

22 October, 2007

Ms. Tish Eaton—KEC—4
Project Environmental Lead
Bonneville Power Administration
Portland, Oregon

RE: Libby (FEC) to Troy 115 kV Rebuild – Project Comments and Questions Regarding Neighborhood and Helicopter Safety.

Dear Ms. Eaton,

Thank you again for clarifying BPA's intent to use helicopters to "fly sock line" for attaching conductor cables to newly erected power line poles within or adjacent to neighborhood lots and, apparently, adjacent to or over Kootenai River Road. I regrettably conclude, after reading the clarification and forwarded information, that significant improvements to BPA's helicopter safety policy (not to mention EIS procedures) are required in order to safeguard local residents.

Am I correct in assuming BPA also intends to continue using low flying helicopters to inspect power lines along the easement through the neighborhood as well as near homes or over road areas to the east? For the record, will you please confirm this as well as your policy regarding subsequent helicopter use for repairing transmission cables or pole equipment in same easement corridor.

BPA's unannounced pre-emption of the EIS process has left another helicopter line use in question. Section 2.2.8, at the bottom, either conflicts with, or was not included in your 10/11/07 clarification. It states that "Helicopters could be used for clearing and would be used intermittently for 6-7 months during removal of existing line and construction of the new line." It goes on to state "A small helicopter would be used to remove inaccessible wood poles and stringing the sock line." Would you please clarify if wood poles would be removed by helicopters near homes or next to well traveled roads along the line east of the wildlife area (the 7 ½ mile stretch back to Libby).

Your clarification (and Section 2.28 of the Draft EIS) mentioned helicopter "stringing of sock line--"the small or light-weight rope or cable used to pull larger diameter cable". Given that this operation is intended for use in our neighborhood, shouldn't the deadly crashes resulting from this operation by power line and telephone companies be revealed in the EIS and carefully mitigated by BPA? The National Transportation Safety Board (NTSB) helicopter accident data files contain specifics of these crashes including deaths and injuries.

Your clarification stated "the helicopter only flies over the line and cleared area (the 60-80' easement) and not directly over houses." Well, let's see. Can it reasonably be

assumed that crashes will only occur down through/under the lines and within the easement and can it so quickly be assumed they will not involve residents, houses, vehicle occupants, private property, etc.? Helicopters flying the easement in question frequently fly offset to the right of the cables and towers (normally headed east) in a crab allowing the crew a better view of the cables. Some flight over private property results and houses have been over flown when helicopters depart the easement, usually to the south. Residents have witnessed these flights.

Can BPA validly predict where helicopters experiencing emergencies at wire or pole level altitudes will go in a neighborhood or over vehicular traffic (for example, consider a tail rotor or turbine failure)? Does BPA really want to claim they always fall straight through, and directly below, the cables and do broken live or dead power cables always fall straight down and remain in the easement? Where does BPA say the spinning rotor blades and other parts go? Do they too remain in the easement or might they violate company policy and depart the scene in any direction at very high velocity and with thousands of foot pounds of energy? Has BPA also considered the added risk to pilots experiencing emergencies the “stay in the easement only” policy could impose?

Does BPA’s management concur that this issue and attendant implications, at the least, should be revealed and described in Section 3.7, Adverse Effects That Cannot be Avoided or, more prudently, be dealt with in a new BPA policy that simply far better enables residents to avoid catastrophic “adverse effects” in the first place? The EIS process recently pre-empted by BPA could have helped avoid or minimize the resulting risks to people and property. I would suggest spending time reviewing previously undisclosed (to residents and in the EIS) helicopter accidents including BPA’s tragic crash involving a Bell 206 “sock pull” operation only three years ago. The tragic wire related accidents in Idaho, Kansas, Texas and other states and similar helicopter logging accidents involving the use of sling loads should be reviewed as well...before power line route selection and policy formulation.

Should people really remain in houses close to cable operations or drive under or along side and below cables when sock-line pulling, pole pulling or line inspection operations are being conducted? Your clarification states: “BPA does not evacuate residents for helicopter activity because the helicopter only flies over the line and cleared area and not directly over houses”. This statement is neither correct nor prudent. It does, however, imply other agencies and those exposed to the risk must participate more strongly in policy development. BPA’s policy will be addressed further because it ignores too many realities as well as third party resident safety and property rights. Does the “we don’t evacuate them—it’s so bloody safe” policy extend to vehicle traffic 60-80’ below “sock pulls”? Will traffic really be allowed to flow below in the high risk zone? Have you really had 20 years of experience using this policy in neighborhoods? Policy revision and concern for people is lacking, but needed here.

Section 2.7, Step 7 states “wood or steel poles are lifted into place by a crane or helicopter.” Again, will helicopters be used near (60-300’) homes or well traveled roads east of the wildlife area for high gross sling operations?

The EIS failed to mention helicopter noise levels when addressing residents along the transmission line easement. Some residents live within 60-300' from the lines. This should have been addressed in Table 5-1, Mitigation Measures and included in the decision making process.

NTSB accident files list a staggering number of different causes or contributing factors to crashes of helicopters involved in various wire, sling and MED EVAC flights. These numerous crashes have occurred in spite of the existence of the same or similar BPA "sanctions and regulations" you cited or forwarded in your clarification. A simple fact emerges, no one, BPA included, can depend on regulations to prevent certain crashes; common sense and concern for third parties is also required. Crashes will occur in the future, so why isn't this reality openly discussed and dealt with when considering residents and others involved in your project?

My previous letter to you on this topic presented several serious safety issues dealing with helicopter use in the specific conditions being addressed. Your clarification letter failed to acknowledge or respond to any of them and instead only cited existing BPA policy, sanctions and Federal Aviation Regulations.

BPA's self serving policy of helicopter use in neighborhoods or close to people may save time and money in the important process of providing low-cost power to rate payers. But too much risk and potential cost is being shifted to those living near power lines. The BPA policy of not disclosing the facts may also serve to make the announced project seem more safe, more benign, less disruptive and, accordingly, more acceptable and supportable by the neighborhood. Regardless of the reason, the welfare of people is being astonishingly subordinated without being disclosed. Support for these beliefs are strengthened by BPA's aborting the EIS process, barely mentioning helicopter use, failing to measure and report the proximity of homes and vehicles to the lines, failing to reveal helicopter use accidents and their nature and failing to acknowledge helicopter risks were a reason favoring re-routing the power lines away from people in USFS land.

An additional self serving step was included in the draft EIS when the alternate route away from people was portrayed negatively by stating wires in USFS land would be a hazard to planes. In addition to the fact aircraft have little reason to be in that area and have not been seen flying in the area, BPA staff additional bias by not mentioning the fact that wires exist all along the existing (BPA's preferred alternative, naturally) routing running through neighborhoods and over cars.

Totally ignoring any threats to residents, BPA, in Table 2-3, Comparison of Alternatives to Project Purposes, stated their "proposed action minimizes environmental impacts (residents would be included) compared to clearing and disturbance required to construct new line and access road in undisturbed areas". This environmentally oriented conclusion was based on biased and selectively presented information BPA developed, approved, printed and disseminated to the public in draft form. Before the EIS process had been completed and approved, BPA proceeded to buy the few unsecured easement

segments along their “preferred alternative” route and tell selected neighborhood residents about their intentions. Some residents were told to continue using the easement (undoubtedly to gain their support) as they have been and not worry about removing encroaching small structures or equipment.

Can you please tell me why a Final EIS is being published? Who will get copies and who will use it for what purpose? All major decisions have been made prior to its completion. Information included in the draft had little if any influence on the nature and scope of the project to be initiated. Why was an EIS conducted? Perhaps its major contribution was to reveal BPA’s procedures and policies, particularly pertaining to honesty and concern for impacted people, need correction and oversight. We will work to achieve that result.

Sincerely yours,

John D. Smith