way through the NEPA process to start all over and begin analysis of the Pearl Corridor.</p>	<p>Same as Alternative #2</p> <p>Moderate to high risk of not being able to meet schedule. This alternative likely increases the risk of not being able to meet the schedule because potential more time would be required after scoping to explain our rationale, and we may receive more comments on the draft EIS from angry individuals along the Troutdale routes. Also, has an even greater potential than Alternative #2 for the longest schedule, as having alerted landowners on both Corridors about the Pearl option, we could feel forced, part way through the NEPA process to start all over and begin analysis of the Pearl Corridor.</p>

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<b>Cost to agency of implementing alternative</b>	time. It's worth noting too that some of the communities on the west side (Pearl) have organized opposition to the LNG pipeline. Full cost of NEPA and preliminary engineering.	30 to 40% reduction in NEPA and preliminary engineering costs compared with Alternative #1.	Same as Alternative #2
<b>Legal</b>			
See separate legal analysis			
<b>Public and Stakeholder Interests/relationship</b>			
<b>Tribes</b>	The Confederated Tribes of the Grand Ronde (OR) and the Cowlitz Indian Tribe (WA) will be the primary tribal contacts. The majority of their concerns will be surrounding the potential impacts to cultural and natural resources. Their concerns will be general until specific routes are chosen.	The Cowlitz Indian Tribe (WA) will be the primary tribal contact. The majority of their concerns will be surrounding the potential impacts to cultural and natural resources. Their concerns will be general until specific routes are chosen.	The Confederated Tribes of the Grand Ronde (OR) and the Cowlitz Indian Tribe (WA) will be the primary tribal contact. The majority of their concerns will be surrounding the potential impacts to cultural and natural resources. Their concerns will be general until specific routes are chosen.
<b>State constituents</b>	The preliminary position of the WA Department of Natural Resources is that they oppose the routes that cross state lands. (DNR staff report to the elected Commissioner of Public Lands; they do not report to Governor	The preliminary position of the WA Department of Natural Resources is that they oppose the routes that cross state lands. Governor Gregoire supports the RPS law, wants more renewable energy development (and	See "local constituents" below.

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	<p align="center"><u>Alternative #1</u> Continue Both Corridors</p>	<p align="center"><u>Alternative #2</u> Troutdale Corridor Only – Decide Now</p>	<p align="center"><u>Alternative #3</u> Troutdale Corridor Only – Decide After Scoping</p>
<p><b>Property owners</b></p>	<p>Approximately 10,859 associated landowners on the mailing list to receive project materials.</p> <p>We expect to receive comments from landowners who do not want a transmission line near their property. Presenting both options (Pearl and Troutdale) will demonstrate BPA is willing to consider all possible alternatives.</p>	<p>would remain the same because the line would still terminate in Troutdale. More focus to media outlets north of the Columbia River. We might consider a special editorial board meeting with Columbian to set record straight on elimination of Pearl option.</p> <p>Approximately 7,749 associated landowners on the mailing list to receive project materials.</p> <p>We would still expect to receive comments from landowners who do not want a transmission line near their property. As long as we have strong and compelling reasons for not considering the Pearl option, we would be able to use those messages with property owners. Lack of those strong reasons, could result in skepticism and distrust of BPA and strained relationships with property owners.</p>	<p>Would start by including approximately 10,859 property owners and then after scoping drop the property owners associated with route segments that BPA decided to remove from further consideration.</p> <p>Property owners on the routes still in consideration may express dissatisfaction with our choice to remove the other alternative. This could result in skepticism and distrust of BPA and strained relationships with property owners.</p>
<p align="center"><b>Environmental Issues</b></p>			

	<p align="center"><u>Alternative #1</u> Continue Both Corridors</p>	<p align="center"><u>Alternative #2</u> Troutdale Corridor Only – Decide Now</p>	<p align="center"><u>Alternative #3</u> Troutdale Corridor Only – Decide After Scoping</p>
<p><b>Implications for EIS effort/content</b></p>	<p>The amount of analysis, and the number of issues, challenges, and problems would be the highest. The NEPA lead can address the volume of the analysis with the use of contractors while meeting the schedule. The challenge is, depending on their nature, it is highly likely that a portion of NEPA staff and resources would be solely dedicated to dealing with all the issues/challenges/problems that would arise with this alternative, requiring additional NEPA staff and resources to manage other parts of the project that cannot be given to contracting staff.</p>	<p>Issues, challenges, and problems will arise on this alternative, also requiring dedicated NEPA staff and resources but because the total line miles are reduced, the amount of analysis will be reduced. Also, w/o the Pearl corridor, entire federal, state, and local agencies would not be involved, likely reducing the number of issues, challenges, and problems. Chances are the existing NEPA staff and resources would be adequate to analyze this alternative and meet project schedules.</p>	<p>Similar to Alternative #2. There may be a need to temporarily increase NEPA staff to thoroughly document and craft the information necessary to drop the Pearl corridor after scoping. After this is done, staffing should return to Alternative #2 levels.</p>
<p><b>Potential effect on the EIS process from public participation</b></p>	<p>The number of publics notified and potentially participating in the process is staggering with this alternative. Even with contracting help, the logistics of processing public comments during the scoping and DEIS phase will be complicated and will take time. The potential issues and challenges will likely be greater. Very unlikely that a 2.5 year schedule can be met.</p>	<p>While this alternative still has the potential to evaluate a large number of line miles, it is not only reduced by half but whole groups of landowners and agencies will not be notified and will most likely have no direct interest in this project. While issues and challenges will remain, the quantity and severity might be less, providing a better chance of meeting the schedule.</p>	<p>Chances are this alternative will create an even greater challenge for BPA in the public arena than Alternative 1. While some publics and their issues will choose to go away, some will remain on the Pearl corridor to make sure we don't come back. Our publics on the Troutdale corridor will likely be more aggressive/angry knowing that a choice has been made and it does not benefit them. This will place BPA in a defensive position through the remaining NEPA process possibly affecting the schedule.</p>

	Alternative #1 Continue Both Corridors	Alternative #2 Troutdale Corridor Only – Decide Now	Alternative #3 Troutdale Corridor Only – Decide After Scoping
<p><b>BPA People and Process Factors</b></p> <p><b>BPA staffing and resource issues</b></p>	<p>The number of issues, challenges, and problems would be the highest. Depending on their nature, it is highly likely that a portion of BPA staff and resources would be solely dedicated to this effort requiring additional staff to manage other parts of the project that cannot be given to contracting staff.</p>	<p>Issues, challenges, and problems will arise on this alternative also requiring dedicated agency staff and resources but because the line miles are reduced, we anticipate adequate agency staffing to undertake this alternative and be on target to meet project schedules</p>	<p>Similar to Alternative #2, but more agency staff and resource likely would need to be dedicated to this project after scoping is complete to explain our rationale and handle potentially angry individuals along the Troutdale routes</p>

**\*\* DRAFT \*\***

**Recommendation:**

BPA should follow Alternative #2 and drop the Pearl corridor from further consideration at this time. The project siting team believes that the routes that have been developed in the Troutdale corridor represent a wide range of reasonable alternatives to consider and take to the public. The siting team also believes that the Pearl corridor provides no advantage to the Troutdale corridor, and that the Pearl corridor actually holds several significant disadvantages that make it unreasonable to consider further. In addition, the project siting team believes that further consideration of the Pearl corridor would only unnecessarily infuriate several thousand additional land owners who will be put in a state of limbo for 3+ years with regards to the value of their property, not knowing whether to invest in their homes or sell, etc. when we feel it is highly unlikely we would build to Pearl. BPA should not carry Pearl through scoping and then drop it because that will mobilize the Troutdale option land owners to, in their eyes, the apparent feasibility of building to Pearl instead, which would likely result in a challenge and may force us to bring Pearl back in at some point during the 3 years of scheduled NEPA and a much longer project schedule.