



July 5, 2007

Stacy Mason, Bonneville Power Administration
Environmental Project Lead
KEC-4, P.O. Box 3621
Portland, Oregon 97208-3621

SUBJECT: Juan de Fuca Cable Project

Dear Ms. Mason:

Even though the following comments are being provided after the close date for the most recent phase of environmental review, I hope you will incorporate them into current and future documentation and plans for this project. Thank you for providing the Washington State Department of Natural Resources (DNR) with the opportunity to comment on the draft Environmental Impact Statement (EIS) for the proposed Juan de Fuca Cable project. DNR is a participating agency in this project as the manager of state-owned aquatic lands located within and surrounding the proposed project area. DNR hopes that BPA and Sea Breeze Corporation consider this belated comment letter.

DNR manages over 2.4 million acres of state-owned aquatic lands and attached resources in Washington State. Resources located upon state-owned aquatic lands include submerged aquatic vegetation, benthic invertebrates, and valuable materials and minerals. As manager of state owned aquatic lands, DNR shall strive to provide a balance of public benefits for all citizens of the state. These public benefits are varied, and include:

1. Encouraging direct public use and access;
2. Fostering water-dependent uses;
3. Ensuring environmental protection; and
4. Utilizing renewable resources (Revised Code of Washington [RCW] 79.105.030).

As the proposed project moves forward through the permitting process, Sea Breeze will need to continue to maintain coordination with DNR on the development of a use authorization for any state-owned aquatic lands the cable will encumber. A successful meeting on this subject occurred on April 10, 2007, between Sea Breeze Corporation and the DNR in Port Angeles.

DNR staff will follow up with Sea Breeze as this project moves forward. At this time, DNR has the following comments on the project:

Application to Use State Owned Aquatic Lands

A complete application to use state owned aquatic lands will be required prior to any pre-construction or construction work in the right-of-way on state owned aquatic lands. Please contact the District Office to obtain this application, or download the document from the DNR website (www.dnr.gov).

DNR Survey

An aquatic lands survey defining the boundaries of the state-owned aquatic lands to be leased is required prior to issuing a use authorization. If Sea Breeze Corporation is developing an "as-built" survey, please work with DNR to ensure that the details meet DNR Survey Guidance for state-owned aquatic lands.

Preference Rights

As discussed on April 10, 2007, the upland owner has preference rights to certain areas of state-owned aquatic lands, specifically 1st class tidelands in harbor areas.

In this situation, it appears Sea Breeze will be exiting in a harbor area. The upland owner will need to be included in discussions about using this location. Please ensure Sea Breeze is working with DNR on this issue.

Method of Submarine Cable Installation

In the nearshore environment, horizontal directional drilling (HDD) is the preferred method of submarine cable installation in order to minimize impacts. The installation of submarine cables in locations where other utilities are also located is also preferred. Shoreline contours should be returned to as near pre-construction condition as possible.

Cable Exposure

The method of installation in the marine environment has not been determined. The cable may be trenched, or Sea Breeze might rest the cable on top of aquatic lands. These details will be required before DNR can issue a use authorization.

Natural Resources Damages

If damages to natural resources on state-owned aquatic land are unavoidable, DNR would request monetary compensation for said resources, based upon fair market value.

In areas where commercial or recreational shellfish beds could be located, populations surveys will need to be conducted. Assessments for disturbed or damaged shellfish and geoduck may be added to the value established to procure the cable easement. Geoduck beds have been identified in the pathway of the cable installation and harvesting could occur in the future. DNR will request that the Juan de Fuca cable is buried four feet below the subtidal geoduck beds in order to avoid any future interference with commercial geoduck harvesting.

Thank you, again, for the opportunity to comment. Please include me in future opportunities to comment on projects potentially impacting state land. If you have any questions, feel free to contact me at (360) 457-2570 ext 221.

Sincerely,

A handwritten signature in blue ink that reads "Martha Hurd". The signature is written in a cursive, flowing style.

Martha Hurd
Straits District Manager, Orca Straits District
Aquatics Program, Washington Department of Natural Resources
919 N Township St
Sedro Woolley, WA 98282

c: Region File, Washington Department of Natural Resources, Orca Straits District
ERC File, Washington Department of Natural Resources, Division; Attn: Elizabeth Ellis, Planner
Sea Breeze Corporation, Attn: Jason Day-Environmental Planner

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