

I-5 Corridor Reinforcement Project

Final Environmental Impact Statement

Volume 3H: Comments and Responses (Communications 14844–14919)
DOE/EIS – 0436

Bonneville Power Administration

Cooperating Agencies:

**U.S. Army Corps of Engineers, Oregon Energy Facility Siting Council,
Washington Energy Facility Site Evaluation Council, Cowlitz and Clark Counties, Washington**

February 2016

Page intentionally left blank

Table of Contents

Volume 1: Chapters 1-13

Abstract

Notes to Reader

Perforated Icon Sheet

Summary

Chapter 1 Purpose of and Need for Action

Chapter 2 Facility Siting, Route Segments, and Action Alternatives

Chapter 3 Project Components and Construction, Operation, and Maintenance Activities

Chapter 4 Proposed Action and Alternatives

Chapter 5 Land

Chapter 6 Recreation

Chapter 7 Visual Resources

Chapter 8 Electric and Magnetic Fields

Chapter 9 Noise

Chapter 10 Health and Safety

Chapter 11 Socioeconomics

Chapter 12 Transportation

Chapter 13 Cultural Resources

Volume 2: Chapters 14-33

Chapter 14 Geology and Soils

Chapter 15 Water

Chapter 16 Wetlands

Chapter 17 Vegetation

Chapter 18 Wildlife

Chapter 19 Fish

Chapter 20 Climate

Chapter 21 Air Quality

Chapter 22 Greenhouse Gases

Chapter 23 Intentional Destructive Acts

Chapter 24 Short-Term Uses versus Long-Term Productivity
Chapter 25 Irreversible or Irretrievable Commitment of Resources
Chapter 26 Cumulative Impacts
Chapter 27 Consultation, Review, and Permit Requirements
Chapter 28 Consistency with State Substantive Standards
Chapter 29 References
Chapter 30 List of Preparers
Chapter 31 Agencies, Organizations, and Persons Receiving this EIS
Chapter 32 Glossary and Acronyms
Chapter 33 Index

Volume 3A: Comments and Responses (Communications 14093 – 14379)

Volume 3B: Comments and Responses (Communications 14380 – 14600)

Volume 3C: Comments and Responses (Communications 14601 – 14701)

Volume 3D: Comments and Responses (Communications 14702 – 14746)

Volume 3E: Comments and Responses (Communications 14747 – 14798)

Volume 3F: Comments and Responses (Communications 14799 – 14827)

Volume 3G: Comments and Responses (Communications 14828 – 14843)

Volume 3H: Comments and Responses (Communications 14844 – 14919)

Appendices

Appendix A Washington Department of Natural Resources Lands Analysis
Appendix B Right-of-Way Tower Configuration Tables and Figures
Appendix B1 Right-of-Way Tower Configuration Tables and Figures – Central Alternative using Central Option 1 (Preferred Alternative)
Appendix C I-5 Corridor Reinforcement Project Photomap Book
Appendix C1 I-5 Corridor Reinforcement Project Photomap Book – Central Alternative using Central Option 1 (Preferred Alternative)
Appendix D Underground Route Study
Appendix D1 Underground Route Study – Castle Rock, Washougal, and Camas areas
Appendix E Visual Assessment
Appendix F Electrical Effects

Appendix F1	Electrical Effects – Central Alternative using Central Option 1 (Preferred Alternative)
Appendix G	Research on Extremely Low Frequency Electric and Magnetic Fields and Health
Appendix G1	EMF Research Updates
Appendix H	Environmental Justice Tables
Appendix I	Cultural Resource Sensitivity Scores
Appendix J	Geologic Assessment – Geologic Hazards, Soil and Slope Gradient, Geology, Shallow Bedrock, Shallow Groundwater
Appendix K	Fish Habitat and Fish Population Impacts
Appendix L	Wetland Modeling
Appendix M	Noxious Weed List
Appendix N	NEPA Disclosure Forms
Appendix O	Shoreline Management Act and Critical Area Ordinance Consistency

Page intentionally left blank

Comments and Responses

Volume 3H

Communication Log Numbers 14844 - 14919

Each comment form, email, letter or other type of correspondence (collectively referred to as communications) was given an identifying log number when it was received (e.g., 14100). Breaks in the number sequence are a result of communications logged during the comment period that were not comments on the Draft EIS. In some cases, duplicate communications (such as petitions and form letters) were later combined and assigned the same log number. Each communication is divided by subject or issue into individual comments. For example, 14444-2 is comment number 2 of communication 14444. BPA received 662 communications on the Draft EIS and 2,859 comments were identified in these communications.

All comments received on the Draft EIS and BPA's responses to these comments are provided in their entirety in Volume 3 (Volume 3A through 3H). Each page of comments is followed by a page of BPA responses to the comments. Due to the number of comments received, Volume 3 has been divided into eight parts for the purposes of printing and managing electronic file sizes (Volume 3A through 3H). The range of log numbers and page numbers found in each volume is included in Table 1 - Volume Contents for reference.

How to Review Comments and Responses

Communications are ordered consecutively by log number in the report. Please refer to Table 2 in the Introduction of Volume 3 for a list of all communications submitted by each commenter and the page number where the communication can be found in Volume 3A through 3H. If BPA's response to a comment refers back to an earlier response, use Table 1 to find the referenced log number. An online comment response search tool is also available at <http://www.bpa.gov/Projects/Projects/I-5/Pages/Search-Comments.aspx>.

Table 1 - Volume Contents

Log Numbers	Volume	Pages
14093 – 14379	3A	1 - 402
14380 – 14600	3B	403 - 808
14601 – 14701	3C	809 - 1222
14702 – 14746	3D	1223 - 1532
14747 – 14798	3E	1533 - 1862
14799 – 14827	3F	1863 - 2262
14828 – 14843	3G	2263 - 2602
14844 – 14919	3H	2603 - 3004

DEARBORN & MOSS P.L.L.C.

14844

Attorneys at Law

March 25, 2013

Mark Korsness
Project Manager

Re: *Impact on High Performance Dressage Horses –
Segment F and Towers F/15 and F/16*

Dear Mr. Korsness:

14844-1 We represent Regina and Brian Agren, owners of a 5.8 acre property at [REDACTED]. The Agrens reside on the property with their son Isaac. More importantly for the purposes of this letter, Regina owns and operates Alpha Riding Academy, a facility for the training and boarding of dressage horses from their start through high performance and a woman-owned small business. High performance dressage horses are athletes in which their owners have made a significant investment. The needs of a training facility for such athletes are entirely unlike barns which board pleasure horses or properties on which livestock is pastured. Quality care, fitness, complete focus, suppleness, and relaxation are all required for safety and success.

14844-2 The Agrens' concern is a fairly narrow one, but one which is not addressed in the DEIS¹ despite its volume. It is one with grave consequences not only for the success of Regina's business and livelihood, but also for the safety and success of the equestrians Regina teaches – the impact of construction and operation of the transmission lines and Towers F/15 and F/16 on the training and performance of the high performance horses and on the children's training program. After reviewing the DEIS, we have concluded that Alpha Riding Academy would not be able to function adjacent to BPA's transmission lines and towers. The DEIS does not disclose or analyze this impact. At the conclusion of this letter we present several options for resolving this dilemma.

14844-3 Because the DEIS fails to analyze impacts on high performance dressage horses, we include in our comments a very brief overview and history of classical dressage, the purposes of the United

¹ Draft Environmental Impact Statement for the I-5 Corridor Reinforcement Project, November, 2012.

2183 Sunset Ave. SW
Seattle, Washington 98116
Phone: (206) 923-0816 Fax: (206) 923-0814

1 of 54

- 14844-1 Thank you for your comments. Specific comments are addressed below.
- 14844-2 Please see the response to Comment 14097-1. The proposed right-of-way in this area has been relocated about 400 feet to the north of the Agren's property line so as not to be adjacent to the Agren's property.
- 14844-3 Comment noted.

14844

Mark Korsness
 March 25, 2013
 Page 2 of 14

- 14844-3 State Equestrian Team's High Performance Horse Program, highlights of Regina's credentials and mission, and a summary of Regina's training program for high performance horses.

The Relationship of the Preferred Alternative to Alpha Riding Academy

- 14844-4 The DEIS explains that BPA's preferred alternative is Central Option 1. The enclosed aerial photograph² shows the location of Alpha Riding Academy in relation to the relevant portion of Central Option 1 -- a northern portion Segment F and Towers F/15 and F/16. Alpha Riding Academy's main features (small barn, large barn with covered riding arena and a round pen) are clearly visible. The centerline of the right-of-way is 75' from the northwestern sand turnout; 130' from the northern barn which houses breeding/performance stallions; 250' from the arena barn and round pen. Many mature trees in the proposed right-of-way would have to be removed, with the result that the turnouts, barns, riding arena, and round pen would have no shielding whatever from the transmission lines and towers.

Alpha Riding Academy

- 14844-5 *The Decision to Build Her Own Training Facility.* As explained above, Regina Agren trains high performance dressage horses for international level competition. After training at several local facilities, she concluded, that, in order to provide the quality of consistent, correct care for the athletes in her program, she needed her own facility. This need arose in part from the need to be able to control all aspects of the horses' care and training.³ In addition, her program is focused on breeding stallions. Due to their special management and handling needs, most barns will not accept stallions.

Regina and her husband Brian bought their property in 2000. Regina sold one of her trained horses to pay for the base and lighting of the arena. Brian, family, and friends built the barns and other facilities.

There are typically up to 20 horses at Alpha Riding Academy: 10 horses owned by clients and participating in the lesson program; 5-6 horses owned by clients and campaigned by Regina; and the family's four horses. Regina typically has a year-long waiting list for entering her training program.

- 14844-6 *Firsthand Observation of the Impact of High Voltage Transmission Lines on Performance Horses.* Regina and her clients⁴ have observed firsthand the impact high voltage transmission lines can have on horses in training: the horses were nervous, uneasy, did not muscle up, and did not hold their weight because they were not eating well. These reactions occurred at two different facilities in Longview, one located less than 100 feet from four high voltage lines and the other about 300 feet from the lines. Training rapidly declined. It took many months after moving from those facilities to a facility remote from power lines for the horses' training to recover. Because the competitive life of dressage horses is short, this lost time can be the

² DEIS, Appendix C-d, Segment Sheet 03.

³ A trainer who does not own a facility faces a number of challenges, including, but not limited to: provision, weekly maintenance, and annual replenishment of high quality footing; the need to provide individualized feeding programs; and managing compatibility of horses (e.g. stall and turn out locations) to minimize injury and stress.

⁴ See the enclosed letters from Anna Dunlap, Jill Hall, and Brenda Karnoski, included in Client Letters, Part 1.

2 of 54

14844-4 Please see the responses to Comments 14097-1 and 14495-1.

14844-5 Comment noted.

14844-6 Comment noted.

14844

Mark Korsness
 March 25, 2013
 Page 3 of 14

14844-6 | difference between a horse making it to international level competition (FEI⁵) and not making it – certainly one such as the Olympics, which occurs only every 4 years.

Property Selection Criteria. The Agrens chose their property based on aspects that would benefit the horses in training and attract discerning clients, including:

- A quiet environment for learning (both students and horses).
- Land suitable for construction of a large FEI sized regulation indoor arena.
- Flat, usable land with areas suitable for pasture/turn out.
- Good drainage (necessary for hoof health).
- Reasonable expectation that surrounding land would not develop with incompatible uses, *i.e.* uses that would interfere with training high performance horses. (The land they chose is adjacent to several large parcels that are in timber management. Ironically, that fact has made them attractive to BPA. As explained in the enclosed letter to the Corps of Engineers, the Agrens were aware that the land to the north and west would ultimately be developed for urban housing, a use which can be compatible.)
- Proximity to I-5.
- Proximity to services clients need, such as motels, restaurants, etc.
- Reasonable driving time to/from a major airport.
- Road access suitable for hauling horse trailers (few hills, curves, etc.). Most clients have 3-4 horse gooseneck trailers which are up to 45 feet long and 8.5 feet wide and weigh up to 30,000 pounds GVW.
- Easily accessible by large horse vans. Many of the horses in training are imported from outside of the United States, requiring use of such vans.

What is Dressage?

The word *dressage* comes from the French word “dresser,” to train. As explained by the USEF:

14844-8 | Dressage teaches a horse to be obedient, willing, supple, and responsive. The horse freely submits to the rider’s lightest “aids” or body signals, while remaining balanced and energetic. The object is the harmonious development of the horse in both mind and body...

Dressage principles are a logical step-by-step progression from simple to increasingly complex movements. More and more is asked of the horse as it becomes mentally and physically ready to respond to these demands. ...

Dressage requires the horse and rider to combine the strength and agility of gymnastics with the elegance and beauty of ballet....

⁵ Federation Equestre Internationale. The FEI was formed in 1921 in Lausanne, Switzerland. It regulates international events in Jumping, Dressage, and Eventing. The founding members are Frantz, USA, Sweden, Japan, Belgium, Denmark, Norway and Italy. Its primary mission is to advance the orderly growth of equestrian sport worldwide by promoting, regulating, and administering humane and sportsmanlike international competition in the traditional equestrian disciplines. www.fei.org.

3 of 54

14844-7 Please see the responses to Comments 14097-1 and 14495-1.

14844-8 Comment noted.

14844

Mark Korsness
 March 25, 2013
 Page 4 of 14

It takes many years of training and great concentration of both horse and rider to perform well in a test. You should expect to see calm, obedient, smooth rides where the horse's ears are forward or turned towards the rider, and clearly "listening" to the rider's instructions, although no actual words will be spoken during a test. The horse should look happy.⁶

A Very Brief History of Classical Dressage

The oldest known written source that espouses some of the most important tenets of classical dressage is a treatise by the Greek general Xenophon (430-354 BC). His work is remarkable for its concern with the well-being of the horse. This principle remains as relevant today as it was 2500 years ago. The tradition of classical equitation was lost during the Roman Empire through the Middle Ages, but resumed in Italy in the 15th century. Federigo Grisone, widely considered to be the founding father of classical equitation after the Middle Ages, explained that the goal of trot work is to make the horse straight and light, with a soft mouth and a good rein contact. Grisone followed Xenophon in his emphasis on the horse's correct posture and the rider's correct and effective seat.

Cesare Fiaschi was first author who mentioned the importance of a steady rhythm and tempo. The importance of his discovery is reflected in the fact that rhythm/tempo became the first element of the training scale eventually adopted by the USDF.⁷

14844-8

Giambattista Pignatelli (c. 1525- c. 1600) is credited with discovering the gymnastic value of riding circles on a single track, which unlock the horse's abdominal muscles and play an important role in developing straightness and equal suppleness in both directions, and in engaging the inside hind leg under the body mass. Later authors explain how the posture and alignment of the horse's entire body creates an even weight distribution over all four legs, which permits the horse to make contact with the bit without leaning on it.

Antoine de Pluvinel (1555-1620), one of the greatest horsemen of all time, is probably most famous and admired for his emphasis on treating the horse as an intelligent being and teaching it with kindness and gentleness. Pluvinel advanced the technical, gymnastic side of training and developed ways to supple the horse more effectively.⁸

The Spanish Riding School in Vienna, which dates to 1572 and still exists today, is probably the best known center for classical dressage. As explained below, Regina trained with several classical masters from the Spanish Riding School.

During the first half of the 20th century, the top competitors were all classical riders, since the competitions were first organized and run by the military for commissioned officers. Content of teaching, competition rules and judging guidelines were heavily influenced by the military. A military horse had to be safe, obedient, and rideable under any circumstances, unlike many horses today that are only ridden inside an arena and trained in movements contained in the dressage tests.

⁶ Source: "Spectator's Guide to Dressage," www.usef.org (website of the United States Equestrian Federation, the National Governing Body for Equestrian Sport).

⁷ United States Dressage Federation. The USDF the national membership organization dedicated to education, the recognition of achievement, and promotion of dressage. www.usdf.org.

⁸ The preceding description of the history of classical dressage is excerpted from Dr. Thomas Ritter "A Brief Outline of the History of Dressage – Xenophon to Antoine de Pluvinel," *Topline Ink Magazine*, 2008.

4 of 54

This page intentionally left blank.

Mark Korsness
 March 25, 2013
 Page 5 of 14

14844

The Art and Importance of Classical Dressage

Classical dressage is a systematic gymnastic training process that helps the horse to carry the weight of the rider with the greatest possible ease so that he moves with the same range of motion and brilliance under saddle as at liberty. Unlike some more recent developments in riding, it is based on centuries of study (discussed very briefly above) that demonstrate that it maintains the horse’s longevity and soundness.

Classical dressage is not widely practiced or taught in the United States. There are very few successful competitors who train classically, a fact which reinforces the misperception that classical dressage cannot be successful in competitions. Spectators, other competitors, and judges need to see classical riding and training if the art of riding and training is to survive. Classical riders must prove the validity of traditional training methods to each new generation of riders by going out in public and demonstrating through personal example in the saddle that classical principles achieve results that are superior to other methods.⁹ That is precisely what Regina does.

The Pyramid of Training and Dressage Tests

The Pyramid of Training or Training Scale, illustrated in the Figure below, evolved as a means to illustrate the different steps/concepts which are essential in the correct training of a dressage horse.¹⁰ It is no mistake that relaxation is at the foundation of the Training Scale.

14844-8



⁹ Excerpted from Dr. Thomas Ritter "Classical Dressage in Competition," *Topline Ink Magazine*, 2008.
¹⁰ Pyramid of Training, 2011 Glossary of Judging Terms, pp. 13-14, United States Dressage Federation (USDF), available at www.usdf.org.

This page intentionally left blank.

14844

Mark Korsness
 March 25, 2013
 Page 6 of 14

Relaxation is defined as:

[T]he horses's mental state (calmness without anxiety or nervousness), as well as his physical state (the absence of negative muscular tension). Usually, mental and physical states go hand in hand. The horse learns to accept the influence of the rider without becoming tense. He acquires positive muscle tone so that he moves with elasticity and a supple, swinging back, allowing the rider to bend him laterally as well as lengthen and shorten his frame. A horse showing the correct responses when allowed to chew the reins out of the hands is relaxed.¹¹

Obviously, relaxation cannot be obtained in a tense, startled, or spooky horse.¹² To ensure that horse and rider combinations have the opportunity to perform at their best, in its "Spectators Guide to Dressage," the USEF advises spectators:

- Avoid running, shouting or sudden movements while a horse is in the ring.
- Applaud only after the rider has completed the final salute.
- You may speak in a normal tone, but do not shout or wave.¹³

14844-8

In the United States, horses and riders participating in dressage competitions advance through levels beginning with the national level tests (Training, First, Second, Third and Fourth Levels). Specific required movements are evaluated and scored. At the conclusion of these tests, the judge gives the horse and rider "Collective Marks." Submission is given a coefficient of 2, emphasizing its importance. Submission is described in the Tests for Training through Fourth Levels as:

Attention and confidence, lightness and ease of movements, acceptance of the bridle, lightness of the forehead. (Emphasis added).

A copy of a Fourth Level test is enclosed.

Very talented horses and riders are able to continue on to the international or FEI tests (Prix St. Georges, Intermediare I, and Intermediare II) and culminating with Grand Prix. Grand Prix is the dressage test performed at the Olympics. The Olympics, Pan Am Games, and the World Equestrian Games are the pinnacles for horse sports.

Purpose of the High Performance Horse Program

Much of this section of our letter is based on articles written by Anne Gribbons and published in *The Chronicle of the Horse*. She is an FEI 5* judge, the highest rank awarded to international judges and one of only four FEI 5* judges in the U. S. She served as USEF Technical Advisor/Coach of the U.S. Dressage Team from 2009-2012. She took on this role with the

¹¹ 2011 Glossary of Judging Terms, United States Dressage Federation, available at www.usdf.org.

¹² The animal instinct to flee is much stronger than the wish to be obedient. Even the most highly trained horses can spook. At the victory lap at the 2006 World Equestrian Games, Salierno, ridden by Anky van Grunsven, a multiple time Olympian for the Dutch team, bolted when a marching band surprised him, terrifying the rider and audience. The rider was able to bail when the mounted honor guard lined up in front of the bolting horse and it skidded to a stop. Anne Gribbons, "In 2006, We Finally Built a Pipeline," *Chronicle of the Horse*, February 20, 2007.

¹³ Available at www.usdf.org.

6 of 54

This page intentionally left blank.

14844

Mark Korsness
 March 25, 2013
 Page 7 of 14

deliberate goal of developing depth and breadth of U.S. bred Olympic caliber horses and riders. Three years before accepting those responsibilities, she wrote:

We are not educating our riders in a timely and orderly manner.¹⁴

Following the U.S. equestrian team's disappointing results in dressage in 2012 Olympics, Ms. Gribbons wrote:

Ravel put in a great effort one last time for Steffen Peters and Team USA, but now he's retiring and it's hard to name many U.S. prospects that could take his place at the 2016 Olympic Games.

We need to increase our depth of Grand Prix combinations to have any hope of success at future international championships.

* * *

14844-8

Where Are Our Next Grand Prix Horses?

The root of our problem is in our lack of depth and how we go about promoting the horse/rider combinations we would like to field on our team. I bet anyone who is well informed about American dressage would have a hard time giving me even four names of combinations they expect will represent us in Normandy (France) two years from now [at the Alltech FEI World Equestrian Games].¹⁵

During her tenure as Technical Advisor, Ms. Gribbons:

- Put in place a development coaching structure designed to build future Olympic success.¹⁶
- Put in place a pipeline to develop dressage riders from children to high performance riders.
- Stressed the need for us to breed¹⁷ and train¹⁸ quality horses from dressage ponies¹⁹ to high performance horses from "scratch"²⁰

¹⁴ Anne Gribbons, "At Last – A Real Recipe for Improvement," *Chronicle of the Horse*, July 7, 2006.

¹⁵ Anne Gribbons, "The Olympics were Everything We Feared," *Chronicle of the Horse*, September 11, 2011.

George Williams, President of USDF, echoes these comments: "Regardless of the equestrian discipline, one of the fundamental lessons the USA learned from the 2012 London Olympics is the need to create greater depth at the top levels." *USDF Connection*, February, 2013.

¹⁶ Anne Gribbons, "In 2006, We Finally Built a Pipeline," *Chronicle of the Horse*, February 20, 2007.

¹⁷ "At the moment, most young horses competing are imports, but an obvious goal will have to be to send U.S.-bred horses to overseas championships. In the long run, it makes little sense to return to Europe with young horses that were produced there. Anne Gribbons, "A New Look At Our Young Horse Programs," *Chronicle of the Horse*, July 18, 2008. See also, "US Young Horse Prospects 'Extremely Exciting' - Scott Hassler," www.dressage-news.com February 25, 2013.

¹⁸ "Riders have learned from the past that they can get on our team on prefab horses, mostly imported from Europe. Sometimes they could even get a medal. But that was yesterday, and a new age is dawning, where to play at the very top you need a close, ongoing relationship with your horse." Anne Gribbons, "Looking Beyond the Olympics," *Chronicle of the Horse*, July 18, 2012.

¹⁹ "We are definitely lacking a strong pony [dressage] division to get the kids off to an early, fun, and social start..." Anne Gribbons, "A Wish List," *Chronicle of the Horse*, June 6, 2008.

7 of 54

This page intentionally left blank.

14844

Mark Korsness
 March 25, 2013
 Page 8 of 14

- 14844-8
- Stressed the need and to create forums for owners and trainers to cross paths.²¹
- A chronology of some of the major development in development of dressage education for both riders and breeders is included as an attachment to this letter.

The pipeline of training is in its infancy, but the fundamentals are in place. It is intended to be expanded and developed into a network of coaching staff throughout the country.²²

Regina's Credentials

Regina has been riding since she was a very young girl and started riding dressage when she was nine. She was a working student for:

- George Williams, Program Director, Temple Farms. Mr. Williams is President of the USDF, former Chairman of the USEF High Performance Committee.
- Karl Mikolka, Temple Farms. Mr. Mikolka is a former Chief Rider of the Spanish Riding School, Vienna, Austria.
- Steffen Peters. Mr. Peters is a three-time Olympian and bronze medalist.
- Hubert Rohrer. Formerly of the Spanish Riding School. Internally known judge and clinician.

14844-9 She also trained under the following acclaimed masters:

- Charles deKunffy. Well known and respected clinician, sought after dressage judge and prolific author.
- Bettina Drummond. Trained under the renowned master, Nuno Oliveira, of Portugal.
- Lilo Fore. USDF judge and head of USDF instructor certification. Well known and respected clinician.
- Ernest Herrmann. Formerly of Switzerland with a background and success in 3-day eventing, jumping and dressage.

A few examples of her accomplishments include:

- She has earned Gold, Silver, and Bronze medals from the USDF.

²⁰ "Unlike European, most U.S. riders do not know how to train a horse 'from scratch.' We badly need a system to develop and encourage competent riders who can and want to concentrate on starting and bringing along 'raw' horse material." Anne Gribbons, "We can see a Light at the End of the Tunnel for American-breds!" *Chronicle of the Horse*, July 19, 2009.

"Green horses need help from experienced and competent riders. The blind leading the blind ends up in confusion, delay and possible injury. It's slowly becoming understood by U.S. owner that if you invest in a lovely young horse, you need to also invest in his continued education..." Anne Gribbons, "A New Look At Our Young Horse Programs," *Chronicle of the Horse*, July 18, 2008.

²¹ "[T]he USEF/US Dressage Federation ought to compile a listing of available young horse trainers with a record of successfully bringing horses along. This would assist the owners in locating and contacting the trainer they could trust to educate their youngsters. Anne Gribbons, "A New Look At Our Young Horse Programs," *Chronicle of the Horse*, July 18, 2008.

²² www.dressage-news.com/?p=17980

8 of 54

14844-9 Comment noted.

14844

Mark Korsness
 March 25, 2013
 Page 9 of 14

14844-9

- In 2012, on Contendon, a Hanoverian gelding, she was one of fifteen riders in the nation to be invited to ride in the Developing Horse Dressage Championships at Prix St. George Level.
- In 2009, on Contendon, she was one of fifteen riders in the nation to be invited to ride in the Young Horse Dressage Championships - FEI 6 Year Olds.
- In 2008, on Mocha Motion, her Thoroughbred-cross mare, she was the Oregon Dressage Society ("ODS") Open Grand Prix Champion.
- In 2008, on Epic, a Dutch Warmblood mare, she was the Third Level Open Champion.
- In 2007, on Mocha Motion, she won Prix St. George USDF Champion – Thoroughbred for Sport.
- In 2007, on Vicaro dos Pinhais, her Lusitano stallion, she won USDF All-Breed Award Open Training Level.
- In 2006, on Mocha Motion, she won Horse of the Year (6th Place) at Fourth Level.
- In 2003, on Nimbus, a Lusitano breeding stallion she had in training, she won Horse of the Year at Third Level and, on Botacario, an Andalusian stallion, Second Level USDF placement/all breed placement IALHA.
- In 2000, on Renata, a Hanoverian mare she had in training, she won Horse of the Year at Training Level.
- In 1985 on Juke Box Blues, an off-the-track Thoroughbred she bought with money made on a paper route and trained, she competed and placed in the North American Young Rider Championships.

Regina's High Performance Horse Training Program

Regina's program for training high performance horses is recognized as one of the premier training programs in the Pacific Northwest.²³ It includes:

14844-10

- FEI-sized covered arena with a special base comprised of 12 inches of compacted rock base with specialized sand.
- Provision and maintenance of a specially groomed arena with excellent footing and plentiful mirrors. The base and footing are essential to maintain equine soundness and longevity.
- Barn layout to accommodate natural herd behavior (*e.g.*, stall fronts are closed so that the horses may relax when eating).
- Training 4-6 days/week, including in-hand training.
- Training, preparation, and presentation for breed inspections.
- Campaigning the horses in competitions.
- Customized Supplements.
- Electrolytes.
- Ulcer prevention.
- Therapeutic saddle pads, wraps, and blankets.
- Customized stall bedding.
- Choice of laundry detergents (for saddle pads) to address allergies.
- Body Work, massage, acupuncture.
- Shoeing every 5-6 weeks.
- Saddle fitting (typically every 6 months).
- Joint and tendon care (injections, wraps, icing, liniments, braces).
- Dental care twice annually.

²³ See the enclosed letter from Judy Pappin, included in Client Letters – Part 2.

9 of 54

14844-10 Comment noted.

14844

Mark Korsness
 March 25, 2013
 Page 10 of 14

14844-10

As is obvious from the discussion above, it takes a great deal of dedication, hard work, and investment by clients for a horse to reach the highest level of dressage. An owner will invest between \$150,000 and \$300,000 to have a horse trained to Grand Prix. These costs do not include “routine” costs such as the initial purchase price, routine veterinary care, and insurance.²⁴ An owner will not risk this investment at a facility in which its horse is anxious or tense.

Letters of Endorsement and Letters from Clients and Equestrians

Enclosed with this letter are a number of letters from Regina’s training clients and students and a licensed equine property appraiser describing the impacts that the proposed location of Segment F would have on Alpha Riding Academy. A common theme runs throughout these letters: owners would be very reluctant to place horses in training, students would not come to the facility, and the business could be forced to relocate or close.

14844-11

Kathleen Carroll, Jane Epperson, Liz Lawson-Weber, and Judy Pappin are examples of her training clients. Ms. Carroll has two highly valued, highly trained horses in training currently. She spent several years and a small fortune to find a top notch facility in the Pacific Northwest and an outstanding classical dressage trainer for her horses. Regina has trained and campaigned Ms. Pappin’s Hanoverian gelding, Contention, for a number of years with great success (see the discussion of Regina’s credentials, above). Regina similarly has trained a number of highly valued horses for Ms. Epperson. Ms. Lawson-Weber has been a client for more than 15 years. She regularly works with Regina and sends her horse to Alpha Riding Academy for training. Each of these clients verifies that she would not place her horse(s) in a facility adjacent to high voltage lines.

Lori Fleming is an example of a student. She owns a young, green horse. Young, green horses are unpredictable and easily distressed. Ms. Fleming regularly works with Regina but would stop hauling her horse to Regina’s facility if the lines were installed next to it.

Joseph Berto, Anna Dunlap, Don and Pamela Holthofer, and Carissa Schmitz testify to the art of classical riding and the difficulty in finding trainers of Regina’s caliber.

Carla Shown and Carissa Schmitz explain the risks of “nuisance” shocks. To the person handling an equine, such a shock is more than a mere nuisance, it can be very dangerous. It also erodes the horse’s trust in the handler and can lead to health problems, training problems, and behavioral vices that are hard to reverse, including weaving, stall chewing, and cribbing.

DEIS Fails to Analyze Impact on Green Horses and High Performance Horses

14844-12

When faced with determining whether it is appropriate to provide federal taxpayer money for local large-scale and expensive projects, federal laws require federal agencies first give careful consideration to a host of significant considerations. These laws generally seek to assure that the agencies approach their decision with minds open to more than pre-conceived proposals and that the decision-makers are fully informed as to the ramifications of project approval as well as reasonable alternatives. The National Environmental Policy Act, 43 U.S.C. § 4321 *et seq.*, (“NEPA”) does not set out substantive standards, but instead establishes “action forcing” procedures that require agencies to take a “hard look” at environmental consequences. The “touchstone” for review is whether the EIS’s form, content, and preparation “foster both

²⁴ Typically at least 3% of the declared value of the horse/year.

10 of 54

14844-11 Comment noted.

14844-12 Please see the response to Comment 14596-1.

14844

Mark Korsness
 March 25, 2013
 Page 11 of 14

14844-12 informed decision-making and informed public participation.” Only in that manner can the decision-makers be fully informed as to the ramifications of project approval as well as reasonable alternatives. The EIS must “[r]igorously explore and objectively evaluate all reasonable alternatives.”²⁵ As explained in the enclosed letter to the Corps of Engineers, which we incorporate herein by reference, the EIS has failed to review two important and reasonable alternatives: one which would avoid the City of Castle Rock’s Water Service Area and the “Grey Line” long advocated by citizens throughout southwest Washington.

14844-13 The purpose of a DEIS and the ensuing comment period is to elicit suggestions and criticisms to enhance the proposed project.²⁶ The problem is that the DEIS simply does not discuss impacts on horses in training – from green horses just being started to high performance horses. It contains a brief description of impacts on wildlife, livestock, and grazing. It mentions in passing that horseback riding is a form of recreation. But neither the DEIS nor any of the alternatives it considers examine the impact of the proposal on horses in training.

Horses’ Hearing

14844-14 Horses are prey animals whose survival instinct is based on flight. Their keen sense of hearing is necessary to their survival. They can move their ears 180 degrees using 10 different muscles so they can single out a specific area to which to listen. Horses’ hearing is considerably keener than humans’ hearing. They can hear low-frequency to very high-frequency sound in the range of 14Hz to 25 kHz. The human range is 20Hz to 20kHz. Horses become anxious or scared if they think the sound is a threat or if they can’t recognize the sound. Loud sounds are disconcerting because they drown out sounds that could be an approaching threat.²⁷ When a horse flees, both the rider and the horse can get seriously injured.

Expected Impacts

14844-15 **Construction.** Construction would require heavy vehicles, helicopters, and equipment such as cranes and bulldozers, and would create dust, noise and potential traffic delays that could disturb residents, motorists, wildlife and the natural environment.²⁸ While BPA did not examine performance horses, their reactions to the construction impacts presumably would be comparable to the reactions of wildlife. Those reactions are described in the DEIS: Increased stress from noise and construction activities could disrupt foraging, breeding, and other normal activities.²⁹ These reactions cause a rapid decline in training. Disruption of feeding would interfere with a horse’s ability to muscle up and hold its weight. Disruption in breeding has an obviously adverse impact on breeding stallions. In short, as should be evident from the discussion above, these impacts are incompatible with training of high performance horses, equine reproduction, and trainer, rider, handler, and equine safety. Consequently, Regina and her clients are very concerned about liability should BPA’s facilities cause accident or injury to a horse, rider, or handler. Now that we have made BPA aware of these risks and the value of these equine athletes, we would expect BPA to share the concern about liability.

²⁵ *League of Wilderness Defenders-Blue Mountains Diversity Project v. U. S. Forest Service*, 689 F.3d 1060, 1069 (9th Cir. 2012).

²⁶ *City of Carmel-By-The-Sea v. U.S. Department of Transportation*, 123 F.3d 1142, 1156 (9th Cir. 1997).

²⁷ *Horse Journal*, April, 2012.

²⁸ DEIS, p. S-7.

²⁹ DEIS, pp. S-64, 18-22.

11 of 54

14844-13 Please see the response to Comment 14495-1.

14844-14 Corona is a very weak source of audible noise. The proposed line is designed to meet applicable noise limits and levels of audible noise are further reduced with distance. In fair weather, the corona noise may not be noticeable at all and dressage events would unlikely be performed during foul weather when corona noise would be most perceptible. Noise from a transmission line is relatively constant, tending to meld into other constant background noise. It does not tend to be the type of unpredictable noise for which concern has been expressed.

Studies show that hearing acuity does not necessarily translate to behavioral responses. For example, the behavior of partially domesticated and wild reindeer is not reported to be affected even when confined within 5 meter by 400 meter pens near high voltage transmission lines. Results regarding electromagnetic fields and noise led these investigators to conclude that the disturbance from power line construction and operation is negligible (Reimers et al., 2007; Flydal et al., 2009).

Horses have not been a species of interest to scientists conducting EMF research. As described in Appendix G, however, research on a variety of other experimental, farm, and wild animals has not identified adverse effects in any of these diverse species, which would be expected to apply to horses as well. The substantial body of research on wild and domestic animals is informative for all large mammals and does not indicate any risk. A veterinary survey of livestock owners of horses, hogs, sheep and cattle living near a 765-kV line that produced higher fields than the proposed line did not identify any health or behavior issues of concern (Amstutz and Miller 1980).

Horses in dressage training are to be stabled in indoor stalls, and audible noise from any source will be substantially attenuated by the horse barn.

14844-15 Please see the response to Comment 14097-1. The proposed right-of-way in this area has been relocated about 400 feet to the north of the Agren's property.

Daytime construction activities are excluded from noise limits, however, BPA chose to evaluate these noise impacts and included this information in Chapter 9, Noise, and Appendices F and F1. Table 9-3, Construction Equipment Noise Levels by Distance from Construction Site, notes that at 400 feet (about the distance to the stallion barn), the dBA would generally be 71 which is similar to a gas lawnmower at 100 feet. Due to the temporary nature of construction activity, BPA determined that the noise impact would be low to moderate.

If BPA decides to build this project, BPA would work closely with the Agren's to determine an appropriate time to construct in this area as to minimize impacts to training schedules.

See also the response to Comment 14844-14 regarding noise during operation of the transmission line.

14844

Mark Korsness
 March 25, 2013
 Page 12 of 14

- 14844-17 Construction noise will be 83 dBA (L_{eq}) at the stallion barn and paddocks (approximately 100' from Tower F/15) and 77 dBA at the arena and round pen (approximately 100' from Tower F/15).³⁰ It would be most imprudent for Regina to train horses or teach students in such circumstances. Alpha Riding Academy would likely have to shut down during construction and move the horses, with the substantial risk that their owners would not return them to Regina for training. Depending on the season of construction, it could lead to loss of an entire competition year.
- 14844-18 In its comment letter on the scope of the EIS, the Environmental Protection Agency ("EPA") urged BPA to provide baseline resources information that characterizes the biological and physical and the social and economic conditions sufficient to determine adequacy of data and information for evaluating potential environmental, social, and economic impacts and to disclose and analyze impacts on all land ownerships. It urged BPA to collect needed information where it is currently lacking.³¹ But BPA has not done so with regard to noise impacts along new rights-of-way.
- 14844-18 EPA has established guidelines for evaluating noise increases caused by a project over existing sound levels. Noise increases of 0-5 dBA at residential receivers are considered a slight impact, 5-10 dBA a significant impact, and over 10 dBA a serious impact. BPA has not taken noise measurements along the proposed new segments, so the DEIS does not reveal the increase in noise levels that will occur at Alpha Riding Academy.³² However, as the surrounding uses are rural residential and Washington law limits noise generated by a residential property and received by a residential property to 55 dBA, it is logical to assume that the existing noise level is no more than 55 dBA. The construction noise would, therefore, be a serious impact under EPA guidelines.
- 14844-19 Operation. Operational impacts present an even greater concern. We are primarily concerned about coronas, noise, and nuisance shocks. The DEIS explains that during "foul" weather, a strong electric field at the surface of wet transmission line conductors can cause a corona, which causes audible noise, electromagnetic interference (static), ozone and nitrogen oxide.³³ The noise is usually heard as a hissing or crackling sound accompanied by a hum under certain conditions.³⁴ This kind of noise is precisely the kind of noise that destroys relaxation in equines. In addition to its negative impact on training, stress has health impacts on horses. It can quickly lead to ulcers, the principal medication for which costs approximately \$900/month.
- 14844-19 "Foul" weather is estimated to occur 20% of the time at the Portland International Airport.³⁵ The corona continues after precipitation events as long as the lines are wet. The DEIS does not include weather data near Castle Rock. Using Weather Source, Brian Agren compiled daily precipitation data from a station 11 miles southeast of Castle Rock for the years 2002, 2004, 2006, 2008, 2010, and 2012. The average number of days per year with measurable rain was 163, or 44.6% of the time. This figure is more than twice as high as the data disclosed in the DEIS for the Portland International Airport. This fact demonstrates not only that the DEIS does not adequately disclose impacts near Castle Rock, but also that it does not disclose the likely severity of corona impacts to Alpha Riding Academy. These data do not include fog,

³⁰ DEIS, p. 9-4.

³¹ November 20, 2009 Letter from EPA to BPA (Communication ID: 11792)

³² Personal communication with Danna Liebhaber, BPA.

³³ DEIS, pp. S-25, S-75, 8-1.

³⁴ DEIS, p. 9-2.

³⁵ DEIS, p. S-26

12 of 54

14844-16 Comment noted.

14844-17 Please see the response to Comment 14097-1. The proposed right-of-way in this area has been relocated about 400 feet to the north of the Agren's property.

Daytime construction activities are excluded from noise limits, however, BPA chose to evaluate these noise impacts and included this information in Chapter 9, Noise, and Appendix F. Table 9-3, Construction Equipment Noise Levels by Distance from Construction Site, notes that at 400 feet (about the distance to the stallion barn), the dBA would generally be 71 which is similar to a gas lawnmower at 100 feet. Due to the temporary nature of construction activity, BPA determined that the noise impact would be low to moderate.

If BPA decides to build this project, BPA would work closely with the Agren's to determine an appropriate time to construct in this area as to minimize impacts to training schedules.

14844-18 Please see the response to Comment 14844-17.

14844-19 Please see the responses to Comments 14587-1 and 14844-14.

Mark Korsness
 March 25, 2013
 Page 13 of 14

14844

- 14844-19 | which is common. Thus, it is reasonable to expect that the transmission lines will subject Alpha Riding Academy to coronas more than 45% of the time from “foul” weather alone.
- 14844-20 | Insects and dust can cause corona during fair weather.³⁶ The DEIS explains that this happens on “rare occasions,” but does not elaborate.³⁷ As you are aware, sandy soils dredged from the Cowlitz River after the eruption of Mt. St. Helens were deposited on the Agrens’ property and properties nearby. These soils can generate dusty conditions. In addition, in the spring, the cottonwood trees’ prolific seeds may be expected to come into contact with the conductors, causing additional impacts for which the DEIS does not account.
- 14844-21 | In summary, the DEIS does not adequately disclose the corona impacts in the vicinity of Alpha Riding Academy. These impacts will disrupt training and jeopardize equine health and equine and human safety.
- 14844-22 | Nuisance shocks occur near the right-of-way when a metal object is touched. Very sensitive people can feel a shock when the strength of the electric field is 1 kV/meter.³⁸ BPA has no information on horses, but would expect them to be similar to sensitive people.³⁹ The distance from the center line of the transmission right-of-way to the point at which the electric field is less than 1kV/m is 110 feet or approximately 35 feet into the Agrens’ property. The stallion barn and paddocks are within this distance. All of the stallions and trained horses are shod with metal shoes.
- 14844-23 | While trees dissipate noise and electrical fields, the trees between the towers/lines and the Agrens’ property are all within the proposed right-of-way and would be removed.

Conclusion and Options

- 14844-24 | The DEIS explains that your siting engineers take a number of factors into account in considering how a new line and substations can be placed, including compatibility of land uses.⁴⁰ As explained above, after reviewing the DEIS, the Agrens have concluded that an adjacent high voltage 500-kV transmission line and towers are not and cannot be made compatible with Alpha Riding Academy. The DEIS would consider this a high land use impact and severe impairment of Regina’s use of the property.⁴¹
- 14844-25 | The stated primary purposes of BPA’s I-5 Reinforcement Project are: maintaining system reliability and performance, helping BPA meet its statutory and contractual obligations, using ratepayer funds responsibly and efficiently, and minimizing impacts to the natural and human environment.

³⁶ DEIS, p. 9-2.

³⁷ DEIS, p. 9-2.

³⁸ Personal communication with Danna Liebhaber, BPA.

³⁹ Personal communication with Danna Liebhaber, BPA.

⁴⁰ DEIS, pp. 2-3.

⁴¹ DEIS, pp. 5-9, 11-22.

- 14844-20 Dust, insects, and seeds can cause corona, however, typically it requires a buildup of particles to reach a noise level that is noticeable. For the conductors to reach a buildup of particles a significant period of dry weather is needed. During the spring, in particular, the area of the proposed line typically does not experience significant periods of dry weather. Wet weather would wash dust, insects and seeds off of the conductors.
- 14844-21 Please see the responses to Comments 14844-14 through 14844-20.
- 14844-22 The perception by a horse of a shock should not be significantly affected by being shod (having metal horse shoes). The relatively small amount of metal, the location of the horseshoe between animal hoof and ground, and the intimate contact between horseshoe and the horse's hoof all combine such that no increased perception of shock by the horse would be expected from wearing metal horseshoes.
- The possibility of a nuisance shock when contacting a metal object near, or on the right-of-way, is related to the size of the metal object, its grounding, the size and proximity of nearby grounded objects, and also the size and grounding of the entity contacting the metal object. Although horseshoes are metal objects, they are not the large metal objects, e.g., a vehicle, being considered in the discussion of nuisance shocks in the EIS (due to the size, location, and use of horseshoes).
- Please also see the response to Comment 14328-6.
- 14844-23 Please see the response to Comment 14844-2. There will now be a buffer of land between the Agrens' property and the proposed right-of-way where tree clearing would not be required.
- 14844-24 Please see the responses to Comments 14495-1 and 14844-2.
- 14844-25 Comment noted. Specific comments are addressed below.

Mark Korsness
March 25, 2013
Page 14 of 14

14844

- 14844-25 | There are at least four options which would address our clients' concerns while fulfilling these purposes.
- 14844-26 | 1. Relocate and rebuild Alpha Riding Academy. The Agrens are obtaining bids for constructing an equivalent facility and will provide them to you when they are completed.
- 14844-27 | 2. Realign Segment F from Tower F/1 to one of Towers F/17 though F/23 so that the transmission line right-of-way crosses the Cowlitz River north of the City of Castle Rock's water service area.
- 14844-28 | 3. The "Grey Line."
- 14844-29 | 4. Central Alternative, Option 2.
- 14844-30 | We look forward to working with you to develop a solution to our concerns.

Sincerely,



Alison Moss

Enclosures:

1. Aerial Photo from DEIS
2. Letters from Clients/Students
3. Chronology of Dressage Developments
4. Fourth Level – Test 2
5. March 25, 2013 Letter from Dearborn & Moss PLLC to Corps of Engineers

cc: Regina Agren
Steven W. Manlow

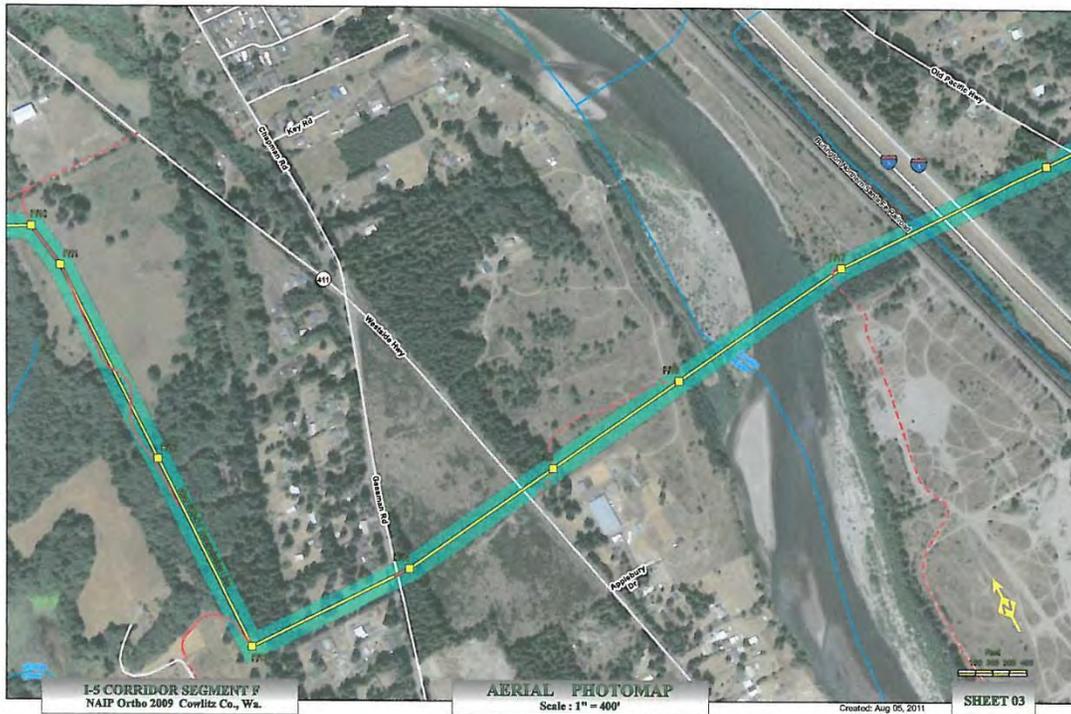
14 of 54

- 14844-26 Please see the response to Comment 14464-4.
- 14844-27 Please see the response to Comment 14097-1. BPA did study this suggestion along with other routing options that would avoid the area around Castle Rock. Segment F and the two additional substations (Baxter Creek and Casey Road) were developed, in part, to respond to numerous comments asking BPA to develop a route that moved east more quickly and crossed more land managed for timber rather than private homes. Segment F still impacts private land, homes, streams, and habitat. These impacts, and others, have been described in the Draft EIS.

In response to comments requesting the line be moved even farther north and east, BPA explored various possible routes. Segment F crosses the I-5 corridor outside the city limits of Castle Rock using mostly vacant lots but passes near some homes. Crossing farther north and then coming down the east side of I-5 would avoid the city's existing or planned service area, but would make the transmission line longer, add at least one Toutle River crossing, and would impact a different set of existing homeowners. To avoid most of the homes in the Castle Rock area altogether, the proposed line would need to be located north of Silver Lake. Section 4.7.2.4, Northeastern Alternative, North of Silver Lake, Washington, explains why this route (sometimes referred to by the public as the "gray line") was considered but eliminated from detailed study.

- 14844-28 Please see the response to Comment 14844-27.
- 14844-29 Please see the response to Comment 14110-1.
- 14844-30 Comment noted.

14844



15 of 54

14844

Alpha Riding Academy
Letters from Clients and Students

1. Joseph Berto
2. Kathleen Carroll
3. Anna Dunlap
4. Jane Epperson
5. Lori Fleming
6. Jill Hall
7. Don and Pamela Holthofer
8. Brenda Karnowski
9. Liz Lawson-Weber
10. Christine Maylone
11. Dolores Morgan
12. Judy Pappin
13. Kimberly Ransdell
14. Carissa Schmitz
15. Carla Shown

16 of 54

14844

Joseph Berto

February 1, 1013

Mark Korsnes
 Project manager
 I-5 Corridor reinforcement project

Dear Mr. Korsnes,

14844-31 It has come to my attention that the BPA is considering placing high voltage power lines in close proximity to the professional Alpha Riding Academy. I am very concerned about this placement and the negative effect it will have on Ms. Agrens ability to continue her performance horse training business. The Alpha Riding Academy is not your typical riding school. Ms. Agren has devoted herself to teaching and training horses to a level that is not attainable through conventional methods. Ms. Agren has developed a program that has its roots in classical riding and uses methods that go back centuries. Her school of riding is one of the few that has the ability to teach this kind of riding because of the special attention that she has devoted to its working conditions. Her teaching requires a whispered connection to the horse. It is based on a carefully cultivated communication that only comes about from many hours of very advanced one-on-one attention. The end result is a magical horse that seemingly follows a command by thought alone.

14844-32 It is inconceivable that this type of training will be able to continue with the noise and distraction that high-tension power lines produce. The constant hum and damp weather snapping would completely distract the horse from achieving the desired union with the trainer, and in the end render the lessons as useless. In addition this distraction would also have a profoundly negative effect on her being able to teach others to ride horses properly, since an unskilled rider cannot be taught properly on a nervous horse.

14844-33 I am an expert in this field; I work closely with Morgado Lusitano, a facility in Lisbon Portugal and also operate a horse training facility in Medford, Oregon. I can tell you, with complete certainty, that the proposed placement of high-tension power lines will ruin Ms. Agrens ability to conduct her business. Ms. Agren's teaching is highly specialized; she is one of only a half dozen trainers of her caliber working in the USA. Although I have the utmost respect for her skills, I would need to reconsider having my horses continued training there. The time and effort to achieve positive results in the distracted environment that the power lines will cause is dangerous to myself as a rider and to my horses expected progression.

14844-34 I believe you should reconsider the placement of these towers or compensate Ms. Agren so that she can relocate her facility.

Sincerely,

Joseph Berto

17 of 54

14844-31 Please see the response to Comment 14844-2.

14844-32 Please see the response to Comment 14844-14.

14844-33 Please see the response to Comment 14844-2.

14844-34 Please see the response to Comment 14844-2.

14844

Kathleen F. Carroll, M.A., Ph.D., CCC-A

Mark Korsness
PBA I-5 Corridor Reinforcement Project

February 15, 2013

Dear Mr. Korsness,

14844-35 The current BPA expansion route will impact many of us in the horse community by forcing the closure of Alpha Riding Academy. I currently have two high valued, highly trained performance horses residing on the property. I spent several years and a small fortune searching the northwest looking for a great barn and an outstanding classical dressage trainer for my horses.

14844-36 Dressage is sometimes thought off as ballet on horseback as it requires both athletic development and harmonious rhythm from horse and rider. The most important factor when looking for a dressage barn is to find a quiet, stress free environment to develop the soft, flowing, suppleness and strength required for correct dressage. With my training as an audiologist and neurophysiology specialist, I can testify that all herd animals have extraordinary hearing that allows them to hear frequencies and decibel ranges far beyond the human range. In the wild, this “early warning system” hearing keeps them alive. Is it any wonder that horses run away from noise? Anyone who has ever ridden a horse knows they are reactive to “unseen and unheard” factors. Obviously, electric line crackles, snaps, buzzing,, will be very stressful to my horses and others as they cannot get away from the noise... they cannot escape it, but will still spook, whirl, or bolt possibly hurting themselves, their riders, or other people in the area. Even if not being ridden, my horses react to noise in their stalls, bolting and spooking when startled.

14844-37 My horses currently compete successfully at advanced USDF National Levels with Regina Agren riding. In order to do this, they require the very best in care, and the ability to learn in a safe, relaxed environment, and the very best skilled riding. The Alpha Riding Academy barn has a large FEI size regulation indoor arena that is a must in this area. In addition, there is excellent footing and drainage that is unique to a riverbed location, and very important to maintain the healthy feathering on my Friesian horses.

14844-38 Regina has spent her life working with the finest trainers in the world to develop into the trainer she is today. I have worked with several internationally known trainers/riders, Regina ranks as one of the best I have ever know. However, I can’t imagine how my horses’ training can continue during BPA construction, or when impacted by the noise generated by the electrical lines. There is not another Alpha Riding Academy within 250 miles – I know, I looked! I am at a complete loss to know what I will do if this line goes in as currently planned.

14844-40 Obviously, I would have to move my horses effectively ending their training and competitive careers. They are too highly trained to just go “anywhere”. There are no other trainer/riders competent to ride them. I would be concerned that the horses might

18 of 54

- 14844-35 Please see the response to Comment 14844-2.
- 14844-36 Please see the response to Comment 14844-14.
- 14844-37 Comment noted.
- 14844-38 Comment noted.
- 14844-39 Please see the responses to Comments 14844-14 and 14884-17.
- 14844-40 Please see the response to Comment 14844-14.

14844

- 14844-40 | hurt themselves in their stalls at night due to noises, or die due to stress induced illness (ulcer, colic.) Without training and riding by Regina, my horses' value would be negatively impacted, thereby impacting me greatly. Obviously my leaving and others
- 14844-41 | would financially harm the Agrens, Alpha Riding Academy and indirectly impact the town of Castle Rock with the loss of business from myself.
- 14844-42 | I hope you will reconsider the location of your lines. Alpha Riding Academy is an important resource for the equine community and Castle Rock.

Sincerely,

Kathleen F. Carroll

19 of 54

14844-41 Please see the response to Comment 14844-2.

14844-42 Please see the response to Comment 14844-2.

14844

February 21, 2013

From: Anna Dunlap

**Re: BPA Proposed High Voltage Line near
Alpha Riding Academy**

To: Mark Korsness
Bonneville Power Administration
I-5 Corridor Reinforcement Project

14844-43 Ten years ago, in 2003, I hired Regina Agren of Alpha Riding Academy to come to Corvallis, Oregon to teach a group of Dressage riders. I organize 3 to 5 very successful two day clinics with Regina each year. As an instructor, Regina continues to seek out trainers for herself, consults with world renowned instructors and Olympic riders. Not all of us can have such opportunities. This makes Alpha Riding Academy an invaluable resource in the Pacific Northwest. Regina teaches Classical Dressage, a time honored riding technique as emulated in the Olympics. She also teaches holistic nutrition, horse-rider fitness and wellbeing, how to tap into the horses nature for optimum results. In an age of modern "get there quick fixes", the historical centuries old techniques must be kept alive. Alpha Riding Academy and Regina Agren serve that purpose. Many of us travel with our horses to her facility in Castle Rock, WA for private lessons and clinics she has organized with internationally respected instructors.

14844-44 I am concerned to hear that BPA will be putting high voltage electrical lines near her establishment. Our horses are very fit and trained to listen to the slightest adjustment of the riders' body. They are trained to be incredibly attentive. Horses are prey animals. No matter the centuries of domestication, the instinct remains: "flee or be eaten". This means horses are hard wired to be sensitive to their surroundings, especially the unknown threat. I have personally ridden under 500kv lines and experienced first hand my horses' distraught reactions to the hum and crackle of the lines over head.

14844-45 Of concern is what will happen when we bring our fit, highly trained horses to the Academy? Many horses have never been exposed to the crackle and hum of high voltage power lines. Another concern is the perceived dangers of the electromagnetic field of

14844-46 high voltage powered lines and the effect that has on the Academy's clientele. It would be devastating for us in Corvallis if we could no longer take our horses to the Academy.

14844-47 For this reason, I urge you to consider Regina's concerns for her business and for those of us who count on the Academy.

Respectfully,

Anna Dunlap

20 of 54

14844-43 Comment noted.

14844-44 Please see the response to Comment 14844-14.

14844-45 Please see the response to Comment 14844-14.

14844-46 Please see the response to Comment 14328-6.

14844-47 Please see the response to Comment 14844-2.

14844

JANE D. EPPERSON

December 14, 2012

BPA

On behalf of Regina Agren and Alpha Riding Academy

Dear BPA,

14844-48 I have been asked to write a letter to you on behalf of Regina Agren and Apha Riding Academy. My name is Jane Epperson, and I have known Regina for almost 20 years. She is one of the premier dressage trainers in the Pacific Northwest.

14844-49 Over the years, I have had numerous horses in training with Regina, most recently my 13 year old show horse, Prescription. Prescription, whom I sold earlier this year, spent the last two years that I owned him with Regina. He was valued at over \$100,000. He was worth that much money because of his talent and the excellent training he received from Regina.

My horse, Prescription, is indicative of the caliber of horses that Regina has in her barn. She trains exclusively dressage horses and dressage people are very picky about their care and training. I feel fairly sure that, should the BPA decide to put power lines along the frontage of Regina's property, she will lose many, if not all, of her dressage horses in training. I, myself, would have to take my horse out of her barn, if he was still in training there, if power lines were to be installed.

14844-50 Many of Regina's clients are from Portland, OR which is an hour and a half drive from Regina's barn. We are all willing to commute that far because Regina is the only trainer in the whole Pacific Northwest with her talents for dressage training. There are numerous trainers in the Portland area and we, as clients, could use any number of them to train our horses. However, we choose to drive one and a half hours to Regina's because she is so good and because she takes such good care of our horses.

I think it is unspeakable that the BPA is considering doing something that will create a situation for Regina that will put her in a position to jeopardize the well being of the horses in her care and will probably destroy the business that she has spent many years developing.

14844-51 Please reconsider your decision to put power lines along Regina's property. I believe it will probably destroy her business.

Thank you for your consideration.

Sincerely,

Jane D. Epperson

21 of 54

14844-48 Comment noted.

14844-49 Comment noted.

14844-50 Please see the response to Comment 14844-2.

14844-51 Please see the response to Comment 14844-2.

14844

February 12, 2013

Mark Korsness
BPA Transmission Services Project Manager

Dear Mr. Korsness:

14844-52 | I am writing to express my objection to BPA's plans to place a high voltage electrical power transmission line adjacent to the Alpha Riding Academy property in Castle Rock, Washington.

14844-53 | I am a dressage rider and horse owner in Seattle; I regularly haul my young horse to Castle Rock to ride and train with Regina Agren of Alpha Riding Academy for several days at a time. Should an HV transmission line and tower be placed near Regina's property, I will regretfully no longer come to Castle Rock with my horse.

14844-54 | I have personal experience with the effect of HV transmission lines on horses here in King County. Leaving aside the evidence of human and animal health risks associated with high power lines, the strong electro-magnetic field created by the power lines makes dressage training impossible. Dressage is based on teaching a prey animal to be relaxed, focused, and confident performance horse. The constant hum of lines and the powerful static electricity

14844-55 | shocks impact the health and temperament of our sensitive animals and pose a real risk to rider and handler safety.

14844-56 | Ending my dressage training relationship with Regina Agren will mean an end to my economic contribution, however small, to the community of Castle Rock. I regularly spend money at hotels, restaurants, feed stores, and gas stations in the area during my training trips.

14844-57 | Further, and more personally, I will be saddened to end my training with Regina. It is difficult enough to find a quality dressage trainer -- to find one who has attained the level of national accomplishment that Regina has attained is rare indeed. It will be a great loss for me and my young horse.

14844-58 | I respectfully request that BPA reconsider the placement of these high voltage transmission lines in Castle Rock, Washington. Thank you for the opportunity to comment on your proposal.

Regards,



Lori Fleming

22 of 54

14844-52 Comment noted.

14844-53 Comment noted. Please see the response to Comment 14844-2.

14844-54 Please see the responses to Comments 14844-14, 14844-17, 14844-20, and 14844-22.

14844-55 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.

14844-56 Comment noted. Please see the response to Comment 14844-2.

14844-57 Comment noted.

14844-58 Please see the response to Comment 14844-2.

14844

March 7, 2013

Mark Korsness
BPA I-5 corridor reinforcement project

Dear Mr. Korsness:

14844-59

I am authoring this letter in an effort to persuade you and/or any other voting member of the BPA to consider an alternate placement of high voltage power lines in Castle Rock. I recently was informed that power lines were intended to be placed adjacent to the site of Alpha Riding Academy (hereafter ARA); a facility which provides training for elite and quite valuable dressage performance horses.

I was upset to hear about this happening so swiftly next to such a unique riding facility; the quality of which is otherwise non-existent in the I-5 corridor between Portland and Seattle. When I relocated with my family from the San Francisco Bay area (an area replete with a plethora of talented dressage instructors) to the Longview, Washington area (where there is a **deficit** of talented riding instructors), I was thrilled to discover the professional instruction provided at ARA by Regina Agren and Riding Cadets Instructor Sue Sabata.

14844-60

The training afforded at the ARA facility is of international quality. Truly, ARA routinely provides riding clinics and symposiums proffering the talents of international judges. Junior Olympic Riders and Pacific North West riders have been trained at ARA by Regina Agren, the owner and founder of ARA. Mrs. Agren was herself trained in the art of classical dressage by Olympians and riding masters. She successfully competes at the highest levels of dressage and is competitive nationally and internationally. This type of instruction is truly unique to this area.

My daughter aspires to compete in dressage at a national level through the Junior Young Rider Program. Mrs. Agren has given her the requisite skills to be able to attain this goal.

I have had lessons and training at ARA over the past decade and have been so impressed with the quality of care and various holistic treatments provided for the horses. I have not been able to find holistic care and treatments for horses anywhere else.

14844-61

Prior to ARA, I boarded our horses at a facility in Longview formerly owned by Jim Ribelin. The facility was known as "The Ribelins." Such 40-stall facility is located in Longview under high voltage power lines. While boarding at this facility, my horse (who is otherwise calm and steady) became agitated and downright dangerous as described below. The power lines snap and crackle and electricity is palpable in the air. I had to treat my horse for ulcers while at the Ribelin facility. Moreover, I had a terrible time keeping weight on my horse. She became quite thin, for her breed and type. My daughter's pony also experienced such a bad episode of colic while living under the power lines that she had to be taken as an emergency patient to

23 of 54

14844-59 Please see the response to Comment 14844-2.

14844-60 Comment noted.

14844-61 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.

14844

14844-61 the Willamette Valley Surgical Center and treated for a week. We were fortunate not to have to operate, given her condition. She had never coliced before. While living under the power lines, my horse began to bolt (running off in an uncontrolled fashion) and shied under saddle. This can be quite dangerous, particularly in a busy arena. I suspected that my horse was reacting to the power lines, as she had never behaved in such a reactive fashion in the previous years that I owned her. "Nuisance" shocks from the horses to the riders and vice versa and static electricity were frequent occurrences.

When a stall finally opened up at ARA, I left the Ribelin facility. Shortly thereafter my horse's bad behaviors stopped altogether. The ulcers (testable through fecal samples) were gone. The bolting behavior stopped. My horse finally started to regain weight. She progressed quickly in her training and the tractable horse that I formerly knew in California was back. The change in my horse was unbelievable and a testament to the negative impact of power lines on horses (particularly sensitive, athletic performance horses)

14844-62 While others may speculate that the placement of performance horses near high voltage power lines may be injurious to the mental and physical health of horses, I KNOW this for a fact. If high power lines are placed adjacent to the ARA facility, I will sadly opt not to train there. While it is a wonderful training facility, I fully expect that the bad will outweigh the good. No matter how talented a trainer and riding instructor, Regina Agren cannot effectively train a horse who is out of its mind with distress and worry. She cannot effectively give a lesson to clients who trailer in, as the horses will be particularly sensitive to the charged atmosphere. Clinicians will not want to frequent ARA, as no client will willingly pay \$185.00/lesson to have his/her mount struggle with inattention and tension caused by the cracking power lines.

In short, the power lines will be a death knell to Mrs. Agren's business. She will not be able to conduct her specialized trade under power lines. It would truly be as sad day if ARA had to close its barn doors. Castle Rock has an absolute gem in its midst. Regina Agren. It would be a horrible shame if Mrs. Agren had to take her talents elsewhere because of the unfortunate placement of power lines.

14844-63 I truly and sincerely hope that you will consider an alternate placement of power lines in Castle Rock, so that they are not adjacent to or within close proximity of the ARA facility.

Very truly yours,

Jill Hall

24 of 54

14844-62 Please see the response to Comment 14844-56.

14844-63 Please see the response to Comment 14844-2.

14844

Alison Moss**Subject:** FW: Power line Issue

From: "Don Holthofer"
To: "brian regina"
Sent: Friday, February 1, 2013 8:31:55 PM
Subject: Power line Issue

Mark Korsness

PBA I-5 corridor reinforcement project

14844-64 | I am writing you in regards to the proposed placement of power lines to close to a cultural asset that will be put in jeopardy by these lines.

14844-65 | The Alpha Riding Academy is a cultural asset with a history of conserving an art form that has been practiced for hundreds of years. This art is being challenged on many fronts: high land cost, taxes, zoning, and even power line interference. During World War II even General Paton, in the middle of fighting a war, recognized the importance of preserving this art form. He used war assets and staff to ensure the survival and preservation of a school and breed of horse even during a war.

14844-66 | The interference of these power lines will create an unendurable environment due to the corona noise that crackles and snaps whenever the transmission lines are wet, getting shocked by static electric air. These all create health concerns from stress on the horses including weight loss, ulcers, colic. Safety of riders trying to ride horses in this environment will result in horses that are, on edge - spooking, rearing, and bolting. Safety of both horse and rider will be compromised to a point that it will mean the end of the Alpha Riding Academy.

14844-68 | If General Paton could see the importance for preserving this art during a time of war, I hope we have the foresight in our present age to recognize this opportunity to preserve the skill knowledge and abilities that exist at the Alpha Riding Academy. I strongly urge you to locate these power lines as far as possible from this cultural asset.

14844-69 |

Regards,

Donald & Pamela Holthofer

14844-64 Comment noted.

14844-65 Comment noted.

14844-66 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.

14844-67 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.

14844-68 Comment noted.

14844-69 Please see the response to Comment 14844-2.

14844

12/31/2012

To Whom It May Concern:

- 14844-70 This letter is for support of Regina and Brian Agren, for their horse training facility "Alpha Riding Academy" located at
- 14844-71 I have been a witness to the development of their property from bare ground to becoming the premier training facility in Cowlitz County. No other facility (boarding or training) has the amenities that Alpha Riding Academy has.
- 14844-71 Over the years starting in the spring of 2002, I have boarded/trained four of my National Level/World Level show ponies (hackney/Shetland crosses) at the facility. It gives me piece of mind when at the facility that they are calm and quiet. Great care is taken to see that the stalls, pens connected to the stall and all pastures are kept at a very high standard of quality to keep all animals safe.
- 14844-72 I have lived in Cowlitz County all my life and have boarded and used other facilities, but of all the facilities Alpha Riding Academy, I have made the most strides in the advancement to training my ponies.
- 14844-73 I have tried a few stables in the area many times that have power lines running through the property and I can tell you from my own personal experience my ponies are nervous and they do not settle in as they do at Alpha Riding Academy. This even includes my National Level Show Pony, who holds the title of 2012 Pinto Pony Pleasure Driving & Ideal Pinto Pony Driving in the United States.
- 14844-73 The topic is a controversial in people, let alone in animals about living next to power lines. What I have noticed in the past when moisture is in the air (we have a lot of moisture) the power lines give off a "buzz" and I think that my pony in general can't really pinpoint where the noise is coming from and from that is why they are nervous and don't settle in. The continuing of the "buzz" to me is like a dripping water faucet or nails on a chalk board. Not something I like.
- 14844-74 Long-term nobody knows what the true effects of these electrical currents are to people, let alone animals.
- 14844-74 Until it can be proven to me that it doesn't cause significant health loss and significant illness because of the electrical currents I will be wary of them.
- 14844-75 Please be cautious when building the power line and look at the loss of income to Regina Agren, who has worked hard for many years building a great facility in Cowlitz County. It will be a great loss if the power lines are built next to the Agren's property.

Sincerely



Brenda Karnoski

26 of 54

14844-70 Comment noted.

14844-71 Comment noted.

14844-72 Comment noted.

14844-73 Please see the responses to Comments 14587-1, 14844-14, 14844-20, and 14844-23.

14844-74 Please see the response to Comment 14332-1.

14844-75 Please see the response to Comment 14844-56.

14844

February 22, 2013

Bonneville Power Association

To Whom It May Concern:

14844-76 | This letter is in support of Regina and Brian Agren/Alpha Riding Academy and their property located at

14844-77 | I have been a client of Regina Agren/Alpha Riding Academy for over fifteen years. Several years before the property in Castle Rock was obtained and the facility built. In the years since the construction of this facility, I have enjoyed the option of sending my horse to Castle Rock for expert dressage training knowing the barn was safe and my horse would be in a calm, comfortable environment.

14844-78 | It has been distressing to hear that the BPA will be placing high voltage power lines adjacent to this property. Not only am I distressed for Regina, Brian and Isaac Agren's health, their business and their property value but I would be very distressed sending my horse to a facility with power lines within sight and earshot.

14844-79 | The nature of our equestrienne discipline (dressage) requires already sensitive (by nature) horses be trained to an even heightened level of sensitivity and strength over time to be able to perform a variety of highly schooled movements. This is a gradual process that takes many years to complete requiring some horses to be in training with the professional for several months at a time and sometimes several years.

14844-80 | Horses living in an altered environment such as one being so close to high voltage power lines and the noise and static electricity they create would be very distressing to these sensitive horses. Problems from colic to lameness could arise chronically. Horses would become frightened by the noise or bothered by the electricity in the air causing confusion and flight. This behavior would also lead to a disruption in their system which could lead to a variety of illnesses the most dangerous resulting in colic. Horses trying to flee (run) from these effects could injure themselves in stalls and turnout. Most importantly, this sort of disruption could be a huge risk to human life. Riding sensitive horses who may unpredictably launch into full flight mode anywhere on the property would become a liability to the property owners. Many owners, like myself, may choose not to have subject their horses to such an environment. As you could imagine, this would be devastating for their business.

27 of 54

14844-76 Comment noted.

14844-77 Comment noted.

14844-78 Please see the response to Comment 14844-56.

14844-79 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.

14844-80 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, 14844-23, and 14844-56.

14844

14844-81 I sincerely hope the Bonneville Power Association will take this information into account and move the lines to another location. It would be a tragedy for this family to lose the use of their property and have
14844-82 to shutter their business. Regina Agren is a very successful and skilled trainer. It would be a significant loss to the local dressage community to lose access to her expertise.

Thank you for your consideration,

Liz Lawson-Weber

14844-81 Please see the response to Comment 14844-2.

14844-82 Please see the response to Comment 14844-56.

14844

To whom it may concern,

14844-83 I would like to introduce myself; I am a licensed equine property appraiser with the American Equine Appraisers Association. I also am a long time student of Alpha Riding Academy in Castle Rock, Washington. I have grave concerns with the knowledge of the BPA high voltage lines being considered to run next to this establishment.

14844-84 If I was hired to appraise any the these horses I would have to say that the horses affiliated with this program are of considerable value, they are very highly tuned, very highly trained and can be equated to Olympic level horses, a majority of these horses are bred from Olympic horses and are the top examples of their respectable breeds, many are imported from Europe to achieve the highest standard of the discipline they were bred for and they are being trained in which is the art of Dressage. Dressage is an art in itself and the training of dressage has been passed down through the centuries originating from the Greeks, it takes years of training and care which in human form can be equated to ballet.

My personal experience with Alpha Riding Academy helps me train my horse and condition my horse for rated shows judged by top equestrian judges and Olympiads. To achieve this level these horses are kept in pristine shape, At Alpha Riding Academy they are looked after with a holistic approach, which covers all aspects of the horses well being. They are fed a special diet to bring out the best enrichment for them; they are nurtured physically with body massages, chiropractics, acupuncture, physiotherapy with the use of herbology and so forth.

14844-85 To bring high voltage equipment next to this stable would null and void all the time and considerable expense put into theses animals, they are not categorized as livestock per-se but as highly valued show animals. If this plan is to go ahead, it would be of necessity for you to help

14844-86 relocate Alpha Riding Academy or it would force the clientele of this exemplary establishment to have to look for an equivalent facility which is far and few between, maybe north to Seattle and south to Portland, Oregon.

14844-87 These horses are highly sensitive and they are susceptible to the various factors affecting both internal and external environment and this is of utmost importance to achieve the top levels. In order to achieve this capacity of the horse, the emotional stability, the lifestyle, nutritional balance, exercise, and training is of utmost importance. These horses have an acute awareness of their surroundings and the effect of the capacity and high levels of your equipment would make them seriously reverse in all aspects of their performance. What you are proposing is not of any value or benefit to the residents of Washington State and maybe the route you choose should at least affect the residents of the state that gets all the benefits from this project.

14844-88 I hope you will take this into account for your assessment and decision in conclusion of the plan.

Respectfully yours
Christine J..Maylone

29 of 54

14844-83 Comment noted.

14844-84 Comment noted.

14844-85 Comment noted.

14844-86 Please see the response to Comment 14464-4.

14844-87 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.

14844-88 Please see the response to Comment 14494-2.

14844

February 20, 2013

Mark Korsness Bonneville Power Authority
I-5 Corridor Reinforcement Project

Dear Sir:

14844-89 For the past seventy-five years I have been a consumer of your services. This is my first letter to you. Since the age of seven I have been involved in the horse world. It is this involvement that brought me to my present residence in Toutle Washington. I wanted to train with Regina Agren at her Alpha Riding Academy in Castle Rock. I have done so with some success in the dressage arena due in large part to Regina's instruction.

14844-90 Regina is a nationally recognized dressage rider and holds clinics throughout the northwest. She also hosts local and international trainers at her barn in Castle Rock, bringing business into the local community. This operation arose and continues through the sweat equity of this family. No "Romney funds" here.

14844-91 The current property with its improvements offers turnout, trails, and an Olympic size indoor arena. This comprehensive facility focuses on holistic treatment for the wellbeing of the horse thus insuring high performance of both horse and rider.

14844-92 **The construction of high voltage lines so close to this horse property will have a negative impact on Alpha Riding Academy and local businesses. Owners of high performance dressage horses want the best for their investment. The aura of power lines that humans can hear and feel are magnified by the heightened senses of horses that can hear and feel far better than we. The horses four feet clad in steel shoes are more likely to be shocked than we in our composite soled footwear. Owners have a negative view of close proximity to high voltage towers. This will lessen their willingness to have their horses at Alpha Riding Academy. One of the barns that I managed (a sixty stall facility with jumping and dressage horses) was placed 1200 feet from similar towers. Boarders and trainers often voiced concern about the voltage. We were careful to have turnouts only on the side opposite the towers. Undeniably the perception that the towers and their load will bother horses exists.**

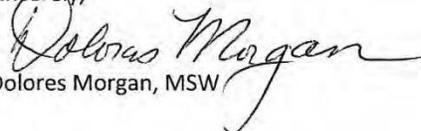
14844-93

14844-94

14844-95

14844-96 The Agren's concerns are valid. If the proposed route is implemented, they must be compensated for the expenses inherent in relocating and reestablishing their business on a more appropriate piece of land.

Sincerely,


Dolores Morgan, MSW

30 of 54

14844-89 Comment noted.

14844-90 Comment noted.

14844-91 Comment noted.

14844-92 Please see the response to Comment 14844-56.

14844-93 Please see the responses to Comment 14844-14, 14844-17, 14844-20, 14844-20, 14844-22, and 14844-23.

14844-94 Please see the response to Comment 14844-22.

14844-95 Please see the response to Comment 14844-56.

14844-96 Please see the response to Comment 14464-4.

14844

Attention: Mr. Mark Korsness

February 20, 2013

PBA I-5 Corridor Reinforcement Project

14844-97 It has been brought to my attention that the decision has been made by the BPA, Bonneville Power Administration, to place a 500 Volt power line immediately to the north of the property owned by Mr. & Mrs. Brian Agren, at 5490 Westside Hwy, in Castle Rock, Washington. Located on this property is the elite equine dressage training facility, Alpha Riding Academy, owned and operated by Mrs. Agren. Regina Agren is one of the top elite dressage trainers in the United States. At her training facility, Regina rides, trains and competes pre-Olympic level dressage prospects at the Regional and National level.

14844-98 Alpha Riding Academy is not a general boarding and pasturing facility for the keeping of pleasure and pasture horses. Alpha Riding Academy is a facility for the training and care of high-level performance horses. Performance horses by their very nature can be very sensitive and high maintenance athletes. Their training process and sports medicine/therapy requirements are the same as the high performance human athletes training and participating in upper level and professional sporting activities. One distinct difference between horses and humans is that you cannot reason with a horse. You cannot tell them, "yes, there is something very real triggering the natural instinctive response of a prey animal, the fright and flight reaction for survival, but that is OK. Everything will be fine." They only know what they are exposed to and it is the human in their lives who has the job of making them feel safe and calm. A constant exposure to the stimuli like that of the power lines will make it impossible for the performance horses to feel safe, relaxed and able to eat and thrive properly. Reports in the past have noted noise and vibrations emitted by power lines. Horses are very sensitive to the power line noise and they feel the static electricity. They become "on edge," affecting the relaxation of body and mind. This will definitely affect their training. The environment needs to be safe, quiet and unthreatening.

14844-100 Due to the environment that will exist when these power lines are placed next to Regina's training facility she will need to relocate her business. She will no longer be able to give the animals the environment they need, and she needs, to achieve the high level of training and care she provides to her clients and their horses. All of Regina's clients who have placed their horses in her care have been very selective in their decision. Many of her clients bring their horses from out of the area and even from out of state for training. The training program Regina operates is known as one of the premier training programs in the Pacific Northwest.

14844-101 Regina has trained and ridden my horse, Contendon, to the highest levels of the Young Horse and Developing Horse Championships in the United States. He has participated in these events at two different levels, once in 2009 and again in 2012. Regina's program and expertise and the care and environment she provides the horses are the reasons why I placed Contendon in this training facility. If she were not able to continue the same program with the same amenities I would be faced with the unpleasant reality of finding another training facility for Contendon, which I do not want to have to do. Horses that compete and perform at this level are considered to be the up and coming Olympic horses for the US Olympic Dressage Team. Contendon is currently training for the 2013 US Equestrian Federation's National Championships. His successful participation in this event depends on his continued, uninterrupted training in an environment conducive to his success. That place will not be in a facility next to a high voltage line where noise, construction and line maintenance work are a daily occurrence.

14844-102 I have written this letter today with the intention of sharing information and to bring awareness of the impact this high voltage power line placement will have on the business of Alpha Riding Academy. The consequences will be profound and will create a very large financial burden on an individual who is conscientiously building a very high quality training program and legitimate business that in turn supports

31 of 54

- 14844-97 Please see the response to Comment 14844-2.
- 14844-98 Comment noted.
- 14844-99 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.
- 14844-100 Please see the response to Comment 14844-56.
- 14844-101 Please see the responses to Comments 14844-14 14844-17, 14844-20, 14844-22, and 14844-23. Construction would be temporary for a few days at a time until the towers are built and the line strung. Maintenance is also temporary depending on if something is needed at the tower. Since the towers are located in a field north of the Agren property, vegetation maintenance is limited.
- 14844-102 Please see the response to Comment 14844-56.

14844

- 14844-102 | other businesses in the area. After 10+ years of dedicated effort and considerable expense to develop her current location, Regina will now be faced with the task of finding a new location to operate her business. She currently has a robust business of stabled and haul-in clients for training. However, discerning clients know the dangers and the effects of emissions from the high voltage power lines. They would choose another training facility for their upper level dressage prospects. Because of these facts, Regina will be forced to relocate her business to a more favorable environment to maintain the high quality program she offers.
- 14844-103 | This relocation will involve a great deal of expense, time and effort and will require acquiring comparable property with the space, environment, topography and proximity to a business center and I-5 freeway access, plus a convenient commute to the Portland International Airport. Hopefully she will be able to obtain some compensation for the fact that she will be forced to relocate her business from her current location or she could face the failure of her business entirely.

Regards,
Judy Pappin
Equusmanor Sporthorses
Vancouver, Washington

32 of 54

14844-103 Please see the response to Comment 14464-4.

14844

February 5, 2013

TO: Mark Korsness

RE: BPA I-5 Corridor Reinforcement Project

To whom it may concern;

14844-104 I would like to express my concern for the plans that the Bonneville Power Administration has to put high voltage lines near Regina Agren's dressage training barn in which my horse is stabled. The placement of these lines will not only affect the health of my horse and my horse trainer but will ultimately force a business to shut down resulting in loss of revenue to a community.

14844-105 Dressage is a sport that focuses on training of the horse to develop the horse's athletic ability and willingness to work making him calm, supple and attentive to his rider. Dressage is conducted in a quiet environment to promote relaxation and concentration (similar to golf and libraries). Unpredictable noises and energy can result in tension, startling and poor behavior which is not only a danger to the rider but also to the horse. The type of horses that excel in this discipline are specifically bred high performance horses that are very sensitive and reactive to their environment. Highly trained athletes who are competitive on a national level often are valued at well over \$100,000.00. These horses are NOT standard pasture horses. High EMF, hissing or popping power lines will not only make my horse nervous and anxious but will make her dangerous for me to ride. I have not sacrificed both time and money to own a horse that I cannot compete or safely ride due to the environment that she would be forced to live in if the BPA installs the lines.

14844-106 Regina Agren is an extremely talented and accomplished trainer in our sport of dressage, a rarity for the Pacific Northwest. She has trained top ranking US dressage horses and has competed on a national level. If the BPA moves forward with installing the lines next to her property she will be forced to close her business and relocate most likely out of the Pacific NW due to the cost of purchasing and rebuilding her property in the Portland – Seattle market areas.

Sincerely,



Kimberly Ransdell

33 of 54

- 14844-104 Please see the response to Comment 14844-56.
- 14844-105 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.
- 14844-106 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.
- 14844-107 Please see the response to Comment 14464-4.

14844



Breeder of PRE Andalusian Horses
Moonstruck Meadows

February 12, 2013

Bonneville Power Administration

RE: Affected property at 5490 Westside Hwy, Castle Rock, WA 98611, known as Alpha Riding Academy

To Whom It May Concern,

14844-108 I was recently informed that property noted above may soon be overshadowed with monstrous electrical transmission lines.

Having owned, bred and ridden horses for over 45 years, I am intimately aware of the affects of noise, electrical current and static electricity on the training and handling of these large sensitive creatures. When a rider is beginning the training process with a skittish 1000+ lb. young horse, quiet and tranquility are two major factors in making the first handling and rides, safe and successful, for both the animal and rider. A small sound at an inopportune moment, such as a "pop" or "crackle" from high voltage electrical transmission lines, could launch a rider into a disastrous, even fatal situation.

14844-109 We often enclose our horses within electrified fencing, which sensitizes them to electrical currents. We see horses standing several yards away from an electrified fence, because they don't like to be anywhere near it.

I have personally had horses that won't cross through a gate, with an insulated electrical cable running under the ground, because their metal shoes, which are nailed to their feet, conduct even the smallest amount of stray electricity. They are so highly sensitive to this that several horses banded at this open gate and would not cross. One horse became ill because she would not even cross over this area to get to water for over 3 days. This proves that electricity, even in small amounts, can keep a horse from satisfying its most primal needs of food and water.

34 of 54

14844-108 Please see the response to Comment 14844-2.

14844-109 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.

14844

At a different time I had an area in my arena, where the horses began to shy away from, and some even became violent and bucked in that same area. I had my electrician inspect the area and it turned out the electric fence charger was not properly grounded and some small amounts of stray current were transmitted through the ground into that area in my arena.

14844-109

From my long term personal experience I have learned that horses have a huge aversion to electricity. The snapping and popping sound of a strand of electric wire that has accidentally become grounded on a metal post, will send them careening in the opposite direction. Even the creation of static electricity, while grooming them, can result in a horse jumping away, kicking out, or worse.

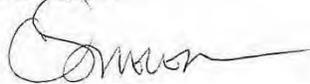
If a horse will refuse to cross even small stray amounts electricity to eat and drink, or react strongly to static or trace electricity, this should be clear evidence that the finer points of riding and handling horses could be substantially affected with the installation of high voltage transmission lines on the adjoining property.

Alpha Riding Academy is known throughout the NW for providing premier dressage training, as well as supporting a local children's pony club. Having a safe and healthy facility is paramount for a stable that is housing horses that are valued between \$50,000 and \$200,000 each, to say nothing of the safety and health of the children riding their ponies.

14844-110

If BPA places these lines near the Alpha Riding Academy, its owner will no longer, in good conscience, be able to provide her clients the top level care and training they have come to expect. Please do not put this fine facility out of business.

With Regards,



Carla Shown

35 of 54

14844-110 Please see the response to Comment 14844-56.

14844

In support of Alpha Riding Academy:

- Holistic Horse training relies on creating a simulated natural environment for performance horses in order to obtain freedom and soundness of body and mind while preserving the natural inherent spirit of the horse. Many factors come into play in choosing a simulated environment worthy of building a training program that can thrive in such an environment. These locations must be chosen carefully with several goals in mind. Trying to find a location free of the ever abundant stress factors that influence high level performance horses is no easy task. Key factors that come into play include: topography of land, acreage, accessibility to clients, and most importantly freedom from stressors.
- 14844-111 To better understand why these key factors play such a large role in choosing the location for your facility we must understand the behavior of the horse in general. This is known to many as the fight-or-flight response. A horse's first initial response unless protecting their young is to flee. Flight occurs when a horse feels that there is a viable threat in the near vicinity. This threat in the domesticated world very rarely comes in the form of a prey animal anymore but is created through the environment that we provide for our horses.
- Choosing a location that is ill suited can manifest itself in a wide variety of stable vices in horses that affect their health and well being in addition to inhibiting their value as performance horses to clients and trainers. Stable vices that affect stressed horses include but are not limited to weaving, stall chewing, and cribbing. These vices lead to mild-severe health consequences in horses and also detract from their ability to perform. Once established these vices are sometimes impossible to eliminate due to alterations in the brain.¹
- 14844-12 Alpha Riding Academy is situated in an environment free from the encumbrances described above. Their location at 5490 Westside Hwy Castle Rock WA was chosen with the aforementioned ideas in mind. The holistic environment has allowed Regina Agren to build a successful dressage business in this location that draws clients in from remote destinations. Her location is easily accessible in a quiet neighborhood that allows for stress free training of highly sensitive dressage horses. She can provide a long list of accomplishments that speak to the environment her horses have been developed in.
- 14844-13 A multitude of people compete in the modern form of dressage as it is presented today. Few and far between are trainers that have devoted themselves to the practices of "Classical Dressage". "Classical Dressage" has a deeply enriched history with roots that date back to the Greeks and Romans. Xenophon, Colonel Alois Podhajsky, and Nuno Oliveira all have held important roles throughout history in creating what is known as "Classical Dressage". The art of classical dressage is in danger of becoming a lost art if we don't continue to support those that take the time to master this ultimate connection between horse and rider. Many fall prey to the latest fad or quickest fix to reach the pinnacle of what we consider modern dressage today. Few take the time to build the

36 of 54

14844-11 Comment noted.

14844-12 Comment noted.

14844-13 Comment noted.

14844

14844-113 foundation to make dressage what is was meant to be a form of art. Regina has dedicated her life and career to this occupation. Her livelihood depends upon it.

14844-114 For the aforementioned reasons I strongly appose the Bonneville Power Administration (BPA), plans to put a very large high voltage electrical power transmission line (500kV) on the property immediatly to the north of Alpha Riding Academy with a tower as close as 100 feet from their barn.

Please reference below the supporting documentation that shows the adverse effects of non-ionizing electromagnetic radiation from high voltage transmission lines.

High voltage transmission lines produce an electric magnetic field (EMF). EMF does potentially have both short and long term health implications in humans. These potential implications include but are not limited to headaches, fatigue, anxiety and neuro-degenerative disease.³

Short of the effects on humans horses have an increased sensitivity to EMF's. Please reference the attached article in regards to EMF Pollution: "The Horse Who Knew More Than His Owners."⁴

14844-115 Why do horses know better than their owner when is comes to electricity? Research shows that horses and electricity do not mix for the following reasons.

"Resistance is the tendency of a material to resist the flow of electrical current. Higher resistance tends to slow the passage of electricity through the body and increases the chance that the electrical energy will be changed to thermal energy, which causes the tissue to heat up and become damaged."²

"Horses proportionally have more of the types of tissues that resist electricity. Their heavy muscles, thick tendons and ligaments, and large, bony skeleton make them especially sensitive even to low levels of current. Because horses are composed of a majority of tissues that slow down or resist the passage of electricity, they tend to be vulnerable to injuries caused by longer duration of contact, as well. Higher resistance and longer duration of exposure combine to be severely detrimental to the horse."²

14844-116 I can attest to the horse knowing better than the owner. One summer day after returning my horse from pasture I opened the gate leading out to the paddock and haltered my six year old Holsteiner cross mare. I proceeded to lead the mare through the gate that she had gone through hundreds of times before. This time she proceeded to bolt off and lead me through the gate in tow rather than in reverse order. Subsequent turn out sessions led to similar responses either bolting or balking. This behavior continued but only when the horse was taken to that particular paddock. I assumed this to be a behavioral issue associated with a young animal. As summer became fall and the temperatures began to drop the water troughs froze over. We proceeded to install the water heaters in the troughs. After installing these heaters into the three front stalls I noticed that the water levels had not dropped the next morning when feeding was occurring. I also noticed that

37 of 54

14844-114 Please see the response to Comment 14844-2.

14844-115 Please see the response to Comment 14328-6.

14844-116 Comment noted.

14844

14844-116 my Thoroughbred gelding would stand in front of his trough tossing his head in the air. I proceeded to the paddock and placed my hand into the trough to test the water temperature and found that everything was in working order or so I thought. I proceeded to grab a bucket of water for the gelding to drink from and he demolished the entire bucket. I followed suit with the other two horses stabled in the front stalls and each proceeded to drain the buckets dry. It was then that the light bulb came on and that perhaps the horses sensed an electric current that I could not detect. After calling out an electrician it was determined that the barn had a poor ground wire. Once this was rectified the horses returned to drinking from their troughs and the young Holsteiner filly walked to the paddock the next morning without missing a step. The current she had so detested was now of no consequence. I learned that horse's sense of electric current was much more in tune than my own. Perhaps I will think twice now before placing my hand in a water trough that my horse will not drink from.

14844-117 Regina has provided me with a more classical look at the dressage sport and has helped me to grow and develop as a rider. I continue to travel from Rosalia, WA to Castle Rock, WA to help progress my horses training as well as develop my riding skill set. Regina is the closest access for me to a trainer schooled in the aspects of "Classical Dressage".

14844-117 These power lines will have a direct effect on Alpha Riding Academy and will pose threats to client relations if they do not feel that they can attain the relaxed environment they are looking for to train and develop their horses in. Reduced clientele to a business not only has an immediate effect on the owners but also an effect on the community. Many of Regina's clients travel from outside the area and support local businesses in the community when they come to stay for their training sessions.

14844-118 Relocation is not a valid option in this economy when looking at comparable facilities' one must have a large budget to invest in such a new venture. The installation of power lines near Alpha Riding Academy will immediately decrease the property value diminishing the chances of any liquidity in the market to obtain investment money for relocation.

Carissa Schmitz ASCP, MLS

References:

1. http://en.wikipedia.org/wiki/Stable_vices
2. <http://www.thoroughbredtimes.com/horse-health/2005/september/10/horses-and-electricity-do-not-mix.aspx>
3. <http://electricalnotes.wordpress.com/2012/02/17/effects-of-high-voltage-transmission-lines-on-humans-and-plants/>
4. [EMF Pollution: The Horse Who Knew More Than His Owners: innerself.com/.../8373-emf-pollution-horse-knew-more-than-owners.html](http://innerself.com/.../8373-emf-pollution-horse-knew-more-than-owners.html)

38 of 54

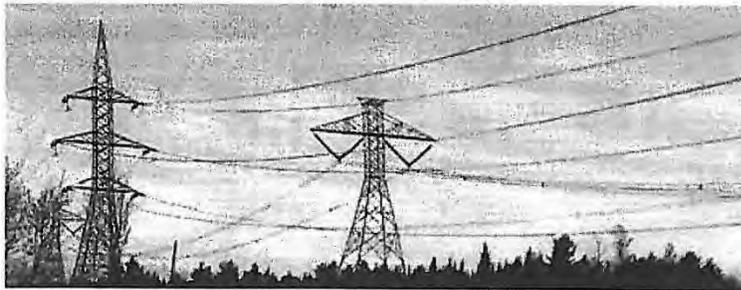
14844-117 Please see the response to Comment 14844-56.

14844-118 Please see the response to Comment 14508-5.

14844

EMF Pollution: The Horse Who Knew More Than His Owners

Written by [Atala Dorothy Toy](#) |  



Several years ago, the McGrearys purchased a large parcel of prairie that had once been a working farm. They were now having severe health issues, and because nothing else had worked, they called me in to assess their land and personal health.

14844-119

The beautiful piece of land stretched way back from a main road, with their house in the middle, a **horse** stable in the back, and strung out catty-corner across the back of the property, crossing within the corral area, was a very tall, very wide line of "marching" power lines. I could see and sense the energy leaking and looping out from those monsters!

To add to the unfortunate situation, the energy of the area was dry, which is a powerful **EMF** (electromagnetic field) conductor, and there were very few trees to counteract the EMFs. The large tower nearest the stable and the McGreary home had been placed on a major ley line that traveled crosswise down the entire length of the property, passing some fifty feet from the home. Most of the plant life along that ley line was yellow, stunted, or seriously warped.

Effects of Severe Electromagnetic Pollution

The whole family showed the **effects** of severe electromagnetic pollution. Their energy was dull and their skin soggy — a "look" that occurs as electromagnetic pollution is absorbed into the body. Everyone in the family was having digestive problems, diarrhea, and skin issues. Their nerves were seriously jangled.

There were currently two **horses** in residence. One, a long-time resident whose health was stable, was standing in a corner farthest from that tower. This was his favorite spot. The other, recently purchased and whose health was deteriorating, was drinking from a water trough the family had unknowingly placed right on the polluted ley line.

39 of 54

14844-119 Please see the response to Comment 14328-6.

"The **horse** has been giving us such problems," Mr. McCreary complained. "He keeps nudging the trough until it's ten feet away from where we place it; we have to keep repositioning it." The **horse** clearly sensed the energetics of the situation far better than the humans did!

The McCrearys were puzzled by that **horse's** poor health. "We buy a healthy **horse**, then its health starts to deteriorate. Then, when we sell it, it regains its health with its new owner."

Horse Farm with EMF Pollution: What A Deal!



The "funny" thing about power lines is that their energy loops out. If an object is in the weak part of this wave, the energy is bearable. If an object is on the loop itself, the object feels it strongly. And if an electrical source is not properly grounded and the wires not properly insulated, the energy can go into the ground itself.

14844-119

Animals forced to live in such an area begin to lose their vibrant energy, and their coats get dull and mangy. The **horse** who had lived there a long time had found a safe area where the loop was not touching down; the newer **horse** had not.

I showed the McCrearys these various situations and explained that the energy was so strong, the best option was for them to move. However, the family was not interested in moving away. They said they had been able to afford this land, which had been sold at a lower rate than surrounding **horse** farms, and they would not be able to replicate such a "deal" elsewhere!

How to Mitigate the Effect of the Major Ley Lines

The best that could be achieved in this situation was to help the family mitigate the **effect** of the major ley lines. They needed to make certain they did not place along either line any objects with which they needed to be in repeated or prolonged contact — especially along the one the power lines were on and the one crossing that.

They also needed to move the water trough out of the electrical loop so that the **horses** could drink healthier water. Water conducts electrical energy, so when electrical current goes through water on a ley line, the problem is amplified.

The third strategy was to see if there was some way to shift the affected **horse's** stable stall (which was clearly affected, while the other **horse's** stable stall was not), and extend the corral in the area farthest from the tower where the other **horse** hung out. That **horse**

This page intentionally left blank.

14844

had commandeered the small clear space for himself, not letting the newer horse use it — a sensible self-protection for the alpha horse.

Tools to Help Clear the EMF Energy

The house was on another loop of the power line, so the solution was to install a mitigating device — a Slim Spurling agricultural harmonizer, developed by a team of people, some of whom had been teaching at the Colorado School of Mines. The harmonizer emits a bubble of clear energy that spans a several-mile radius. It would help keep the farm energy clear.

I also recommended that each of the humans wear an EMF ceramic clearing pendant and that they plait a ceramic clearing bead into the horses' manes. These ceramic devices resonantly help to rebalance the energy fields back to zero point optimal health. Of course, everything has its limits, and clearing devices can only mitigate in the case of steady unhealthy oscillations such as what this family was enduring.

This was all I could do to assist the family.

14844-119

EXERCISE: Check Out Your Surroundings

Look around your house for power lines and step-down transformers. Learning to feel/sense the path of these energies helps you create a healthy environment.

Are there generators for underground lines near your property? If you have in-ground generator stations, consider what types of bushes you could plant around them and at what distance, in keeping with local ordinances.

If a house is in close proximity to one of the community generators that are way stations for underground electricity, it helps to plant evergreen bushes such as yews all around the generator, place large boulders that can mitigate EMFs such as granite and obsidian, and make certain children do not play near it. Evergreens such as yews and pines are good buffers, absorbing the frequencies and actually thriving on this energy.

*This material was reproduced by permission of Quest Books,
the imprint of The Theosophical Publishing House
(www.questbooks.net) ©2012 by Atala Dorothy Toy.*

41 of 54

This page intentionally left blank.

14844

KEY DEVELOPMENTS IN DRESSAGE EDUCATION

- 1998 USEF Junior Dressage Team Championships. Recognizes the Country's top 12 Junior Riders in a unique team competition.¹
- 2001 First FEI North American Junior Championships. Will serve as the "elite" Junior Program to dovetail with elite High Performance Program.¹
- 2004 USEF Young Horse Program. Provides recognition for 5-6 year old young horse dressage prospects. Promotes correct development of future FEI-level horses and offers a showcase for breeders.¹
- 2005 Charged Lendon Gray with creating a program to promote more ponies in dressage and capture this neglected part of our dressage education.
- 2005 USEF Dressage Medal Program. Designed to promote and award excellence in the correct seat, position and use of aids for Juniors (up to 18 years of age).¹
- 2006 Initiated the Brentina Cup to assist riders under age 28 in making the transition for Senior Grand Prix. In the initial year, the Intermediare II test was used because riders were familiar with it. In 2007, a special test was designed to include all the Grand Prix movements, but be a bit less demanding.¹
- 2006 Created position of Coach for Developing Riders and Developing Young Horses. Now a rider with a capable 4-to-7 year-old will have a place to go for help and guidance. As soon as a horse looks promising for the FEI Levels, he'll be under the wing of one of the developing coaches.^{1,2}
- 2009 Created position of Youth Coach.

¹ Anne Gribbons, "I Wish We'd Had These Programs for My Generation," *Chronicle of the Horse*, June 14, 2006.

² Anne Gribbons, "In 2006, We Finally Built a Pipeline," *Chronicle of the Horse*, February 20, 2007.

42 of 54

13 of 54

COLLECTIVE MARKS:			
GAITS (freedom and regularity)		1	
IMPULSION (desire to move forward, elasticity of the steps, suppleness of the back, engagement of the hindquarters)		2	
SUBMISSION (attention and confidence, lightness and ease of movements, acceptance of the bridle, lightness of the forehand)		2	
RIDER'S position and seat		1	
RIDER'S correct and effective use of the aids		1	
HARMONY between rider and horse		1	
FURTHER REMARKS:		Subtotal: _____ Errors: (_____) Total Points: _____ (Max: 370)	



UNITED STATES EQUESTRIAN FEDERATION
THE NATIONAL GOVERNING BODY FOR EQUESTRIAN SPORT

United States Equestrian Federation, Inc.

2011 Fourth Level Test 2

Name of Competition

Date of Competition

Name and Number of Horse

Name of Rider

Final Score

Points

Percent

Name of Judge

Signature of Judge

©2010, United States Equestrian Federation

1844

14844

		2011 Fourth Level Test 2		NO.	
		<p>Purpose: To confirm that the horse has developed sufficient suppleness, impulsion and throughness to perform the Fourth Level tests which have a medium degree of difficulty. The horse remains reliably on the bit, showing a clear uphill balance and lightness as a result of improved engagement and weight-carrying by the hind quarters. The movements are performed with greater straightness, energy and cadence than at Third Level.</p> <p>Introduce: Working half-pirouettes in canter; multiple flying changes on diagonal; counter change of hand in trot.</p> <p>READER PLEASE NOTE: Anything in parentheses should not be read.</p>		<p>CONDITIONS: Arena: Standard Average Ride Time: 5:30 (from entry at A to final halt) Maximum Possible Points: 370 *Double Bridle Optional*</p>	
				Coefficient	
TEST	DIRECTIVE IDEAS	POINTS	↓	TOTAL	REMARKS
1 A X	Enter collected canter Halt, Salute Proceed collected trot	Straightness on centerline; quality of canter and trot; straight, immobile, attentive halt; clarity and balance of transitions.			
2 C M-B	Track right Shoulder-in right	Consistent tempo; engagement and cadence of trot; angle, bend and self carriage in shoulder-in.			
3 B-K K-A	Medium trot Collected trot	Consistent tempo; moderate lengthening of frame with elasticity and suspension; straightness, engagement and self carriage throughout; well defined transitions.			
4 A D-E	Down centerline Half pass left	Consistent tempo; bend and balance in turn; engagement and cadence of trot; alignment, bend, fluency, lateral reach and self carriage in half pass.		2	
5 E-G C	Half pass right Track left	Consistent tempo; engagement and cadence of trot; alignment, bend, fluency, lateral reach and self carriage in half pass; bend and balance in turn.		2	
6 H-E	Shoulder-in left	Consistent tempo; engagement and cadence of trot; angle, bend and self carriage in shoulder-in.			
7 E-F F-A	Medium trot Collected trot	Consistent tempo; moderate lengthening of frame with elasticity and suspension; straightness, engagement and self carriage throughout; well defined transitions.			
8 A KXH	Collected walk Extended walk	Clarity and balance of transition; regularity, lengthening of frame and clear overstep maintaining light contact; straightness.		2	
9 H C	Collected walk Half-pirouette right, proceed collected walk	Well defined transition; activity of hind legs, bend, fluency and size of half pirouette.			
10 H	Half-pirouette left, proceed collected walk	Activity of hind legs, bend, fluency and size of half pirouette.			
11	(Collected walk) HCHC	Quality, regularity and energy of shortened and heightened steps of collected walk.			
12 C	Collected canter right lead	Clarity, calmness, straightness and self-carriage in transition; collection of walk and canter.			
13 M-F F-K	Medium canter Collected canter	Consistent tempo; moderate lengthening of frame with elasticity and suspension; straightness, engagement and self carriage throughout; well defined transitions.			
14 K-X Near X	On diagonal Develop very collected canter. Working half-pirouette right approximately 3 m diameter Proceed collected canter	Well defined transition to very collected canter; bend, fluency, self carriage, lowering of haunches and size of half pirouette; straightness on diagonal.		2	
15 Before K	Flying change of lead	Correctness, straightness, clarity, fluency and self carriage in flying change.			
16 F-M M-H	Extended canter Collected canter	Consistent tempo; lengthening of frame with elasticity, suspension and utmost ground cover; straightness, engagement and self carriage throughout.			
17	(Transitions at F and M)	Well defined transitions maintaining straightness, engagement and self carriage.			
18 H-X Near X	On diagonal Develop very collected canter. Working half-pirouette left approximately 3 m diameter Proceed collected canter	Well defined transition to very collected canter; bend, fluency, self carriage, lowering of haunches and size of half pirouette; straightness on diagonal.		2	
19 Before H	Flying change of lead	Correctness, straightness, clarity, fluency and self carriage in flying change.			
20 MXK	Three single flying changes of lead, the first change near first quarterline, second change near X, and third change near last quarterline	Engagement and collection of canter; straightness, clarity, fluency and self carriage in flying changes.			
21 A	Collected trot	Clarity and self carriage in transition; engagement and cadence of trot.			
22 FXH H-R	Extended trot Collected trot	Consistent tempo; lengthening of frame with elasticity, suspension and utmost ground cover; straightness, engagement and self carriage throughout.			
23	(Transitions at F and H)	Well defined transitions maintaining straightness, engagement and self carriage.			
24 R I G	Turn right Turn right Halt, Salute	Bend and balance in turns; quality of trot; straightness on centerline; prompt, balanced transition; straight, immobile, attentive halt.			
Leave arena at A in walk on a long rein					

This page intentionally left blank.

14844

DEARBORN & MOSS P.L.L.C.

Attorneys at Law

March 25, 2013

Steven W. Manlow
 U. S. Army Corps of Engineers
 Regulatory Branch

Re: NWS-2011-346 Impact on High Performance Dressage Horses –
 Segment F and Towers F/15 and F/16

Dear Mr. Manlow:

14844-120 We represent Regina and Brian Agren, owners of a 5.8 acre property at [redacted]. The Agrens reside on the property with their son Isaac. More importantly for the purposes of this letter, Regina owns and operates Alpha Riding Academy, a facility for the training and boarding of dressage horses from their start through high performance and a woman-owned small business. High performance dressage horses are athletes in which their owners have made a significant investment. The needs of a training facility for such athletes are entirely unlike barns which board pleasure horses or properties on which livestock is pastured. Quality care, fitness, complete focus, suppleness, and relaxation are all required for success.

14844-121 In this letter, we offer comments on three topics: (1) the adequacy of BPA's DEIS¹; (2) impacts on the aquatic environment; and (3) whether BPA's Preferred Alternative is in the public interest.

DEIS

14844-122 BPA prepared a DEIS which analyzes 4 main alternatives as well as 3 variations of each alternative. It is publicly taking the position that, not only has it not yet made a final route decision, it not yet decided whether to proceed with the project at all. Therefore, we were a bit surprised to receive notice that it has submitted a JARPA for its Central Option 1. The application seems premature at best.

14844-123 Our first concern is that the DEIS fails to analyze impacts on dressage horses intended for high performance – whether they are green or highly trained. Its only acknowledgment of horses is a mention in passing that horseback riding is a form of recreation.

Our concern focuses on the impacts of a northern portion of Segment F and Towers F/15 and F/16. The enclosed aerial photograph² shows the location of Alpha Riding Academy in relation

¹ Draft Environmental Impact Statement for the I-5 Corridor Reinforcement Project, November, 2012.

² DEIS, Appendix C-d, Segment Sheet 03.

2183 Sunset Ave. SW
 Seattle, Washington 98116
 Phone: (206) 923-0816 Fax: (206) 923-0814

45 of 54

- 14844-120 Please see the response to Comment 14844-1.
- 14844-121 Thank you for your comments. Specific comments are addressed below.
- 14844-122 The JARPA form submitted to the USACE in November 2012 was a preliminary JARPA submittal. The preliminary JARPA is intended to provide estimates of impacts to Waters of the U.S. and to facilitate public comment on the 404 permit process. A revised JARPA will be submitted following wetland and stream delineations, final impact analysis, and mitigation planning.
- 14844-123 Please see the response to Comment 14844-2.

14844

Steven Manlow
 March 25, 2013
 Page 2 of 8

14844-123 to the relevant portion of Central Option 1. Alpha Riding Academy's main features (small barn, large barn with covered riding arena and a round pen) are clearly visible. The centerline of the right-of-way is 75' from the northwestern sand turnout; 130' from the northern barn which houses breeding/performance stallions; 250' from the arena barn and round pen. Many mature trees in the proposed right-of-way would have to be removed, with the result that the turnouts, barns, riding arena, and round pen would have no shielding whatever from the transmission lines and towers.

14844-124 After a careful review of BPA's DEIS, we have concluded that Alpha Riding Academy would not be able to function adjacent to BPA's transmission lines and towers, due primarily to construction impacts, which would force the Academy to close during construction with potential long term impacts to its viability, and to the coronas, noise, and nuisance shocks generated by operation of the lines. Please see the enclosed letter to BPA, which we incorporate by reference herein, for a detailed explanation of our concerns.

Impacts to the Aquatic Ecosystem

14844-125 No discharge of dredged or fill material is permitted if there is a practicable alternative to the proposed discharge that would have less adverse impact on the aquatic ecosystem. 40 CFR § 230.10(a). An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes. 40 CFR § 230.10(a)(2). If an activity is not water-dependent, practicable alternatives with less adverse impact to the aquatic ecosystem are presumed to exist unless the applicant clearly demonstrates otherwise. 40 CFR § 230.10(a)(3). BPA's proposal is not water dependent.

14844-125 BPA has chosen Central Option 1 as its preferred alternative. The DEIS demonstrates that there are alternatives available that would have lesser impacts on the aquatic ecosystem, primarily wetlands and riparian buffers. Therefore, it does not appear that the Corps of Engineers can issue a permit for Central Option 1.

In its comment letter on the scope of the EIS, the Environmental Protection Agency ("EPA") urged BPA to develop alternatives that avoid as much as possible streams, riparian areas, wetlands, and other environmentally sensitive areas.³ It also advised BPA that use of existing right-of-way corridors is generally preferred to avoid disturbance to previously undisturbed areas.⁴ Central Option 1 does not accomplish either goal.

Riparian Buffers

14844-126 Central Option 1 would require clearing of forested vegetation along 69 fish bearing streams. For 50 of these streams, the vegetation provides high shade function. As the table below demonstrates, this alternative not only crosses the greatest number of fish bearing streams, it crosses the greatest number of streams at a location where the vegetation that would have to be removed provides a high shade function.

³ November 20, 2009 Letter from EPA to BPA (Communication ID: 11792) available on BPA's website under "Library" (scroll down to "Public Meeting and Comments," "Comment Summaries," "Appendix C").

⁴ *Id.*

46 of 54

- 14844-124 Please see the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.
- 14844-125 BPA's Preferred Alternative was identified after analyzing impacts to all the resources present within the project area. Aquatic resources were one of the many resources considered by BPA in an effort to balance impacts and identify the Preferred Alternative.
- 14844-126 Comment noted.

14844

Steven Manlow
 March 25, 2013
 Page 3 of 8

Riparian Impacts - Number of Streams Crossed⁵

Alternative	Clearing of forested riparian vegetation on fish-bearing streams	High shade function	Low shade function
West Option 2	46	18	28
West Option 1	46	19	27
East Option 1	46	24	22
West	47	19	28
West Option 3	51	20	31
East	52	35	17
Crossover	55	32	23
Crossover Option 2	56	32	24
East Option 3	56	39	17
Crossover Options 1 & 3	58	33	25
East Option 2	59	40	19
Central Option 3	60	47	13
Central Option 2	63	40	23
Central	68	49	19
Central Option 1	70	50	20

Wetlands

14844-127

Central Option 1 would clear 70 acres of forested wetlands and 16.5 acres of scrub-shrub wetlands and fill more than 19 acres of wetlands. As the table below demonstrates, while Central Option 1 would fill fewer acres of wetlands than the other alternatives, it would clear a greater number of acres of forested wetlands than all alternatives other than Central Option 2 and have greater overall impacts than 4 other alternatives.

⁵ Source: DEIS Table 15-2.

47 of 54

14844-127 Between the Draft and Final EIS, wetlands and streams were surveyed in the field along the Preferred Alternative. Chapter 16, Wetlands, has been updated with this additional information.

Steven Manlow
March 25, 2013
Page 4 of 8

Wetland Impacts – In Acres⁶

Alternative	Wetland Clearing			Wetland Filling			Total Impact
	Forested	Non-Forested	Total Clearing	Forested	Non-Forested	Total Fill	
Central Option 1	70	16.5	86.5	3.6	15.6	19.2	105.7
East Option 2	65	16	81	4.4	14.9	19.3	100.3
Central	69	16	85	4	15.5	19.5	104.5
Central Option 3	67	15.5	82.5	4.7	16	20.7	103.2
East Option 3	62	22	84	5.7	15.5	21.2	105.3
East	61	23	84	6.3	16	22.3	106.3
Central Option 2	74	15.3	89.3	6.8	15.6	22.4	111.7
East Option 1	63	31	94	7.6	18.3	25.9	119.9
Crossover Opt. 3	56	37	93	6.8	19.2	26.0	119.0
Crossover Opt. 2	54	38	92	6.8	19.4	26.2	118.2
Crossover	53	35	88	7.7	19	26.7	114.7
Crossover Opt. 1	61	36	97	8.3	19.9	28.2	125.2
West Opt. 2	46	59	105	4.8	28.7	33.5	138.5
West Opt. 3	49	60	109	5.0	28.7	33.7	142.7
West	54	62	116	5.6	32	37.6	146.6
West Opt. 1	59	64	123	6.6	35.7	42.3	165.3

14844-127 While BPA has not submitted its alternatives analysis, its DEIS calls into serious question whether Central Option 1 has the least impacts to the aquatic ecosystem.

Public Interest Considerations

14844-128 The Corps must evaluate impacts of the proposal on the public interest, balancing the reasonably foreseeable benefits that may be expected to accrue from the proposal against its reasonably foreseeable detriments. Factors which the Corps considers include a broad range of environmental concerns as well as economics, land use, recreation, safety, property ownership, and the needs and welfare of the people.

Economics

14844-129 As the enclosed letter to BPA explains, the construction and operation of the high voltage electrical transmission lines and Towers F/15 and F/16 are wholly incompatible with the Regina Agren's business: the training of the high performance horses and a children's riding program. Clients have advised Regina that, if the BPA facilities are, in fact, constructed adjacent to Alpha Riding Academy, they would not place horses in her training program. This would not only cause a serious financial hardship to the Agrens, but also an economic loss to the many providers of services to the horses, including, but not limited to, farriers, veterinarians, massage therapists,

⁶ Based on DEIS Table 16-1.

14844-128 Comment noted.

14844-129 Please see the responses to Comments 14495-1, 14884-2, and 14884-56.

14844

Steven Manlow
 March 25, 2013
 Page 5 of 8

14844-129 | acupuncturists, feed stores, and hay growers. Many students would be no longer haul their horses in to work with Regina, causing a loss not only to Regina, but to area restaurants, hotels, and gas stations.

Safety

1. *Coronas.*

During “foul” weather, a strong electric field at the surface of wet transmission line conductors can cause a corona, which causes audible noise, electromagnetic interference (static), ozone and nitrogen oxide.⁷ Training young or high performance horses would be unsafe during the corona events, as would teaching students.

14844-130 | The DEIS estimates that coronas will occur approximately 20% of the time, based on weather data collected at the Portland International Airport. We question whether this data is representative of Castle Rock. Data compiled by Brian Agren from a station 11 miles southeast of Castle Rock for the years 2002, 2004, 2006, 2008, 2010, and 2012 demonstrate that, during these years, there were on average 163 days per year with measurable rain - 44.6% of the time. This figure is more than twice as high as the data disclosed in the DEIS for the Portland International Airport. This fact demonstrates not only that the DEIS does not adequately disclose impacts near Castle Rock, but also that it does not disclose the likely severity of corona impacts to Alpha Riding Academy. Fog, sand generated dust, and cottonwood seeds would likely cause coronas during additional days. Nor can one assume that the impact on sensitive, high performance horses is limited to the duration of the coronas – the impact is ongoing as explained in the enclosed letter to BPA – and can be mitigated only by moving the equines to a location remote from the transmission lines.

2. *Nuisance Shocks.*

14844-131 | To the person handling an equine, such a shock is more than a mere nuisance, it can be very dangerous. It also erodes the horse’s trust in the handler and can lead to health problems, training problems, and behavioral vices that are hard to reverse, including weaving, stall chewing, and cribbing.

Land use Impacts/Property Ownership

1. *Alpha Riding Academy.*

14844-132 | The DEIS classifies land use impacts as “high” where BPA project activities would cause a permanent change in land use that is incompatible with existing land use.⁸ An adjacent 500-kV transmission line and towers are not and cannot be made compatible with Alpha Riding Academy. Had the DEIS analyzed the impact, it would have considered this a *high* land use impact and a severe impairment of the Regina Agren’s use of the Agrens’ property.

2. *City of Castle Rock Service Area.*

14844-133 | Between Towers F/15 and F/14, Segment F cuts through the City of Castle Rock’s water service area. This route was chosen because the property is largely vacant and undeveloped. What this decision ignores is the fact that this area is intended to accommodate the City’s projected

⁷ DEIS, pp. S-25, S-75, 8-1.

⁸ DEIS, p. 5-9.

49 of 54

14844-130 Please see the response to Comment 14587-1. The Final EIS has been updated with more relevant weather data across the project area.

See also the responses to Comments 14844-14, 14844-17, 14844-20, 14844-22, and 14844-23.

14844-131 Please see the response to Comment 14844-22.

14844-132 Please see the responses to Comments 14495-1 and 14844-2.

14844-133 BPA's Preferred Alternative is routed outside of the current city limits of Castle Rock but is within the urban growth and water systems service area. More information about the city's urban growth and water systems service area has been added to Section 5.1.2.1 Urban/Suburban, and Section 27.26.2, Washington Local Plans and Programs. Although homes cannot be built in BPA's right-of-way, water, sewer, natural gas and other utilities can be permitted to cross the right-of-way.

BPA understands that the property between F/14 and F/15 has not been platted and remains for sale. BPA would negotiate directly with the property owner of record for an easement across this property at the time of easement acquisition. Section 24.4, Economic Productivity, acknowledges the project's potential long-term impacts on economic productivity in the region. It recognizes the possibility that some areas could be excluded from future urban development.

Construction impacts from the proposed transmission line through this area would be intermittent, temporary and short-term, and contained mostly at the tower sites and mostly along an existing road. If urban development occurs in the future in the urban growth and water services area, the densities would be high (6000 square feet average lot size according to the City of Castle Rock). The Agren property is surrounded to the east, north, and west by large tracts of undeveloped land in the water systems service area. If this land was to be developed, which is preferred by Castle Rock, housing construction impacts would be on-going, potentially for quite some time until all lots were developed.

14844

Steven Manlow
 March 25, 2013
 Page 6 of 8

14844-133 population growth. The City's water service area, shown on the enclosed map as the "retail service area," extends north of the City limits along both sides of Westside Highway to the intersection of Gassman Road and Westside Highway. The City of Castle Rock has planned for the properties in this area to be developed at urban densities and planned that connection and utility fees from this area would contribute needed funds for maintenance of the system. Segment F between Towers F/15 and F/14 bisects the largest undeveloped property. The City is legitimately concerned that bisecting this property and removing a significant area of developable land for the right-of-way will make it economically infeasible to extend utilities 2,000 feet to this property. The DEIS has not examined these impacts.

14844-134 The City has asked that the lines not be located in its water service area.⁹ This could be done by realigning Segment F from Tower F/1 to one of Towers F/17 through F/23 so that the transmission right-of-way crosses the Cowlitz River north of the City's water service area. The Corps of Engineers should require that the Final EIS thoroughly examine this alternative and give great weight to it in its public interest review.

Needs and Welfare of the People

14844-135 We do not question the public need for a reinforcement project. We do question whether choosing an alternative which requires the greatest amount of new right-of-way serves the public need and welfare. In a document entitled "*Why BPA Prefers Central Alternative Using Option 1,*" (BPA, November, 2012), BPA explains that there are 327 homes within 500 feet of the Central Alternative compared to 3,032 along the West Alternative.¹⁰ What this statistic ignores is the fact that almost 98% of the total distance of the West Alternative (66 miles) would be located within *existing* right-of-way.¹¹ We understand from FOIA requests posted on BPA's website that BPA has owned much of that right-of-way – Segments 25 and 9 - for more than 70 years. It is reasonable to assume that the majority of property owners within 500 feet of this *long-existing* right-of-way bought or built their homes with the knowledge that their property was near a BPA right-of-way and that BPA one day might construct facilities within that right-of-way. Their needs in selecting their properties and property values would reflect this risk.

14844-136 In contrast, the Central Alternative would use only 8 miles of existing right-of-way, and according to the DEIS would require the *greatest* amount of new right-of-way (public and private lands) of all of the alternatives examined – 1,287 acres.¹² Although the DEIS states that the Central Alternative would require the greatest amount of new right-of-way, that is not actually the case. Central Option 1 would require even more right-of-way – an additional 42 acres, for a total of 1,289 acres.¹³ Property owners adjacent to these 1,289 acres of new right-of-way had no notice that they were at risk of having high voltage transmission lines constructed

⁹ Undated telephonic comment to BPA from T.J. Kiernan, planner for City of Castle Rock, available on BPA's website by going to "Search Comments."

¹⁰ Figures are not provided for the Option routes, even though one was chosen as the Preferred Alternative. If one is willing to invest the time, he/she can derive them by comparing the segments in each of the options to its "main" alternative and then adding to and subtracting from the total for the main alternative the number the homes near the route segments that are added and deleted, respectively. Those data are provided in a document entitled "Data by Segments and Alternatives - November 2011," available on BPA's website under "Library" (scroll down to "Project Updates").

¹¹ DEIS, p. S-8. "Data by Segments and Alternatives - November 2011".

¹² DEIS, p. S-13.

¹³ DEIS, Table 5-2.

50 of 54

- 14844-134 Please see the response to Comment 14844-27.
- 14844-135 Please see the response to Comment 14110-1.
- 14844-136 Please see the responses to Comments 14495-1 and 14793-12.

14844

Steven Manlow
 March 25, 2013
 Page 7 of 8

14844-136 adjacent to their homes or businesses. Many of these property owners, including the Agrens, specifically sought out property that was *not* near such lines. As explained in our letter to BPA, the Agrens did so based on firsthand knowledge that their intended use could not exist in proximity to high voltage transmission lines.

14844-137 Impacts to owners adjacent to the *existing* rights-of-way were reasonably foreseeable. Impacts to those who sought out different environs were not. Your public interest review should place great weight on this fact. While perhaps not traditionally considered under the rubric of social justice, we contend that imposing impacts to substantial numbers of properties along new right-of-way when there is viable existing right-of-way is a matter of social justice.

In addition, when considering the welfare of the people, the Corps should be mindful of the fact that the Central Option 1, by requiring the greatest amount of new right-of-way, will cause the greatest tax shift by removing property from the County tax rolls and/or reducing its value.

Impact on Small Private Landowners

14844-138 As an agency cooperating on the DEIS,¹⁴ we presume you are aware of the public's request that a northeastern route with the least impact to homeowners be evaluated in the DEIS. This request was made at the earliest possible opportunity – in comments on the scope of the DEIS and in comments made at the scoping meetings, two full years before the DEIS was published.¹⁵ In the fall of 2010, with the assistance of experts, the citizens' group No Lines in Populated Areas proposed an alternate route north and east of the routes BPA had initially identified (the "Grey Line"). BPA ultimately declined to include this alternative. Ironically, two of the reasons BPA offered for its decision were that studying the Grey Line would affect the project schedule and "significantly affect...small private landowners not yet aware of the project...."¹⁶ The affect on project schedule was wholly within BPA's control. It was made aware of the public's strong desire for this alternative during the DEIS scoping period. It could easily have studied this alternative without an affect on its schedule. With regard to impact on small landowners not aware of the project, the same can be said of *all* of the small private landowners along *all* of the potential new segments – including the Agrens.

14844-139 As you made clear in your October 18, 2011 Memorandum for the Record (NWS-2011-346), criteria must be applied *equally* to *all* alternatives. If "affect on small private landowners not aware of the project" is an appropriate criterion for eliminating alternatives, then all alternatives except the West Options must be eliminated. The West Options require 55-119 acres of private land for transmission line right-of-way versus 456-1,027 acres of private land for the other options.¹⁷ The Preferred Alternative would require 891 acres, more than 11 other options.

14844-140 To put this impact in context, we point out that, when BPA announced its plans, *all* of the alternatives crossed the Cowlitz River considerably south of Castle Rock and passed to the west of Castle Rock. The October and December, 2009 Project Maps¹⁸ did not include Segment F.

¹⁴ November 4, 2011 email from Lydia Grimm, BPA to Steven Manlow, et al., Corps of Engineers.

¹⁵ See, e.g., Communication ID Nos. 10972 (comment at Longview open house 10-29-09) and 11495 (comment at Vancouver open house 11-07-09) for a few of the many requests. Comments are available on BPA's website under "Library" (scroll down to "Public Meeting and Comments," "Comment Summaries," "Appendix C").

¹⁶ Evaluation of Northeastern I-5 Route, BPA, January 18, 2012.

¹⁷ Source: DEIS, Table 5-2.

¹⁸ Available at: <http://www.bpa.gov/Projects/Projects/I-5/Pages/Library.aspx>, Project Maps.

51 of 54

- 14844-137 Comment noted. The difference in level of impact to landowners along portions of the route alternatives adjacent to existing transmission line rights-of-way as compared to portions of route alternatives in new rights-of-way is reflected in Section 5.2 of the EIS. See also the response to Comment 14291-3 regarding the topic of property assessments and local tax revenues.
- 14844-138 Please see the response to Comment 14638-4 concerning the reasons why potential routes farther north and east were considered but eliminated from detailed study in the EIS. BPA believes these reasons are a sufficient basis for eliminating this alternative from detailed study. See also the response to Comment 14793-12 concerning BPA's public involvement activities for this project.
- 14844-139 Please see the response to Comment 14110-1.
- 14844-140 Please see the response to Comment 14793-12. BPA did hold a public meeting in August 2010 to present new project information.

14844

Steven Manlow
 March 25, 2013
 Page 8 of 8

14844-140 They included only one location for a substation near Castle Rock, what is now referred to as the Monahan substation site. The October, 2009 map was published in conjunction with the publication of Notice of Intent ("NOI") to prepare an EIS and the commencement of the Scoping Period, which ended on December 14, 2009. The NOI stated that BPA will use comments received during the scoping, continuing discussions with various interested parties, and further transmission line design work to develop route segments into transmission line alternatives to be studied in the draft EIS.¹⁹ Obviously, there was no need for anyone to comment on Segment F as it did not exist at the time. BPA held 7 scoping meetings, none of which took place in Castle Rock. It was not until the August, 2010 so-called "Refinements" map, some eight months after the close the Scoping Period, that this 15.8 mile segment was added.

14844-141 It is difficult to understand Segment F as a simple refinement. Fifty-six homes are within 500 feet of Segment F.²⁰ Segment F requires the acquisition of new or additional rights from the owners of 73 parcels, requires new 47 stream crossings for the right-of-way, 7 of which have Special Status Species, and 8 crossings for new roads outside of the right-of-way.²¹ Segment F is now part of four alternatives (Central, Central Option 1, Central Option 3, and East). The only explanation offered was to avoid "potential impacts to timber harvesting activities."²²

14844-142 As discussed above, the property to the west and north of the Agrens' property is planned for the City's urban growth. The Agrens knew when they acquired their property that these properties were planned for urban growth and that one day they might be surrounded by urban density housing. In contrast, they had no knowledge of potential high voltage electrical transmission lines.

14844-143 Thank you for the opportunity to comment. We look forward to working with you to ensure that whatever configuration the Corps ultimately authorizes does not cause the demise of Alpha Riding Academy.

Sincerely,


 Alison Moss

cc: Regina Agren
 Mark Korsness, BPA

Enclosures:

1. Aerial Photo from DEIS
2. Castle Rock Water Retail Service Area
3. March 25, 2013 Letter from Dearborn & Moss PLLC to BPA

¹⁹ 74 Fed. Reg. 52483.

²⁰ "I-5 Corridor Reinforcement Project – Number of Houses Near Route Segments," available in "Data by Segments and Alternatives - November 2011," contained in BPA's website "Library" (scroll down to "Project Updates").

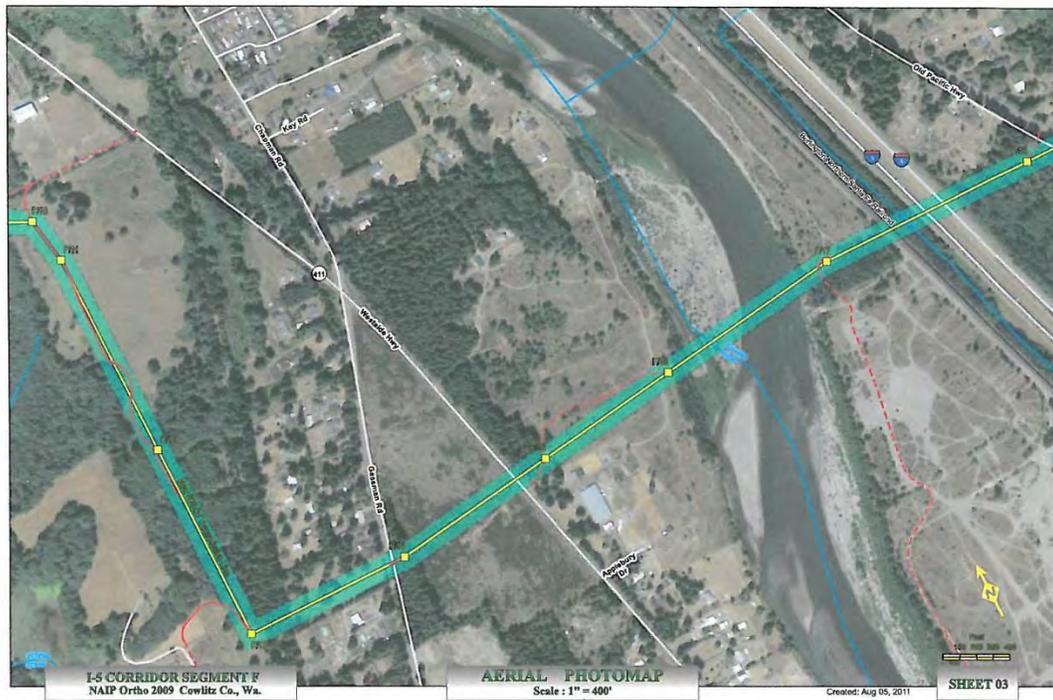
²¹ "Property Parcel Counts by Segment and Alternative," available in "Data by Segments and Alternatives - November 2011."

²² Available at: <http://www.bpa.gov/Projects/Projects/I-5/Pages/Library.aspx>, Project Updates, "Refinements to the I-5 Corridor Reinforcement Project, August, 2010."

52 of 54

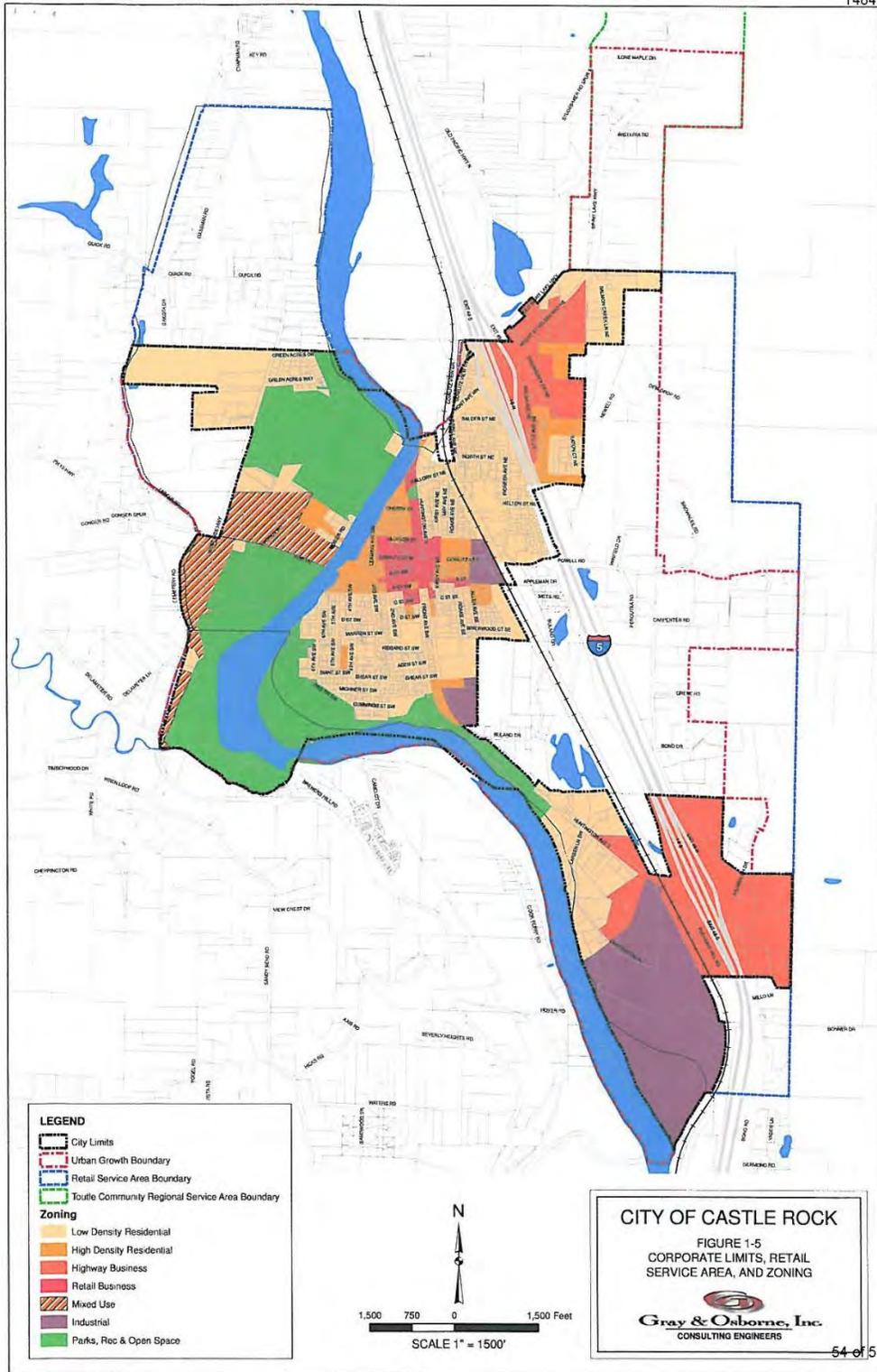
- 14844-141 Segment F and the two additional substations (Baxter Creek and Casey Road) were developed, in part, to respond to numerous comments asking BPA to develop a route that moved east more quickly and crossed more land managed for timber rather than private homes. Segment F still impacts private land, homes, streams, and habitat. These impacts, and others, have been described in the Draft EIS.
- 14844-142 Please see the response to Comment 14495-1.
- 14844-143 Comment noted.

14844



53 of 54

14844





14846_attachment

April 28, 2012

American Land Rights Association
 Attention: Chuck Cushman

Mr. Cushman:

The Bonneville Power Administration intends to build a new 500 kV transmission corridor, known as the I-5 Corridor Reinforcement Project, through Clark and Cowlitz Counties. Other routes have been considered and rejected by BPA.

The goal of A Better Way for BPA and its allied groups is to minimize the impact this project will have on private landowners by choosing a route that takes the least amount of private land. The West Alternative is the route that accomplishes this goal.

The issues are:

1. **Landowner Rights:** Utilizing the data BPA recently released, BPA would need to acquire an estimated **94 acres** of private land along the **EDGES** of its existing right-of-way—the West Alternative. In contrast, where BPA owns no existing transmission right-of-way, up to an estimated **1,055 acres** would be taken **THROUGH** new private land.
2. **Cost:** According to BPA’s estimate, up to 90 million more dollars will be spent to build on any route other than the West Alternative. Federal Recovery and Reinvestment Act loans are financing this project.
3. **Environmental Impact:** There is minimal damage to the environment by using the BPA-owned West Alternative, an existing transmission corridor with a 70-year history. Any other alternative would consume up to an estimated **1,291 acres** of new private and public land with many new river and stream crossings in areas that are home to threatened and endangered species.

14846-1

	West Alternative	Crossover Alternative	Central Alternative	East Alternative
Private Acres	94 acres	492 acres	873 acres	1055 acres
Total Acres	122 acres	783 acres	1291 acres	1273 acres
Cost in Millions	117 Million	363 Million	407 Million	406 Million

We ask that you recognize these facts concerning the impact a new transmission corridor would have on rural homeowners, their private land and their landowner rights, as well as the scenic areas that would be permanently damaged, and the productive timberland that would be permanently lost.

The board members of A Better Way for BPA, our allied groups and members believe private land and landowner rights are worth protecting. We believe BPA should use its existing corridor, land on which this federal agency

Working Together To Preserve Our Landowner Rights
A Better Way for BPA

Dole Valley Landowners’ Coalition • Friends of Upper Lacamas Creek • Friends of Green Mountain Page 1 of 2
 Tum Tum Mountain Area Landowners’ Coalition

14846-1 Comment noted.



14846_attachment

already owns easement rights and where transmission lines already exist, rather than unnecessarily invading and taking an excessive amount of private land for a new transmission corridor.

We believe American Recovery and Reinvestment Act dollars should be spent wisely. It would be a misuse of federal dollars if BPA does not use the land on which it already own rights to build.

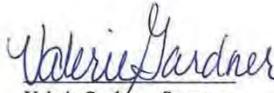
14846-1 In the coming weeks BPA will be releasing their Draft Environmental Impact Statement. We ask that you help us stand up for our property rights and speak out against misuse of stimulus dollars by attending and speaking at an upcoming BPA Open House meeting and commit to comment during the Public Comment Period. We ask that you stand up for property rights by telling BPA to choose a route that would take the least amount of private acreage. Any additional involvement by your organization to protect our private landowner rights from the unnecessary taking of our private land by this federal agency would be deeply appreciated.

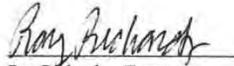
Sincerely,

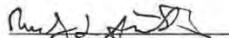
The Board of A Better Way for BPA, our allied groups and members


Cheryl Brantley—Chair


Bolt Minister—Vice Chair


Valerie Gardner—Secretary


Ray Richards—Treasurer


Rod Smith—Media Advisor


Jan Davis—Membership

Name	Address (Optional)
	

Working Together To Preserve Our Landowner Rights
A Better Way for BPA

Dole Valley Landowners' Coalition • Friends of Upper Lacamas Creek • Friends of Green Mountain Page 2 of 2
Tum Tum Mountain Area Landowners' Coalition

This page intentionally left blank.

14847

A BETTER WAY FOR BPA, HELEN BURNS, KENT BURNS, TRISTAN COLCORD, JOSEPH COLLINS ETAL, HOWARD L COOK, RICHARD A DAVIS, CHARLIE DOMBLEWSKI, MARY DUNN, SANDRA FERNEDING, ALICE M GIESE, MARIE FRANCE GRENIER, ROGER GRIGGS, CARLA HAMMER, SHERRY JOY, TREVOR LEVANEN, MAURA QUILLI

03/25/2013

A Better Way for BPA [address]

April 28, 2012

14847-1

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on working forests, wildlife and recreational land would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through the countryside of Clark and Cowlitz counties. All of these rural routes would require new crossings of the No1th Fork and East Fork of the Lewis River and invade private and public forest land. Owners of working forests would suffer a permanent, ongoing loss of the right to grow trees on and adjacent to any new easement.

- Environmental Impact: There is minimal damage to the environment by using the BPA-owned West Alternative, an existing corridor that has been transmitting power for 70 years with a record of reliability, stability and security. BPA would need to acquire an estimated 122 acres of land along the EDGES of this existing corridor. In contrast, any other alternative would consume up to an estimated J ,291 acres, cutting THROUGH new private and public land with many new river and stream crossings in areas that are home to threatened and endangered species.

- Cost: According to BPA's estimate, up to 90 million more dollars will be spent to build on any route other than the West Alternative.

- Scenic Values: The East Fork and North Fork of the Lewis River would both suffer from any of the proposed new routes. Silver Star Mountain, Tarbell Trail, Hantwick Trail and Bell Mountain Trail are examples of popular hiking, biking and horseback riding destinations that would be adversely affected.

14847-2

In the coming weeks BPA will be releasing its Draft Environmental Impact Statement. We ask that you help us in protecting the working forests and recreational lands of Clark and Cowlitz counties by attending and speaking at an upcoming BPA Open House meeting and to comment during the Public Comment Period. We ask that you tell BPA to choose the route that would consume the least amount of acreage, the West Alternative. Any additional involvement by your organization to protect the scenic and recreational lands, working forests, and wildlife habitat of southwest Washington would be deeply appreciated.

14847-1 Comment noted.

14847-2 Comment noted.

14848

United States Department of Energy
Bonneville Power Administration

March 17, 2013

Re: BPA's I-5 Reinforcement Project EIS.

Dear Sirs:

We are writing to make a few general comments on a small section of the Environmental Impact Survey.

14848-1 We appreciate that the report recognizes that the Central Alternative's Option 3,, which includes Route 30, would have a high adverse impact on Recreation in the area of the East Fork of the Lewis River between Moulton Falls and Lucia Falls. The "High Impact" finding is appropriate not only because power lines and towers would disfigure two public hiking trails, they would spoil two key stretches of the Scenic and Historic Chelatchie Railroad.

14848-2 We feel the report understates the impact the Central Alternative Option 3 would have on plants, fish and wildlife. We feel that the adverse impact to Bald Eagles in this area would be high, not low to moderate, siince eagles have been well documented here. In addition to the Wood Duck which was acknowledged in the report, a Merlin would also be impacted. The report makes no mention of an unusual, fully transformed, giant green terrestrial salamander found and documented in Route 30.

14848-3 We also believe Route 30 would have a high adverse impact on an important salmon and steelhead spawning ground in the East Fork of the Lewis River.

14848-4 Our opinions on the project including environmental comments are outlined in our previous letters to the BPA and to the U.S. Environmental Protection Agency. .

Thank you for keeping us informed.

Sincerely,

Stephen M. Bailey and
Donna M. Bailey

Stephen M. Bailey
Donna M. Bailey

1 of 1

- 14848-1 Comment noted.
- 14848-2 The EIS summarizes the distribution of special-status species in Section 18.1.4, Special-Status Species and in Table 18-2, Special-Status Wildlife Species with the Potential to Occur in the Study Area. Bald eagle is reported present for all action alternatives. Impacts on bald eagle are identified as moderate for the Central Alternative because bald eagle are listed as sensitive by WDFW but impacts are not expected to contribute to a need for federal relisting. The conservation status of bald eagle is identified as secure at both the state and federal levels. Merlin was not identified as present in any of the action alternative study areas by WDFW (Priority Habitat and Species Digital Data. Data compiled in 2014. Obtained August 21, 2014, from agency website http://wdfw.wa.gov/conservation/phs/maps_data/). Assuming the commenter is referring to Cope's giant salamander, that species is documented as present in the West, Central, and Crossover alternatives and for all associated options. Impacts on Cope's giant salamander are discussed in Section 18.2, Environmental Consequences, for all action alternatives.
- 14848-3 The EIS summarizes distribution of special-status fish species in Section 19.1, Special-Status Species. Segment 30 would cross the East Fork Lewis River at stream crossing 30-3. Table 19-1 and Map 19-1C indicate that this crossing is used by Lower Columbia steelhead and river lamprey. NOAA Fisheries designated these reaches as critical habitat for Lower Columbia steelhead. Spawning and rearing use is noted. Table D-1 in Appendix K indicates production of adult salmon and steelhead is in the 50th percentile among all anadromous fish-bearing streams crossed by transmission line corridors.
- The EIS summarizes impacts to fish resources in Section 19.2, Environmental Consequences. Table B-1 in Appendix K indicates that riparian vegetation at this crossing currently provides moderate large woody debris recruitment potential. Because the stream is wide (~50 ft), the ability of riparian vegetation to fully block solar radiation to the stream is limited. Development of riparian function is limited by Lucia Falls Road, which is about 25 to 50 feet from the streambank within the transmission line corridor. Overall, impacts would not be as great as if the stream were narrower and without a road in the riparian buffer. Therefore, impacts from clearing of vegetation would be low as noted in Table B-1.
- 14848-4 Comment noted.

I-5 Corridor Reinforcement

14849-1 I am writing to you about the BPA I-5 Corridor Reinforcement Project. Many citizens have talked to BPA and asked them to use the Northeastern route option. [The Northeastern route option (Jan 18, 2012, map 1)] The Northeastern route option has less impact on citizens and cities. There are many known factors in BPA's own study which indicate that the central alternative route option is an unfavorable and poor route.

Impact on Public Interest:

1. Unstable conditions for the central alternative route line.

A. Mudslides (p. 14-1A, 14-1A2, and 14.3).

14849-2 Much of the central line around Castle Rock and Cowlitz County is on unstable ground steeper than 6°.

B. Unstable ground (map 14-1A).

The land between state Route 411 and the Cowlitz River is Mount Saint Helens river spoils with round unstable-shifty and dusty sand. The BPA map shows soil erosion hazard as "severe" over most of the proposed route from Casey Road to south Cowlitz County.

C. Flooding of the Cowlitz River south of the Toutle River.

14849-3 Castle rock has a flood history and has built a flood protection dyke on the east side of the river to protect the city. It would be against BPA policy and a high risk to put a line on the proposed central alternative route option on the west side of the river where a risk of flooding (at F/15 & F/16) onto sandy river spoils exists.

2. Wild life. (p. 27.1, 27.2, & 27.3)

A. Sensitive species at Segment F-towers F/15 & F/16.

a. Red legged frog.

14849-4 In a small water inlet (a naturally occurring cut off section of the Cowlitz River), which supports the unique habitat of the red legged frog.

b. Disregard-intentional act by BPA at bald eagle habitat (p. 27.3 & p. 27.5).

c. Disregard of breeding season and feeding of young bald eagles.

d. Disregard for safety of bald eagles while foraging, nesting, and perching.

e. Disruption and loss of habitat during bald eagle breeding season caused by EMF.

Bald eagles are (each year) hunting, and feeding their young from early spring until fall at this location.

- 14849-1 Please see the response to Comment 14443-1 regarding the elimination of potential routes in Oregon from detailed study in the EIS. Section 4.7.2.4, Northeastern Alternative, North of Silver Lake, Washington, explains why potential routes farther east were considered but eliminated from detailed study. BPA believes that the reasons provided in the EIS for eliminating these alternatives sufficiently explain their elimination.
- 14849-2 Comment noted. Please see the response to Comment 14737-1.
- 14849-3 As stated in Section 15.2.2.1, Construction, towers, substations, and access roads would be sited to avoid floodplains as much as possible. Where unavoidable, towers constructed in a floodplain would be designed to allow water flow around the tower legs. Also, the volume of the tower footings relative to the volume of floodplain storage would be inconsequential given that towers would only be placed in floodplains that are too large to span.
- 14849-4 Table 18-2, Special-Status Wildlife Species that Occur in the Study Area, lists those special-status species with the potential to occur along the action alternatives (based on preferred habitat) and identifies those that are documented to occur within a 2-mile-wide corridor in the study area based on information in the databases listed in the Sources footnote of the table.

Section 18.2.8, Recommended Mitigation Measures, recognizes the need to avoid construction activities near active nests during the breeding season. A measure is also included to install appropriate bird flight diverters on overhead ground wire or fiber optic line in areas of high risk for bird collisions.

Electric and magnetic fields and their impacts are discussed in Chapter 8, Electric and Magnetic Fields.

14849-5	<p>3. Taxes:</p> <p>A. Near and distant future. This route would create high economic burdens to all the citizens and schools in Castle Rock, it would cause the devaluation of property and limited land use. It would limit the "Higher and Better" use of river front property and suburban use for planned growth of the city. Tax income would then be affected.</p> <p>B. The city of Castle Rock would be permanently damaged as to the type of growth that could take place and where it could occur, again affecting taxes.</p> <p>C. Castle Rock schools, already in a poverty area, would be impacted by even more financial burden and lowered tax base and population.</p>
14849-6	<p>4. CO2 emissions and health risk.</p> <p>A. Washington state has double the emissions compared to Oregon, and almost 3 times the amount of Montana.</p>
14849-7	<p>B. Health risk of EMF's such as increased blood cancer in children and conflicting EMF study outcomes. Conflicting study outcomes leaves the safety of EMF's questionable.</p>
14849-8	<p>5. Tourism:</p> <p>Castle Rock has been working on, and looking at details (for several years) in order to grow businesses, jobs, tourism, and a family friendly community. Castle Rock has received \$350,000 for development, and has been making many improvements. The proposed central alternative route is located on the east side of the city limits and goes over state Route 504 (State Scenic Byway), also known as National Forest Scenic Byway. This tourist attraction is called (THE GATEWAY TO MOUNT SAINT HELENS) BPA's line is ethetically UGLY and would have a negative impact. It's right on the city limit line which could discourage positive growth (such as restaurants and more's), as well as tourism.</p>
14849-9	<p>6. Recreation:</p> <p>A. Boating & fishing:</p> <ul style="list-style-type: none"> a. Near F/16 a boating dock is located on the west side of the Cowlitz river. b. Near proposed line F/16 is a popular fishing area. <p>B. Low-flying man made personal recreational planes.</p>
14849-10	<p>7. Common flight route</p> <p>The Kelso Airport stated that there is a common flight route along the Cowlitz river near F/16. This common flight route is used by low-flying aircraft and helicopters from the Army base during low inversion weather and other times.</p>

- 14849-5 Please see the responses to Comments 14171-5, 14291-3, and 14642-2.
- 14849-6 Comment noted.
- 14849-7 Please see the response to Comment 14322-1.
- 14849-8 Please see the response to Comment 14674-1. See also Chapter 6, Recreation, which describes the potential impacts of the project on recreational resources and Chapter 7, Visual Resources, which describes the potential impacts on views.
- 14849-9 See Section 6.2.2, Impacts Common to Action Alternatives, for a discussion of impacts to fishing. Fishing activities are considered compatible with transmission line rights-of-way. During the construction phase of the project there would be temporary, low-to-moderate impacts on fishing activities in areas where line crossings require temporary closures for vegetation removal, wire stringing and other project-related actions. During operation and maintenance of the project, while there would be infrequent (twice yearly) maintenance inspections of the line, these would not cause permanent impacts to fishing activities.

Regarding personal aircraft use, all towers constructed in the vicinity of river crossings would be marked with FAA approved lighting, lines would be strung with marker balls, and all project elements would be subject to and consistent with FAA regulations related to aircraft use of approved airspace in the vicinity.

- 14849-10 At its closest point, the Preferred Alternative is over 8 miles away from the Kelso airport and at the Cowlitz River crossing over 12 river miles away. Per FAA requirements, the project design would be reviewed for towers over 200 feet to see if markers need to be placed on the towers or the conductors. In certain situations, BPA, with or without FAA guidance, may elect to place markers on the conductors or towers for low flying aircraft. Presently, towers at the Cowlitz River crossing are no higher than 175 feet. This could change as project design becomes more refined.

To ensure compatibility with existing airspace and use by military or other aircraft, all towers over 200 feet constructed in the vicinity of river crossings would be marked with FAA approved lighting, lines would be strung with marker balls, and all project elements would be subject to and consistent with FAA regulations related to aircraft use of approved airspace in the vicinity.



This page intentionally left blank.

14849

14849-11 The proposed central alternative line is not in BPA's best interest due to all that was stated above. The proposed line would permanently stunt Castle Rocks growth. This central alternative would prevent the "Higher & Better" use of land around Castle Rock, leaving an unfavorable result for all. The goal should be to minimize the negative impact on citizens of Cowlitz and Clark counties.

14849-12 To our elected state officials, Governor, and federal officials: Please reopen the SCOPING. The preferred central alternative option line is near 173 homes whereas the northeastern route option is near 16 homes. By using a route (the central alternative option) that wipes out the higher value and best land-use, a permanent burden is placed on taxpayers in our county and state. It has been stated many times that even though the northeastern route would be estimated to cost 10% more than the central alternative route, proceeding with a late on the central alternative route would result in a greater negative economic impact.

Sue Sahara

Thank you



4 of 5

14849-11 Comment noted.

14849-12 Please see the response to Comment 14472-3 concerning how BPA identified its Preferred Alternative, and the response to Comment 14800-5 regarding re-opening the EIS scoping period.

This page intentionally left blank.

14850

I-5 Corridor Reinforcement Project

14850-1

Environmental Impacts on BPA'S "preferred" Central Alternative versus West Alternative

Building this new corridor would consume 1500 acres of rural land creating an 80 mile long permanent clear-cut. As stated in Chapter 19.2.5 of the DEIS, "Riparian vegetation would be cleared at 68 forested crossings of fish-bearing streams... Among the action alternatives, this would be the greatest number of forested crossings... impacts to loss of shade function would be high. Most crossings (46) would also occur where the existing riparian vegetation provides high large woody debris recruitment potential; impacts to loss of large woody debris function would be high. This is the greatest number of high riparian function impacts among the other alternatives because of the greater number of forested crossings and because riparian vegetation at these crossings provide relatively greater shade and large woody debris function." In contrast, Chapter 19.2.4 of the DEIS states "...the West Alternative...crosses floodplains that are already greatly affected by existing agricultural and residential uses that have caused widespread clearing, road construction, ditching, filling, and grading. ...Because of the existing degree of impairment and disconnection of floodplains crossed by this alternative, impacts...would be low."

BPA must reexamine its choice of a preferred alternative. Based on its own data as shown above, the riparian impacts on the Central Alternative would be HIGH, whereas these impacts to the West Alternative would be LOW.

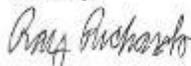
14850-2

Visual Impacts on West, Central, Crossover and East Alternatives

In Chapter 7 of the DEIS, figures 7-1 through 7-9 show pairs of photographs of the existing transmission corridor at various locations. The first of each pair is how the site appears now. The second is a simulation of how it would appear with an additional power line. This is a good demonstration showing that not much changes when power lines are added to an existing transmission corridor. Now let's take a look at what BPA seems to think the visual effects would be on the other alternatives. Figure 7-10 is of a restroom at Lake Merwin on the Central and Crossover Alternatives. Figure 7-11 shows a clearing and a muddy road on the East Alternative. **That is all!** Where are the before and after shots of views toward Mt. Saint Helens, Tum Tum Mountain, Silver Star Mountain, Mount Adams and Mount Hood that would be ruined by a new corridor? Where are the before and after shots of the 68 forested fish-bearing river and stream crossings where the riparian zones are permanently destroyed by ugly 150 foot wide clear-cuts to the shoreline? Obviously, BPA made no serious effort to compare visual impacts between their four alternatives.

BPA must do a complete and honest analysis of the visual impacts on all alternatives.

Sincerely,



Ray Richards

1 of 1

- 14850-1 Comment noted. Please see the response to Comment 14492-3.
- 14850-2 Please see the response to Comment 14171-10 for further explanation of the methodology used in the visual assessment.

14851

I-5 Corridor Reinforcement Project

March 20, 2013

Wetlands and Double-Circuiting on the West Alternative

Three main points:

1. Wetlands are already impacted on the West Alternative.
2. Double-circuiting would result in no net loss of wetlands.
3. BPA has neglected to study how it can build a new 500-kv line on its existing right-of-way with no significant impact on wetlands.

Chapter 16.2.4 reads: "All forested wetlands within new and existing transmission line right-of-way and where crossed by access roads would be cleared. About 54 acres of forested wetlands would be cleared within new and existing right-of-way..."

Chapter 16, page 13 (16-13) of the DEIS states: "Fill for tower footings and access roads would also be placed in 25 acres of forested and non-forested wetlands ... including along the Coweeman, Lewis, and East Fork Lewis rivers, and Salmon and Lacamas creeks"

14851-1

There is no mention of double-circuiting to minimize impact to these wetlands. BPA should be planning for double-circuiting at all these locations, removing old towers and footings, and decommissioning unneeded access roads. Wetlands should be restored wherever towers or roads are decommissioned. However, the only place where double-circuiting is proposed is in Chapter 4.2.1 for route segments 40 and 46 northwest of Camas.

Chapter 3-6: "If existing lines are removed, the entire structure or tower footing would only be removed if the footing interfered with placement of the new tower." This shows that BPA has made no effort to study how impacts to wetlands of the West Alternative could be avoided or mitigated by removing tower footings and restoring wetland function.

Conclusion: Double-circuiting would result in zero long-term net loss of wetlands since towers would be replaced, not added, on the existing corridor. Existing access roads would either be used or decommissioned and replaced. The footprint of the project on these wetlands would be no more than it is now. BPA has made no serious study of how to use its existing corridor with minimal impact to wetlands. BPA has chosen a preferred alternative without adequate study of its existing right-of-way, the West Alternative. BPA must perform a complete study of double-circuiting and triple-circuiting on the West Alternative to minimize damage and prevent any long term loss of these wetlands. BPA must also request a permit from the US Army Corps of Engineers to build on the West Alternative using the best possible methods to protect its wetlands.

Sincerely,



Ray Richards

1 of 1

14851-1 Please see the response to Comment 14460-1.

14852

Saturday, February 23, 2013

Congresswoman Jaime Herrera Beutler

re: BPA

14852-1

Your Aid Deputy District Director, Shari Hildreth, attended the Clark County Farm Forestry Association (CCFFA) Annual meeting Friday, February 22, 2013, in Battle Ground, Wa. She spoke on your behalf regarding the BPA "proposed" power line. After the meeting I was able to talk to her for a few minutes and she suggested I write you a note regarding my position concerning an easement access on the south portion of my Family Tree Farm.

14852-2

In reviewing the data that was provided by Paul Brachvogel, General Council for Cowlitz County Commissioners, I believe that BPA has the option to lease land subject to power line R/W.

Because Tree Farming is a long term business for producing income. Any land lost to production is lost income and should be fairly compensated for. Also Family Tree Farms are planned for current and future generations. Compensation should extend through the life of the BPA power line, at which time the land should revert back to the Tree Farm.

My position is to negotiate a lease with BPA to adequately compensate myself and heirs for the loss of highly productive tree growing land.

14852-3

Any help you can provide would be greatly appreciated. I have taken the liberty of enclosing the Memorandum from Paul Brachvogel dated 11/10/2010 and a copy of my propose negotiating points with BPA

14852-4

Please note that I have used a conservative per acre yield of 35 MBF whereas expected yield is closer to 40+MBA. The numbers will be refined at the time of negotiations with BPA.

Thank you,

Sincerely



Richard D. Easter

1 of 6

- 14852-1 Thank you for your comments. Specific comments are addressed below.
- 14852-2 If BPA decides to build this project, it would acquire perpetual easements for the proposed transmission project. Please see the response to Comment 14566-9.
- 14852-3 Comment noted.
- 14852-4 Please see the response to Comment 14566-9.

Memorandum

To: Board Member Ketchum
From: Paul Brachvogel, General Council
Date: November 10, 2010
RE: Constituent Inquiry of BPA Authority

Issue:

You stated you had a constituent "who has asked [you] to track down the Federal Law enabling BPA to acquire land to enable them to fulfill their mission." This memo intends to respond to this inquiry.

Short Answer:

BPA's authority to acquire real property is but one part of its broad authority and duties delegated by congress. The following offers some statutory context in which this authority is exercised.

The answer is cited in 16 U.S.C.A. § 838e, which states: "Subject to the provisions of section 838c of this title the Administrator may purchase or lease or otherwise acquire and hold such real and personal property in the name of the United States as he deems necessary or appropriate to carry out his duties pursuant to law." Section 838e authorizes condemnation with certain limitations imposed by Congress.³

Background / Context of Citation:

BPA is a federal agency within the Department of Energy created by Congress in 1937 originally to market low-cost hydroelectric power generated by the Federal Columbia River Power System, a series of dams along the Columbia River in Oregon and Washington; 16 U.S.C. § 832-832m. Congress has since expanded BPA's mandate to include marketing authority over

³ Unless specifically authorized by Act of Congress, the Administrator shall not expend funds made available under this chapter, other than funds specifically appropriated by the Congress for such purpose, to acquire any operating transmission facility by condemnation: *Provided*, That this provision shall not restrict the acquisition of the right to cross such a facility by condemnation

⁴ Note: 16 U.S.C.

14852-5

14852-5 Comment noted.

nearly all the electric power generated by federal facilities in the Pacific Northwest; 16 U.S.C. § 838f. As part of its marketing responsibilities, BPA is charged with oversight of the massive, federal, high-voltage transmission system, comprising approximately 80% of the bulk transmission capacity in the Pacific Northwest, used to deliver power generated at a federally owned and operated facility, termed "federal power," and non-federal power to its customers, such as the District; 16 U.S.C. § 838b.

14852-5

BPA's operations are governed largely by four statutes: the Pacific Northwest Electric Power Planning and Conservation Act of 1980, 16 U.S.C. § 839-839h ("Northwest Power Act"); the Pacific Northwest Federal Transmission System Act of 1974, 16 U.S.C. § 838a-838k ("Transmission Act"); the Pacific Northwest Consumer Power Preference Act of 1964, 16 U.S.C. § 837-837h ("Preference Act"); and the Bonneville Project Act of 1937, 16 U.S.C. § 832-832m ("Project Act"). These statutes exclusively authorize (and require) BPA to engage in a variety of detailed statutory directives.

The Northwest Power Act grants BPA the right and duty, with oversight from the Federal Energy Regulatory Commission (FERC), to set its rates for electric power at a level sufficient to meet its costs and to repay the federal debt incurred in building the projects included in the Federal Columbia River Power System.² The Transmission System Act requires that BPA

² 16 U.S.C. § 839e(d) of the Northwest Power Act, giving the Administrator the duty to establish rates and call for their periodic review.

"The *Administrator* shall establish, and periodically review and revise, rates for the sale and disposition of electric energy *and capacity* and for the transmission of non-Federal power. Such rates shall be established and, as appropriate, revised to *recover*, in accordance with sound business principles, the costs associated with the acquisition, *conservation*, and transmission of electric power, including the amortization of the Federal investment in the Federal Columbia River Power System (including irrigation costs required to be repaid out of power revenues) over a reasonable period of years and the other costs and expenses incurred by the Administrator pursuant to this chapter and other provisions of law. Such rates shall be established in accordance with sections 9 and 10 of the Federal Columbia River Transmission System Act (16 U.S.C. 838) [16 U.S.C. 838g and 838h], section 5 of the Flood Control Act of 1944 [16 U.S.C. 825s], and the provisions of this chapter ... 16 U.S.C. § 839e(a)(1) [emphasis added].

See also, 16 U.S.C. § 838g, 839(4), (Pacific Northwest Federal Transmission Act) which is consistent with the Northwest Power Act vesting rate making under the preview of the Administrator: "Schedules of rates and charges for the sale, including dispositions to Federal agencies, of all electric power made available to the Administrator ... shall become effective upon confirmation and approval thereof by the Secretary of Energy. Such rate schedules may be modified from time to time by the Secretary of Energy, acting by and through the Administrator, subject to confirmation and approval by the Secretary of Energy, and shall be fixed and established."

This page intentionally left blank.

14852

Negotiating Points with BPA

It is important that it's established that a Family Tree Farms goal is to make money not only for the current tree cycle but also for future tree cycles. The loss of income caused by the removal of property from the Tree Farm must be compensated for.

Therefore only negotiations must consider adequate compensation that the Tree Farm recovers all loss income from the removal of land used to grow timber.

Points to consider:

1. The purpose of a Family Tree Farm is to provide income for the Family- short term and Long term.
2. The Family Tree Farm provides definite benefits to society
 - a) A stable Forest cover.
 - b) Clean water, as a stable forest acts as a sump and filter for rain and snowfall.
 - c) The majority of Family Tree Farms provide a longer growing cycle than industrial or state Tree Farms: generally 50-60 years.
 - d) Cuts on Family Tree Farms are generally small: less than 70 acres.
3. The Family Tree Farm is an investment made with no expected cash return for at least 30 years; which would be a commercial thinning with a final cut in 40-60 years.
4. The Family Tree Farm Business Plan is based on a continued repeating of the tree cycle to provide for financing the operation and cash flow, with cash return to the Family
5. Therefore: any land taken away from the planning must have sufficient compensation to maintain the required income stream. If BPA wants to place a High Voltage Power Line through Tree Farm Property it is expected that the project income stream should not be interrupted.

14852-6

Example:

If the Tree cycle is 50 years and the yield is 35 MBF per acre at the time of harvest and timber prices average \$900.00 / MBF (an adjustment for inflation based on CPI). The per acre value would be \$31,500.00 less cost of planting, maintenance and harvest estimated at 40%. The net return would be \$18,600.00/acre or \$372.00/acre per year based on a 50 year cycle.

NOTE: The above is just an example to consider how to reach an equitable compensation amount.

15 of 6

14852-6 Please see the response to Comment 14566-9.

14852

14852-6

Other considerations:

1. Right of tree farmer to cross R/W to access his/her property.
2. If danger trees were removed outside of R/W to protect Power Lines or towers the Tree Farmer must be reimbursed for the future value of the removed trees. Any roads across the Tree Farm lands to service Power Lines and R/W will be maintained by BPA or contractors. If BPA/Tree Farmer jointly use roads then BPA and the Tree Farmer shall agree to a road maintenance agreement.
3. Gates and Locks shall provide for 2 (two) locks joined together, one for the Tree Farmer and one for BPA. The Tree Farmer shall be responsible for the gate.
4. Any roads constructed shall be the responsibility of requiring party, but shared use shall comply with item 2. above.

Note: Costs of items 2, 3 and 4 above can be agreed to by Tree Farmer and BPA and added to the annual lease payment.

2 of 8

11/14

REVENUE CHIEF'S OFFICE ROAD 7049871872

Aug 15 07:06:02

This page intentionally left blank.

14855

Congresswoman Jaime Herrera Beutler

March 10, 2013

Dear Representative Herrera Beutler,

14855-1 We, the undersigned Small Forest Landowners write on behalf of our family of four generations in the tree farming business. It is with pride that we speak up in defense of not just our forest as a viable business that produces income for ourselves, but also as tax-paying contributors to Clark County's remarkable and unique value of renewable natural resources of forest, fish and wildlife.

14855-2 BPA's I-5 Corridor Reinforcement Project's high-voltage power line that BPA is planning in our "neck of the woods" threatens with permanent impact - beyond the financial aspects. The attached paper is our constructive review of our position on Bonneville Power Administration's chosen "Central" routing on or near our "Dunegan Mountain" and "Boody" Tree Farms.

Unfortunately as is well known, trees and power lines are incompatible. We were and are, therefore, opposed to BPA's Central Alternative routing, however, we offer some helpful adjustments if it is imposed. Two highlight issues covered in our positions are:

14855-3 In summary for our Dunegan Mountain Tree Farm, we feel that BPA's easement for Line Segment 18 should not be moved north to the property line of this tree farm because we are already sacrificing considerable revenue to an existing half-mile long and 175 foot wide power line easement plus its undefined Border Zone that bisects our tree farm, and to the preservation of Mature Forest wildlife habitat.

In summary for our Boody Tree Farm bordering Line Segment 28 and marked by BPA to provide road access to at least 4 towers, our highest priority is the protection of the Boody Creek Watershed and the viability of our Tree Farms.

Other priority issues are:

1. Establish site for 28/12 and change access road location.
2. Establish site for 28/13 and change access road location.
3. Propose relocations of access roads to 28/11, 28/14, and 28/15
4. Arrange easements to entire proposed road system from public pavement to towers 28/11, 28/12, 28/13, 28/14, and 28/15 for Witter/Revesz.
5. Arrange a property line survey.
6. Safety concerns must be planned for, including plans to control trespass, intrusion, and vandalism. Gated year-round gravel roads are required. Ongoing review of the success of safety plans is to be part of the process.

1 of 14

14855-1 Thank you for your comments. Specific comments are addressed below.

14855-2 Comment noted.

14855-3 Comment noted. Please see the response to Comment 14097-1.

14855

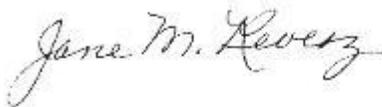
- 7. Memoranda of agreement or the equivalent will be essential to assure coordination of all phases on a continuing basis on our property.
- 8. Obsolete one-time easement purchases for forest land must be replaced by realistic lease agreements reflecting future incomes foregone as well as ongoing and ad-hoc real costs incurred.

14855-4 We appeal to you for support of protecting our family's and Clark County's forests. Thank you for your past constructive role for protecting natural resources, the people who care for them and our property rights to do so.



Patricia Lee Witter

Phone: , e-mail:



Jane M. Revesz and Peter T. Revesz

Phone: , e-mail:

2 of 14

14855-4 Comment noted.

14855

***IMPACT OF BPA'S I-5 CORRIDOR LINE SEGMENTS 18 AND 28
ON THE WITTER/REVESZ FAMILY TREE FARMS***

MARCH 2013

Prepared by

Patricia Lee Witter

Jane Revesz

Peter T. Revesz

3 of 14

This page intentionally left blank.

14855

I. OVERVIEW

14855-5 The Comments below address our family's forest properties impacted by the BPA I-5 Corridor Reinforcement Project shown on FIGURE 1, a BPA map of the Central Alternative. The map identifies two separate tree farms owned by our 4-generation tree farm family. The first tree farm, which we call "Dunegan Mountain Tree Farm", is located approximately 50 feet north of the proposed easement for Corridor **SEGMENT 18** in the vicinity of Tower 18/29 to Tower 18/31. The second family tree farm, which we call "Boody Tree Farm", borders the easement of **SEGMENT 28** in the vicinity of Tower 28/11 to Tower 28/15. We will first state our general position regarding preservation of each of these tree farms from unnecessary harm by SEGMENT 18 and/or 28, followed by more detailed comments and Figures regarding each tree farm in II. WITTER/REVESZ FAMILY TREE FARMS: A. DUNEGAN MOUNTAIN TREE FARM AND B. BOODY TREE FARM .

14855-6 We have always tried to operate our tree farm holdings as a sustainable business while protecting the creeks, ponds, wetlands and native species on our land. This approach is becoming more difficult these days with fluctuating market conditions, a scarcity of saw mills, arbitrary vacating of shared-use access roads and increased regulation by various levels of government. Now BPA proposes to impact our family business in ways that will have not only new current costs to us but unforeseeable as well as foreseeable impacts throughout future years. Our 60 years of experience with PacifiCorp's Yale-Merwin easement on our Dunegan Mountain Tree Farm has taught us that big power companies can not be expected to treat Small Forest Landowners with common business ethics, fairness, honesty nor reciprocity. This forces us into continuous monitoring and supervision of their activities on our properties, and as necessary, legal action. We must be alert to poorly trained employees, inexperienced supervisors, unsupervised contractors and subcontractors. We incur heavy loss of time and costs on general damage prevention, remedies to damaged roads, left-open gates, ignored long-agreed mutual control and use of access; we found unsupervised operators sinking big machinery deep into our wetlands after being warned against operating in there; they drench our acres with powerful herbicides and widen their clearcuts outside their powerline easements.

14855-8 Another serious concern for timber growers is the industry-wide recognized fact that a 150 foot wide ROW – 75 feet on each side of the center line to the edge of timber—is not an adequate operational distance from 180-200 foot tall timber. The Control Zone regulated by BPA on each side of it's actual 150-foot ROW easement through forested terrain is stated as an additional up-to 200 feet of timber land on which Danger Trees may not be grown. (See ATTACHMENT A, Excerpt from Kirk Naylor, PacifiCorp Comment to BPA, and

4 of 14

14855-5 Comment noted.

14855-6 For private timber landowners whose land the project would cross, if BPA decides to build the project, it would acquire timber through easement negotiations. These timber landowners would have an opportunity to negotiate compensation with BPA.

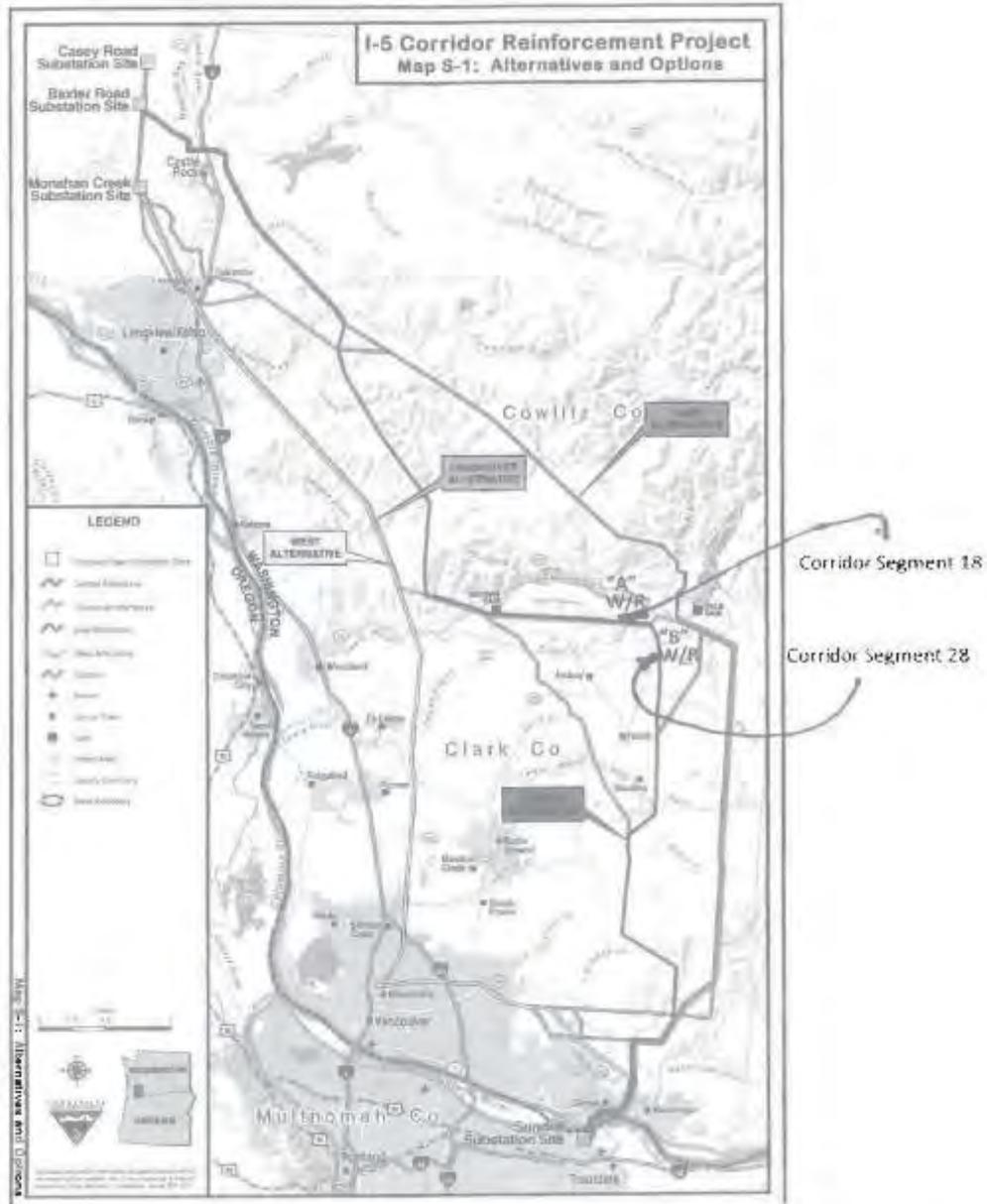
14855-7 Comment noted.

14855-8 Please see the responses to Comments 14566-9 and 14665-14.

14855

Figure 1. BPA Map of Alternatives -- Central Alternative Selected

Witter & Revesz properties shown as **W/R**



March 2013

5 of 14

This page intentionally left blank.

14855

ATTACHMENT B, a diagram introducing the concept of Wire Zone and Border Zone* corresponding to ROW and Control Zone, respectively.)

Compensating the landowner outside the 150 foot ROW is an unresolved and often ignored issue. Since growing tall timber on rich Site Class 2 soil is the purpose of our business, this means that BPA may be putting us out of the forestry business along an up-to 550-foot wide swath -- (200 feet + 150 feet + 200 feet) of forestry - the only business we are legally allowed on our Forest Tier 1 properties. It is our understanding that this operational, safety and cost issue is currently being researched for a reasonable resolution.

14855-8

This leads us to an overriding concern: compensation to the owner of Forestland which is crossed by a powerline is far below his/her ongoing costs caused by the presence of the powerline. Decades of experience has taught us that the powerline company makes a low one-time payment for the ROW Wire Zone acreage on which timber trees can never again be grown. The powerline company makes no payment whatsoever when it physically and/or financially prevents the growing of timber in the Border Zone and added Access road acreage. The land owner must continue to pay taxes on land in both Wire Zones and Border Zones on which timber will no longer be grown (but whose only use under current regulation is to grow timber). In our experience, the powerline company pays not a cent for road maintenance or road access or road construction but tears up our light-footprint forest roads with their heavy equipment and if forced to, pays for repairs. The presence of a powerline opens timberland to vandalism, intrusion, tree rustling and garbage dumping but all the associated costs fall on the landowner. In other words, the private timberland owner is forced to bear much of the cost of providing the public with "cheap" electric power. In fairness, the timberland owner should be able to lease his land (both Wire Zone and Border Zone) to the power company for an annual payment which approximates the value of the timber-growing foregone. The power company should assume responsibility for access to their towers through construction or reconstruction of year-round maintained roads and cooperate with the landowners to solve problems of vandalism, theft and misuse of the land, and an establishment of practical procedures for scheduled and ad-hoc compensation.

14855-9

Forestry is a dynamic business. It depends on the initial and ongoing assumptions of cost and revenue, market conditions that are only partly predictable, such as maintenance costs, which are normally forecast. The unpredictable variables range from natural climate changes, variable demand for timber, cost of energy, security, property taxes, technological, legal and regulatory changes, etc.

These variables call for continuing and increasing monitoring, changing technological and procedural coordination among all of us impacted by and responsible for managerial and operational problem-solving. We need instruments of forward planning, coordination and mutual interaction. Such instruments of communication, management, and decision-

6 of 14

14855-9 Comment noted.

14855

- 14855-9 making call for documents like contracts, Memoranda Of Agreement, etc. As mentioned before, one-time easement terms are inadequate and impractical. The terms of such interactions will, of necessity extend beyond the EIS process, the subsequent design, acquisition and implementation phases, and into the on-going modus operandi. BPA and DNR, Weyerhaeuser and others have spent several years and developed mutual reciprocal
- 14855-10 cost and other agreements prior to the DEIS. We, as "Small Businesses in Forest Landownership" must insist on our share of opportunities to adjust our management plans, do our analyses, consult with our experts, accountants, attorneys on an on-going basis, not to mention revising our family's ownership plans and last wills and testaments to reflect the advent of BPA power lines.
- 14855-11 **A: DUNEGAN MOUNTAIN TREE FARM:** A summary of our position regarding our Dunegan Mountain Tree Farm is that the segment of Line 18 from Towers 18/29 to 18/31 should not be moved north toward our south property line because our tree farm is already harmed enough by being bisected by PacifiCorp's Yale-Merwin powerline. Also, moving Line 18 north would put our forest stands along our south line further into the Control Zone for Line 18 which would destroy this tree farm's long-term balance between sustainable forestry with small clear cuts, and maintenance of habitat corridors. This tree farm contains one of the few stands of Mature Forest shown on any BPA map so BPA's easement should not encroach on this stand. (The map with the Mature Forest can be found in the BPA DEIS, Chapter 17, Map 17-1C.) Other local residents have already commented that the wetland conditions at the proposed site for Tower 18/28 and 18/29 would indicate that Line 18 should be moved further south in this area, not north toward our tree farm. Conclusion: Line 18 between Towers 18/29 and 18/31 should not be moved further north. More details to support this position are contained in section II.WITTER/REVESZ FAMILY TREE FARMS. A: DUNEGAN MOUNTAIN TREE FARM.
- 14855-12 **B: BOODY TREE FARM:** Here, a brief summary of our position regarding the location of Towers 28/11 to 28/14 on or near our east property line is that these towers and their access roads must be placed so as to minimize harm to the important wetland corridor comprised of Boody Creek, the ponds on Boody Creek and the wetlands surrounding these bodies of water. EVEN IF THIS MEANS MOVING A TOWER ONTO OUR LAND, we will insist on protecting the integrity of this remarkable wetland corridor. We are also very concerned about the placement of access roads so as not to unnecessarily fragment our tree farm which, as with the Dunegan Mountain Tree Farm, we manage for a balance between sustained forestry and habitat preservation. More details to support this position are contained in section II. WITTER/REVESZ FAMILY TREE FARMS. B: BOODY TREE FARM.

7 of 14

14855-10 Comment noted.

14855-11 Please see the response to Comment 14097-1.

14855-12 Please see the responses to Comments 14097-1 and 14119-2.

14855-13

READERS PLEASE NOTE: ADVICE TO SMALL FOREST LANDOWNERS WHO ARE IMPACTED BY POWERLINE COMPANIES AND THEIR HIGH CAPACITY TRANSMISSION LINES: A valuable reference that we used in preparing these comments is a list of relevant considerations and issues in dealing with utility companies. It is the document approved by the Clark County Farm Forestry Association and the Cowlitz County Farm Forestry Association. The title is Considerations for Valuing Timber Land for Powerline Right-of-Way. It was submitted to the BPA comments section for the I-5 Corridor Reinforcement Project on July 30, 2011. This document is included here as ATTACHMENT C.

*Utility Vegetation Management Final Report: March 2004. FERC. U.S. Government. CN Utility Consulting, L.L.C.

14855-13 Comment noted.

SUMMARY OF BOODY TREE FARM REQUESTS TO BPA

THE FOLLOWING ARE TO BE ARRANGED THROUGH AGREEMENTS BETWEEN WITTER/REVEZS AND BPA ON HOW ACTIVITIES WILL BE ACCOMPLISHED:

14855-14

Our highest priority is to be given to the protecting of the Boody Creek Watershed and the viability of our Tree Farms.

Other priority issues are:

14855-15

1. Establish site for 28/12 and change access road location.
2. Establish site for 28/13 and change access road location.
3. Propose relocations of access roads to 28/11, 28/14, and 28/15
4. Arrange easements to entire proposed road system from public pavement to towers 28/11, 28/12, 28/13, 28/14, and 28/15 for Witter/Revesz.

14855-16

5. Arrange a property line survey.

14855-17

6. Safety concerns must be planned for, including plans to control trespass, intrusion, and vandalism. Gated year-round gravel roads are required. Ongoing review of the success of safety plans is to be part of the process.

14855-18

7. Memoranda of agreement or the equivalent will be essential to assure coordination of all phases on a continuing basis on our property.
8. Obsolete one-time easement purchases for forest land must be replaced by realistic lease agreements reflecting future incomes foregone as well as ongoing and ad-hoc real costs incurred.

- 14855-14 Please see the responses to Comments 14097-1 and 14119-2.
- 14855-15 Please see the responses to Comments 14097-1 and 14119-2.
- 14855-16 Please see the response to Comment 14725-11.
- 14855-17 Mitigation measures proposed or recommended to address the commenter's concerns are listed in Table 3-2, and Section 5.2.8, Recommended Mitigation Measures.
- 14855-18 Please see the response to Comment 14724-13. Through the negotiation process, BPA would work with the landowner to address unique considerations associated with acquiring easement rights across their property.

ATTACHMENT A**EXCERPT FROM COMMENT TO BPA**

by Kirk Naylor, PacifiCorp, dated June 13, 2011

14855-19

"On May 11, 2011, BPA and Mason, Bruce & Girard (MB&G, consultants to BPA) presented results of these studies to the TCC. During discussion the TCC was informed that the BPA proposed study area boundary on PacifiCorp Property was based on a 150-foot transmission right-of-way (ROW) plus up to 200 feet of potential additional clearing to a "backline" on each side of the ROW. This clearing-to-backline was represented to the TCC as BPA's standard practice to ensure all potential hazard trees within reach of the line would be removed. Vegetation would be allowed to re-grow in the in the 200-foot zone beyond either side of the ROW, as long as trees did not reach a height that would threaten the transmission line. This initially could result in a 550-foot wide clearing along the entire length of the selected transmission line route (not necessarily all on PacifiCorp WHMP lands)."

- 14855-19 Cutting to a “Full Safe Backline” is not one of BPA’s preferred options for danger tree control. For new transmission line easements, BPA would acquire rights to cut vegetation outside the easement that presents a real or potential hazard to the transmission line’s reliability. Criteria for these conditions would include but not be limited to vegetation exhibiting characteristics of failure such as trees on unstable slopes, isolated tree or tree fringes exposed to adverse winds, diseased trees or communities of diseased trees, damaged trees and defective trees. Healthy, stable trees outside the easement that exhibit no potential hazard to the transmission line would not be cut.

ATTACHMENT B

14855

BS&A 300 Part 7 IVM Revision Draft 1 version

Annex A: Wire Zone – Border Zone Concept (This annex is not part of the ANSI A300 Part 7 IVM standard)

The wire zone – border zone concept is a proven IVM method that ensures the reliability of electric supply lines while promoting stable, compatible plant communities and improved wildlife habitat on suitable electric utility rights-of-way. This method delineates the portion of the right-of-way beneath the conductors (wire zone) from the portion on either side (border zone), and prescribes different management strategies for each area. Annex A provides supplemental information about this method.

A-1 Annex A Glossary

A-1.1 Border zone: Portion of electric utility right-of-way on either side of the wire zone and extending to the outer edge of the established right-of-way, selectively managed to include a mix of compatible herbaceous and low-growing woody vegetation below a specified height.

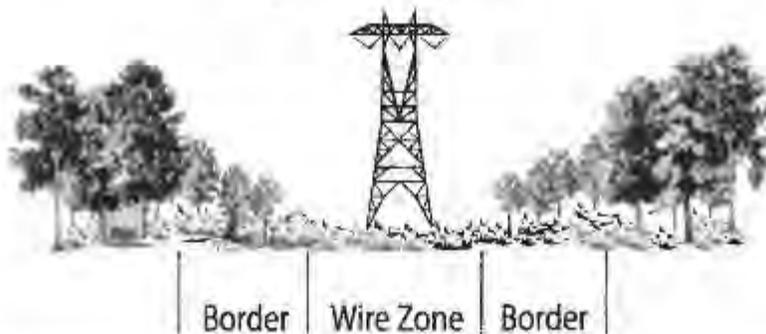
A-1.2 Wire zone: Portion of electric utility right-of-way directly beneath electric supply lines and extending outward to a utility-specified distance, managed to promote only low-growing, primarily herbaceous vegetation.

A-2 The wire zone – border zone method requires the use of separate management strategies for the wire zone and border zone on the same right-of-way, which may not be optimum for all sites. The method is especially useful in areas where ecological concerns, such as visual impact and wildlife diversity, are a consideration. When properly implemented, use of the wire zone – border zone method will not affect the reliability of utility facilities. The vegetation manager must determine the suitability of a particular site or right-of-way for management using the wire zone – border zone method.

During initial establishment, especially on rights-of-way that have not been regularly maintained, or contain noxious or competitive vegetation, non-selective methods may be used; however, the effect of these methods on surrounding land owners and other stakeholders must be carefully considered prior to implementation.

A-3 In the border zone, incompatible vegetation is selectively controlled, and compatible vegetation that will not grow above a specified height is conserved. By retaining a greater variety of vegetation types, wildlife habitat is improved, and the visual impact of the right-of-way is softened.

Figure 1: Wire Zone – Border Zone



A-4 In the wire zone, woody stems, climbing vines or other vegetation that could impair access or harbor young trees may be controlled using selective or non-selective methods. Maintaining low growing, primarily herbaceous cover in this area allows access to utility infrastructure for inspection, repair, and maintenance, and to inspect vegetation on and off the right-of-way. In addition, the wire zone is often ideal for wildlife species that prefer a meadow-like habitat.

A-5 Over the long term, the wire zone – border zone method increasingly makes use of natural and biological controls to develop stable plant communities in each zone, thus minimizing the need for other IVM control methods. These plant

communities attract and aid in the establishment of stable wildlife populations, which in turn may further enhance biological controls. The wire zone – border zone method can be implemented in most areas, however, the need for additional control methods, as well as the species of flora and fauna present, will vary depending on local climate and site conditions.

© The International Association of Wildlife Refugees

14855-20

- 14855-20 See Chapter 3, Sections 3.11, Vegetation Clearing, and 3.15, Maintenance, for discussions about BPA vegetation management. BPA would use an integrated vegetation management strategy guided by its Transmission System Vegetation Management Program EIS. BPA is familiar with the wire zone - border zone method of right-of-way management and is evaluating how it can integrate some of the concepts into its existing vegetation management program given its present and future maintenance budget.

14855

ATTACHMENT C

Considerations for Valuing Timber Land Taken for Powerline Right-of-Way

- 14855-21
1. Initial Requirements:
 - a. Pay for the bare land value - independent appraisal based for highest and best use. Land varies by soil productivity (site class), slope/aspect, annual precipitation, location from populated areas, etc.
 - b. Pay for younger trees based on present worth of value at maturity (forester's appraisal).
 - c. For mature timber pay based on the cruised value. Give at least one year notice so the landowner can log instead if they wish.
 - d. Build and maintain roads to DNR standards so trucks and equipment can use them. If the DNR rules change, BPA needs to follow the new rules.
 - e. Clearly mark the edges of the right-of-way.
 - Ongoing Requirements:
 2. Lease option, if not sold for highest and best use. Pay an annual lease payment **for the lost opportunity to grow timber**. This would be on a per acre basis and based on the average growth rate of 700 bf/acre/year with a stumpage value of \$500/Mbf. This would be \$350/acre/year initially and would be adjusted for inflation based on the producer price index. The above is an example actual numbers are specific for each site in consultation with a forester.

Note: There are significant differences between the small timber owner and state or federal land and the large industrial timber owner regarding the value of timber. Thus, values from state, federal, or large industrial timber owners are not useful in valuing the timber for small timber owners. Two primary differences are that small timber owners may wait until the market price is attractive and may export their wood. However, the growth rate will be site and specie specific.
- 14855-22
3. A number of other issues surface with power lines generally involving trespass. The BPA needs to put in adequate gates (refer to BPA documents on stockyard gates; this is a starting point depending upon trespass issues) and **maintain them**, let it be generally known that this is private land and trespassers will be prosecuted with the BPA paying these costs. Provide frequent signage indicating land is private and no trespassing allowed. A mutually agreed upon standard for managing and controlling the short and long-term impacts of unauthorized public use of the right-of-way needs to be determined.
- 14855-23
4. There needs to be an agreed upon standard for roads including: inspection and maintenance schedules, reporting requirements, maintenance standards, and road construction, reconstruction, and abandonment standards as well as the cost sharing. Landslide potential for roads needs to be assessed. Road grades would vary depending on the land slide potential. Roads would be rocked where needed

12 of 14

- 14855-21 Please see the response to Comment 14566-9.
- 14855-22 Chapter 5 discusses potential impacts from unauthorized access. Table 3-2 lists mitigation measures that are part of the project that would minimize these impacts, including gates. Section 5.2.8, Recommended Mitigation Measures, lists additional measures, including working with landowners to minimize these impacts.
- 14855-23 BPA has reviewed the existing road systems that could provide access to the proposed new transmission line, and identified the roads that would be needed. If BPA decides to build the I-5 Project and based on existing conditions and proposed use, BPA will work with the underlying landowner and negotiate the right to use, improve, or reconstruct the roads as needed. After construction, BPA will leave these roads in as good or better condition. BPA has conducted a geotechnical reconnaissance of the project and identified areas of concern for slope stability. Additional geotechnical work is planned.

14855

- 14855-23 for dust abatement, stability, load bearing and seasons of use. BPA has road design sheets that may be used in conjunction with DNR standards for building and maintaining roads.
- 14855-24 5. The Access Roads required for each Power Line Tower - from a public road to the tower – need special, individual contracts between the BPA and the private landowners. These roads may be for exclusive BPA use only, or they may be shared with one or more landowners in a chain of land parcels. They may be shared with multiple ownerships on branched roads. Whatever the configuration of each road system, the specifics must be negotiated with all impacted owners. The issues include:
- Mutual planning and coordination of road use,
 - Agreed-on responsibility for maintenance timing and quality control,
 - Assessment of damages – man-made,
 - Procedures for notifying all owners and users of road availability or blockage
 - Procedures for coordinating security – policing security gates, multiple locks and keys among owners and users, between owners, contractors, subcontractors and regulatory personnel (refer to BPA road design spec).
- 14855-25 6. BPA needs to prevent any spreading of weeds during construction and afterwards. BPA needs to comply with all noxious weeds rules county, state, and federal. The BPA integrated pest management plan should be approved by the landowner.
- 14855-26 7. Native wildlife and plants needs to continue to have good habitat. Perhaps low growing shrubs could be placed by streams to maintain reasonable water temperatures. A plan for promoting the growth of low growing, native plants needs to be agreed upon.
- 14855-27 8. The term of the lease should be for the life of the powerline.
9. The lease is for a single use by the BPA and not for any other utility.
10. Compensation needs to be made for any other land that is taken out of timber production or encumbered because the location of the powerline (i.e. causes land to be inoperable or increases harvest costs) or additional BPA roads - a severance right-of-way.
11. Even if the adjacent land is not within the powerline right-of-way, its value will be reduced and an evaluation of the just compensation is necessary.
12. Any additional property taxes over the amount for timberland will be paid annually to the county by the BPA.
13. The agreement needs to be signed "under threat of condemnation for the public good." Refer to IRS Publication 544 or an accountant for tax implications. Wording in our agreements "lawfully seized and possessed of the lands and premises aforesaid."
- 14855-28 14. BPA's contractor assumes all risks of damage to the property or injury to the contractor in connection with construction and maintenance of the powerline. Landowner will not be liable for any claims.
- 14855-29 15. Fire protection will be provided by the contractor during construction and construction will be suspended, if considered necessary. The landowner and BPA

13 of 14

- 14855-24 BPA wants to ensure that we have adequate access to each structure on this project. Through the negotiation process, BPA would work with the landowner to address unique considerations associated with acquiring easement rights across their property.
- 14855-25 Please see the response to Comment 14566-6.
- 14855-26 Section 17.2.8, Recommended Mitigation Measures, lists mitigation measures identified to limit removal and minimize disturbance to sensitive habitats. These include routing the transmission lines to minimize the length of stream cleared and avoiding or minimizing clearing of riparian and floodplain vegetation where possible.
- Section 17.2.2.2, Operation and Maintenance, states that low-growing vegetation would be allowed to persist; thus lower-growing streamside vegetation would remain along stream banks. Moreover, depending on the height of conductors over riparian areas, BPA may be able to manage vegetation to greater heights than the standard 4-foot height, returning some of the riparian habitat value to the right-of-way.
- 14855-27 Please see the response to Comment 14566-9.
- 14855-28 BPA is a federal agency within the United States Department of Energy. The United States is responsible for damage or injury caused by a negligent act or omission of a BPA employee to the extent allowed by the Federal Tort Claims Act, 28 USC 2671.
- 14855-29 Fire protection is described in Section 10.2.2.1, Construction and Section 10.2.2.2, Maintenance. For construction, BPA and its contractors would develop site-specific safety plans that would include a section on fire safety. These sections would include specifics from safety plans developed by the underlying landowner. During maintenance, BPA would follow all fire safety requirements that may be in place by large public or private landowners. Maintenance will typically schedule work in drier climates earlier in the season to minimize fire potential. Depending on location and time of year, work practices such as cutting or crushing vegetation, lifting vehicle frames, or not dragging poles through dry grass, can be altered to minimize potential fire hazards. All maintenance vehicles are equipped with firefighting kits.

14855

- 14855-29 | will determine a mutually agreeable fire prevention and suppression plan for both the construction phase and the operation and maintenance of the BPA powerline.
16. Any damage to agricultural land (fences, crops, irrigation) during construction, reconstruction, or maintenance of the lines shall be repaired or paid for by BPA.
17. BPA needs to notify the landowner, whenever they will be coming on your land for maintenance. Agreement on the notification protocols for maintenance, repair and reconstruction activities.
- 14855-30 | 18. The owner and successors have the right to use the land for all purposes not inconsistent with the BPA's use. The owner has the right to freely cross and if possible, use the land for normal agricultural purposes. The owner may access timber on both sides of the powerline, pull logs underneath and use the roads to haul logs.
- 14855-31 | 19. If danger trees were removed outside of the right-of-way to protect transmission lines or the towers the landowner must be reimbursed for the trees based on their present worth of value at maturity.
- 14855-32 | 20. The value of the land for future purposes is being lost. Some examples are hunting leases, recreational uses, and carbon credits.
- 14855-33 | 21. Any construction permit with the BPA or its contractor needs to also include items listed in this outline such as use of roads, access, maintenance rock, pay for damages, and cash deposit. You don't need to accept their proposed construction permit.

document approved by Clark County Farm Forestry Association and Cowlitz County Farm Forestry Association and submitted as comments to the BPA I-5 Corridor Reinforcement Project by Robert Zumstein, Chairman of the Farm Forestry Task Force, 30, 2011.

14 of 14

- 14855-30 BPA's easements states, "the United States shall repair or make compensation only for damage caused by the United States that is not incidental to the exercise of any of the above said rights and which results from and during construction, reconstruction, removal, or maintenance activities associated with the purposes of this Agreement on and adjacent to the Transmission Easement Area and Access Easement Area. Payment for such damage shall be made on the basis of a damage estimate approved by the United States." BPA has a landowner notification process for all planned activities. In the event of an emergency, BPA will notify the landowner as soon as reasonably possible after correcting the emergency situation. The easement also includes the following language, "the Grantor agrees that prior to undertaking any activity (including, but not limited to, building a structure, placing any manmade item, planting, digging, earth-moving, burning, piling or storing materials) within the Transmission Easement Area, the Grantor agrees to contact the Grantee to seek a determination from Grantee as to whether the proposed activity is safe and compatible with Grantee's use, and does not interfere with Grantee's current or future needs. The Grantor will not proceed with any proposed activity within the Transmission Easement Area without written consent from Grantee."
- 14855-31 For new transmission line easements, BPA would compensate landowners for the rights to cut danger trees based on the fair market value of the danger trees at the time the trees are identified. For existing transmission line easements, the basis for compensation for danger trees removed outside the right-of-way would be in accordance with the terms and conditions documented in the easement.
- 14855-32 Please see the responses to Comments 14566-9 and 14724-30. Hunting and other recreational uses are not incompatible with transmission line rights-of-way. BPA is not aware of any federal or state programs yet developed for managing different types of land use for sequestration and carbon credit. Section 22.2.3, Tree Sequestration Reduction, has been added to recognize the potential for reduced carbon storage.
- BPA recognizes that carbon sequestration would be lost with the permanent removal of vegetation for this project. While tall-growing trees would be removed on the right-of-way and some additional vegetation in the form of danger trees adjacent to the right-of-way, BPA would also be required to provide compensatory mitigation for impacts to wetlands, streams, and riparian areas. The vegetation provided through this mitigation would provide some sequestration although would likely not replace the full sequestration that may be lost through clearing.
- 14855-33 Through the negotiation process, BPA would work with the landowner to address unique considerations associated with acquiring easement rights or permits across their property.

14853



A Better Way for BPA

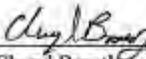
September 26, 2012

I-5 Corridor Reinforcement Project

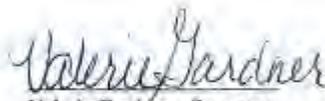
14856-1

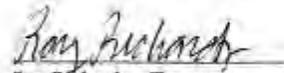
The board of A Better Way for BPA along with our subgroups Friends of Green Mountain, Dole Valley Landowners Coalition, Tum Tum Mountain Area Landowners Coalition, and Friends of Upper Lacamas Creek obtained these signatures from citizens who agree that Bonneville Power Administration should use its existing transmission corridor, the West Alternative, instead of creating a new corridor that would cut private properties into pieces, take away landowner rights, damage sensitive ecosystems and cost ratepayers tens of millions more dollars. We ask you to make the sensible decision and choose the West Alternative.

Respectfully,

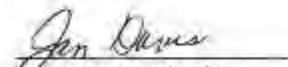

Cheryl Brantley—Chair


Bolt Minister—Vice Chair


Valerie Gardner—Secretary


Ray Richards—Treasurer


Rod Smith—Media Advisor


Jan Davis—Membership

1 of 1

14856-1 Comment noted.

14857



May 1, 2012

Bonneville Power Administration
I-5 Corridor Reinforcement Project

14857-1 The Friends of Green Mountain and Tum Tum Mountain Area Landowners' Coalition circulated the enclosed petition, obtaining signatures from landowners who agree that Bonneville Power Administration should use its OWN LAND along the West Alternative instead of creating a new corridor that would cut THROUGH private land, take away landowner rights, and destroy communities and sensitive ecosystems forever.

	West Alternative	Crossover Alternative	Central Alternative	East Alternative
Private Acres	94 acres	492 acres	873 acres	1055 acres
Total Acres	122 acres	783 acres	1201 acres	1273 acres
Cost in Millions	11 Million	363 Million	497 Million	406 Million

14857-2 Please acknowledge receipt of this cover page and petition and publish as general comment to the I-5 Corridor Reinforcement Project website and records.

On behalf of the board of A Better Way for BPA, Friends of Green Mountain, Tum Tum Mountain Area Landowners' Coalition, and our members,

Cheryl Brantley-President
A Better Way for BPA

1 of 1

14857-1 Comment noted.

14857-2 BPA confirmed that the comment had been received. The comment has been posted on the project website and included in the comment record.

14858 petition

1

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

14858-1

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <i>Tina Davis</i>		March 5, 2012
Print: Tina Davis		
Sign: <i>Janice Johnson</i>		
Print: Janice Johnson		
Sign: <i>Tim Johnson</i>		
Print: Tim Johnson		
Sign: <i>Meranda Kysar</i>		
Print: Meranda Kysar		
Sign: <i>Bonnie K. Huehl</i>		3-16-12
Print: Bonnie Huehl		
Sign: <i>Carl Huehl</i>		
Print: Carl Huehl		
<i>Christine Colby</i> <i>Christine Colby</i>		

14858-1 Comment noted.

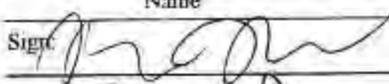
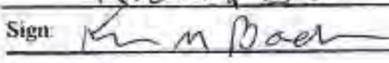
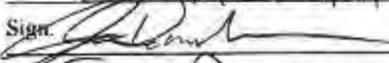
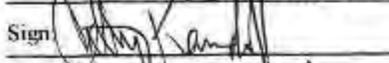
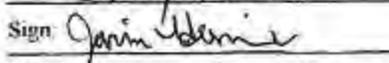
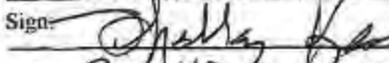
Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: 		3-5-12
Print: Richard Daviss		
Sign: 		3-16-12
Print: Kim M Baer		
Sign: 		3-16-12
Print: Soe, Dornhove		
Sign: 		3-16-12
Print: Cathy Kandoll		
Sign: 		3/16/2012
Print: Janine Hendrickson		
Sign: 		3-16-2012
Print: SHELLEY KEEF		

14858_pellion

3

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Waltraude Moss</u>		
Print: <u>WALTRAUDE MOSS</u>		
Sign: <u>Bobby J. Moss</u>		
Print: <u>BOBBY J. MOSS</u>		
Sign: <u>Kathy Boehm</u>		
Print: <u>Kathy Boehm</u>		3-31-12
Sign: <u>Matt Boehm</u>		
Print: <u>Matt Boehm</u>		
Sign: <u>Sandra Veness</u>		
Print: <u>Sandra Veness</u>		
Sign: <u>Paul Smith</u>		
Print: <u>Paul Smith</u>		

14058_petition

4

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Danae Castle</u>		
Print: <u>Danae Castle</u>		<u>3/16/12</u>
Sign: <u>[Signature]</u>		
Print: <u>Debra Zitt</u>		<u>3/16/12</u>
Sign: <u>Daniel Castle</u>		
Print: <u>Daniel Castle</u>		<u>3-6-12</u>
Sign: <u>Danni Zitt</u>		
Print: <u>Danni Zitt</u>		
Sign: <u>Doug Zitt</u>		
Print: <u>Doug Zitt</u>		<u>3-17-2012</u>
Sign: <u>Derek Zitt</u>		
Print: <u>Derek Zitt</u>		<u>3/17/2012</u>

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Grand Old Moss</u>		3-18-2012
Print: <u>Grand Old Moss</u>		
Sign: <u>Barby J. Moss</u>		
Print: <u>Barby J. Moss</u>		
Sign: <u>Harriet Vaske's</u>		3-24-2012
Print: <u>Harriet Vaske's</u>		
Sign: <u>Waltraude Moss</u>		
Print: <u>WALTRAUDE MOSS</u>		
Sign: <u>Peter Lecko</u>		
Print: <u>Peter Lecko</u>		
Sign: <u>John Keen</u>		
Print: <u>John Keen</u>		

14858_pellion

6

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <i>[Signature]</i>		3-31-12
Print: Darryl P. Grow		
Sign: <i>[Signature]</i>		
Print: Victoria Whitesell-Clark		4-1-12
Sign: <i>[Signature]</i>		
Print: LARRY CHARIS Sam Wamelsdorf		4-1-12
Sign: <i>[Signature]</i>		
Print: Larry Clark		
Sign: <i>[Signature]</i>		4-1-12
Print: Victor Vasilev		
Sign:		
Print:		

14958 petition

7

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Jeffrey Berry</u>		<u>3-24-11</u>
Print: <u>Jeffrey Berry</u>		
Sign: <u>Ken & Celvia</u>		
Print: <u>KEN PAINE</u>		
Sign: <u>Wayne A Hoffman</u>		
Print: <u>WAYNE A. HOFFMAN</u>		
Sign: <u>James F. Farber</u>		
Print: <u>JAMES F. FARBER</u>		
Sign: <u>Kim Sparks</u>		<u>3/30/12</u>
Print: <u>Kim Sparks</u>		
Sign: <u>Mike Colbert</u>		<u>3/31/12</u>
Print: <u>Mike Colbert</u>		

14858_pethon 8

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <i>Matthew E. Hart</i>		
Print: MATTHEW E. HART		
Sign: <i>Judy Sumner</i>		
Print: <i>Judy Sumner</i>		3-12-12
Sign: <i>Lindsay Lemmen</i>		
Print: Lindsay Lemmen		3/13/12
Sign: <i>Debbie Lemmen</i>		
Print: Debbie Lemmen		3-13-12
Sign: <i>John Fleming</i>		
Print: John Fleming		3-17-12
Sign: <i>Gary Miller</i>		
Print: Gary Miller		3-12-12
Print: Lana Massa		
Sign: Lana Massa		3/17/12

Please submit the following comment on the I-5 Corridor Reinforcement Project

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <i>Michael R. Skaling</i>		
Print: Michael R. SKALING		
Sign: <i>Kevin Rousley</i>		
Print: Casey Wankke		
Sign: <i>Casey Wankke</i>		
Print: Casey Wankke		
Sign: <i>Dennis Miesner</i>		
Print: Dennis Miesner		
Sign: <i>Scott R. Levanen</i>		
Print: Scott R. Levanen		
Sign: <i>Scott R. Levanen</i>		
Print: SCOTT LEVANEN		

Please submit the following comment on the I-5 Corridor Reinforcement Project.

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Sign:	Name	Address	Date
	Jasslyn Hoffman		3/10/12
Print:	Jasslyn Hoffman		
	JAN THREUKELD		3/13/12
Print:	JAN THREUKELD		
	Karen Ratschy		3/15/12
Print:	Karen Ratschy		3/15/12
	Earthy L Ratschy		3/15/12
Print:	Earthy L Ratschy		
	Misty Shandley		3/17/12
Print:	Misty Shandley		

14858_petition

11

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Phone #
↓

Name	Address	Date
Sign: Leah Graylord		
Print: Leah Graylord		
Sign: Mark Allen		
Print: MARK ALLEN		
Sign: Ernie Frederick	ERNIE FREDERICK	
Print:		
Sign: [Signature]		
Print: BENJAMIN SONGAS		
Sign: Leifani Waldal		
Print: Leifani Waldal		
Sign: Bonnie Ostiko		
Print: BONNIE OSTIKO		

14958_pettibon 12

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>h D Nunn</u>		3/10/12
Print: <u>Deane Nunn</u>		
Sign: <u>Lona Cooper</u>		03/11/2012
Print: <u>Lona Cooper</u>		
Sign: <u>Emie Freshick</u>		
Print: <u>F A M I E Freshick</u>		
Sign: <u>Andrew McNeal</u>		
Print: <u>Andrew McNeal</u>		
Sign: <u>Mark Allen</u>		
Print: <u>MARK ALLEN</u>		
Sign: <u>Reginald Asbury</u>		
Print: <u>Reginald Asbury</u>		

12 of 34

14858_pettition 13

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Julie Lynch</u>		3/13/12
Print: <u>Julie Lynch</u>		
Sign: <u>[Signature]</u>		
Print: <u>[Name]</u>		
Sign: <u>[Signature]</u>		
Print: <u>Fred Betman</u>		
Sign: <u>[Signature]</u>		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		

14958_p0110 14

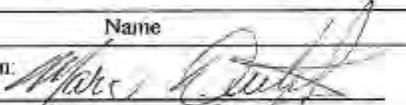
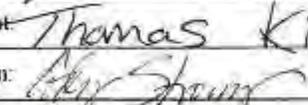
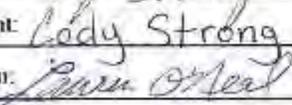
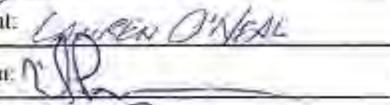
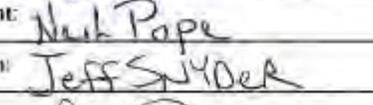
Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: 		
Print: MARC DEATON		3-7-12
Sign: 		
Print: Thomas Kingdom		
Sign: 		
Print: Cady Strong		3-7-12
Sign: 		
Print: Lauren O'NEAL		3-10-12
Sign: 		
Print: Nick Pope		3-10-12
Sign: 		
Print: Jeff Snyder		3-10-12

14858_p0100 15

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Sami Moore</u>		3-4-12
Print: <u>SAMI MOORE</u>		
Sign: <u>[Signature]</u>		3-5-12
Print: <u>[Name]</u>		
Sign: <u>James Proctor</u>		
Print: <u>JAMES PROCTOR</u>		
Sign: <u>Har</u>		
Print: <u>Hanley Gist</u>		
Sign: <u>[Signature]</u>		
Print: <u>Margie Campbell</u>		
Sign: <u>Margie Campbell</u>		
Print:		

14858 16

Please submit the following comment on the I-5 Corridor Reinforcement Project.

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>[Signature]</u>		3-3-12
Print: <u>Jeff Strong</u>		
Sign: <u>[Signature]</u>		3-4-12
Print: <u>Justin Strong</u>		
Sign: <u>[Signature]</u>		3-4-12
Print: <u>Stewart Proctor</u>		
Sign: <u>[Signature]</u>		
Print: <u>Roger Sturdevant</u>		
Sign: <u>[Signature]</u>		
Print: <u>Michael Edwards</u>		
Sign: <u>[Signature]</u>		
Print: <u>Bill Penning</u>		

14858_17

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <i>Deborah K. Baker</i>		3-31-12
Print: Deborah K. Baker		
Sign: <i>Charles V. Baker</i>		3-31-12
Print: Charles V. Baker		
Sign: <i>Kevin R. Saggard</i>		3/31/12
Print: Kevin R Saggard		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		

14858_118

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Sign:	Name	Address	Date
	Norene M. Rogers		3-29-2012
	Nick Sullivan		3-27-2012
	Victor Rudolph		3-29-2012
	John Henning		3-31-2012
	Beannette Baker		3-31-2012
	Ben Carmen-Murray		

14858-19

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Eugene De Rosa</u>		
Print: <u>EUGENE DE ROSA</u>		
Sign: <u>Kathryn L. Bachar</u>		
Print: <u>KATHRYN L BACHAR</u>		
Sign: <u>Kimberly R Roskamp</u>		
Print: <u>Kimberly R Roskamp</u>		
Sign: <u>Mike Roskamp</u>		
Print: <u>Mike Roskamp</u>		
Sign: <u>Russell A. Groen</u>		
Print: <u>Russell A. Groen</u>		
Sign: <u>Albert A. Pease</u>		
Print: <u>Albert A. Pease</u>		

14858_00100

20

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Richard M. Easter</u>		3/3/2012
Print: <u>Richard D. Easter</u>		
Sign: <u>Robert M Easter</u>		
Print: <u>ROBERTA M. EASTER</u>		
Sign: <u>Julie A. Lynch</u>		3/10/2012
Print: <u>Julie A. Lynch</u>		
Sign: <u>Carl B Ruestig</u>		
Print: <u>CARL B RUESTIG</u>		
Sign: <u>Vicki L Ruestig</u>		
Print: <u>Vicki L Ruestig</u>		
Sign: <u>Lori M Quay</u>		
Print: <u>LORI M QUAY</u>		

14858 Public 21

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Jonathan Lynch</u>		
Print:		
		3-3-12 Jonathan Lynch
Sign: <u>Julia Anderson</u>		
Print: <u>JULIA ANDERSON</u>		
Sign: <u>Kathleen Aaseth</u>		
Print: <u>Kathleen Aaseth</u>		
Sign: <u>Edward A Royner</u>		
Print: <u>Edward A Royner</u>		
Sign: <u>Charlotte A Royner</u>		
Print: <u>Charlotte A Royner</u>		
Sign: <u>John H Eisenman</u>		
Print: <u>John H Eisenman</u>		

14058_per on **22**

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>[Signature]</u>		3-10-12
Print: <u>ROD SCHADEWITZ</u>		
Sign: <u>[Signature]</u>		3-10-12.
Print: <u>TOM BAUMS.</u>		
Sign: <u>[Signature]</u>		
Print: <u>Crystal Baune</u>		
Sign: <u>[Signature]</u>		
Print: <u>DEAN A. HUASS</u>		
Sign: <u>[Signature]</u>		
Print: <u>Jean Reno</u>		
Sign: <u>[Signature]</u>		
Print: <u>Judy DeRosa</u>		

14858-10000

23

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <i>Jeremy Sayad</i>		
Print: <i>Jeremy Sayad</i>		
Sign: <i>[Signature]</i>		
Print: <i>DW GERGES</i>		
Sign: <i>Victoria M Pederson</i>		
Print: <i>Victoria M. Pederson</i>		
Sign: <i>Gary A. Getman</i>		
Print: <i>Gary A. Getman</i>		
Sign: <i>Dan McDaniel</i>		
Print: <i>DAN Mc DANIEL</i>		<i>3/22/12</i>
Sign: <i>Bonnie L. McNaughton</i>		
Print: <i>Bonnie L. McNaughton</i>		<i>3/27/12</i>

14858_pend 24

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Richard W. Colf</u>		
Print: <u>Richard W. Colf</u>		
Sign: <u>Robert L. Colf</u>	" "	" "
Print: <u>Robert L. Colf</u>		
Sign: <u>Margaret Colf Hepola</u>	" "	" "
Print: <u>Margaret Colf Hepola</u>		
Sign: <u>Wilho Shio</u>		
Print:		
Sign: <u>Eric R. Clark</u>		
Print: <u>Eric R. Clark</u>		
Sign: <u>Nancy Clark</u>		
Print: <u>Nancy Clark</u>	" "	" "

14058 page 25

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Craig D. Gorch</u>		3/10/2012
Print: <u>Craig D. Gorch</u>		
Sign: <u>Michael E. Doster</u>		3/10/12
Print: <u>MICHAEL E. DOSTER</u>		
Sign: <u>Sharon L. Pann</u>		
Print: <u>SHARON L. PANN</u>		
Sign: <u>Larry Pettis</u>		3/10/12
Print: <u>LARRY PETTIS</u>		
Sign: <u>Jim Allen</u>		
Print: <u>Jim Allen</u>		
Sign: <u>Kathy Schadewitz</u>		3-10-12
Print: <u>KATHY Schadewitz</u>		

14858_p6 of 26

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <i>[Signature]</i>		3-14-12
Print: Thomas L Sutton		
Sign: <i>[Signature]</i>		
Print: Bill Kujawa		3-16-12
Sign: <i>[Signature]</i>		3-16-12
Print: Jeff Kujawa		
Sign: <i>[Signature]</i>		3-16-12
Print: BERRY TINGLEY		
Sign: <i>[Signature]</i>		3-17-12
Print: Roger McDougal		
Sign: <i>[Signature]</i>		3-18-12
Print: Beckly McDougal		

14856_petition **27**

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Larry Shinn</u>		
Print: <u>Larry Shinn</u>		<u>3-5-2012</u>
Sign: <u>Don Tebert</u>		
Print: <u>DON TeBERT</u>		
Sign: <u>Dawn D Shinn</u>		
Print: <u>Dawn D. Shinn</u>		
Sign: <u>L. D. Shinn</u>		<u>3-17-2012</u>
Print: <u>L. D. Shinn</u>		
Sign: <u>Debbie Lynch</u>		
Print: <u>Debbie Lynch</u>		
Sign: <u>Bertha Lynch</u>		
Print: <u>Bertha Lynch</u>		

14858_p01028

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Ron Beebe</u>		3/6/12
Print: <u>Ronnie Beebe</u>		
Sign: <u>Kari Beebe</u>		3/8/12
Print: <u>Kari Beebe</u>		
Sign: <u>Fredrick A. Malinowski</u>		3/10/12
Print: <u>Fredrick A. Malinowski</u>		
Sign: <u>C Roger Benm</u>		
Print: <u>C Roger Benm</u>		
Sign: <u>Linda Behm</u>		
Print: <u>Linda Behm</u>		
Sign: <u>Jessica Beebe</u>		
Print: <u>Jessica Beebe</u>		

14859 29

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Sign	Name	Address	Date
	Stacy Tikka		3-3-17
	LARRY THEW		3-3-17
	Doug F. Ward		
	Lodge Calstoy		
	DAVID ROSS		
	KENNETH L. EDWARDS		

14851 Comment 30

Please submit the following comment on the I-5 Corridor Reinforcement Project.

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Kent Burns</u>		3/3/12
Print: <u>Kent Burns</u>		
Sign: <u>Helen Burns</u>		3/3/12
Print: <u>Helen Burns</u>		
Sign: <u>R. Page</u>		
Print: <u>Richard Page</u>		3/3/12
Sign: <u>L. Page</u>		
Print: <u>Laura Page</u>		3/3/12
Sign: <u>Mike Lynch</u>		
Print: <u>MIKE LYNCH</u>		3-3-12
Sign: <u>Richard Lynch</u>		
Print: <u>Rick Lynch</u>		3-3-12

30 of 34

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Monterville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
------	---------	------

Sign: Leslie Brady Lounsbury

Print: LESLIE BRADY LOUNSBURY

Sign: Lee Witter SMALL FOREST LANDOWNER IN CLARK COUNTY WA MARCH 30, 2012

Print: LEE WITTER

Sign: Eugene G. Brady small forest landowner in Clark County WA MARCH 30, '12

Print: EUGENE G. BRADY

Sign: _____

Print: _____

Sign: _____

Print: LEE WITTER OWNS TIMBERLAND IN CLARK COUNTY UNDER:

Sign: PATRICIA LEE WITTER, LEE WITTER KAHN, LEE VON HOHEN BALKEN

Print: _____

14858_petition

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Michael R. Dyer</u>		
Print: <u>Michael R. Dyer</u>		<u>4-1-12</u>
Sign: <u>Carla M. Hammer</u>		
Print: <u>Carla M. Hammer</u>		<u>4-7-12</u>
Sign: <u>Fannie Newman</u>		
Print: <u>Fannie Newman</u>		
Sign: <u>Sherry Hansen</u>		
Print: <u>Sherry Hansen</u>		
Sign: <u>Brian Maxwell</u>		
Print: <u>Brian Maxwell</u>		
Sign: <u>Daniel C. Huddlestone</u>		
Print: <u>DANIEL C. HUDDLESTONE</u>		

14856_petition

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <u>Tracee Nunn</u>		
Print: <u>Tracee Nunn</u>		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		

14858_petition

Please submit the following comment on the I-5 Corridor Reinforcement Project:

BPA use your EXISTING right-of-way!

Bonneville Power Administration has proposed building a 500-kilovolt power line between Castle Rock, Washington and Troutdale, Oregon. The least expensive alternative and the one with the least impact on landowner rights and the environment would be to use the West Alternative where BPA already has towers and lines. All of the other alternatives that BPA has proposed would cut a new 150 foot wide swath through miles of countryside in Clark and Cowlitz counties. All of these rural routes would invade private land, restrict landowner rights and render some parcels useless. These routes would also harm rivers, streams, wetlands, fish and wildlife. BPA tells us there is enough room on its existing right-of-way for this project. We say BPA should use this existing corridor, the West Alternative. It just makes the most sense!

- BPA already owns the easement rights to The West Alternative and has been transmitting power on it for 70 years with a record of reliability, stability and security.
- Placing the new line on this existing corridor is the least expensive route and would be the best use of ratepayers' money.
- There is minimal impact to private landowners from building the new line on the West Alternative where towers and lines already exist.
- Using this existing right-of-way would prevent an unnecessary invasion through two counties, consuming hundreds of acres of private land.

We, the undersigned, ask BPA to not violate our landowner rights. We ask BPA to use our ratepayer dollars wisely and efficiently by placing the new line on its existing right-of-way, the West Alternative, where it has had lines and towers for the past 70 years.

Name	Address	Date
Sign: <i>Jane M. Revesz</i>		
Print: Jane M. Revesz		
Sign: <i>Peter T. Revesz</i>		
Print: Peter T. Revesz		5-31-12
Sign: <i>Sigmund Robinson</i>		3-3-12
Print: Lynn Robinson		
Sign: <i>Kim Villarreal</i>		3/31/12
Print: Kim Villarreal		
Sign: <i>Ralph Villarreal</i>		3/31/12
Print: Ralph Villarreal		
Sign: <i>Luther D. Nunn</i>		3/31/12
Print: Luther D. Nunn		

This page intentionally left blank.

14359

II. WITTER/REVESZ FAMILY TREE FARMS.

A: DUNEGAN MOUNTAIN TREE FARM and Line 18 as it impacts the Witter/Revesz family tree farm comprising the SE quarter of Section in the vicinity of Towers 18/29, 18/30, and 18/31. (Please note: additional family names included in ownership of this tree farm: Brady, Von Hohenbalken and Kahn.)

14859-1

The attached aerial photo (Figure A1) shows the property line of our 160-acre tree farm in the SE quarter of Section . The property boundaries are marked in red in Figure A1. The existing PacifiCorp Yale-Merwin transmission line corridor is clearly visible as it crosses our tree farm.

Our south property line is the ½ mile long line marked in red in Figure A1 between the large clearcut on our neighbor to the south (bare land in the foreground of the photo Figure A2) and our family's sustained-yield timber stands to the north of the clear cut. BPA's aerial map (Figure A3) shows that our south line is approximately 0-foot north of the north edge of the 150-foot BPA Line 18 easement. Again, the existing PacifiCorp Yale-Merwin transmission line corridor is clearly visible crossing our tree farm.

14859-2

Our position is that our 160-acre family tree farm has for 60 years sacrificed a great deal to the transmission of power in our region because the PacifiCorp Yale-Merwin transmission line already bisects the property as shown in Figures A1 and A2. To have a second powerline impacting our tree farm is an unfair additional burden on this well-managed small business.

As currently proposed, Line 18 of the Central Alternative would not locate the easement (Wire Zone) itself on our tree farm but would impact an estimated 7.6 acres of our timberland in the Border Zone.

14859-3

It could get worse. The neighboring owner of the clear cut area to our south in Figure A1 is HASLINGER PROP LLC AND FRANCAR LLC and the owners include Tom Hoesly. As of this writing, Tom Hoesly is requesting that the gap between the proposed easement and our shared property line be eliminated by moving the easement north to "coincide with the property line". If BPA does move the line thusly, the Border Zone would involve a further restriction of 4.5 acres in our ability to grow timber trees of the species, age and height that this growing site and our management plan call for, adding up to an estimated total of 12.1 acres of the Witter/Revesz property removed from forestry by Line 18.

14859-4

To reiterate the point that forestry is constrained well outside the boundaries of the actual easement, consider our experience with the PacifiCorp Yale-Merwin transmission line

1 of 19

14859-1 Comment noted.

14859-2 Comment noted.

14859-3 Please see the response to Comment 14097-1.

14859-4 Comment noted.

14853

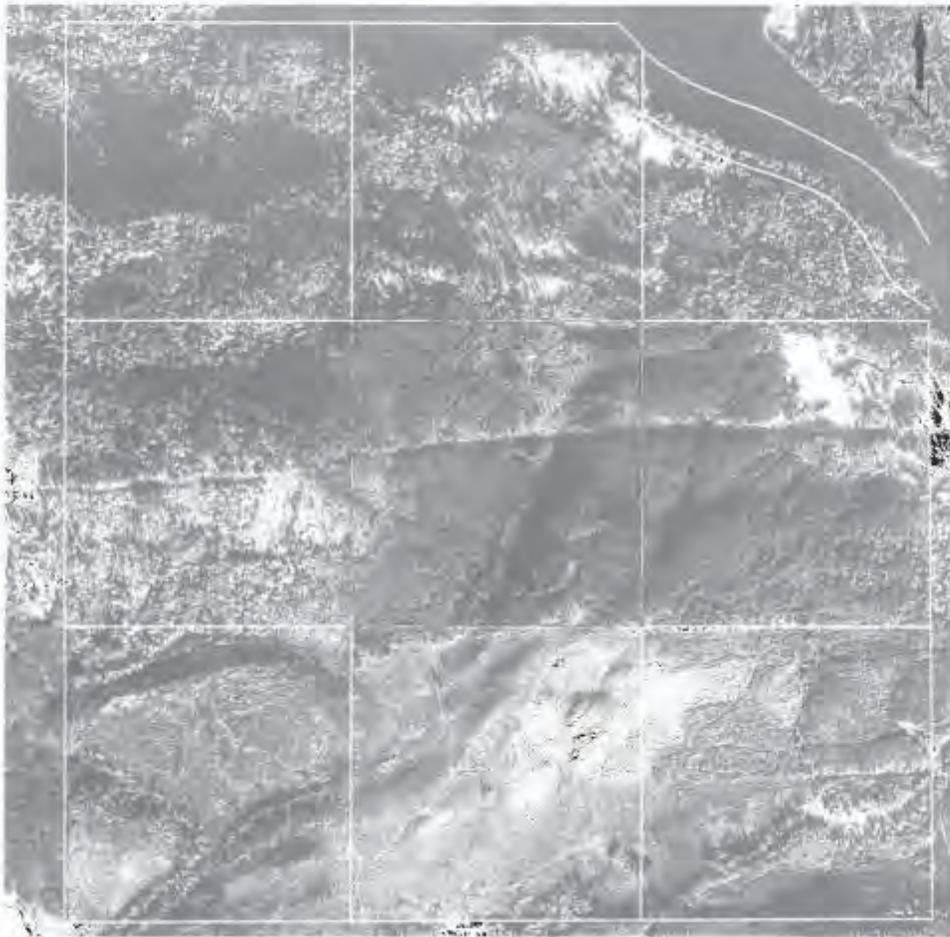


FIGURE A1

Witter and Revesz Property marked in Red, (SE Quarter of Sec 35 T6N R3E)

Note 1. BPA Line Segment 18 would lie parallel to the south red Property Line.

Note 2. Mature Forest stand along historic Klickitat Trail at center of Witter and Revesz property (red line).

Note 3. Witter and Revesz property shows long rotation moderate harvest Management.

2 of 13



14059

Figure A 2. Aerial photo of Witter/Revesz Family Dunegan Mountain Tree Farm. The 1/2 mile long south line of this tree farm is adjoined by the large clearcut in the foreground of the photo. This 1/2 mile property line is projected to be paralleled by the Central Alternative of the I-5 Reinforcement Project and extends between the two blue arrows in the photo. Note Mature Forest areas on the Witter/Revesz Family Tree Farm.

3 of 19

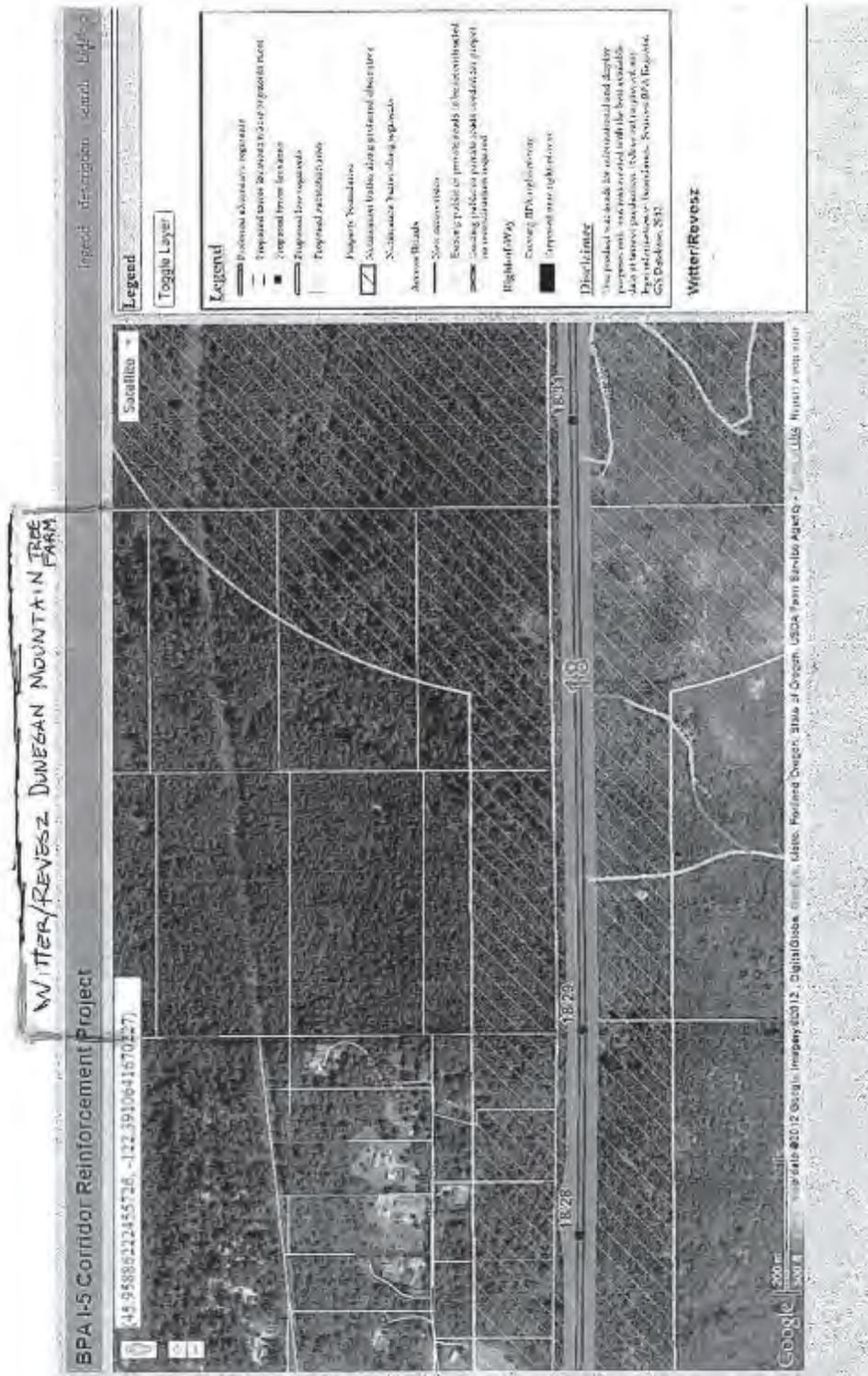


Figure A.3. BPA projected Segment 18 with easement located approximately 50 feet south of the Witter/Revez property shown outlined in red. Towers 18/29, 18/30, and 18/31 affect this Witter/Revez tree farm. Tower 18/30 location is obscured in the photo by the number "18".

This page intentionally left blank.

14859

14859-4 which removes a 175-foot wide easement Wire Zone half a mile long (equaling 10.6 acres) from forestry as easement for the existing line (built in the early 1950's) and one potential additional line which may be built on that easement some day. PacifiCorp's Vegetation Control Department does indeed preclude cost-effective, long-rotation forestry on a Border Zone swath where "Danger Trees" are increasingly being removed. So the industry-recognized standard of 200 feet each side of the actual easement being controlled by the needs of power transmission is gradually being imposed on this tree farm. On average, a tree on our side of the PacifiCorp Wire Zone becomes a danger tree at age 27 in PacifiCorp's eyes, which is just when such Douglas firs enter their most productive period of growth. The Yale-Merwin transmission line takes up 10.6 acres of our forestland for Wire Zone and 24.4 acres for Border Zone for a total of 35.1 acres on this 160-acre tree farm that has already been removed from growing prime timber. Is it fair to impact additional acreage by moving BPA's Line 18 segment closer to, or onto, us?

Our south border, as illustrated in Figure A1, was subjected to tree blow-down when our neighbors did a massive clear-cut. Our forest stand along that border is now pretty well stabilized. If BPA moves the location of Line 18 further north in this Tower 18/29 - Tower 18/31 portion, our edge trees will be defined as Danger Trees and our sturdy edge stand will have to be harvested early rather than in accordance with its planned long rotation. (See Figure A3.)

14859-5 Even though we are a small business, we have maintained continuous wildlife corridors, small sized clearcuts and are growing long-rotation timber for harvests; in particular, we have respected the stand of mature timber that follows the pre-pioneer Klickitat Trail. This became the Protzman Road---the pioneer route to the Cresap Ferry, which serviced the logging operations north of the Lewis River. This mature timber corridor contains several identified Legacy Cedar Trees with ancient signs of cedar-bark stripping by local Native Americans. It also contains a Perennial Initiation Point where water flows north to the Lewis River and south to Chelatchie Prairie, and is home to various wildlife species of note such as salamanders, etc. General George McClellan is reported to have gone this way in 1853 while leading a survey party to find a railroad route across the Cascades. Chapter 17 of the DEIS describes this Mature Forest corridor and Vegetation Map 17 -1C in the DEIS shows it. Also the aerial photos in Figures A1 and A2 show this mature forest corridor. Moving Line 18 fifty feet north to our south property line would, forever, remove more of this Mature Forest habitat.

In summary, we feel that BPA's easement for Line 18 should not be moved north to the property line of this tree farm because we are already sacrificing considerable revenue to an existing 175 foot wide power line easement and its Border Zones, and to preserving Mature Forest wildlife habitat.

14860

14859-5 Please see the response to Comment 14097-1.

14859

B. BOODY TREE FARM and Line Segment 28 as it impacts the Witter/Revesz Family Boody Tree Farm, an L-shaped 160 acre tree farm in T5N R4E Section 18.

If the Central Alternative were to be used for the I-5 transmission line (a location to which we remain absolutely opposed) then we have to consider tower and access road locations and very heightened security concerns in regard to the Witter/Revesz Family Boody Tree Farm so that it can survive as a business, be able to remain a tree farm, and continue the healthy Boody Creek watershed.

In regard to the material proposed in the BPA DEIS for the I-5 Reinforcement Project, there are site specific changes and requirements that we consider essential for there to be any chance that this BPA I-5 Project does not cause ruin to our tree farm business.

14859-6

TOWER AND TRANSMISSION LINE LOCATIONS:

Our highest priority is to be given to protecting the Boody Creek Watershed and the viability of our Tree Farms.

CURRENT LOCATIONS PROPOSED BY BPA IN DEIS:

On the aerial photo from BPA of line segment 28, the transmission line and 150 foot ROW easements (wire zone) appear to be on the neighboring land to the west of us, owned by the Safranskis, with possible occasional intrusions onto the Witter/Revesz property. The 200 foot "border zone" to the east of the defined easement (wire zone) would appear to be on Witter/Revesz from Tower 28/12 south to our southwest property corner. To the north of Tower 28/12 the transmission line would angle away from our property. (See Figure B1 for BPA proposed tower locations.)

28/12—Current location approximately appropriate near top of hill. It is unclear whether this tower and wire zone are on the Safranski or the Witter/Revesz property.

14859-7

28/13—Current location identified by BPA by GPS reading is untenable, unlikely. On the ground, it appears to be in a swale behind a ridge, and on a very steep slope to the west. It appears this tower is shown to be located on Safranski property.

28/11—Line and tower direction veers off to the west from 28/12 going north to Chelatchie Prairie. This tower is located on Safranski and would appear to isolate a widening sliver of unmanageable timber from his major stands going to the north.

6 of 19

14859-6 Comment noted.

14859-7 Please see the responses to Comments 14097-1 and 14119-2.

14859

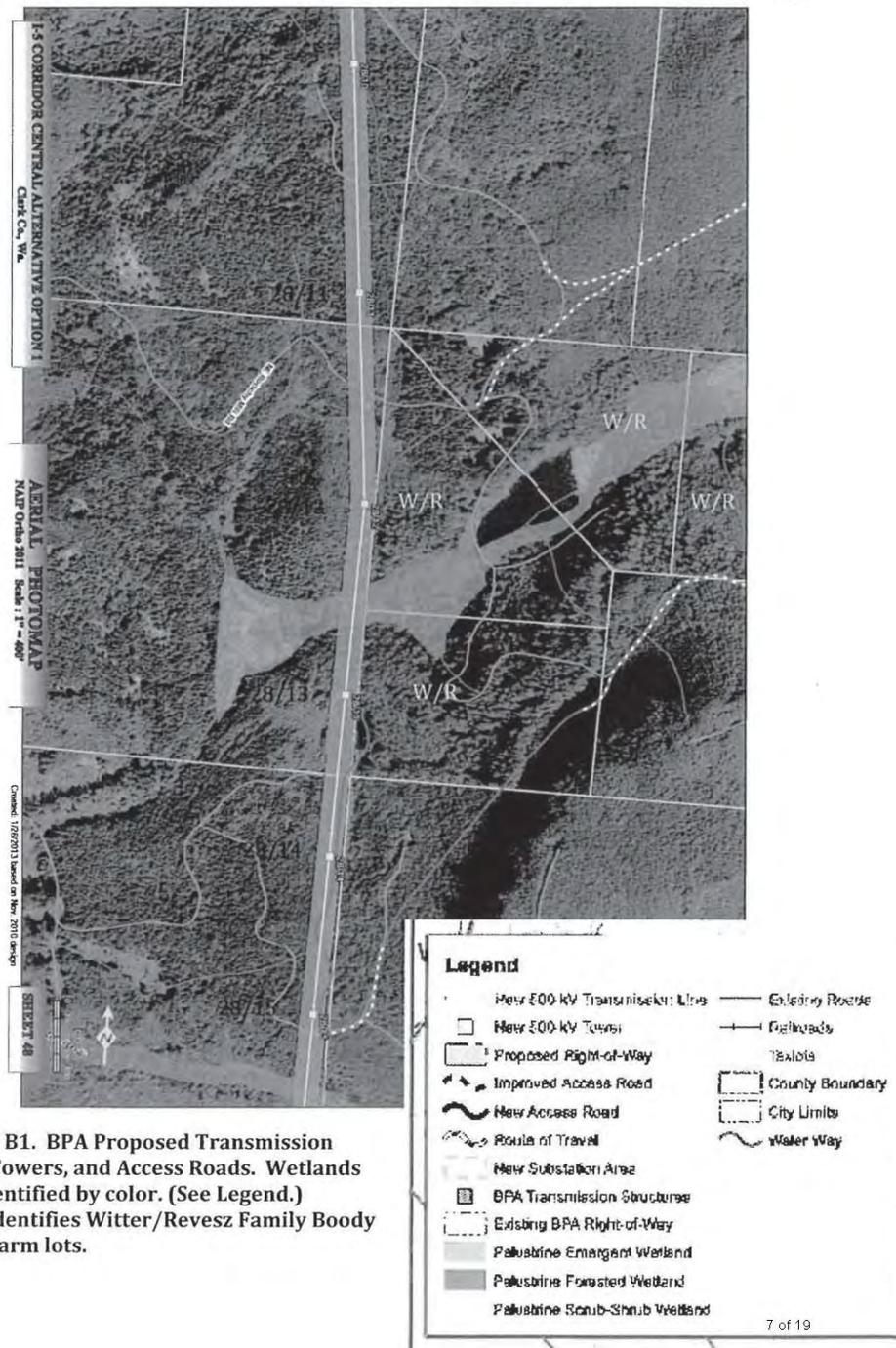


Figure B1. BPA Proposed Transmission Line, Towers, and Access Roads. Wetlands are identified by color. (See Legend.) W/R identifies Witter/Revesz Family Boody Tree Farm lots.

This page intentionally left blank.

ADJUSTMENTS TO TOWERS AND TRANSMISSION LINES AS SUGGESTED BY WITTER/REVEZ:

28/12—Location to be fine-tuned on the ground. Road access to be changed.

28/13—Placement to be adjusted to be on the west end of top of ridge. This spot appears to possibly be on the Witter/Revesz side of the property line between Safranski and Witter/Revesz. This location is suggested because it more adequately protects the Boody Creek and wetland. This should be on a high point that can be reached by an access road without cutting into a steep slope or using an awkward siting or going to a lower elevation. Access road to be changed to avoid swale and steep slopes.

14859-7

28/11—This tower and its easement seem subject to change so that neighbor Safranski has less orphaned land. We request it not be moved onto our property. The access road has never been illustrated in the BPA materials for 28/11. It does not need to cross our land.

28/14 and 28/15—These towers are located on Weyerhaeuser land. Siting may remain where they are located in DEIS. Placement of access roads to these 2 towers through us needs to be changed since current proposed location is unnecessarily fragmenting to our property.

Our suggestion for Tower 28/13 would result in taking some of our timberland for the tower location and easement. This suggestion is based on our field observations that this would reduce the negative impact of this project on the Boody Creek watershed and wetlands. Since the impact on the Creek is affected only by towers 28/12 and 28/13, towers 28/14 and 28/15 should remain as placed or at least not moved eastward to effect any of our tree farm. The height and elevations of towers 28/12 and 28/13 have critical impact on the Boody Creek wetland. We recommend special attention to these towers.

**PROPOSED ACCESS ROAD LOCATIONS NEED CHANGES:
ENHANCED SECURITY ABSOLUTELY REQUIRED**

14859-8

The use and location of roads to this back country Shangri-la presents a complicated set of difficulties. At this time the BPA DEIS has major access roads proposed on our tree farm. The roads to towers 28/12, 28/13, 28/14 and 28/15 are shown to cross our property. (Refer to Figure B1.)

On the map the entry to the road up the hill goes from public pavement at NE Healy Road in Chelatchie Prairie, passes through the Kravas property which is the old International Paper Mill grounds and from there crosses into the private property of

14859-8 Please see the response to Comment 14119-2.

14859-8 Per Holten-Anderson, goes up the steep slope to the south, then onto the bench of the Boody Creek watershed, still on Holten-Anderson, and eventually enters our property. This route is the access proposed by BPA to their transmission line. This road has been used over the decades for logging and access to various properties on the bench to the south of Chelatchie Prairie. The Witters used this road at times for tree farm management including for log hauling. It has not been kept in consistently good repair nor is it open for free public access. (See Figure B2.)

14859-9 The lack of easy road access to the Boody Creek watershed and the forested bench surrounding it has been a major protection to our place, the Holten-Anderson tree farm and the tree farm that is now owned by Safranski. Improving this road for BPA access will increase the need for protection from intrusion of this area that is unusually attractive to those that cruise the back country looking for lovely areas especially areas that are unsupervised. To be able to control unwelcome trespass and intrusion to our place and the ruin of Boody Pond, it will be essential that we have easement and use of this entire road system through our place and any entry to it which includes the access roads on Weyerhaeuser to the south and within the L of our property, the road across Holten-Anderson, and the road through the Kravas mill property so that we can enter and patrol this road system with its increased BPA-created accessibility by determined public intruders.

After studying a number of maps and comparing BPA proposed road access to and through our place to the proposed tower sites, we find many sections of this road system that should be placed in revised locations. However, this will require both additional time on the ground for us and for us accompanied by experts and the loggers and foresters that have worked with us or our parents in the past so that excess roads and fragmentation of our property is avoided or at least minimized. We expect that if this project includes a road system on our property it will provide functioning logging roads for us and do as little damage to our tree farm as possible.

14859-10 As mentioned above in our preliminary suggestions for tower locations, the BPA proposed access roads to towers 28/11, 28/12, 28/13, and the spur to 28/14 and 28/15 are not well-placed. We expect to take the time to analyze and to avail ourselves of the use of experts to make this a well-planned project before any final decisions are made. We do have tentative suggestions for some of the access roads and we also know some of the currently proposed road locations are not acceptable. (See Figure B3.) For instance, the access road to 28/12 is shown going through our invasive weed patch. We and our parents before us have battled Giant/Japanese Knotweed for decades in this area. There are also additional invasive weeds in that location which is near the old homesite for the original homesteaders. Introducing a road through knotweed that goes to the clearcut corridor of the transmission line would establish an open route for the knotweed to get into the Boody Creek. Knotweed is a known extreme threat to the well-being of creeks and riparian areas if it gets a start there. Knotweed spreads extremely easily if established in a waterway and we have tried for years to avoid this happening. There is an already present old logging drag that goes to the approximate tower 28/12 site, does not

14859-9 Please see the response to Comment 14119-2.

14859-10 Please see the responses to Comments 14097-1 and 14119-2.

14859

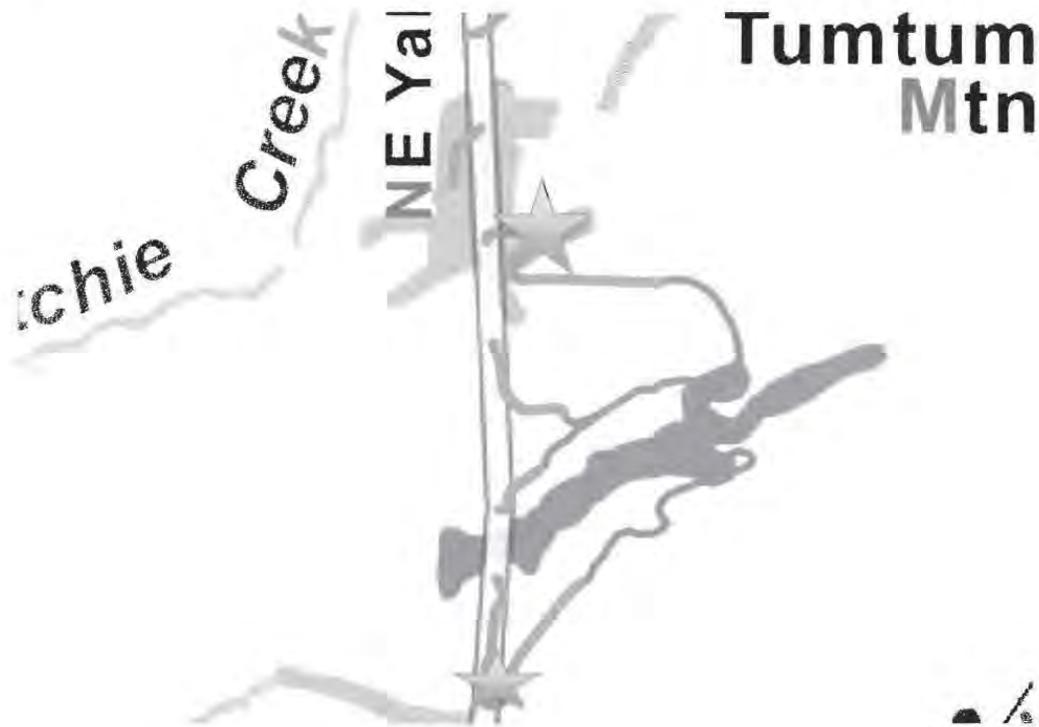


Figure B2. Road system from Chelatchie Prairie at northern blue star to Tower 28/15 on Weyerhaeuser timber land at southern blue star. Refer to Figure B1 for road and tower location details on this system. The red roads are proposed new roads to access proposed tower sites. We find the new road locations on us inappropriate and in need of relocation.

The dark green shows the location of wetlands of high quality and encompasses most of the length of Boody Creek. About 1/2 of the dark green area is on the Witter/Revesz Family Boody Tree Farm. (This figure is copied from BPA's DEIS, Chapter 16, Map 16-2c: Wetland Quality. The qualitative Wetland Rating given to Boody Creek of "High", colored dark green, is the highest rating given in this publication.)

The yellow line shows the proposed location of a portion of segment 28 of the transmission line of the Central Alternative of the I-5 Project that has been chosen as BPA's preferred alternative. The yellow transmission line crosses the valued wetlands of Boody Creek as illustrated. The selection of the siting location of the closest towers to the creek are of great concern from an ecological standpoint and is a priority of the Witter/Revesz family in order to retain the high quality health of this watershed.

10 of 19

14859

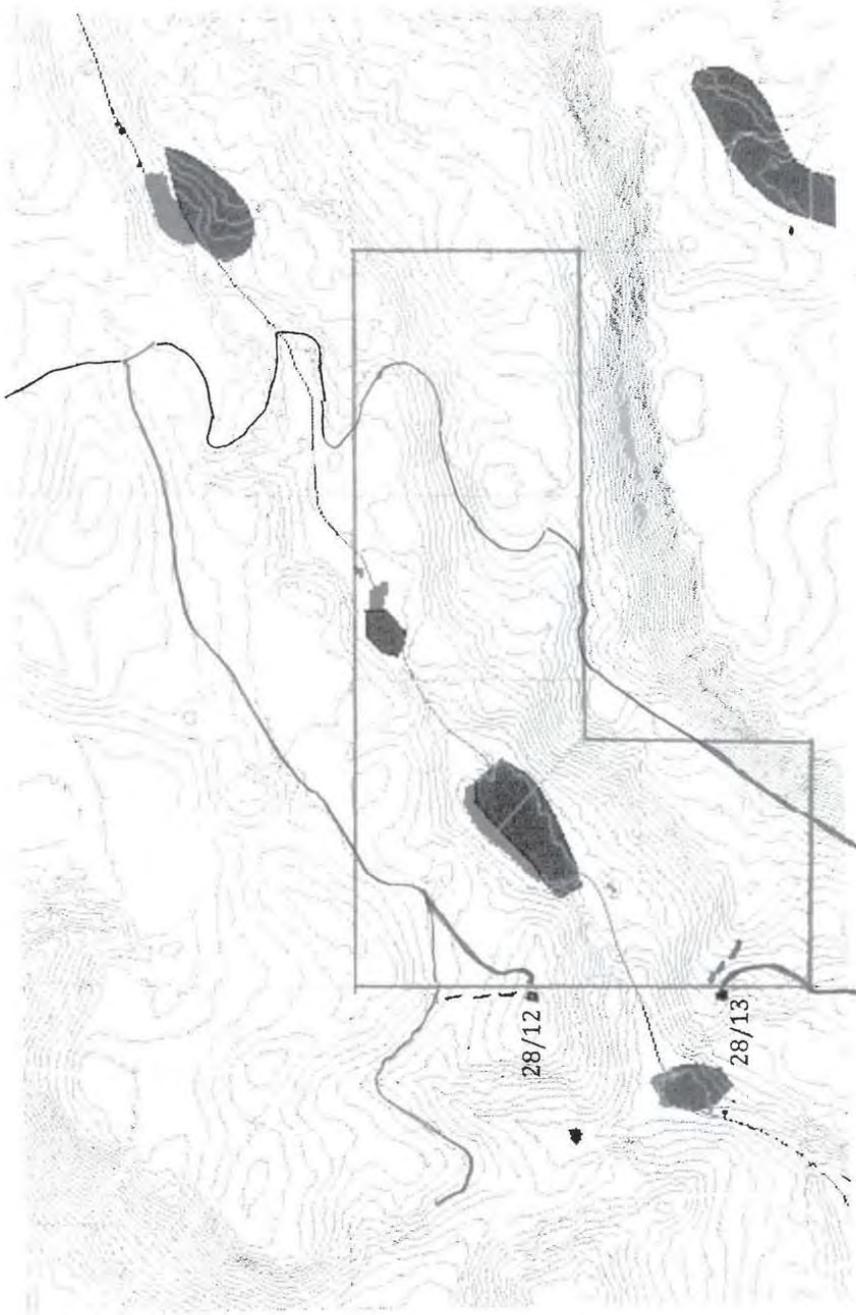


Figure B3. New Road Locations not found Acceptable by Witter/Revesz.

Relocations for Access Roads to Towers 28/12 and 28/13 and relocation of Tower 28/13 appears to be indicated. Roads shown in purple need analysis and relocation. Dashed lines are tentatively suggested relocations of access roads to Towers 28/12 and 28/13. Further analysis of connecting roads will be necessary if the project is built here.

11 of 19

- 14859-10 enter the knotweed patch and would be more appropriate. However, this logging drag, and the sites for 28/12 and 28/13 are close to the not well-defined property line between Witter/Revesz and Safranski. It is requested that BPA survey and mark this property line so that we as property owners can determine more precisely the location of the towers, transmission line and road locations that are on us or whether are on the neighbor.

DESCRIPTION OF BOODY CREEK WATERSHED AND WETLAND: PRESENT AND NEEDED PROTECTION

- 14859-11 The property is bisected diagonally by a highly functioning, fish-bearing creek of very high quality. Boody Creek Valley is illustrated in the accompanying aerial photo. (See Figure B4.) Boody Creek throughout its valley is characterized by wetlands and small ponds. (Boody Creek, wetlands and ponds are shown in Figures B4-9.) In addition, our tree farm contains the largest pond on this creek, known as Boody Pond for a century or more. This pond has been a longtime haven for fish and wildlife. (Figure B5 a and b.)
- 14859-11 The history of this pond and creek since 1946 includes continuing protection and enhancement by Leon and Winifred Witter and their descendants. A major project to stabilize the Boody Pond was undertaken by the Witters and completed in 1990. The results are illustrated showing the five culvert design of the outlet reinforcement. (See Figure B6). The fifth culvert is a portion of a fish ladder that is the route established as the entry and exit for fish and other aquatic organisms swimming between Boody Pond and downstream Boody Creek. This project was entirely paid for by the Witters under the approval of the WDFW and the design and supervision of construction by Fred Pickering. This fish ladder/pond stabilization project characterizes the emphasis on this tree farm of providing habitat of excellence for aquatic and terrestrial life.
- 14859-12 Boody Creek for its full length currently provides a very valuable watershed of ponds, wetlands, rapids, and waterholes that is productive of native cutthroat, native mussels (Western Pearlshell), water fowl, birds of prey, songbirds, native mammals and the aquatic organisms, reptiles and amphibians that are also native to western Washington. Some probable occurrence of coho and steelhead is recorded in various references.
- 14859-13 To continue this healthy creek condition, it is essential that the circumstances that have made this possible be sustained or be followed by conditions that will equally protect it. Unfortunately, this seems unlikely. The wetland where the transmission line is proposed to go threatens the health of the vegetation and the wetland. Removal of vegetation will damage the wetland and increase the likelihood of intrusion along the right-of-way. The specific site that is proposed for the Boody

- 14859-11 The EIS summarizes distribution of special-status fish species in Section 19.1, Special-Status Species. Segment 28 would cross Boody Creek at stream crossing 28-5. The EIS identifies this creek as an Unnamed Tributary to Cedar Creek. Table 19-1 and Map 19-1C indicate that this crossing is used by Lower Columbia steelhead. Table D-1 in Appendix K indicates production of adult steelhead is in the 40th percentile among all anadromous fish-bearing streams crossed by transmission line corridors. Boody Pond described in the comment is located about 700 feet upstream of the transmission line corridor. Boody Pond would not be impacted by the project.
- 14859-12 Please see the response to Comment 14480-3.
- 14859-13 Please see the response to Comment 14724-30.

14859



Figure B4. Boody Creek Valley. The course of the creek in this isolated valley goes between horizontal arrows. The vertical arrow points at Boody Pond on the Witter/Revesz Family Boody Tree Farm.

13 of 19

14859



Figure B5. Boody Pond.
a. A peaceful summer day—let's go fishing!
b. Bufflehead ducks in winter.



14 of 19

14859



Figure B6. The five culverts at the Boody Pond outlet. The Fish ladder goes from the culvert on the right at Pond level down to the creek level. This project stabilized the pond above that has probably been present for centuries.

15 of 19

This page intentionally left blank.

14859

14859-13 Creek crossing is illustrated in Figures B7 a and b and Figure B8. We are told it is likely the lovely old Western Red Cedar in the latter photo would have to be removed even if the towers are placed as high as is practical. Elevating the towers that are closest to this wetland would help retain the shade, vegetation and health of the Boody Creek and wetland and, hopefully, not interrupt the fish runs, the amphibians, and/or the mussel beds in this area.

14859-14 So far, what has made the superior condition possible: **it is a tree farm**, the tree farm is managed sustainably with small harvests but productive enough to be a family asset; it is a family tree farm. The philosophical position of—Tree Farms—The Best Use of the Land is characterized by the stewardship proposed and carried out on an ongoing basis on this family tree farm. This conveys the truth that a healthy forest not only produces fine timber, lumber, paper and pulp, and many other forest products, but also provides the conditions for the highest quality clean water, clean air, healthy habitat for fish and wildlife, and home for native vegetation. Carbon sequestration is now added to the list of positive contributions. With the underlying purpose of this family tree farm to promote continuing sustainable forestry stewardship, these positive results are heightened by our ownership.

What else has being a tree farm provided? The creek can be given as high a priority as the owners wish to provide. The riparian buffer is highly protected and restricted by Washington State law on small forest landowner tree farms. However, the most effective protection has been that the creek and pond have been protected by site-specific management to the extent that private land and tree farm purpose can protect it. The riparian buffer contains frequent large, live conifers as well as other shade and nutrient supplying vegetation. The large woody debris illustrated in Figure B9 has been retained since long before state regulation; this is what a pristine creek looks like.

14859-15 In addition, another protection is that **access has been limited** but in a way that has more or less balanced with the activities of intruders so that the Boody pond, the Boody watershed with its several other ponds and wetlands and our tree farm have been able to continue. However, this balance is fragile. It has been our Shangri-la but that same peaceful beauty of an isolated fish, duck, salamander, wildlife pond is an attraction that also contains the seeds of its own destruction if it becomes open to unrestrained entry by a much larger number of people. Gates may help at times. However, we have found on our back-country tree farms that gates only restrain the well-behaved so that frequently there is vandalism and breaking in through gates. There is no law-enforcement patrol or response for this type of crime so that typically the landowners supply whatever control is performed. Consequently, the increased access to intruders that will be provided by BPA's improved and/or new access roads and by the clearcut corridor under the transmission line threatens the integrity and health of our tree farm and the Boody Creek watershed.

16 of 19

14859-14 Please see the response to Comment 14724-30.

14859-15 Please see the responses to Comments 14457-2 and 14724-30.

14859



Figure B. 7. a. WETLAND at approximate location of BPA transmission line Segment 28 at the "Crossing of Boody Creek" between Towers 28/12 and 28/13. (Glimpse of Boody Creek at center.)

b. This same wetland crossing area has several other small streams and wet spots and nurtures a large variety of aquatic and terrestrial native wildlife. See below.



7 of 19

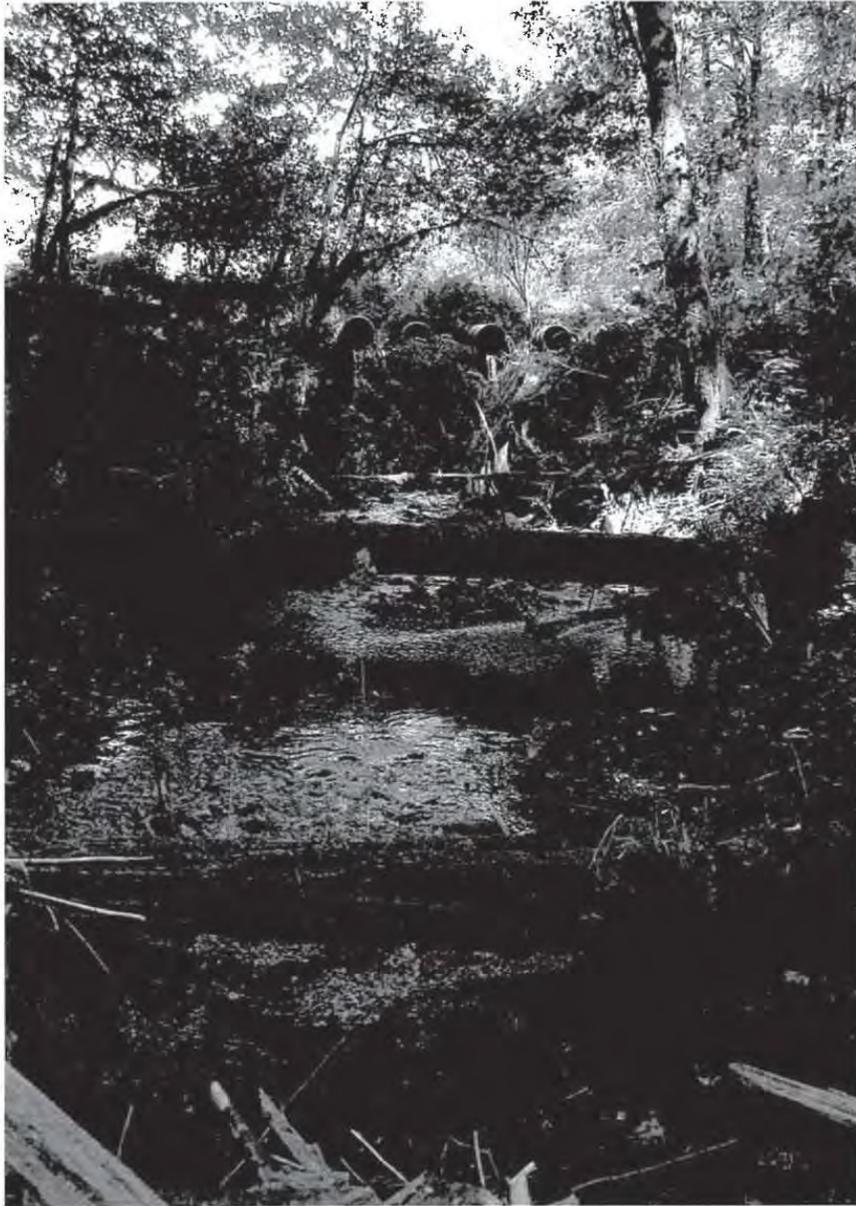
14859



B8 Big Western Red Cedar Tree that will be lost to the transmission line vegetation management. It measures 37 inches in diameter at breast height.

18 of 19

14859



B9. Naturally occurring Large Woody Debris and shade on fish-bearing Boody Creek in summer. Witter pond stabilization project is visible in background.

19 of 19

This page intentionally left blank.

14860



Seattle Office:

Spokane Office:

Contact:

Reply to: Seattle Office

March 29, 2013

Bonneville Power Administration
I-5 Corridor Reinforcement Project

**RE: Comments on the November 2012 Draft Environment Impact Statement
for the I-5 Corridor Reinforcement Project – Reasonable Alternatives**

Bonneville Power Administration:

14860-1

On March 24, 2013, on behalf of a Better Way for BPA, I submitted the enclosed comment letter and attachments via facsimile and e-mail transmission. Today, BPA representative Miriam Asgharian called to say that BPA had not received the email but had received the facsimile. However, Ms. Asgharian stated that some of the attachments were too dark to read and requested that I resubmit via U.S. Mail. Enclosed is that resubmittal.

Thank you for your consideration of these comments.

Very truly yours,

BRICKLIN & NEWMAN, LLP

David A. Bricklin
Julie K. Ainsworth-Taylor
Attorneys for A Better Way for BPA

Enclosure

cc: Client

1 of 30

14860-1 Thank you for resubmitting the attachments.

14860

**Bricklin &
Newman
LLP**

Seattle Office:

Spokane Office:

Contact:

Reply to: Seattle Office

March 24, 2013

Bonneville Power Administration
I-5 Corridor Reinforcement Project

VIA Fax:

FACSIMILE COVER SHEET**RE: Comments on the November 2012 Draft Environment Impact Statement
for the I-5 Corridor Reinforcement Project - Reasonable Alternatives**

Bonneville Power Administration:

Attached please find A Better Way for BPA's comments in regards to BPA's failure to consider, in detail, all reasonable alternatives in the DEIS for the I-5 Corridor Reinforcement Project. A copy of this submittal has also been sent via e-mail to I-5@bpa.gov.

Thank you for your consideration of these comments.

Very truly yours,

BRICKLIN & NEWMAN, LLP

David A. Bricklin
Julie K. Ainsworth-Taylor
Attorneys for A Better Way for BPA30 pages to follow

2 of 30

This page intentionally left blank.

14860



**Bricklin &
Newman**
LLP

Seattle Office:
1001 Fourth Avenue
Suite 3303
Seattle, WA 98154

Spokane Office:
35 West Main
Suite 300
Spokane, WA 99201

Contact:
Phone: 206-264-8600
Toll Free: 877-264-7220
Fax: 206-264-9300
www.bnd-law.com

Reply to: Seattle Office

March 24, 2013

Bonneville Power Administration
I-5 Corridor Reinforcement Project
PO Box 9250
Portland, OR 97207
e-mail: I-5@bpa.gov

**RE: Comments on the November 2012 Draft Environment Impact Statement
for the I-5 Corridor Reinforcement Project – Reasonable Alternatives**

Bonneville Power Administration:

I write on behalf of A Better Way for BPA and its members to provide comments on the Draft Environment Impact Statement for the I-5 Corridor Reinforcement Project (DEIS) in regard to the DEIS's failure to address, in detail, all reasonable alternatives such as the Pearl Routes and Double-Circuiting along the West Alternative Route. Thank you providing the opportunity for the members of the communities impacted by this proposed project to comment.

14860-2

A Better Way for BPA is a coalition of rural property owners in Cowlitz County and Clark County working together to address concerns over the construction of the Bonneville Power Administration's (BPA) proposed I-5 Corridor Reinforcement Project in southwest Washington. A Better Way for BPA is concerned about the impacts - economic, environmental, and aesthetic - that the proposed transmission line will have in their communities. A Better Way for BPA believes that reasonable alternatives are available to BPA that will maintain a healthy and diverse environment in their southwestern Washington communities. Specifically, we demonstrate that BPA erroneously eliminated at least two reasonable alternative – the routes referred to as the "Pearl Routes" and the Double-Circuiting of the West Alternative – from a detailed review within the DEIS. Consequently, a new or supplemental EIS must be prepared so the public and agencies have the opportunity to comment on those alternatives before a final EIS is prepared.

3 of 30

14860-2 Specific comments are addressed below.

14860

Bonneville Power Administration – I-5 Corridor Reinforcement Project
 March 24, 2013
 Page 2

**THE NEED FOR THE PROJECT IS TO INCREASE ELECTRICAL CAPACITY AND
 TRANSFER CAPABILITY**

14860-3

The range of reasonable alternatives is a function of the agency's purpose and need in pursuing the project. Alternatives that meet an agency's purpose and need for a project should be reviewed, in detail, in the environmental impact statement. Alternatives that do not meet an agency's needs may be eliminated. *City of Carmel by the Sea v. U.S. Dept. of Transportation*, 123 F.3d 1149, 1155 (9th Cir. 1997) (citing *Citizens Against Burlington Inc. v. Busey*, 938 F.2d 190 (D.C. Cir., 1991)). BPA's stated need for this project is to increase electrical capacity and transfer capability to meet growing demand in Southwest Washington and Northwest Oregon.¹ More precisely, BPA's stated need for the project is to address these concerns in relationship to the South of Allston (SOA) path. DEIS at 1-2 to 1-3.

BPA acknowledges that eliminated alternatives, such as the Pearl Routes and Undergrounding the transmission line, would meet the project's need – capacity and capability. Yet, despite this, BPA failed to address these alternatives in detail within the DEIS because BPA made a preliminary "threshold" decision that the impacts of these alternatives were too great. This is an error BPA should correct with a new or supplemental DEIS.

ALL REASONABLE ALTERNATIVES MUST BE ANALYZED IN DETAIL

14860-4

NEPA's environmental review process requires that an EIS contain reasonable alternatives. 42 USC § 4332(c)(iii). NEPA regulations explain not only that the alternatives analysis is the "heart of the environmental impact statement" but that the agency must "rigorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14. By analyzing a full range of reasonable alternatives, NEPA's purpose of fostering informed decision-making and public participation is satisfied. *Westlands Water District v. U.S. Dept. of Interior*, 376 F.3d 853, 868 (9th Cir., 2004). The consideration of alternatives in detail allows reviewers of the EIS to evaluate the comparative merits of each alternative. 40 C.F.R. § 1502.14(b).

While NEPA requires an analysis of alternatives, it recognizes that some alternatives may be eliminated from detailed study but does require a brief discussion as to the rationale reasons for their omission. 40 C.F.R. § 1502.14. The existence of a viable but unexamined alternative will render an EIS inadequate. *Oregon Natural Dessert Ass'n v. Bureau of Land Management*, 625 F.3d 1092, 1100 (9th Cir., 2008) (citing *Vermont Yankee Power Corp. v. Natural Resource Defense Council*, 435 U.S. 519 (1978); *Westlands Water Dist. v. U.S. Dept. of Interior*, 376 F.3d 853, 858 (9th Cir., 2004)).

There is no doubt that all of the alternatives, including those that the DEIS does analyze in detail, will have substantial impacts on the areas the transmission line transects. BPA's preliminary or threshold decision to eliminate alternatives based on impacts put the "Cart before the Horse." The analysis of impacts is the function of NEPA's full environmental review process – to use the EIS to evaluate the severity of impacts, and potential mitigation to lessen that severity, and then determine which alternative is the more environmentally-sound alternative. Simply put, any

¹ The need should not be narrowly defined as a line from Castle Rock to Troutdale as BPA appears to do with within the DEIS. Such a defined limitation may erroneously foreclose consideration of other alternatives that meet the true need.

4 of 30

14860-3 Please see the response to Comment 14677-6.

14860-4 Please see the response to Comment 14677-6.

14860

Bonneville Power Administration – I-5 Corridor Reinforcement Project
 March 24, 2013
 Page 3

14860-4 routing alternative will have extensive impacts but this is the information needed to be presented to the decision-maker and the public in a comparative analysis format within a DEIS. Not, as BPA has done, in a preliminary, threshold analysis lacking rationale support. A new or supplemental DEIS is required to analyze these alternatives.

▪ **Reasonable Alternatives Exist West of the Interstate 5 Corridor – the Pearl Routes**

14860-5 Section 4.7 of the DEIS sets forth alternatives that were considered but eliminated from detailed study in the DEIS. Section 4.7.2.1 addresses transmission line routing alternatives commonly referred to as the “Pearl Routes.” DEIS at 4-22. These routing alternatives were proposed to run from Castle Rock, Washington west of Interstate 5, cross the Columbia River north of Longview, Washington, then head south for final connection with BPA’s existing Pearl Substation near Wilsonville Oregon. Exhibit A, September 2009 I-5 Corridor Reinforcement Project Study Area Map. Both during the scoping of this project and with comments subsequently filed, interested parties, including A Better Way for BPA, repeatedly voiced concerns over BPA’s premature elimination of route alternatives traveling through Oregon. January 2010 Scoping Summary; April 2011 Supplemental Comment Report; March 2012 Supplemental Comment Report; January 2013 Supplemental Report. Yet, despite these repeated requests, BPA did not conduct a NEPA-based detailed environmental review of any of the Pearl Routes in the DEIS.

As stated above, the overarching need for the I-5 Corridor Replacement Project (Project) is to increase the electrical capacity and transfer capability of BPA’s existing transmission system in response to the increasing congestion on the system and growing system reliability concerns. DEIS at 1-1. BPA expressly acknowledges that the Pearl Routes address the transmission capacity need of the Project just like the action alternatives addressed in the DEIS. DEIS at 4-22; Exhibit B – September 2009 Korsness/Bekkedahl Pre-Decisional and Deliberative Presentation to the Administrator at 4 (Sept 2009 Pre-Decisional Presentation).² Thus, the Pearl Routes are reasonable alternatives that should have been considered. But, without a NEPA-based review of impact or any detailed publically-available review documents, BPA summarily dismisses any Pearl Route alternatives, contending they were not reasonable. DEIS at 4-22 – 4-23.

14860-6 In the Sept 2009 Pre-Decisional Presentation, BPA states that “the routes in the Troutdale corridor [the action alternatives], taken by themselves, represent a very wide range of reasonable routing options for the project ... the routing options in the Pearl corridor provide no significant advantage to the routing options in the Troutdale corridor.” Exhibit B at 2. This rationale for not addressing the Pearl Routes in detail in the EIS is inadequate. An alternative need not provide “a significant advantage” to merit detailed analysis in an EIS. If an alternative addresses the agency’s purpose and need, it should be addressed. It need not be significantly better.

BPA’s Sept 2009 Pre-Decisional Presentation also asserts several disadvantages of the Pearl Routes such as a new Columbia River crossing; the routes would pass thru residential, timber, and agricultural land; and the need to acquire new right-of-way. *Id.* Yet it quickly becomes

² Exhibit B is marked “Draft”. However, despite several Freedom of Information Act (FOIA) requests, this is the only explanatory document A Better Way for BPA has received from BPA.

5 of 30

14860-5 Please see the responses to Comments 14443-1 and 14638-4.

14860-6 Please see the responses to Comments 14443-1 and 14638-4.

14860

Bonneville Power Administration – I-5 Corridor Reinforcement Project
 March 24, 2013
 Page 4

apparent that these are all makeweights. The action alternatives studied in detail within the DEIS dealt with these same issues. The true rationale for the Pearl Routes elimination comes through in a table contained on Pages 4 to 13 of Exhibit B. This table contains no analysis as to the environmental impacts of the Pearl Routes, this table identifies the political reasons behind the agency's exclusion of the Pearl routes—a fear that landowners and political bodies in Oregon would become involved in the process and insist that BPA's analysis of those routes be done with care. BPA was concerned this would add to the amount of time it had to devote to correctly analyzing the alternatives. Thus, BPA explained, analyzing these routes would create a variety of political and administrative problems it wished to avoid:

- The complications faced by adding additional state and local governments and the political consequences of competing interests, e.g. an Oregon vs. Washington stance.
- The consideration of the Pearl Routes would “infuriate several thousand additional land owners” and would “mobilize the Troutdale option land owners to, in their eyes, the apparent feasibility of building to Pearl instead.”
- The “staggering” number of the public needing to be notified and participating, creating greater issues and challenges.
- The number of issues, challenges, and problems would require more BPA staff and resources.
- Not being able to meet the 2.5 year schedule given the logistics of completing the environmental analysis and document preparation – an “enormous and time consuming” undertaking.

14860-6

The Sept 2009 Pre-Decisional Presentation clearly reveals the factors motivating BPA to bury the Pearl (Oregon) Routes. Simply put, BPA wanted to avoid the political and administrative issues that were present along that route option; essentially the fear of political opposition. But the same political and administrative issues were present along each and every route that BPA did address in detail in the EIS. If neighborhood and political opposition were a legitimate basis for excluding otherwise reasonable alternatives from the EIS, none of the alternatives would have survived.

When it came time to draft the EIS, BPA was more careful and hid its real motivations from view. None of the political and neighborhood opposition reasons are clearly articulated in the DEIS. Yet the earlier Sept 2009 Pre-Decisional Presentation makes clear the real reasons for BPA's decision to eliminate these alternatives. And it is equally clear that these are illegitimate grounds for excluding the Pearl Routes from consideration. But BPA cannot so easily hit the delete key. Its real reasons for avoiding the Pearl Route options are laid out for all to see in the Sept 2009 Pre-Decisional Presentation. When the drafters of the EIS saw that presentation and recognized that the agency had used faulty reasoning to eliminate the Pearl Routes, they should have stopped the process and told the agency to go back and make things right - do the analysis necessary to include the Pearl Routes in the DEIS. Instead, the drafters pursued the course of hiding the ball. They simply omitted from the DEIS most of the agency's stated rationales for dropping the Pearl Routes (i.e., omitted all of the neighborhood and political opposition rationales). But the record cannot so easily be erased.

6 of 30

This page intentionally left blank.

14860

Bonneville Power Administration – I-5 Corridor Reinforcement Project
March 24, 2013
Page 5

- The better option for the drafters of the DEIS would have been to acknowledge the agency's error and to have held off on publication of the DEIS until the analysis of the Pearl Routes could be concluded and those routes included in the DEIS. It is now too late for that, but it is not too late for the error to be addressed. BPA can either go back now and prepare a new DEIS that includes the Pearl Routes or it can wait until a judge orders it to do so at the end of this process. If BPA is as concerned with time and cost as it says, the far better choice is for BPA to correct this fatal flaw now. Delaying corrective action will only increase the waste of time and money that BPA is generating by using its flawed approach.
- 14860-6 While the Sept 2009 Pre-Decisional Determination made clear that BPA was primarily motivated by potential neighborhood and political opposition to the Pearl routes, it did include a number of environmental problems with the Pearl Routes in an attempt to buttress its decision to exclude those routing alternatives. DEIS at 4-22. But an examination of those environmental issues demonstrates that they are so-many "makeweights." The environmental issues BPA foresaw along the Pearl Routes are the same types of environmental issues present along the Washington routes. The existence of these issues along the Pearl Routes did not make those routes any less reasonable than the routes that were addressed in detail in the EIS—all of the alternatives that were considered in the DEIS pose the same risks and, therefore, could have been eliminated for the very same reasons BPA arbitrarily eliminated the Pearl Routes.
- 14860-7 For example, BPA states the Pearl Routes were eliminated because these routes would require new rights-of-way. DEIS at 4-22. But these same consequences arise in varying degrees for all of the action alternatives. The Preferred Central Alternative would require "up to 2,113 acres of new easement" for right-of-way and roads; only 10 percent of this proposed route would utilize existing right-of-way. DEIS at 4-33, Table 4-10; DEIS at S-6. Without a full detailed analysis allowing for a comparative analysis between other reasonable alternatives, the decision-maker and the public are not fully apprised of the impacts arising from right-of-way acquisition.
- 14860-8 BPA also contends the Pearl Routes would require "removing private homes, significantly increasing project costs and social impacts." DEIS at 4-33. But, BPA's previous analysis states that the Pearl Routes would require the removal of only one, possibly ten homes (route/segment dependent). Exhibit B at 2. This quantitative detail is missing from the DEIS and surely cannot be seen as significantly increasing costs or resulting in "high social impacts of housing removal" as the DEIS alleges. DEIS at 4-22.
- 14860-9 Indeed, BPA has recognized that the Pearl Routes would potentially impact substantially fewer landowners – 3,100 land owners, 5,900 parcels of land compared with 7,750 landowners and 11,600 parcels of land with the DEIS action alternatives. Exhibit B at 2. Such a significant decrease in impacted owners and property –4,650 fewer impacted landowners and 5,700 fewer parcels – should have caused BPA to view these routes as likely having fewer social and environmental impacts, not more.
- 14860-10 BPA contends the Pearl Routes would require a new Columbia River crossing that would locate towers on islands currently managed for wildlife habitat. DEIS at 4-22. However, BPA fails to reveal that this impact would only occur at one of the three crossing alternatives for the Pearl Routes. See Exhibit A (Segment 49 crossing over national park land). BPA also fails to state in the DEIS or its September 2009 Pre-Decisional Presentation how the crossing would actually

7 of 30

- 14860-7 Please see the response to Comment 14443-1 regarding the elimination of the Pearl Routes from detailed study in the EIS. The reason cited by the commenter was one of many factors considered by BPA in eliminating the Pearl Routes from detailed study. Also see the response to Comment 14777-13.
- 14860-8 Comment noted. Section 4.7.2.1, Alternative Routes from Castle Rock, Washington to near Wilsonville, Oregon (Pearl Routes), has been updated to reference the BPA document with analysis of the Pearl Routes that is mentioned by the commenter, as well as an Issue Brief that BPA issued in August 2010 entitled "Why all the route options go from Castle Rock to Troutdale". Because of the potential number of homes that would have to be removed for the Pearl Routes, BPA believes there indeed would be a significant social impact. BPA also believes it is reasonable to expect significant costs to relocate people from these removed homes.
- 14860-9 Please see the response to Comment 14715-15.
- 14860-10 Comment noted. Consistent with NEPA, the EIS briefly discusses the reasons why the Pearl Routes were considered but eliminated from detailed study in the EIS. The reason cited by the commenter is one of many. Given the sensitivity of the wildlife-managed lands that could be impacted by the Pearl Routes, BPA believes it was reasonable to consider this impacts as one of these reasons. Please see also the response to Comment 14860-8.

14860

Bonneville Power Administration – I-5 Corridor Reinforcement Project
 March 24, 2013
 Page 6

14860-10 impact wildlife habitat³ so as to support complete elimination of all of the Pearl Routes. If the span between towers is generally 1,150 feet and each tower permanently disturbs 0.08 acres (DEIS at 3-2 and 3-6), then permanent impact to these areas may be minimal. Moreover, any construction impact could presumably be addressed with mitigation. A variety of measures to reduce the impacts could be employed, e.g., timing limits to avoid construction during sensitive nesting seasons, on-site restoration, or off-site compensator mitigation. The DEIS recognizes the same type of mitigation opportunities for the action alternatives analyzed in detail in the EIS (see, e.g. DEIS at 18-64 to 18-65, Wildlife; DEIS at 19-28, Fish) yet inexplicably fails to consider the opportunities presented by those mitigation measures when seeking to justify exclusion of the Pearl Routes.

14860-11 Lastly, BPA claims impacts to visual resources would be high at this crossing. DEIS at 4-22. The DEIS does not state the type or quality of visual resources at this crossing but, once again, this impact is shared by all of the action alternative. See DEIS at Chapter 7 Visual Resources.

14860-12 BPA's 2009 Pre-Decisional Presentation also asserts that the Pearl Routes were eliminated because of cost. The BPA asserts the Pearl Routes would cost an undisclosed "millions of dollars" more. For a project estimated to cost about half a billion dollars, an alternative that costs "millions more" is not necessarily out of the range of reasonable alternatives. Simply because an alternative is somewhat more expensive does not render it unreasonable. If this were the case, then both the Central and East Alternatives, both with an estimated price tag \$104 million (or approximately one-third) more than the West Alternative, could have been eliminated from consideration yet it is the Central Alternative that BPA has labeled as its "preferred alternative."⁴

Moreover, if cost estimates are based on the length of the various routes⁵, the DEIS action alternatives and the Pearl Routes appear to be similar. The Pearl Routes ranged from 67 miles (shortest) to 97 miles (longest). The DEIS action alternatives range from 67 miles (shortest) to 77 miles (longest). In addition, BPA has wrongly redacted the cost figures for the Pearl (Oregon) Routes from its 2009 Pre-decisional Presentation so the public is unable to determine the cost differential between the Pearl Routes and the DEIS action alternatives.⁶ Once again, BPA's claims related to the elimination of the Pearl Routes due to all of these types of impacts are unfounded.

14860-13 In sum, BPA concedes the elimination of the Pearl Routes was not based on the fact that these routes did not meet the project's need. BPA concedes the Pearl Routes do. BPA does not contend the Pearl Routes were technically infeasible. While BPA asserts the Pearl Routes are too costly, it has failed to provide any documentation to support that claim and the claim is contrary to BPA's own data showing the length of the Pearl Routes are in the same range as the

³ In fact, neither the 2009 Pre-decisional Presentation nor the DEIS states what type of habitat would be impacted, which species would be impacted, or the level of impact.

⁴ The West Alternative is estimated to cost \$385 million. DEIS at 4-5. The Central and East Alternatives are both estimated to cost \$489 million. DEIS at 4-11; 4-16.

⁵ Just exactly how BPA estimated costs is unknown at this time. The exact accounting formula for estimating cost (e.g. right-of-way purchase costs, environmental analysis, construction materials and labor, mitigation costs) is not directly discussed in the DEIS.

⁶ See DEIS at S-4: Cost range for action alternatives is \$385 to \$489 million.

8 of 30

- 14860-11 Please see the response to Comment 14860-10.
- 14860-12 Please see the response to Comment 14860-10. BPA believes that the extra cost of the Pearl Routes was a reasonable factor to consider in determining whether to further evaluate this alternative in the EIS.
- 14860-13 Please see the responses to Comments 14443-1 and 14860-10.

14860

Bonneville Power Administration – I-5 Corridor Reinforcement Project
 March 24, 2013
 Page 7

Washington routes. And, the DEIS is devoid of any technical assessment that would support BPA's superficial claims of environmental issues out of scale with those presented by all of the alternatives.

14860-13

Stripping away the façade, the reason for the elimination was simply that it was easier for BPA to not conduct a detailed analysis of the Pearl Routes - reducing their workload, reducing the potential for public or governmental resistance, and expediting the environmental review process. Exhibit B. These, of course, are not sustainable reasons for eliminating a reasonable, feasible alternative that meets the project's need.

BPA should prepare a new or supplemental DEIS that analyzes this reasonable alternative.

- **A Reasonable Alternative Exists with Less Environmental Impacts – Double-Circuiting of the West Alternative**

Public comments submitted to BPA raised the potential for double-circuiting the proposed transmission line with BPA's existing line - double-circuiting what is identified as the West Alternative. The January 2010 Scoping Summary reflects commenters' suggestions that transmission circuits could be doubled to allow for the use of existing right-of-way which encompasses almost the entire length of the West Alternative. January 2010 Scoping Summary at 12. Review of BPA's Public Comment Database reveals that commenters raised the issue of double-circuiting existing lines at scoping meetings conducted in Vancouver, Longview, Camas, and Amboy. Public Comments, accessed Feb 14, 2013: <http://www.bpa.gov/Projects/Projects/I-5/Pages/Search-Comments.aspx>. Such comments persisted through 2012. January 2013 Supplemental Comment Report at 12. And, comments received to date on the DEIS similarly request that BPA consider this alternative.

14860-14

Despite these comments, the DEIS, either in the alternatives analysis or in Section 4.7, which discusses eliminated alternatives, is devoid of a reference to any such alternative. NEPA requires that the reasons for accepting certain alternatives and rejected others be set forth in the DEIS so that the public and other governmental agencies will be better informed as to the environmental costs of the decisions. *National Wildlife Federation v. Andrus*, 440 F. Supp. 1245 (D.C. Cir., 1977); *Animal Defense Council v. Hodel*, 840 F.2d 1432 (9th Cir., 1988). In addition, a recent Freedom of Information Act (FOIA) request, FOIA No. BPA-2013-00334-F, filed by A Better Way for BPA specifically asked for "studies, documents, notes, and emails related to double-circuiting along BPA's existing transmission corridor." Yet, in direct contrast to the public comment record, A Better Way for BPA was told that no public records existed. Thus, even if BPA gave careful consideration to this alternative, the reasons underlying BPA's decision remain undisclosed contrary to NEPA.

This alternative, to replace the existing BPA transmission line that is represented by the West Alternative with a double-circuited line, is not an unreasonable alternative and should have been considered within the DEIS. This alternative, which would meet the need for this project (electrical capacity and transfer capability), was deserving of special consideration since it would be most consistent with the spirit of NEPA.

9 of 30

14860-14 Please see the response to Comment 14460-1.

14860

Bonneville Power Administration – I-5 Corridor Reinforcement Project
 March 24, 2013
 Page 8

The failure of the DEIS to analyze, even in a brief format to support elimination, double-circuiting of the line appears to be in direct contrast to recent BPA tower design and transmission line projects that speak to substantial savings. For example, in 2011, BPA announced its new double-circuit 500 kV tower that it advertised as being stronger, sturdier, and cheaper than transmission towers of the past. BPA Newsroom: BPA engineers build a better tower, saving millions (May 25, 2011). Two of BPA's projects, the McNary-John Day line⁷ and the Central Ferry-Lower Monumental line⁸, are both estimated to save millions of dollars by using this new tower design for some of their towers. *Id.* The McNary-John Day line saves "BPA as much as \$300,000 per tower and a total of more than \$11 million." *Id.*⁹ The savings from the Central Ferry-Lower Monumental line "will exceed \$7 million."

14860-15

In promoting its new technology, BPA further acknowledges that:

The savings will grow quickly as BPA upgrades other transmission lines because each new tower costs less, goes up faster and new lines may need fewer towers per mile. These savings will flow to utilities and other BPA transmission customers, and from there to homeowners and businesses through the Northwest.

Exhibit C - BPA Newsroom: BPA engineers build a better tower, saving millions (May 25, 2011).

Thus, not only are economic savings realized at the project level but these savings are passed through the system. One of the purposes the BPA stated it was attempting to achieve with this project was the responsible and efficient use of ratepayer funds. Thus, A Better Way for BPA finds it unfathomable, given BPA's available cost-effective tower design, that the viability of double-circuiting along the existing transmission line was not analyzed within the DEIS.

14860-16

In addition, it is only common sense that replacing existing towers within existing right-of-ways would have less environmental impacts. Namely, because an additional swath of right-of-way would not be required and existing access/service roads could continue to be utilized. The continuation of transmission lines along a corridor that presently exists will also little visual impact as individuals have acquiesced to the transmission lines presence and the tower height¹⁰ is not substantially higher. While there will be some environmental impacts if tower footings cannot be placed within the existing tower's footprint, the level of any impacts within right-of-ways that have been cleared and disturb since the original line was constructed will undoubtedly be lower. Given that the existing right-of-ways already are largely cleared, there would be no loss of timber resources. Most agriculture that has always occurred within the right-of-way can continue. In addition, the environment of that existing line is more accurately known to BPA so a full, detailed analysis can readily be performed.

⁷ The Final EIS for the McNary-John Day line was issued in August 2002 with supplemental analysis occurring between 2010 and 2012.

⁸ The Final EIS for the Central Ferry-Lower Monumental line was issued in February 2011.

⁹ It is interesting to note the Double-Circuiting was eliminated in the McNary-John Day DEIS due to alleged high costs and equal environmental impacts. McNary-John Day DEIS at 2-18. BPA's newsroom promotes the opposite.

¹⁰ DEIS, Figure 3-1 and -3 (Tower Types).

10 of 30

14860-15 Please see the response to Comment 14460-1.

14860-16 Please see the response to Comment 14702-1.

14860

Bonneville Power Administration – I-5 Corridor Reinforcement Project
March 24, 2013
Page 9

Conclusion

The alternatives analysis is considered the “heart” of the EIS. Without conducting a detailed analysis of a reasonable range of alternatives, the decision-maker and the public are deprived of information that would allow for informed, reasoned decision-making. NEPA requires that BPA explore all reasonable alternatives and, as shown above, both the Pearl Routes and the Double-Circuiting of the West Alternative are reasonable. Both of these alternatives would meet the need of increasing electrical capacity and transfer capability in the SOA path. Nothing has been presented to the public or the decision-maker that these alternatives are not feasible. The existence of a viable but unexamined alternative will render an EIS inadequate.

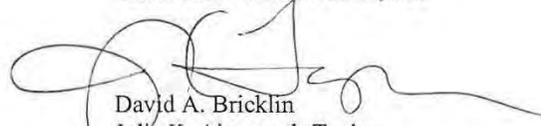
14860-17 BPA must examine alternatives that would satisfy the need of the I-5 Corridor Reinforcement Project in a cost-effective and environmentally-conscious manner. Public comments expounded the Double-Circuiting of BPA’s existing transmission line that the West Alternatives adheres to, yet the DEIS is devoid of any analysis – detailed or superficial. BPA cannot dismiss alternatives, such as the Pearl Routes, merely because it wants to avoid conflict, reduce its workload, and expedite the review process. The NEPA process is not intended to be a superficial exercise. Project proponents are to rigorously evaluate their projects so that full consideration of environmental impacts is infused in every decision.

To fulfill NEPA’s purposes, BPA must prepare a New or Supplemental DEIS which analyzes, in detail, the environmental impacts of these reasonable alternatives.

Thank you for your consideration of these comments.

Very truly yours,

BRICKLIN & NEWMAN, LLP



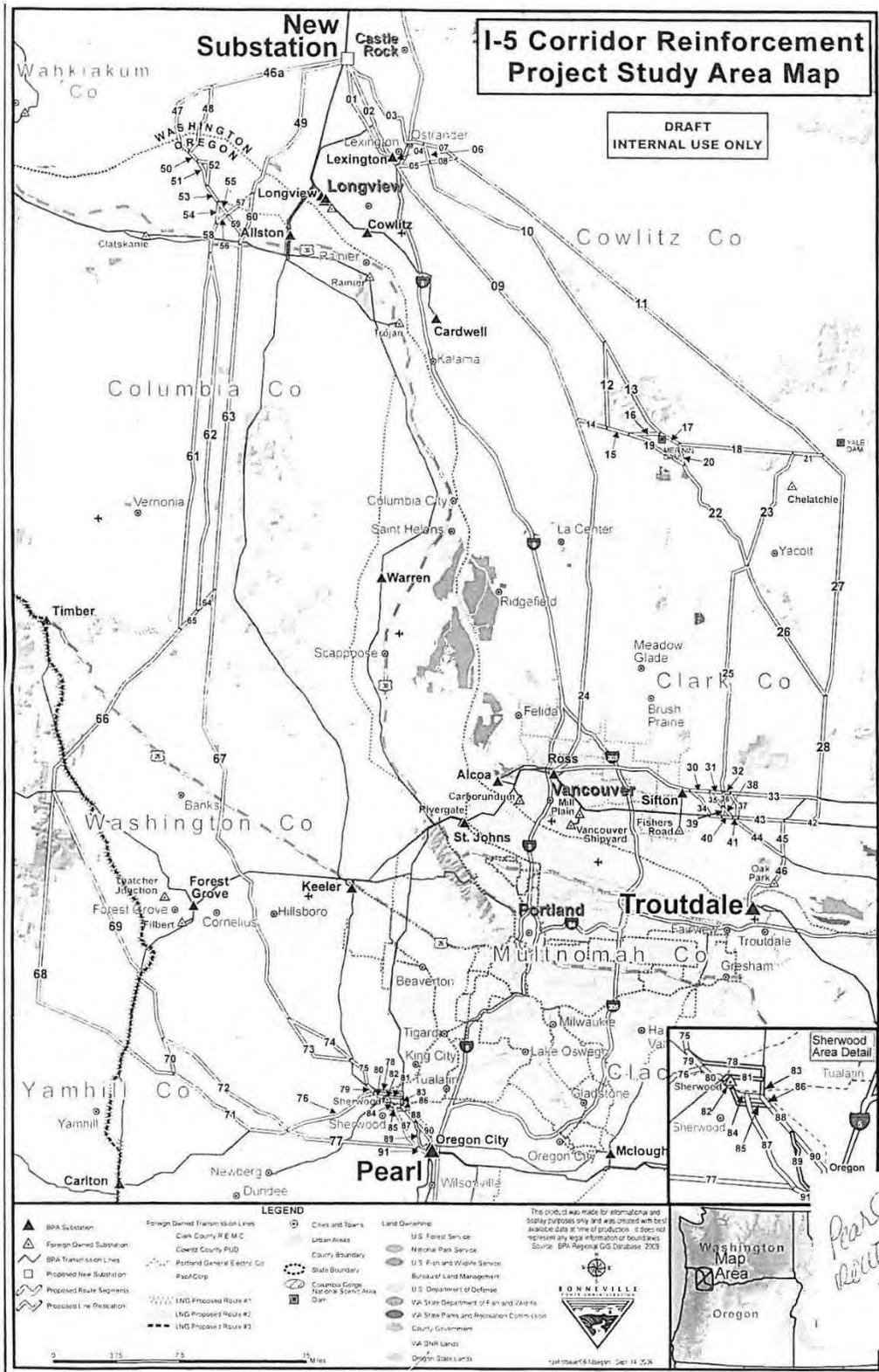
David A. Bricklin
Julie K. Ainsworth-Taylor
Attorneys for A Better Way for BPA

Enclosures

cc: Client

11 of 30

14860-17 Please see the response to Comment 14596-4.



14860

14860

**** DRAFT ****

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 a 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.

EXHIBIT B

*Pre-Decisional and Deliberative, For Internal Use Only
 Page 1 of 14*

13 of 30

14860

** DRAFT **

- 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 _____ to _____ million depending on alignment, whereas the estimated construction cost of a Troutdale routing alternative ranges from _____ to _____ million, making Troutdale plan _____ to _____ 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.

Pre-Decisional and Deliberative, For Internal Use Only
Page 2 of 14

14 of 30

**** DRAFT ****

- 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.

14860

**** DRAFT ****

Evaluation of Alternatives

	Alternative #1 Continue Both Corridors	Alternative #2 Troutdale Corridor Only – Decide Now	Alternative #3 Troutdale Corridor Only – Decide After Scoping
Business/Finance Ability of alternative to meet the electrical needs of the system	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
Effect of alternative on our ability to meet established project schedule	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.

Pre-Decisional and Deliberative, For Internal Use Only
Page 4 of 14

16 of 30

14860

**** DRAFT ****

	Alternative #1 Continue Both Corridors	Alternative #2 Tromdale Corridor Only – Decide Now	Alternative #3 Tromdale Corridor Only – Decide After Steeping
Cost to agency of implementing alternative	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
Legal			
See separate legal analysis			
Public and Stakeholder Interests/relationship Tribes	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.
State constituents	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.

Pre-Decisional and Deliberative. For Internal Use Only
Page 5 of 14

17 of 30

14860

**** DRAFT ****

Alternative #1 Continue Both Corridors	Alternative #2 TROUTDALE Corridor Only – Decide Now	Alternative #3 TROUTDALE Corridor Only – Decide After Scoping
<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>	<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>Local constituents</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) 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"> • Vancouver Mayor and staff • Camas Mayor & staff • Clark County Commissioner Chairman 	

Pre-Decisional and Deliberative, For Internal Use Only
Page 6 of 74

18 of 30

14860

**** DRAFT ****

<p>Alternative #1 Continue Both Corridors</p>	<p>Alternative #2 Frontal Corridor Only – Decide Now & County Administrator</p>	<p>Alternative #3 Frontal Corridor Only – Decide After Scoping</p>
<p>and WA, and 2) raise hopes and expectations that the line will get built “in the other 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>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>

Pre-Decisional and Deliberative, For Internal Use Only
Page 7 of 14

19 of 30

14860

20 of 30

**** DRAFT ****

Alternative #1 Confine Both Corridors	Alternative #2 Truncate Corridor Only - Devote More Scoping	Alternative #3 Truncate Corridor Only - Devote More Scoping
<p>General public</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>Media: 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. (9/30/2009 clarification). Agencies frequently consider but eliminate various potential preliminary alternatives from further consideration in the NEPA process prior to publication of the NOI for an EIS in the Federal Register, for a variety of reasons. These preliminary alternatives typically are not identified in scoping materials sent to the public at the time of or after publication of the NOI, nor specifically raised at scoping meetings. These alternatives are, however, specifically identified in the draft and final EIS as considered but eliminated from further consideration, with an explanation of why they have been eliminated. This approach</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>Media: Current plan would suffice.</p>

Pre-Decisional and Deliberative, For Internal Use Only
Page 6 of 14

14860

21 of 30

**** DRAFT ****

Alternative #1 Continue Both Corridors	Alternative #2 Trousdale Corridor Only – Decide Now	Alternative #3 Trousdale Corridor Only – Decide After Scoping
	<p>would be followed under alternative 2. If, prior to publication of the draft EIS, members of the public inquire into BPA's consideration of routes into Pearl, or the consideration and study of previous routes into Trousdale that may have been shown on outdated maps, we would certainly describe our multi-year process and how we got to the latest Castle Rock-Trousdale routes.]</p> <p>We would need to add our reasoning for eliminating the Pearl option from further consideration [9/30/2009 clarification: per the above, this reasoning would be provided in the draft and final EISs], since we have talked about Pearl as an option in the following materials:</p> <ul style="list-style-type: none"> • Transmission Web site: 2008 NOS project descriptions, • May 2009 factsheet: Investing in the NW Transmission System 	

*Pre-Decisional and Deliberative. For Internal Use Only
Page 9 of 14*

14860

**** DRAFT ****

Alternative #1 Continue Both Corridors	Alternative #2 Troutdale Corridor Only – Decide Now	Alternative #3 Troutdale Corridor Only – Decide After Scoping
<p>Property owners</p>	<p>Older documents:</p> <ul style="list-style-type: none"> • The 2002 September BPA Journal listed public meetings in Washington and Oregon. • A 2002 factsheet shows two alternative routes to Pearl. We don't know how broadly this was circulated. <p>Media: Proactive outreach 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>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</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)</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</p>	

Pre-Decisional and Deliberative For Internal Use Only
Page 10 of 14

22 of 30

14860

23 of 30

**** DRAFT ****

Alternative #1 Confine Both Corridors	Alternative #2 Trousdale Corridor Only – Decide Now	Alternative #3 Trousdale Corridor Only – Decide After Scoping
<p>will demonstrate BPA is willing to consider all possible alternatives.</p>	<p>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. [9/30/2009 clarification: We have strong and compelling reasons for not considering the Pearl option, and these reasons will be fully explained in the draft and final EISs. This will help to avoid and/or minimize property owner skepticism and distrust, but these issues may nonetheless arise.]</p>	<p>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>Environmental Issues Implications for EIS effort/content</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.</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>

Pre-Decisional and Deliberative, For Internal Use Only
Page 11 of 14

14860

**** DRAFT ****

	Alternative #1 Continue Both Corridors	Alternative #2 Troudale Corridor Only - Decide Now	Alternative #3 Troudale Corridor Only - Decide After Scoping
Potential effect on the EIS process from public participation	<p>requiring additional NEPA staff and resources to manage other parts of the project that cannot be given to contracting staff.</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>and meet project schedules.</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 Troudale 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>
BPA People and Process Factors BPA staffing and resource issues	<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</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 Troudale routes</p>

Pre-Decisional and Deliberative, For Internal Use Only
Page 12 of 14

24 of 30

**** DRAFT ****

Alternative #1 Continue Both Corridors given to contracting staff.	Alternative #2 Troutdale Corridor Only – Decide Now	Alternative #3 Frontdale Corridor Only – Decide After Scoping
---	--	--

Pre-Decisional and Deliberative. For Internal Use Only.
Page 13 of 14

14860

**** 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.

Pre-Decisional and Deliberative, For Internal Use Only
Page 14 of 14

26 of 30

[About](#) | [Careers](#) | [Contact](#) | [bpa.gov](#)

[News & Us](#) | [Projects & Initiatives](#) | [Finance & Rates](#) | [Involvement & Outreach](#) | [Doing Business](#)

Newsroom

Search News Articles

Search



BPA engineers build a better tower, saving millions

May 25, 2011

Like 3

0

Tweet 0

Transmission towers are so familiar, people rarely give them a second glance. But Bonneville Power Administration's structural engineers looked at them and asked: Can we build a better one?

It was an engineering quest that took them around the world and led them to invent new software that's the envy of the industry.

The result: new transmission towers that do more with less. They are stronger, but use less steel. They are sturdier, but cheaper. They are easier to assemble, but better withstand winds and storms. They will also cut the cost of modernizing BPA's grid.

This new double-circuit 500-kilovolt tower is put to the test at a facility in India. To see if it will hold up in extreme conditions, pressure is applied via dozens of cables at various angles.

On BPA's new McNary-John Day line alone, the designs are saving BPA as much as \$300,000 per tower and a total of more than \$11 million. On the new Central Ferry-Lower Monumental transmission line project, expected to begin this summer, savings will exceed \$7 million.



This new double-circuit 500-kilovolt tower is put to the test at a facility in India. To see if it will hold up in extreme conditions, pressure is applied via dozens of cables at various angles.

The savings will grow quickly as BPA upgrades other transmission lines because each new tower costs less, goes up faster and new lines may need fewer towers per mile. These savings will flow to utilities and other BPA

EXHIBIT C

27 of 30

<http://www.bpa.gov/news/newsroom/Pages/BPA-engineers-build-a-better-tower-saving-mi...> 3/21/2013

Bonneville Power Administration

Page 2 of 4
14860**Policies**Accessibility
Privacy Policy**Get Involved**Contact
Public Meetings
Submit a Comment**Functions**Energy Efficiency
Environment, Fish & Wildlife
Power
Transmission**Stay Connected**Facebook
YouTube
Twitter**Related Sites**Energy.gov
WhiteHouse.gov

transmission customers, and from there to homeowners and businesses throughout the Northwest.

The mission to design a better tower began more than five years ago.

"When we started planning for the McNary-John Day line, we took another look at our existing designs and believed we could make them more efficient," explains Juan Nuño, civil engineer.

While most of the industry had routinely contracted out tower design, BPA pushed the engineering forward on its own.

Taking tower design to new heights

"To most people, a tower is a tower," says David Hesse, structural engineer. "The industry hasn't invested in improving tower designs because, for the most part, the transmission infrastructure in the United States is decades old, and there isn't a lot of new construction. Much of the expertise in tower design is gone."

Much of the remaining expertise is at BPA.

"That's our niche," says Mike Staats, supervisory engineer. "We have a rich history of engineering, and a lot of expertise has been passed on along the way."

Engineers examined the steel shapes that make up each tower. They looked for ways to tweak angles here or moving braces there that took less steel but maintained the tower's structural integrity.

"The most challenging part in tower design is the infinite number of configurations. You can move a piece of steel in one place and end up with problems in another," says Structural Design Manager David O'Claire. "It's trial and error."

Engineers on their own might spend weeks or months to evaluate a single tower configuration. So Hesse – a self-taught software designer – developed a computer program to accelerate the process.



The cruciform shape of this tower footing is saving BPA millions. It's easier and cheaper to manufacture than the original design.

"In one day, we can look at a variety of different configurations," says Hesse of his Advanced Tower Analysis and Design System.

BPA had been using tower design software since the 1960s. Hesse started working on improvements in 1991. By 2005, he'd transformed it into a system coveted by utilities and private industries around the country. BPA has granted several requests from others to use the system.

The program analyzes whether a tower design can hold up to worst-case scenarios such as 100-mile per hour winds and heavy ice, or failure of the next tower along the power line. It also predicts the cost of the tower, helping engineers find a design as economical as it is strong.

28 of 30

<http://www.bpa.gov/news/newsroom/Pages/BPA-engineers-build-a-better-tower-saving-mi...> 3/21/2013

The system helped BPA engineers find the best designs in days rather than months.

They developed one double circuit and three single-circuit designs the agency can use again and again. Less steel cuts the tower weight by about 20 percent. That saves BPA an average of \$18,000 to \$270,000 per tower – and more on the largest towers. That's about one-quarter of the total tower cost.

The newly designed towers make up all but 20 of the 380 towers on McNary-John Day line. The savings easily cancel out the \$80,000 cost to design them.

Fewer and farther between

Five towers per mile of transmission line is the norm. But these new designs could change that.

"We designed the towers so that fewer are needed – only four per mile in some places," says Hesse. "The number of towers on McNary-John Day did not change because the new line is adjacent to another, and the tower positions need to match. But this will be an advantage in future transmission projects."

The new design will cut the number of towers on the Central Ferry-Lower Monumental line from 181 to 159 when construction begins this summer.

That's possible because – despite being lighter – the new towers are stronger. They also are cheaper to manufacture, transport and assemble. They can be more efficiently constructed with helicopters.

"There are special rigging points so helicopters can lift them more easily. And because they weigh less, helicopters can lift the towers in one piece instead of two smaller sections," Hesse adds. Special helicopters known as Skycranes helped assemble some of these towers last summer.

More circuits, more savings

Nuño was the lead designer for a new double-circuit 500-kilovolt tower. Double-circuit towers are typically taller and require more steel than single-circuit towers because they support more weight. They also are more expensive.

While the majority of towers on McNary-John Day are single-circuit, fifteen double-circuit towers are needed where two lines intersect. Seven of the fifteen are the new design.

In the previous design, four massive "main legs" anchored the tower to the foundation. These legs were larger than a steel mill could produce, so a vendor had to fabricate them by welding two thick plates together to form a large angle.

"The fabrication required multiple processes in multiple locations. It wasn't very economical," says Nuño.

So the designers went to the drawing board. They replaced each large single angle in the old design with four smaller angles, bolted together in cross. The pieces of steel for the crosses are small enough for a steel mill to produce, taking a fraction of the previous time and cost.

"There are actually more pieces in the design now, but they are smaller and the tower weighs less overall," says Nuño.

The modification saved BPA nearly \$300,000 on the biggest of these double-circuit towers on the McNary-John Day line.

Testing, testing

Bonneville Power Administration

Page 4 of 4

14860



A helicopter hoists platforms for linemen during the construction of this single-circuit 500-kilovolt tower – one of hundreds on the McNary-John Day line saving BPA big bucks.

How do you know if a new tower will hold up? You build one and put it to the test.

Only a few places in the world test towers. Brazil is one – that's where BPA usually goes. But at nearly 200 feet tall and with very high loads, the new double-circuit tower was too big for Brazil's facility. So Nuño and a few other BPA employees traveled to India.

The tower was fabricated and constructed at the test site. Crews connected cables to it, then pushed and pulled on it from different directions, mimicking forces the tower might experience, such as high winds or heavy ice.

"We crossed our fingers, and it held," joked Nuño.

That tower, after making the journey from India, is now in its place on the McNary-John Day line. Construction on the line continues, and it is scheduled to be energized in February 2012.

BPA will use these new tower designs if it moves forward with other proposed transmission projects. More savings are in store.

30 of 30

<http://www.bpa.gov/news/newsroom/Pages/BPA-engineers-build-a-better-tower-saving-mi...> 3/21/2013

This page intentionally left blank.

14863

14863-1

Please find the attached comments on the Draft Environmental Impact Statement on the I-5 Corridor Reinforcement Project.

Thanks,

Richard Till, Conservation Legal Advocate
Friends of the Columbia Gorge

Direct:
General:
Fax:

Become a Friend of the Columbia Gorge at

1 of 1

14863-1 Thank you for your comments. Specific comments are addressed below.

14863



FRIENDS OF THE COLUMBIA GORGE

SUBMITTED VIA E-MAIL AND FIRST-CLASS MAIL

March 28, 2013

I-5 Corridor Reinforcement Project
PO Box 9250

Re: NEPA Scoping for the I-5 Corridor Project

Dear Responsible Official:

14863-2 Friends of the Columbia Gorge (Friends) has reviewed and would like to comment on the Draft Environmental Impact Statement (DEIS) for the I-5 Corridor Reinforcement Project. Friends is a non-profit organization with approximately 5,000 members dedicated to protecting and enhancing the resources of the Columbia River Gorge. Our membership includes hundreds of citizens who reside within the Columbia River Gorge National Scenic Area.

The National Environmental Policy Act (NEPA), 42 USC § 4321 *et seq.* requires that the Bonneville Power Administration (BPA) take a hard look at the potential direct, indirect, and cumulative social, economic, physical, and biological effects of the proposed action and reasonable alternatives.

14863-3 The proposed transmission project has the potential to generate significant direct, indirect, and cumulative impacts. The proposed development would cause direct impacts to local communities and nationally important resources like the Lewis and Clark National Historic Trail and views from the Columbia River Gorge National Scenic Area. These impacts also include the extensive impacts of increasing the capacity of the grid to accommodate new sources of energy, thereby increasing impacts of energy development throughout the region. Given this range of impacts, BPA must undertake a broad, programmatic analysis of impacts to the environment from new transmission facilities and new energy facilities that would depend on the new transmission facilities.

2 of 8

- 14863-2 BPA appreciates the Friends of the Columbia Gorge's comments on the Draft EIS. Specific comments are addressed below.
- 14863-3 Comment noted. BPA believes the EIS adequately addresses the potential direct, indirect, and cumulative impacts of the proposed project and alternatives on all relevant resources. For example, potential direct impacts to local communities are discussed in Chapters 5 through 11 of the EIS, and potential impacts to the referenced National Historic Trail and National Scenic Area are addressed in Chapters 6 and 7. Concerning potential generation projects and other transmission infrastructure projects, for the reasons explained in Section 1.7, Issues Outside the Scope of the I-5 Project or this EIS, these projects are outside the scope of the proposed project considered in the EIS. BPA also does not have a region-wide plan for these facilities. Accordingly, a programmatic analysis is not required under NEPA.

14863

Environmental Impacts

14863-4 BPA must take a hard look at the potential direct, indirect, and cumulative environmental impacts of the proposal. The DEIS explains that the project is needed to provide capacity for energy passing through the Vancouver/Portland metropolitan area and to provide capacity in response to interconnection requests received through the 2008, 2009, and 2010 Network Open Season marketing processes. DEIS at S-1-S-2. As a result, the project is directly related to the development of new energy facilities in the region. The increased transmission capacity would allow the interconnection of more wind energy generated on the east side of the Washington and Oregon Cascades and new thermal energy facilities that are needed to back-up intermittent wind energy sources.

14863-5 In brief, but for the I-5 Corridor Reinforcement Project and other new transmission facilities, additional energy production facilities would not be able to interconnect to the grid. As such, the environmental impacts analysis of the proposed development must include programmatic review of the impacts of new energy sources that would be accommodated by all new transmission lines. This includes wind energy development and any new sources of power that would be required to mitigate the intermittent production of energy from wind facilities. The impacts analysis must include cumulative impacts analysis of all proposed and likely foreseeable projects in addition to

14863-6 existing projects.

In addition, the BPA must ensure that the Final EIS address the following environmental impacts:

- 14863-7 • The environmental effects on plants and wildlife, including state and federally listed sensitive, threatened, and endangered species;
- The impacts to National Audubon Society-designated Important Bird Areas where wind energy development and transmission lines have been or will be developed;
- The impacts to Washington Department of Fish and Wildlife-designated Priority Habitats from wind energy and transmission line developments;
- 14863-8 • The likely effects on cultural resources, including Native American cultural sites and historic sites;
- 14863-9 • The impacts to migratory birds and compliance with the Migratory Bird Treaty Act;
- The impacts to bald and golden eagles and compliance with the Bald and Golden Eagle Protection Act;
- 14863-10 • The aesthetic and scenic impacts to designated national heritage landscapes, scenic areas, and recreation sites such as the Columbia River Gorge National Scenic Area, the Lewis and Clark National Historic Trail, and Wild and Scenic Rivers.

Indirect Impacts, Cumulative Impacts, and Tiering

14863-11 Under NEPA, an EIS must consider direct effects, indirect effects, and cumulative effects. "Effects includes ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative." 40 C.F.R. § 1508.8. The direct effects of an action are those effects "which are caused by the action and occur at the same time and place." 40 C.F.R. § 1508.8(a).

- 14863-4 Please see the response to Comment 14863-3. As explained in that response, proposed generation projects are outside the scope of the proposed project considered in the EIS. In addition, there are no wind projects proposed to be interconnected to the proposed I-5 Project. This line is being proposed to allow BPA to provide for local load growth, maintain reliable power, and respond to transmission service requests, not interconnection requests. However, to the extent that the potential environmental impacts of any reasonably foreseeable proposed generation projects in the vicinity of the I-5 project are cumulatively additive to the potential environmental impacts of the project, these impacts are discussed and considered in Chapter 26.
- 14863-5 Please see the responses to Comments 14863-3 and 14863-4.
- 14863-6 Comment noted. See Chapter 26, Cumulative Impacts.
- 14863-7 The EIS addresses environmental impacts from the proposed project alternatives on plants in Chapter 17, Vegetation and on wildlife in Chapter 18, Wildlife including impacts on federally-listed species and WDFW Priority Habitats and Species. There are no National Audubon Society-designated important bird areas in the project area. This includes the global-, continental-, and state-designated levels as identified on their website at <http://netapp.audubon.org/iba/state/US-WA>.
- 14863-8 BPA has conducted a literature review, pedestrian survey, and additional testing for cultural resources within the area of potential effect for the Preferred Alternative. Information has also been gathered from Traditional Cultural Property studies. BPA will use this information to identify effects the project would have on cultural resources. This information has been used to update Chapter 13, Cultural Resources, in the Final EIS.
- 14863-9 Chapter 18, Wildlife, discusses impacts to birds, including eagles. Mitigation measures proposed for impacts on migratory birds and raptors are provided in Section 18.2.8, Recommended Mitigation Measures. All project activities will comply with the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. Appropriate bird flight diverters will be installed on overhead ground wires or fiber optic line in areas at high risk for bird collisions, such as at the crossing of the Cowlitz, Coweeman, Kalama, Lewis, East Fork Lewis, Washougal, and the Columbia rivers; in wetland and riparian areas with high bird use; in WDFW waterfowl concentration priority areas; in WDFW bald eagle priority areas, and where the transmission line traverses steep slopes.

- 14863-11 The indirect effects of an action are those effects “which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.” 40 C.F.R. § 1508.8(b). For example, “[i]ndirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.” *Id.* These types of growth-inducing impacts must be analyzed, even when they are characterized as “secondary.” *City of Davis v. Coleman*, 521 F.2d 661, 676 (9th Cir. 1975) (requiring EIS to address growth-inducing impacts of freeway interchange planned in agricultural area on the edge of urban development); see also *Swain v. Brinegar*, 542 F.2d 364, at 370 (7th Cir. 1976) (Federal Highway Administration was required to consider the effects of possible future highway construction that would be made possible by a proposed highway project, particularly when the proposed segment would have “no utility” absent related development.) In fact, “[f]or many projects, these secondary or induced effects may be more significant than the project’s primary effects While the analysis of secondary effects is often more difficult than defining the first-order physical effects, it is also indispensable.” Fifth Annual Report of the Council on Environmental Quality, 410-11 (December 1974).
- 14863-12 A cumulative impact is the “impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions.” 40 C.F.R. § 1508.7. NEPA requires that an EIS assess cumulative impacts in sufficient detail to be “useful to a decision maker in deciding whether, or how, to alter the program to lessen cumulative impacts.” *City of Carmel-By-The-Sea v. United States Dep’t. of Transp.*, 123 F.3d 1142, 1160 (9th Cir. 1997). The cumulative impacts analysis for a proposed project must examine past, present, and proposed/reasonably foreseeable actions in the same area. 40 C.F.R. §§ 1508.7, 1508.25, 1508.27(b)(7); *Tomac v. Norton*, 433 F.3d 852, 864 (D.C. Cir. 2006).
- 14863-13 Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 C.F.R. § 1508.7. “To consider cumulative effects, some quantified or detailed information is required. Without such information, neither the courts nor the public, in reviewing [an action agency’s] decisions, can be assured that the [agency] provided the hard look that it is required to provide.” *Neighbors of Cuddy Mountain v. United States Forest Serv.*, 137 F.3d 1372, 1379 (9th Cir. 1998). The cumulative effects of the proposed action, combined with the cumulative effects of other proposed actions, must be described in detail. *Muckleshoot Indian Tribe v. United States Forest Serv.*, 177 F.3d 800, 810 (9th Cir. 1999). Broad and general statements “devoid of specific, reasoned conclusions” are not sufficient; neither are one-sided cumulative impact statements. *Id.* at 811.
- 14863-13 NEPA prohibits the consideration of the environmental consequences of a project or series of projects in a piecemeal fashion. In the seminal NEPA segmentation case, *Thomas v. Peterson*, the Ninth Circuit held that the failure to consider several related actions in a single EIS “would permit dividing a project into multiple ‘actions,’ each of which individually has an insignificant environmental impact, but which collectively has a substantial impact.” 753 F.2d 754, 758 (1985) (citing *Alpine Lakes Protection Society v. Schlapfer*, 518 F.2d 1089, 1090 (9th Cir. 1975)).

- 14863-10 The visual assessment detailed in Chapter 7, Visual Resources, acknowledges that visual resources would be affected with localized areas of high impacts on some parks and natural areas. Through project design and mitigation measures, BPA has worked to minimize residual impacts to visual resources for all action alternatives. Mitigation measures are provided in Chapter 3, Project Components and Construction, Operation, and Maintenance Activities, Chapter 7, Visual Resources, and Appendix E. Recreation impacts are in Chapter 6, Recreation. Cultural resource impacts are in Chapter 13, Cultural Resources.
- 14863-11 Comment noted.
- 14863-12 Comment noted.
- 14863-13 Comment noted. BPA has not tiered the EIS for the proposed I-5 Project to prior environmental review documents.

14863

- 14863-13 If the BPA tiers its environmental review to prior environmental review documents the BPA must take into account any significant new information. *See* CFR 40 § 1502.9(c)(ii).
- 14863-14 Cumulative impacts and new information that must be considered include the extraordinarily rapid rate that industrial wind energy facilities and natural gas facilities have been developed in the region. The BPA has enabled this development by approving new interconnections to the grid. By constructing new transmission lines the BPA increases grid capacity, which allows additional energy production facilities to be constructed and connected to the grid. Despite this direct connection, the BPA has not undertaken comprehensive review of the impacts of its transmission system and associated energy developments. The BPA's last comprehensive review of the transmission system was in 1995, BPA Business Plan Final Environmental Impact Statement (DOE/EIS-0183) (hereinafter "BPA BP EIS"). That review noted that wind energy could cause adverse impacts to wildlife and scenic resources, but did not undertake any detailed review of how providing access to the transmission system would lead to impacts from the rapid expansion of wind energy development throughout the region. BPA BP EIS at 4-42, Section 4.3.1.
- 14863-15 In 2007, the BPA undertook a supplemental analysis of the Business Plan EIS, but declined to undertake a new programmatic environmental review. Supplemental Analysis of the Business Plan EIS (DOE/EIS-0183) (April 6, 2007). The supplement stated that "continued consideration of a comprehensive policy for BPA's transmission business is not in the best interests of the agency at this time." At the time of the supplemental analysis, four wind projects totaling 750 MW of wind energy had been connected to the grid. *Id.* at 42. The analysis did not discuss impacts to wildlife from this development. *Id.* at 46. The analysis did not include a section on scenic impacts, much less how wind energy development enabled by the BPA has transformed scenic landscapes. The supplemental review also failed to acknowledge the ongoing impacts to cultural resources from the development that has been enabled by BPA transmission projects. *Id.* at 48-49.
- 14863-16 Since the BPA's last review of the environmental impacts associated with the transmission system and the energy production that system allows, an unprecedented level of new wind energy development has occurred throughout the region. The BPA has signed agreements to supply transmission services to thousands of MW of new generating capacity, most of it wind.
- 14863-17 Wind energy developments have dramatically changed landscapes throughout thousands of acres of rural Washington and Oregon along with countless scenic vistas. Some of these vistas are designated as nationally significant, including the Columbia River Gorge National Scenic Area and the Lewis and Clark National Historic Trail. To a large extent, wind energy development has been given a free pass based on unquestioned acceptance of the industry talking point that visual impacts analysis is subjective and that people like the way the wind turbines look. These unsubstantiated assertions completely ignore that federal agencies have decades of experience in evaluating impacts to scenic resources based on standardized, objective methodologies. Many developments have not undergone environmental review using these best available scientific methodologies for evaluating scenic impacts. When these methodologies are used during environmental review, they are often misapplied by individuals without sufficient training or expertise in using the systems. The BPA must address this failure by perform comprehensive
- 14863-18

- 14863-14 Please see the response to Comment 14863-4. The commenter's views concerning BPA's Business Plan EIS and a regional review of BPA's transmission system are noted. BPA does not believe that there is any requirement that it conduct a regional review of its transmission system. BPA also believes it is reasonable to consider transmission needs on a location-specific basis, given the transmission path-specific nature of firm transmission service requests. BPA is committed to ensuring thorough NEPA evaluation of any proposed transmission projects arising from such considerations.
- 14863-15 The commenter's observations concerning BPA's 2007 Supplement Analysis (SA) to the Business Plan EIS are noted. However, the commenter appears to misunderstand the purpose of this SA. As discussed in the SA, the SA was prepared to determine whether there have been any changes in BPA's business practices or in environmental conditions since publication of the Business Plan EIS that could trigger the need for a supplemental or new EIS. The SA was not intended to provide for environmental review of wind projects that had been interconnected to BPA's transmission system since the Business Plan EIS; such review was accomplished through NEPA documentation prepared for each project. In addition, the four wind projects referenced by the commenter were identified in the SA merely as examples of changes in the affected environment since publication of the Business Plan EIS. BPA believes it has adequately evaluated wind projects under NEPA as they have been proposed for interconnection to BPA's transmission system.
- 14863-16 Please see the response to Comment 14863-15.
- 14863-17 Comment noted. Please see the response to Comment 14863-15.
- 14863-18 Please see the responses to Comments 14863-3 and 14863-4.

14863

14863-18 review of regional energy development and ensure that best available science is used in that analysis.

The potential for adverse impacts from energy development were also acknowledged in the BPA's Business Plan EIS, BPA Business Plan Final Environmental Impact Statement (DOE/EIS-0183) (hereinafter BPA Business Plan EIS). The Business Plan EIS stated:

14863-19 In areas used for recreation, particularly in undeveloped places, studies show that many users find transmission lines to be an unwelcome visual intrusion. Also, many citizens feel strongly that transmission lines near their homes are visually intrusive, and that some property values may be reduced. Adverse visual effects may be perceived up to several kilometers from the line. Transmission lines may be more compatible with industrial areas. The effectiveness of potential mitigation measures depends on the site, and some measures may substantially increase the cost of the project. Possible measures include darkened towers in forested areas; different tower designs more compatible with a particular environment; non-specular (nonshiny) conductor; and locations that avoid visually sensitive areas.

BPA BP EIS at 4-52, Section 4.3.2.6. The Business Plan EIS also explained that one of the main environmental risks of wind energy development is visual impacts. BPA Business Plan EIS at 4-42, Section 4.3.1. Despite this cursory analysis, the BPA has not reviewed the cumulative effects to scenic resources that have resulted from constructing new transmission capacity to accommodate new generation facilities.

14863-20 Energy development facilitated by BPA is also killing or displacing an unknown number of birds and bats. During project-specific review of wind energy facility proposals throughout the Columbia Plateau, the Washington Department of Fish and Wildlife (WDFW), the Oregon Department of Fish and Wildlife (ODFW), and the U.S. Fish and Wildlife Service (USFWS) have called for analysis of cumulative impacts to avian and bat species, with emphasis on the need to evaluate impacts to wildlife using migratory bird corridors. No agency has conducted a programmatic environmental review of extensive industrial-scale energy development throughout the region. To Friends' knowledge, there have not been any peer-reviewed studies of impacts from wind energy development on wildlife. Initial post-construction reports for some projects have shown a high level of raptor mortality. To fill this void, the BPA must prepare a programmatic EIS to study the impacts of its actions on wildlife.

14863-21 Industrial development enabled by the BPA is also causing damage to cultural resources from ground disturbance for turbine construction and road building. Some County permitting agencies have failed to consult with tribal governments in a timely fashion and BPA interconnection decisions have failed to respond to this oversight. Native American cultural resources continue to be destroyed by development that could not occur absent a connection to BPA's grid. The BPA must perform comprehensive review and consult with tribal governments to determine the full extent of damage to cultural resources and identify avoidance and mitigation measures.

- 14863-19 Please see the responses to Comments 14863-3 and 14863-4 concerning generation projects, which are outside the scope of the proposed I-5 Project. The visual impacts of the transmission line that would be built for the proposed project are discussed in Chapter 7; this chapter also identified recommended mitigation measures to lessen or avoid these impacts. Potential cumulative impacts related to the proposed project, including cumulative visual impacts, are discussed in Chapter 26.
- 14863-20 Please see the responses to Comments 14863-3, 14863-4, and 14863-15. BPA would be supportive of efforts by the agencies identified by the commenter to work with wind project developers on a more regional impact analysis suggested by the commenter.
- 14863-21 BPA is committed to a comprehensive review and consultation for the I-5 Project. BPA has identified cultural resources within the Area of Potential Effect for the proposed I-5 Project. BPA has also consulted and will continue to consult with Indian Tribes and the State Historic Preservation Office for the proposed project. BPA will avoid and minimize impacts to historic properties where possible and mitigate for impacts that are unavoidable.

14863

14863-22 The BPA's existing environmental review documents do not appear to address the limited capacity of the grid to integrate wind energy. Recently, the BPA expressed concern about how it will reliably integrate over 6,000 MW of wind energy by 2013. Northwest Power and Conservation Council, Sixth Power Plan, at 12-11. There may be insufficient capacity to integrate all of the potential wind energy sources that have been promised access to the grid. At some point the grid will be saturated with intermittent sources of energy. The BPA must do comprehensive review of the grid and energy development to determine the long-term capacity of the grid. The BPA must also evaluate how it can ensure the energy production facilities with the fewest adverse environmental impacts are given higher priority for transmission space on the grid.

14863-23 The BPA is the only agency with a central role in permitting all new connections to the grid and managing and expanding the transmission system. In this role, the BPA must undertake environmental review of the impacts of projects using BPA interconnections and must undertake a programmatic review of the impacts of the large-scale energy development throughout the region.

The BPA must analyze impacts to the Lewis and Clark National Historic Trail.

14863-24 The BPA's Draft EIS for the Central Ferry-Lower Monumental 500-kilovolt Transmission Line Project concluded that construction of a 200-foot-tall transmission line within viewsheds visible from the Lewis and Clark National Scenic Trail and the Lewis and Clark Scenic Byway would have "high" impacts to scenic resources. Central Ferry-Lower Monumental 500-kilovolt Transmission Line Project DEIS (July 2010) Section 3.7, p 3-91 to 3-104. The analysis explained that the transmission line would be 1.6 miles (middleground view) from the Lewis and Clark National Historic Trail at its closest point. Central Ferry DEIS at 3-98.

The I-5 Corridor project would cross the Lewis and Clark National Historic Trail and traverse within foreground views from the trail. As such the impacts would likely be significant and must be documented using the best available science. The best available methodology for evaluating scenic impacts are the Forest Service and BLM visual resource assessment methodologies. The BPA must ensure these tools are used for evaluating the impacts of the proposed development and for developing possible mitigation measures.

Endangered Species

14863-25 Several endangered plant and animal species may inhabit the analysis area. Pursuant to Section 7 of the Endangered Species Act, the BPA must consult with the National Marine Fisheries Service ("NMFS") and the Fish and Wildlife Service ("USFWS") to ascertain whether the alternatives would impact any threatened or endangered species.

Consultation with agencies with expertise

14863-26 NEPA requires that BPA request comments from federal agencies with special expertise in the resources that would be affected by the proposed development. 40 C.F.R. § 1503.1(a)(1). NEPA requires that the BPA seek comments from state agencies and tribal governments. 40 C.F.R.

- 14863-22 Please see the responses to Comments 14863-3 and 14863-4.
- 14863-23 Please see the responses to Comments 14863-3 and 14863-4.
- 14863-24 Chapter 7, Visual Resources, describes the use of BLM's VRM system for the visual impact analysis. Chapter 6, Recreation, discusses impacts to the scenic byway. BPA has also coordinated with the National Park Service on the transmission line crossing of the highway in Camas. While the project does cross the Lewis and Clark Trail park unit and BPA understands the Lewis and Clark Expedition travelled through this area in 1806 on their return trip east, the National Park Service has not identified any concerns regarding potential impacts on the trail. The area both north and south of the project's Columbia River crossing contains a highly altered view and landscape because of the industrial nature of this particular area of Camas, Washougal, and Troutdale. The project would use an existing utility crossing of the river that contains six transmission lines. BPA plans to rebuild two of these lines onto one tower and use the vacated right-of-way for the new transmission line.
- 14863-25 Section 27.2, Endangered Species Act of 1973, describes the consultation process between BPA, NMFS, and USFWS for threatened and endangered species under Section 7 of the Endangered Species Act.
- 14863-26 As described in Section 1.6, Public Involvement and Major Issues and Chapter 27, Consultation, Review, and Permit Requirements, BPA has worked throughout the NEPA process to inform and involve federal agencies with jurisdiction by law or special expertise. BPA has also worked with state and local governments and Tribes to obtain information about resources of concern and potential impacts to these resources. BPA believes that these involvement efforts fully comport with applicable NEPA requirements.

11/6/13

§1503.1(a)(2). The NEPA regulations also requires that federal agencies respond to requests for comments: "Federal agencies with jurisdiction by law or special expertise with respect to any environmental impact involved and agencies which are authorized to develop and enforce environmental standards shall comment on statements within their jurisdiction, expertise, or authority." 40 C.F.R. § 1503.2. NEPA regulations also require that BPA prepare the DEIS "concurrently with and integrated with" required consultations. 40 C.F.R. § 1502.25(a).

- 14863-26 The BPA must consult with agencies that have expertise in the resources that would be affected by the proposed action. This must include consultation with agencies with expertise in the resources that would be directly affected, and agencies with expertise in resources that are subject to indirect and cumulative impacts. The BPA must consult with the USDA National Forest Service, the National Park Service, the BLM, state and local governments, and tribal governments regarding the likely impacts to resources that are within their jurisdiction or expertise. To date the BPA has not complied with its consultation duties. This must be corrected through a programmatic EIS.

Conclusion

- 14863-27 The direct, indirect, and cumulative impacts of the BPA's actions in facilitating the expansion of the regional energy production system have not undergone sufficient environmental review. The BPA must prepare a programmatic EIS that takes a hard look at the environmental impacts caused by the explosion of energy production developments in the region. As part of that review, the BPA must consult with all governments that have expertise in the resources that have been and will be affected by energy developments.

Sincerely,



Richard Till
Conservation Legal Advocate

14863-27 Please see the responses to Comments 14863-3, 14863-4, and 14863-26.

14864

Nancy,

Attached is a cover letter and copies of comments provided to EFSEC by state agencies. Paper copies will go out in today's mail. Please contact Tammy Talburt if you have any questions.

Thanks,

Stephen Posner
Energy Facility Site Evaluation Council
Utilities and Transportation Commission

1 of 4

This page intentionally left blank.



STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

14864

March 22, 2013

Ms. Nancy Wittpenn, Environmental Protection Specialist
Environment, Fish and Wildlife
Bonneville Power Administration

Subject: State Agency Comments – I-5 Corridor Reinforcement Project

Dear Ms. Wittpenn:

14864-1

EFSEC would like to thank BPA for the opportunity to review the I-5 Corridor Reinforcement Project (I-5) Draft Environmental Impact Statement (DEIS). No inconsistencies between state agency comments were discovered. This determination was made after a thorough review and comparison of state agency comments submitted to EFSEC. Copies of state agency comments are enclosed and are being provided to you pursuant to the BPA/EFSEC Work Plan Agreement Section III – EFSEC Work Plan Responsibilities, Part G.

EFSEC Primary Concerns:

14864-2

EFSEC substantive standards require analysis of socioeconomic criteria; therefore, the following items need to be evaluated and included in the FEIS:

- An analysis of whether or not the local work force would be sufficient to meet the anticipated demand for direct workers.
- An estimate by month of the average size of the project construction, operational work force by trade, and work force peak periods.
- A list of the required trades for the proposed project construction.
- An estimate of how many workers would potentially commute on a daily basis and where they would originate.
- The approximate average hourly wage that would likely be paid to construction and operational workers.
- Describe impacts, relationships, and plans for utilizing or mitigating impacts caused by construction or operation of the facility on the following services:
 - Schools, parks and other recreational facilities, utilities, maintenance, communications, and other governmental services.

2 of 4

- 14864-1 BPA appreciates EFSEC's comments. Thank you for coordinating and submitting comments from Washington state agencies on the Draft EIS. Specific comments are addressed below.
- 14864-2 Section 3.12, Construction Schedule and Work Crews, includes a general description of the work crews and equipment needed to build the project and a general idea of the schedule needed for this project. Chapter 11, Socioeconomics, describes construction and operation and maintenance effects on governmental services and lists mitigation measures. Table 3.2, Mitigation Measures Included as Part of the Project, also includes mitigation measures. Details on hourly rates, list of trades, number of workers and where they originate are not available at this time. If BPA decides to build the project and once a construction contractor is secured, BPA could provide these details to EFSEC.

4834

Ms. Nancy Wittpenn
Page 2 of 3
March 22, 2013

- 14864-3 EFSEC requires a site restoration plan. The DEIS addresses site restoration through mitigation measures; EFSEC requests that the FEIS include an initial site restoration plan as required by WAC 463-72-040, with sufficient details for site restoration occurring at the conclusion of the project's operating life, or in the event the project is suspended or terminated during construction.
- EFSEC Substantive Standards require that fish and wildlife surveys be conducted during all seasons; BPA has committed to a survey in the spring of 2013. EFSEC requests that the FEIS fish and wildlife surveys be conducted during all seasons.
- The following state agencies provided comments to EFSEC:
- 14864-4
- Washington State Department of Archaeology and Historic Preservation
 - Washington State Department of Fish and Wildlife
 - Washington State Department of Natural Resources
- Agency comments include:
- 14864-5
- Washington State Department of Archaeology and Historical Preservation – requests Section 106 of the National Historic Preservation Act be completed.
- 14864-6
- Washington Department of Fish and Wildlife requests the following details be included in the FEIS:
 - Appendix addressing information related to wildlife..
- 14864-7
- A more thorough assessment of impacts to elk and deer, including all anticipated effects and not just adverse effects.
- 14864-8
- A discussion of potential impacts to the slender-billed white breasted nuthatch.
- 14864-9
- A discussion of the potential impacts to the wild turkey.
- 14864-10
- Clarify the peak seasons for hunting are fall and winter; and more thorough identification of the impacts.
- 14864-11
- Washington Department of Natural Resources requests that the FEIS include the following details:
 - A comparison of road standards between Washington Forest Practices RMAP Standards and the 1987 BPA access road planning and designs.
- 14864-12
- A discussion about building of temporary construction roads and the need to mitigate impacts from temporary construction roads.
- 14864-13
- A discussion about the type of road improvements that could be needed, and the potential impacts for road improvements.
- 14864-14
- A discussion regarding the impacts from the removal of legacy trees and retention clumps.
- 14864-15
- Further details on the permanent impacts at locations altered by placement of transmission towers, access roads, and rights of way in the planned recreation opportunities in the Yacolt Burn State Forest.

3 of 4

- 14864-3 The I-5 Project would be regulated under EPA's National Pollutant Discharge Elimination System (NPDES) stormwater program. BPA is required to obtain coverage under an NPDES permit, which is administered by either the state (if it has been authorized to operate the NPDES stormwater program) or EPA, depending on where the construction site is located. For federal projects in Washington, EPA is the permitting authority, and construction stormwater discharges are permitted under the Construction General Permit (CGP February 16, 2012). In Oregon, the EPA has delegated NPDES enforcement and permitting authority to the state. BPA, as a public agency, has obtained and maintains an agency NPDES General Storm Water 1200-CA Permit (File No.: 111769; EPA No.: ORR10-4145) from ODEQ. To assure consistency with state law, BPA implements the terms and conditions of the CGP, which requires the development of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would be included as a requirement of the construction specifications. Development and implementation of site restoration plans would be a part of compliance with SWPPP requirements. The SWPPP would be developed either by BPA or a contractor (with BPA review). Site-specific restoration plans would be developed, in most cases, by the construction contractor's personnel who are certified to develop and implement the SWPPP. Plans would be reviewed by BPA. Plans and construction specifications would include any special restoration provisions such as specific seed mixes. Only general requirements would be included in the project's Mitigation Action Plan since it would be issued concurrently with the Record of Decision and prior to any detailed analysis of specific sites (also, if the contractor is developing the SWPPP, they would not have the opportunity to work on plans until after they are awarded a contract). Table 3-2 identifies a mitigation measure for developing a SWPPP.
- 14864-4 Thank you for providing comments from these agencies.
- 14864-5 Please see the response to Comment 14156-1.
- 14864-6 The reference to an appendix with more detailed wildlife information (Appendix N) was an error. The detailed discussions on species were instead included in Chapter 18, Wildlife.
- 14864-7 A discussion of Columbian white-tailed deer is provided in Section 18.1.4.1, Federally Listed Wildlife Species. Columbian black-tailed deer, Roosevelt elk, and Rocky Mountain elk presence are discussed in Section 18.1.4.2, Other Special-Status Wildlife Species. Impacts on all these species and their preferred habitats are discussed for each alternative in Section 18.2, Environmental Consequences. Both positive and adverse effects are discussed.
- 14864-8 Please see the response to Comment 14665-85.
- 14864-9 A discussion of wild turkey has been added to the Final EIS in Section 18.1.4.2, Other Special-Status Wildlife Species. Wild turkey, an introduced species, is found within the study area of all action alternatives except East Option

14864

Ms. Nancy Wittpenn
Page 3 of 3
March 22, 2013

- 14864-16
- Socioeconomic impacts to recreational use and the potential decrease in revenue from reduced Discover Pass sales.
- 14864-17
- A discussion of the effects on DNR licenses, leases, and easements that will be affected by the project and to calculate the lost revenue to the state.
- 14864-18
- A pre-construction survey of the impacts on special status plant species.
- 14864-19
- A review of the GIS data, and update the data and the environmental impact analysis where needed, especially that which is related to the hydro layers.
- 14864-20
- Editing and formatting changes as identified in Attachment 1, pages 26-29.
- 14864-21
- The Washington Department of Natural Resources request that further analysis be completed::
 - Impacts to listed threatened and endangered species and to the integrity of DNR's Uplands HCP. BPA consults under Section 7 of the Endangered Species Act with US Fish and Wildlife Service and/or National Oceanic & Atmospheric Administration /Fisheries addressing construction impacts on listed species.
- 14864-22
- The predicted environmental impacts as a result of the need to control the vegetation within 200' of the transmission line corridor edge.
- 14864-23
- Harvest restrictions to forest landowners.
- 14864-24
- Zoning and allowable uses, impacts on rural residential properties and impacts for the project on residentially developable land.
- 14864-25
- Specific recreational uses that would be displaced in the Yaacolt Burn State Forest.
- 14864-26
- The tower located in the Columbia River and impacts on aquatic resources on state-owned aquatic lands.
- 14864-27
- On aquatic plant species and protected vegetation.
- 14864-28
- The overall impacts of each alternative compared to a no-action alternative.
- 14864-29
- Thank you again for the opportunity to review the DEIS. Please contact Tammy Talburt at: (360) 664-1359 if you have any questions concerning this letter.

Sincerely,



Stephen Posner
EFSEC Acting Manager

Enclosures

cc: Rob Whitlam, DAHP; Leonard Young, DNR; Michael Ritter, WDFW

14864

- 14864-9 1. Impacts on wild turkey are discussed in Section 18.2, Environmental Consequences for each action alternative.
- 14864-10 Hunting seasons for specific game are identified in Section 6.1.5, Hunting. Generally, the peak hunting seasons are fall and winter. Specific impacts on hunting are provided in the individual action alternative discussions and text changes to clarify comments on seasonal construction impacts have been made to Sections 6.2.4.1, 6.2.4.3, 6.2.5.1, and 6.2.6.1. Cooperative agreements with landowners for allowed hunting activities are discussed further under the responses to Comments 14523-4 and 14865-20. Hunting impacts were not included under the Operation and Maintenance discussions of the action alternatives because BPA does not anticipate that the operation of the project facilities, or occasional required maintenance along the right-of-way, would impact hunting to any identifiable level.
- 14864-11 Please see the response to Comment 14665-3.
- 14864-12 Temporary access roads are discussed in Section 3.9, Access Roads. Mitigation measures that pertain to access roads are included in Table 3-2, Mitigation Measures Included as Part of the Project, and included in the mitigation sections of the various resource chapters (5 through 22).
- 14864-13 The types of access roads are described in Section 3.9, Access Roads. The resulting impacts from access roads to various resources are included in Chapters 5 through 22. See also the response to Comment 14665-4.
- 14864-14 See the response to Comment 14665-13.
- 14864-15 Please see the responses to Comments 14665-28, 14665-29, and 14665-30.
- 14864-16 Please see the response to Comment 14665-31.
- 14864-17 Section 11.2.2.4, Government Revenue, describes the potential impacts of the project on revenues from WDNR lands. BPA will be meeting with and discussing conditions of right-of-way agreements and compensation with applicable property owners.
- 14864-18 See the response to Comment 14665-53. A final assessment of impacts on special-status species based on field surveys has been added to the Final EIS in Chapter 17, Vegetation.
- 14864-19 BPA has updated data and impact analyses that were applicable to preparing the Final EIS.
- 14864-20 Please see the responses to Comments 14665-55 through 14665-94.
- 14864-21 BPA has submitted a Biological Assessment to the USFWS and NOAA Fisheries (the Services) under the Endangered Species Act that assesses impacts to federally-listed species, their habitat, and overall ecological needs. This assessment defines the level of impact caused by the project. The Services will

14865



State of Washington
Department of Fish and Wildlife
 Habitat Program - Renewable Energy Section

Mailing Address:
 Main Office Location:

MWR-02-13

March 1, 2013

Stephen Posner
 EFSEC Compliance Manager

SUBJECT: Bonneville Power Administration (BPA) Draft Environmental Impact Statement (DEIS), I-5 Corridor Reinforcement Project, November 2012.

14865-1 The Washington Department of Fish and Wildlife (WDFW) has reviewed the above-referenced document and offers the following comments. We appreciate the effort of BPA to consider comments from us in 2009 to use existing transmission line corridors and consider avoiding sensitive habitats such as the Lacamas and Chelateic Prairies in the development of the DEIS. While these actions have likely reduced impacts on a site specific scale, impacts on a project-wide scale are still considerable.

14865-2 BPA has selected the Central Alternative using Option 1 as its preferred alternative. This 77-mile long x 150-foot wide alternative will result in both temporary and permanent impacts to WDFW Priority Habitats and Species (PHS), including but not limited to, 1,213 acres of forested, production forest, shrubland, urban/shrubland, and open wildlife habitats which includes 69 forested fish-bearing streams, 74 acres of riparian habitats, and 105 acres of wetlands (85 acres cleared and 20 acres filled). Additional, but unquantified, impacts are identified in areas where additional habitat clearing would be required in order to protect the transmission line and infrastructure from large falling trees.

14865-3 The DEIS states that "Twenty-one [special-status species] have documented occurrences in the study area and are discussed in Appendix N." However, Appendix N is not about wildlife - its subject is "NEPA Disclosure Forms." We recommend the DEIS include an additional appendix to provide more information related to wildlife.

1 of 10

- 14864-21 evaluate these impacts, define mitigation, and make conclusions in their Biological Opinion for the project.
- BPA recognizes that WDNR and other landowners have Section 10 coverage through the Uplands and Forest Practices HCPs. BPA will continue to coordinate with the Services and WDNR to identify impacts and appropriate mitigation that would uphold the commitments made through these HCPs.
- 14864-22 Please see the response to Comment 14665-14. Danger trees are discussed in Section 3.11, Vegetation Clearing. BPA has identified danger trees in the southern portion of the project along existing right-of-way and has conservatively modeled the presence of danger trees elsewhere in the project. This information will be used to assist the BPA forester to identify danger trees in the field.
- 14864-23 Chapter 5, Land and Chapter 11, Socioeconomics discuss timber resources and BPA compensation for affected properties.
- 14664-24 Chapter 5, Land and Appendix A, WDNR Lands Analysis, discuss land use and zoning limitations within the proposed right-of-way for each alternative.
- 14864-25 Please see the responses to Comments 14665-28, 14665-29, and 14665-30.
- 14864-26 Please see the responses to Comments 14665-33 and 14665-34.
- 14864-27 See the response to Comment 14665-36.
- 14864-28 Table 4-10, Summary of Impacts by Action Alternative, summarizes and compares the overall impacts of each action alternative compared to the No Action Alternative.
- 14864-29 Comment noted.
- 14865-1 BPA appreciates the Washington Department of Fish and Wildlife's comments on the Draft EIS. Specific comments are addressed below.
- 14865-2 Comment noted.
- 14865-3 Please see the response to Comment 14565-16.

14865

Priority Habitats and Species Comments

14865-4 The proposed project will have unavoidable impacts to WDFW PHS; therefore, WDFW encourages BPA to conduct a finer scale assessment of Priority Wetland Habitats, their locations, and potential impacts. While the DEIS appears to acknowledge all of the PHS types occurring within the alignment of the preferred alternative, the actual areas and acreage of habitat types potentially impacted are not clearly documented and will only be known when on the ground verification and additional analysis is completed. For example, the DEIS identifies all wetlands in the study area that are considered priority habitats although additional wetlands that may be present in the study area have not been documented (Chapter 16-3). Additionally, data presented in the tables are not comparable between chapters. For example, the *Right-of-Way* wetland acreage impacts/clearing for the Central Alternative Option 1 in Tables 15-2 and 16-1 are not consistent (76.6 acres vs. 86.5 acres, respectively).

The discussion above regarding wetlands can be extended to streams where the actual level of impacts will only be known when all streams are identified and typed correctly and once the ground verification and additional analysis is completed.

14865-5 The preferred alternative includes right-of-way clearing, towers, and new and improved access roads in an area known as the North Fork Lacamas Snags that would result in the loss of three acres of snag-rich habitat. For example, one new tower (P/20) is within the mapped snag-rich area, as is approximately 600 feet of access road. WDFW encourages BPA to retain some degree of fine-scale flexibility in design to further avoid impacts to this and other Priority Habitats when the opportunity exists. We recommend relocating the tower further south and out of the snag-rich area. We also recommend modifying the layout of the access road to avoid individual snags. Aerial photography indicates a network of existing disturbed dirt road and trails in this area and we encourage new construction to use existing disturbed areas to the greatest extent possible.

14865-6 The preferred alternative will impact the Washougal Oaks woodland. Aerial photography indicates an existing transmission line corridor at that location. As with wetlands, snags, and logs; WDFW encourages BPA to employ fine-scale flexibility in design to further avoid impacts to these and other Priority Habitats where they exist.

14865-7 Potential WDFW PHS species which may occur in the study area are not discussed in Chapter 18. Some PHS species actually have been documented to occur in the study area. In addition, some PHS species discussed occur in alternatives not listed in the discussions. For example band-tailed pigeon is known to occur in the central alternative. The DEIS would benefit from an additional appendix providing more information related to wildlife.

General Habitat Comments

14865-8 The actual amounts of habitat types and clearing for such actions as safety backlines, and temporary and permanent impacts are not known. This is supported throughout the DEIS with statements like "additional wetlands may be present in the study area although they have not yet

2 of 10

- 14865-4 Chapter 16, Wetlands, describes how wetlands were surveyed using aerial imagery interpretation, and available databases. Wetland delineations were done for the Preferred Alternative between the Draft and Final EIS. Potential impacts on wetland habitats and species were also identified and documented for the project. These results are summarized in Chapter 16, Wetlands.

The data referred to in Table 15-2 is identified as riparian habitat in acres based on a 200-foot buffer, some of which could be wetlands. The data in Table 16-1 is estimated acres cleared in forested (could be both upland and/or riparian) and scrub-shrub wetland habitat.

In general, more natural resource information has been gathered through on-the-ground surveys and has been included to update the Final EIS.

- 14865-5 Please see the responses to Comments 14097-1 and 14119-2. The route in this area has been moved about 1/2 mile to the east to avoid this area. Most access roads proposed to be used for construction already exist.

- 14865-6 BPA Foresters have identified some trees within the right-of-way that need to be removed for safe operation of the existing transmission lines. Likely these will be removed with the next vegetation management cycle that occurs for the existing lines.

Danger trees outside the existing corridor have been marked for removal and will be removed if BPA decides to build this project. A few of these trees are oaks. Danger trees are discussed in Section 3.9, Vegetation Clearing.

- 14865-7 Chapter 18, Wildlife discusses the presence of WDFW Priority Habitats and Species (PHS) and Table 18.2 indicates which action alternatives have documented occurrences. A number of PHS are reported in the study area. The impacts on PHS are discussed in Section 18.2, Environmental Consequences.

- 14865-8 Between the Draft and Final EIS, wetlands were delineated where BPA had permission to enter property. This information has been included in the Final EIS.

Only a small portion of the project has been surveyed at this time for danger trees. Based on the information to date, use of a full safe backline is not anticipated but all areas have not been surveyed yet. Before the danger tree survey, high resolution photography and modeling techniques were used to identify "fall-into" vegetation polygons. These are areas where danger trees could exist and represent a very conservative estimate of potential danger trees. The DT survey team will use this information to continue their work in the field.

BPA recognizes the importance of retention clumps and legacy trees. BPA has worked with WDNR and other landowners to balance many important factors in the siting of the transmission line, including retention clumps and legacy trees.

- been documented” (Chapter 16-3) and “clearing for danger trees outside the right-of-way is unknown at this time and not included in these calculations” (Note 4, Table 18-3). Additional clearing for danger trees could be significant, particularly in high-quality forested areas (old growth, biodiversity areas/corridors) where existing trees are relatively tall.
- 14865-8 While the DEIS is too ambiguous to determine actual impacts, there may be certain legal requirements for the retention of some habitat features, particularly forestland features through the Forest Practices Laws and the Department of Natural Resources Habitat Conservation Plan. Eventhough some of these features would likely need to be removed to maintain a clear and safe transmission line corridor, WDFW recommends that they be replaced or developed in suitable locations at an appropriate mitigation ratio.
- 14865-9 A concept misrepresented throughout the DEIS pertains to certain wildlife using shrublands and benefiting from the creation of new habitat due to tree clearing. This concept is misleading since the loss of native habitat and animal species appears to be minimized. While wildlife that prefer more open shrubland habitat may become more abundant, there is a loss of existing habitat and animal species. The DEIS would benefit from a more thorough discussion on the amount and types of native habitats and animals species that will be replaced by these new habitats.
- 14865-10 If this transmission line is constructed, forested areas will be cleared resulting in habitat fragmentation and increased edge effect where invasive and noxious weeds can become more readily established. Cleared areas and habitat edges will likely be replaced by shrublands and invasive species that must be maintained not only to protect the integrity of the transmission line but also to prevent and minimize undesirable vegetation. Since most shrubland in the study area is highly disturbed and dominated by weedy species (S-69), long-term maintenance of the transmission line corridor is vital, as is maintenance of appropriate vegetative communities. The DEIS would benefit from a more thorough discussion on how cleared areas and new habitat edges will be maintained to prevent and minimize invasive and noxious weeds.
- 14865-11 We agree with the statement in Chapter 18 that shrubs can provide nesting habitat and shrubs and herbaceous plants that grow in the cleared right-of-way are desirable for deer, elk, and other species; however, without long-term management/maintenance, the suitability for nesting and foraging habitat diminishes. The DEIS should provide long-term management actions that will promote and maintain the suitability of these right-of-way habitats.
- 14865-12 Section 17.2.2.2 (p 17-19) of the DEIS states that BPA conducts ongoing vegetation management under its Vegetation Management Program (VMP). The VMP calls for native species to provide wildlife forage and shrub cover in some instances (see p 68 and 83). Within the DEIS, Table 3-2 (p 3-27) suggests including “the dominant native species from the impacted community” in the seed mix. Although the VMP lacks a specific plant list, Table V-1 on page 124 of the VMP lists some dominant native species which may be appropriate.
- WDFW supports the use of native species as mentioned in the VMP. Furthermore, WDFW recommends that the transmission line right of way be managed to specifically encourage native early seral plant species beneficial to wildlife (forage with high nutritional value). Site

- 14865-8 BPA continues to work with WDNR to determine existing and future required retention trees (as required under the HCP's) that would need to be removed if BPA were to build this project. When this study is complete, BPA and WDNR would then work together to determine future mitigation as needed for these removed trees.

See also the responses to Comments 14306-4 and 14665-13.

- 14865-9 The EIS identifies those species that use shrublands and could benefit from that habitat. It also identifies those species that use forestland and would be adversely impacted by its removal. Impacts on habitat and species are discussed in Section 18.2, Environmental Consequences.
- 14865-10 A discussion of edge effects from vegetation clearing including changes in sub-canopy climate conditions, increased temperature and humidity variation, increased light levels, and increased risk of windthrow has been added to Chapter 17, Vegetation.

Chapter 17, Vegetation, Section 17.2.2.2 Operation and Maintenance, discusses steps BPA would take to assess any noxious weed spread caused by the project and implement noxious weed controls. Section 18.2.8, Recommended Mitigation Measures identifies a number of steps BPA will take to prevent and minimize the spread of noxious weeds related to the project.

- 14865-11 Please see the response to Comment 14306-4.
- 14865-12 Please see the responses to Comments 14566-12 and 14566-13. As noted, BPA incorporates native seed mixes and plant species representative of preconstruction plant communities wherever practicable as part of the BPA Vegetation Management Program. BPA has discussed suggested native plant species seed mixes with WDFW and will continue that discussion if the project moves forward to construction. BPA wants to make sure that these mixes are used where appropriate and practicable for successful establishment. BPA is also exploring adding specific pollinator species to seed mixes if possible and where appropriate.

14865

14865-12 preparation, planting and reseeding as well as watering and maintenance following construction will be needed to develop this plant community. Suggested native plants that are both useful to wildlife and won't reach a height that interferes with transmission lines include:

Native rose	<i>Rosa</i> spp.
Red elderberry	<i>Sambucus racemosa</i>
Hazelnut	<i>Corylus cornuta</i>
Willow	<i>Salix</i> spp.
Salmonberry	<i>Rubus spectabilis</i>
Thimbleberry	<i>Rubus parviflorus</i>
Trailing blackberry	<i>Rubus ursinus</i>
Black raspberry	<i>Rubus leucodermis</i>
Vine maple	<i>Acer circinatum</i>
Osoberry	<i>Oemleria cerasiformis</i>
Snowberry	<i>Symphoricarpos albus</i>
Native grasses	Various spp.
Fireweed	<i>Epilobium angustifolium</i>
Native forbs	Various spp.

Deer and Elk Comments

14865-13 Adverse effects to elk and deer are described in Chapter 18. A more thorough assessment of impacts to elk and deer should take into account all anticipated effects and not just adverse effects. This should be based on the amount (acres) of habitat directly impacted by construction or by stating that there would be no permanent adverse impacts from right-of-way clearing. Federally listed species Columbian white-tailed deer and WDFW priority species, such as elk and Columbian black-tailed deer, could still use shrubland or prairie habitat as foraging habitat. A more thorough discussion of how this transmission line project may impact elk populations north of the North Fork Lewis River and deer south of this area would be useful. The discussion should include but not be limited to temporary and permanent impacts from construction, fragmentation, vegetation management, and human disturbance.

The VMP states (p 180) that, "Animals such as deer, elk, and moose can be affected if clearing interrupts their wintering or birthing habitats." It also states that "For some animals, a treeless swath through a forest can divide or fragment their habitat." These animals might be unlikely to cross through the right-of-way to get to the other side, especially in the winter. Without tree cover, winter snow depth and exposure to wind can increase (because there is no tree canopy to catch and hold the snow), lessening protective hiding places.

This statement is in contrast to the statement on page 18-22 of the DEIS that states, "... the shrubs and herbaceous plants that grow in the cleared right-of-way are desirable for deer, elk, and other species..." For an area to be suitable habitat for deer and elk, it should have useful plants and provide useable habitat features and structure. The area should provide food that is desirable (relatively high in digestible dietary energy) and abundant. Also, the area should be

4 of 10

- 14865-13 Both positive and adverse impacts on elk and deer and their preferred habitats are discussed for each alternative in Section 18.2, Environmental Consequences. The passages quoted by the commenter from the EIS are examples of discussions that indicate both positive and adverse effects. Loss of habitat is discussed for deer and elk for all action alternatives in Section 18.2. The potential for introduction of noxious weeds is discussed in Chapter 17, Vegetation, and mitigation measures are proposed in Section 17.2.8, Recommended Mitigation Measures to prevent and limit such introductions. Measures include conducting a preconstruction weed survey of areas that would be disturbed by construction activities to document weed distribution present at that time as well as a post construction weed survey of all areas disturbed by construction activities to determine if noxious weeds were introduced or spread.

14865

arranged in such a way so that these resources are available to them (meaning gentle enough topography to access, not too disturbed by people or predators, not inside of a fence, not inside an agricultural area that they are chased out of, etc.).

- 14865-13 The proposed transmission line project can compromise deer and elk habitat in three main ways. First, it can outright eliminate some habitat by constructing roads, concrete footings, cable mounts, etc. Second, it can introduce people, pets, disturbance, etc. into remote areas and disturb the wildlife. This disturbance goes beyond the footprint of the road and makes areas near the roads and transmission lines less useful. These disturbances may also lead to additional vulnerability to poaching. Since elk are drawn to areas of early successional vegetation, it becomes more important to limit human access. Finally, the transmission lines and roads open up the landscape, disturb soil and provide an avenue for the introduction of weeds and other undesirable plants (such as Himalayan blackberry and Scotch broom) further degrading habitat.

Bird Comments

- 14865-14 The DEIS lists slender-billed white-breasted nuthatch in Table 18-2, but does not acknowledge any occurrences within the study area. An occurrence of this State Candidate and Federal Species of Concern is mapped approximately 650 feet east of the transmission line on Lady Island, south of Camas. Please include a discussion of potential impacts to slender-billed white breasted nuthatch.

- 14865-15 The DEIS does not mention wild turkey, a species which is included in WDFW's PHS list. An occurrence of this species is mapped approximately 200 feet east of the transmission line, in the vicinity of Rose Valley Road. Please include a discussion of potential impacts to wild turkey.

- 14865-16 The preferred alternative crosses (Segment L) through bald eagle winter habitat along the North Fork Lewis River just downstream of Lake Merwin. The DEIS states (p 18-42) that "... since most of the new line would not parallel existing lines, there would be less of a fence effect to increase the collision risk for birds." However, the portion of Segment L that crosses the North Fork Lewis River through the bald eagle habitat *would* parallel existing lines, presumably magnifying any negative effect. Please include more discussion of expected effects of new transmission lines through the bald eagle winter area in Segment L downstream of Lake Merwin.

- 14865-17 As a safeguard for bald and golden eagle flight corridors, WDFW recommends aerial marker (visual) devices be installed on transmission lines that cross the North Fork Lewis, East Fork Lewis, Kalama and Washougal Rivers. WDFW believes that these measures will somewhat reduce the likelihood of direct injuries or mortalities from strikes.

Recreation and Access Comments

- 14865-18 The VMP states a study that "...showed that the number of moose harvested by recreational hunters in rights-of-way was not statistically different from that in control areas." Another study in the VMP showed that poaching was more common within 30 miles of urban centers and in areas where road densities were high. The same study found no cases of elk poaching in road

5 of 10

- 14865-14 Please see the response to Comment 14665-85.
- 14865-15 Please see the response to Comment 14864-9.
- 14865-16 All action alternatives have areas of suitable bald eagle habitat (MG&B 2011, 2012). Chapter 18, Wildlife has been updated to reflect this with more specific information on nest locations and bald eagle priority areas. The Merwin South Shore Communal Night Roost has been added to that discussion. Each action alternative crosses within 1 mile of at least two WDFW bald eagle priority areas (the East Alternative crosses five and the Crossover Alternative crosses six), and all cross within 1 mile of at least six nests. The West and Crossover alternatives cross by the most nests. Impacts on bald eagle for each action alternative are discussed in Section 18.2, Environmental Consequences.

Note that all conductors will be 500-kV transmission lines, which are large enough in diameter that they are easy for birds to see (APLIC 2012). The smaller ground wires will have bird diverter devices at river crossings (such as this area) and other areas identified as important waterfowl or bald eagle areas using PHS data and WDFW recommendations (pending). Collision risk is low for many species, including bald eagles. Bird species with the highest risk for collisions are large birds with poor eyesight and limited ability to maneuver in flight, particularly waterfowl (ducks, geese, swans), herons, cranes, and pelicans.

Reference:

Avian Power Line Interaction Committee (APLIC). 2012. Reducing Avian Collisions with Power Lines: The State of the Art in 2012. Edison Electric Institute and APLIC. Washington, D.C.

- 14865-17 BPA agrees with WDFW that bird flight diverters can reduce the likelihood of direct injuries or mortalities from bird strikes. Section 18.2.8, Recommended Mitigation Measures, includes a mitigation measure for installing bird flight diverters. The Washougal River has been added to the list of rivers in the mitigation measure.
- 14865-18 Comment noted. Please see the response to Comment 14457-2. In coordination with landowners, BPA installs gates across entrances to access roads to prevent public access to private lands and the transmission line right-of-way. See also Section 3.9, Access Roads.

14865

14865-18 closure areas. WDFW supports approved, controlled hunting seasons within the transmission line corridors, provided the public abides by applicable access restrictions and game laws. However, we also support installation of gates and signs at potential access points in order to limit unauthorized access to these areas.

14865-19 Chapter 6 does not address how hunting will be impacted by construction activities or which criteria are used to determine that the impact to peak hunting seasons is low. Construction and other activities during hunting season could influence the success of the hunt as game animals will likely avoid areas where construction is occurring. Although temporary, how hunting is impacted has not been addressed here. Peak seasons for hunting are during the fall and winter months which are off-peak use for general recreation. Page 6-19 does allude to a difference in peak season for general recreation and hunting but does not include hunting areas in the list of areas affected. Page 6-20 and 6-23 states peak use times are summer for general recreation and hunting season for hunting uses, then provides a contradictory statement that winter is a non-peak time. The DEIS should clarify that the peak seasons for hunting are fall and winter and better identify the impacts.

14865-20 Chapter 6 states that there are no other locations in Cowlitz or Clark counties where private landowners have entered into formal "Hunt by Written Permission" or "Feel Free to Hunt" agreements with WDFW to allow public access for hunting (WDFW 2009). However, WDFW has entered into a Settlement Agreement with PacifiCorp that allows hunting on Wildlife Mitigation Lands. Other such agreements may exist in the study area.

Fish Comments

14865-21 Within the preferred route, Segment L crosses the North Fork Lewis River. At its closest point, the northern edge of the 150-foot right-of-way for Segment L is about 33 feet from the pools at the Merwin Hatchery (operated by WDFW). This area also contains important natural spawning grounds for Lewis River Wild Fall Chinook, a listed evolutionarily significant unit (ESU). The Merwin Hatchery pools and Fall Chinook redds in proximity to Segment L contain young fish that are presumably in the process of developing magnetite crystals in their bodies. Potential effects of an electromagnetic field on development of magnetite crystals are unknown.

As acknowledged in Appendix G (p 60), "... fish may have magnetite in certain organs in their bodies, and use magnetite crystals as an aid in navigation... These magnetite crystals are believed to serve as a compass that orients to the earth's magnetic field."

Appendix G (p 61) discusses "...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." However these two studies used fish that were already in the ocean. Ueda's experiment used adults, and Yano's used "maturing" chum from the ocean. Neither examined the formation of the magnetite crystals, and possible impacts to crystals from magnetic fields during development.

8 of 10

- 14865-19 Please see the response to Comment 14523-4.
- 14865-20 Comment noted. According to WDFW, Region 5, Vancouver, WA Office, there are no formal “official” agreements between WDFW and private landowners for locations in Cowlitz and Clark counties to allow public access for hunting. WDFW does have a cooperative partnership “unofficial agreement” with Weyerhaeuser and Yacolt Burn Sportsman's Club to facilitate hunting access. Please also see the response to Comment 14523-4.
- 14865-21 Alternating magnetic fields at far higher intensities than would be produced by the proposed transmission line are known to demagnetize ferromagnetic materials, e.g., used in the demagnetization of audio or data recording tapes. The magnetic field under a power line would be far too weak to produce such an effect. No studies have examined the crystals of magnetite that accumulate in some species of fish with age but based on the physics of these crystals, 60-hertz magnetic fields would have to exceed 50 mG to have any effect on the orientation of the crystals (Adair, 1994; Normandeau, 2011). See also Appendix G and G1 - Research on Extremely Low Frequency Electric and Magnetic Fields and Health. Calculations of the magnetic field under and around the line at average loading are below this value (Appendices F and F1).

14865

- Appendix G (p 61) also states that "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." However, again, this does not address the formation of the magnetite crystals in the body of the fish.
- More recent research presents evidence that salmon imprint on the geomagnetic signature of the area where their natal freshwater habitat transitions to seawater, and then use the earth's magnetic field to navigate back to that same area to relocate their natal waters (Putman et.al. 2013). The author of this study followed up with a statement that, "If, for instance, hatchery fish are incubated in conditions with lots of electrical wires and iron pipes around that distort the magnetic field, then it is conceivable that they might be worse at navigating than their wild counterparts."
- 14865-21 Since Segment L is adjacent to the Merwin Hatchery, please include an analysis and discussion utilizing the best available science of potential impacts from prolonged exposure to electromagnetic fields during formation of magnetite crystals, imprinting, and a fish's ability to return to the hatchery to spawn.
- Returning adults that congregate below Merwin Dam may also experience prolonged exposure to an electromagnetic field from Segment L. The DEIS, which discusses such exposure only in terms of transient fish, would benefit from a discussion of this topic as well.
- 14865-22 Clearing of vegetation for Segment L could potentially lead to increased sediment in the North Fork Lewis River in the area containing wild Fall Chinook redds. We recommend extra caution and full use of BMPs particularly in this location in order to avoid sediment discharge to this important spawning area.
- Similar concerns apply to the East Fork Lewis River, which contains 3 evolutionarily significant units (steelhead, Chinook, coho) and which the transmission line corridor crosses multiple times. Again, we recommend extra caution and full use of BMPs in order to avoid sediment discharge to this important spawning area.
- Mitigation**
- 14865-23 The DEIS defers specific compensatory mitigation measures to future agency discussions, which is an approach that WDFW generally supports. Additionally, we are supportive of the EFSEC Substantive Standard of no net loss of fish and wildlife habitat function and value. In preparation for the development of a comprehensive compensatory mitigation strategy, WDFW offers the following recommendations.
- 14865-24
1. A committee should be formed among WDFW, DNR, industrial forest land owners, U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, the National Oceanic and Atmospheric Administration, the Lower Columbia Fish Recovery Board, and BPA, to address the impacts of the proposed transmission line. The group should meet and develop a standardized approach to the mitigation requirements and

7 of 10

14865-22 The Final EIS includes mitigation measures to minimize sediment delivery to these streams that may result from construction and maintenance of the transmission line.

14865-23 Please see the response to Comment 14306-4.

14865-24 Please see the response to Comment 14306-4.

14865

14865-24 regulatory arenas associated with the I-5 transmission line proposal. WDFW believes that a pooled approach to a compensatory mitigation strategy will result in a more comprehensive and ultimately more meaningful method to address the negative impacts to fish and wildlife habitats associated with this development proposal.

14865-25 2. Compensatory wetland mitigation should be calculated and implemented based on *Wetland Mitigation in Washington State, Part 1 and Part 2* (WA Department of Ecology 2006).

14865-26 3. Provide compensatory mitigation for WDFW Priority Habitats such as Oregon white oak woodlands, snag rich areas, old growth/mature forests, wetlands, talus and riparian habitats should be calculated and implemented based on #1 above where applicable, and in accordance with the WDFW Wind Power Guidelines (WDFW 2009)

14865-27 4. WDFW requests that BPA work with private industrialized forestland owners and WDFW to develop appropriate mitigation measures for these lands. More specifically, WDFW requests that mitigation fully address impacts to wildlife and fish habitat on these lands. WDFW requests that the legal requirements within State Forest Practices Laws related to riparian and wetland protection as well as the requirements to retain large structural features on the landscape be addressed while developing mitigation agreements with these landowners.

14865-28 5. WDFW requests that BPA initiate consultation under section 7 of the ESA. During consultation, WDFW requests that BPA work with DNR and include recommendations from WDFW to develop appropriate mitigation measures for DNR lands. WDFW requests that these mitigation measures fully address the requirements and intent of DNR's HCP. For example, DNR's HCP requires riparian stream buffers and wetland buffers much larger than those in the standard Forest Practices Laws and four times the number of retention trees within timber harvest units. The impact of the transmission line corridor and associated backline(s) should be addressed in terms of their relationship to DNR's inability to manage these lands per the legal requirements of the HCP.

14865-29 6. WDFW requests that BPA appropriate dedicated mitigation funding for the long-term maintenance of all proposed mitigation sites.

8 of 10

14865-25 Comment noted.

14865-26 Please see the response to Comment 14306-4.

14865-27 Please see the response to Comment 14306-4.

14865-28 Please see the response to Comment 14306-4.

14865-29 Please see the response to Comment 14306-4.

14865

14865-30 We appreciate the opportunity to provide these comments. Please contact me at
or at if you have any questions.

Sincerely,



Michael Ritter

cc: Travis Nelson, Major Projects Manager, WDFW
Doug Robison, Major Projects Team Lead WDFW
George Fornes, PHS Biologist, WDFW
Guy Norman, Regional Director, Region 5, WDFW
Sandra Jonker, Wildlife Program Manager, Region 5
Dave Howe, Wildlife Biologist, Region 5
Jim Byrne, Biologist, WDFW
Eric Holman, Biologist, WDFW
David Anderson, Wildlife Biologist, WDFW
Peggy Miller, Major Projects, WDFW
David Bergvall, WaDNR

9 of 10

14865-30 Comment noted.

14870

TIMOTHY E WEIHE

02/16/2013

- 14870-1 I strongly urge you to move Towers V/27P/1, P/2, P/3 and P/4 To the east approximately 990 feet to run due south of tower V/26. This will 1) Cost less. 2) Be shorter. 3) Most importantly, these towers will not have a devastating effect on the lives of several families. Tower V/27P/1 is 150 feet from one home and 300 feet from another. At 150 feet tall it will destroy the views currently enjoyed as well as lowering the house values, if they will even be sellable with the towers there. I live one lot over from these two
- 14870-2 homes and it will effect my view and value as well. I see no reason why these towers cannot be moved a little further to the east. Thank you.

14870-1 Please see the response to Comment 14097-1.

14870-2 Please see the response to Comment 14140-2.

Dear Mr. Korsness,

14871-1 I was very disappointed by your announcement that you have selected my route as your preferred alternative. I continue to believe you have better options available. However, in talking with my sister-in-law Tessie Cherrington it is my understanding that she is going to try and discuss with you options in regards to the property her and my brother jointly own with me and my wife(F40 and F41). I'm supportive of her doing this and sincerely hope that these conversations go well. All my family wants is to be treated fairly Mr. Korsness. If you do ultimately pick our route I'm still not convinced

14871-2 that going through our property is the best option available to you. However, I'm hopeful that if you must go through our property that we would be compensated fairly for the land that is taken as well as compensated fairly for the amount that the rest of our property is depreciated as a result of your project. This is how I understand that the process is supposed to work, and this is the closest thing in my mind to what could approach being fair. I have been through too much Mr. Korsness to quietly accept anything less.

It is my desire to remain in the shadows at this point in hopes that my family is presented with some solid information that the BPA intends to be fair. After having fought cancer off and on for 10 plus years I would much prefer to have some resolution and not expend excess energy towards your project, but I also know that God has put this latest challenge in front of me for a reason. If the reason is for me to be patient and accepting then I'm on board with that to a point, but I will ultimately turn to God for answers. In reflecting on what God has done for me I realize that if I never had to fight cancer I would have never met my wife, and if I would have never met my wife I would not be the father to the beautiful baby girl who doctors call one of their little miracles. I have to trust that God knows what he is doing. Therefore, at this point I'm continuing to focus on my family and our latest little miracle child we our welcoming into the world in February. However, through this process I do continue to pray for additional support to go along with the support I already have available from a very large amount of people from all walks of life to include the following:

- 14871-3
- support by way of a sea of purple as my wife and I have been asked to light the torch at more than one Relay for Life this year.
 - support from Mr. Ryan O'neal whose latest response to me was "now what?"
 - support by way of an open door policy with elected officials in Olympia as to how I feel things are going.
 - support from my tribe who has a rather unique perspective regarding this situation.
 - support by way of an open invitation from Portland and Seattle based television media personnel whom I worked with on a story over the summer.

With all of the support that I do have available though all I really want is to live my life, and to be treated fairly. I am too proud to ask for any kind of hand out, but I'm not too proud to ask for help in seeing that fairness is achieved. I remain hopeful that your intention is to treat my family fairly, and I'm asking that you please personally see to it that this is done. I realize that you are holding all the cards. I'm merely asking that you will decide not to further complicate the hand that I have already been dealt. With my perspective every second, every minute, every hour, and every day of my life is amazing Mr. Korsness. It is amazing now, I believe it will be amazing through this process, and I'm hopeful that it will be amazing after. God bless.

Sincerely,

David Cherrington

- 14871-1 BPA did meet with the Cherringtons and the transmission line route has been slightly adjusted in this area. Please see the response to Comment 14097-1.
- 14871-2 Please see the response to Comment 14566-9.
- 14871-3 Comment noted.

14872

Good evening Mr. Korsness,

- 14872-1 My name is Keith Matheson and I am a property owner in one of the affected areas of the I-5 Corridor project. I'm reaching out to you to request that you reconsider the location of towers V/27P/1, P2, P3 and P4. I request that you move them east approximately 990 feet to run due south of tower V/26. This will 1) Cost less, 2)Be shorter, 3) Have greater access from Berry Road, a public road. You will not have easy access through the Kaskillah neighborhood. There is a very sharp 90 degree turn surrounded by mature trees that is very difficult for tractor trailer traffic to negotiate. Numerous home construction vehicles have been stuck for several hours. The roads in this neighborhood are privately purchased and very brittle. Any damage will be documented and require repair. 4) Most importantly, these towers will not have a devastating effect on the lives of several families. Tower V/27P/1 is 150 feet from one home and 300 feet from another (both of which are directly on the other side of the street from my property).
- 14872-2
- 14872-3
- 14872-4 Thank you for your consideration. Please call me if you would like to discuss further.
- Keith Matheson

1 of 1

14872-1 BPA did meet with the Cherringtons and the transmission line route has been slightly adjusted in this area. Please see the response to Comment 14097-1.

14872-2 Please see the response to Comment 14566-9.

14872-3 Comment noted.

14872-4 BPA did meet with the Cherringtons and the transmission line route has been slightly adjusted in this area. Please see the response to Comment 14097-1.

14873-1

Mark, 14873
Contact information for Peter and Kelly Gardner is below. We would like to meet with you around 4 PM one afternoon this week or next to talk the projects plans for route, right of ways, tower placements, and access roads that are currently planned to cross our private property.

Days this week that we are available are Tuesday, Wednesday, and Thursday. Days next week that we are available Wednesday and Thursday. Please let us know a time and location in Vancouver, Washington that we can talk.

Thank you,
The Gardners

We are lots

Peter:

home cell
work
home email
work email

Kelly:

home cell
work
home email
work email

14873-1 BPA met with the Gardners at their property. The proposed transmission line right-of-way and access roads have been moved off their property for various reasons.

Mark,

14874-1

I would like to officially request an onsite visit with your team of engineers at the intersection of Line 1B and 28. The visit with the engineers today was productive and I am hopeful that an onsite visit could resolve the issues at hand. I will be available during the month of February if that will work with your schedule.

Thank you,

Lee Levanen

1 of 1

- 14874-1 BPA and Mr. Levanen have discussed the proposed project several times and Mr. Levanen understands the current proposal. If new information becomes available, BPA will contact Mr. Levanen.

Hi, Lou,

14875-1

I'm sorry for what must have seemed obtuse mulishness on the phone the other day. Waiting for this decision has been especially difficult for the past several months. That was exacerbated because, last summer, I ran across a letter I had sent to BPA in -1981? - when they first floated this idea of putting a new 500 kv line through the Yale Valley. I had forgotten all about that! Put it from my mind, I guess; much like I did college calculus. Anyway, that made me start thinking that your plan all along had been to sneak the K-line (and Yale) route in as an option at the last minute, which you did, too late for us to even submit any comments before the official end of the first comment period; and then pretend the others were actually under serious consideration when you really intended to use Yale all along. And I think you did! It's galling to think I may have something to thank Kirk Naylor and his ilk for. So it was especially important to me that the decision be at least somewhat definite, one way or another. And it isn't! I do believe you (personally) really do think you've chosen and explained the preferred alternative in a strong and defensible manner. If the Project Update and Issue Brief could have just stated "No other routes will be released until the EIS is published and final route selection is made," that would have been one thing. But they don't! They repeatedly stress that ALL routes will still be under active consideration!



2014. We intend to issue a record of decision after completing the final EIS to announce and explain BPA's decision about whether to build the project and, if a decision is made to build, which alternative we have chosen.

- 14875-1 Under NEPA, BPA cannot make a final decision concerning a route for the proposed project until after it completes the Final EIS and allows for a 30-day "waiting period" from the time the Final EIS is issued. That decision then will be announced in a Record of Decision for the project. Accordingly although BPA has identified its Preferred Alternative, all alternatives considered in detail in the EIS remain under consideration at this time.

Identifying a preferred alternative does not represent a final decision concerning the route for the project, but it does show the direction BPA is leaning. It presents a

(The word "leaning" is a pretty puny indication!)

Action Alternative. Though BPA has identified a preferred alternative at this time, all other alternatives in the draft EIS are still being considered.

And the observations which led to the concerns I grilled you about:

It includes any necessary revision to the EIS. BPA expects to complete and publish the final EIS in 2014. During the remainder of the EIS process we will work closely with property owners and others who could be affected by the preferred alternative to help us refine transmission tower and access road locations for this alternative.

14875-1

So this is what the Issue Brief promises will be the time frame:

1) During the (total) remainder of the EIS process they will work closely with the property owners.. *who could be affected by the preferred alternative...*

Following the release of the final EIS, BPA will issue a record of decision (ROD). The ROD will announce and explain BPA's final decision on whether to build the project. If a decision is made to build, the ROD also will explain BPA's final decision concerning which alternative route it will build.

2) *...AFTER the release of the final EIS...and ROD...the ROD also will explain BPA's final decision concerning which alternative route it will build.*

You see, I was not just making it up! It is reiterated time after time that the current preferred

This page intentionally left blank.

14875

route may not be the one chosen. Even though that is stressed, nowhere is there any mention of what property owners' involvement will be pursued or even allowed, before the EIS and ROD are issued, IF on the long and bumpy road to the final EIS, BPA determines that it is necessary to substitute a 'Plan B' for the preferred route!! In fact, it really appears (to me!) quite likely 'they' do not intend any such secondary input to be given a chance to take place! It puzzles me how the team could have spent, as I know they did, so much time on the DEIS and even, probably, on the wording and phraseology of the Project Update and Issue Brief without having noticed that omission, if it was in fact an accident.

I'm sorry to keep beating you over the head with this. But what explanation can there be for the almost obvious pussy-footing around the fact that though it is stated repeatedly that another route could ultimately be chosen, the currently published time-line does NOT allow for any recognition, even, of that possible change, until after the EIS and ROD?

14875-1

The BPA subtly suggests that those of us not on the (current) proposed alternative kind of, well, butt out and quit bugging the 'project team', which, at this point, is of course all-desirous to concentrate on current preferred alternative. To see what can be done to make it better, fairer, less of an impact on the subject property owners. I understand and applaud that; but then the BPA has no right to keep 'considering all the routes' and poking around our neighborhoods and coming up with reasons why ours really would in fact be the better alternative. I mean, fair is fair. 'Fish or cut bait. If we're still under the microscope, then we shouldn't be told to 'stand down.' And if there is a chance another route may eventually be chosen, which of course there is, the 'What's Next' timeline should include a plan for some concessions to be made to THOSE home- and property owners. We should not just be told that we'll find out after the ROD is a done deal! And you have to admit that is the way it currently stands!

I understand what you were saying about how you see this playing out. That's because you have developed the DEIS with that one goal in mind, and think you have it in hand. But it just seems like there is one big possibility that is not only not addressed, but is being studiously ignored. Do you see?

Well, you are going to come to hate these long dreary rainy days for what they spawn, aren't you? I guess that's why somebody invented long holiday weekends. Thank you for your patience and consideration over the past two-plus years. I wish there wasn't almost that much longer to go, like this, still uncertain of the eventual outcome.

Happy Thanksgiving, Patti

This page intentionally left blank.

Mark.

14876

I've attached the article links and one article I was given permission to copy regarding the incentive program for landowners denying access to their property.

14876-1

I understand your concern about my public comment yesterday. However, realistically, the program was started as incentive to gain access through private land to build towers and string conductors. So, even though you don't think I said it properly, incentive to acquire access was what this program was about.

These articles are very disturbing. I sure hope we have a team of BPA employees who are sensitive to what they're doing to the lives of the folks we work with.

<http://www.goldendalesentinel.com/story/2012/03/14/news/bpa-offering-unique-easements-pilot-program/400.html>

<http://www.goldendalesentinel.com/story/2012/04/18/news/hill-bpa-sends-out-final-ultimatum-letters/573.html>

Cheryl Brantley
A Better Way for BPA

Page 1 of 2

14876-1 Please see the response to Comment 14455-1.

The Goldendale Sentinal

<http://www.goldendalesentinel.com/story/2012/03/14/news/bpa-offering-unique-easements-pilot-program/400.html>

BPA offering unique easements pilot program

March 14, 2012 | Vol. 133, No. 11 | [View PDF](#)

The Bonneville Power Administration (BPA) says a claim made recently by [Klickitat County](#) commissioner [Rex Johnston](#) that the BPA had made an insufficient offer for right-of-way on a county quarry was probably a misunderstanding of the BPA's actual offer. Johnston stated at a public meeting that the BPA had offered \$5,000 for right-of-way and that the quarry would not be able to operate with a tower in place; the loss of revenues from the shut-down, he said, would be far greater than the easement offer.

14876-1

But BPA spokesperson Doug Johnson says his understanding is that the quarry would not need to shut down, though some of its blasting procedures might be mitigated in proximity to the tower. **More to the point, however, he said the offer of \$5,000 was per tower on properties sought for easement, or per easement if there were no towers,** plus fair [Market](#) value on the property. In addition, Johnson indicated the BPA would make up the difference if its easement negatively affected the quarry's revenues.

"We're definitely offering fair [Market](#) value," Johnson says. The offer program is a unique pilot program being offered for the first time. "We may not do it again," Johnson says. A decision on its effectiveness is to be made after responses from the 19 remaining properties for which easements are sought are received.

Property owners have until April 5 to respond to the BPA's offer based on this pilot program of \$5,000 per tower plus fair [Market](#) value for easements. "We'll see if a sufficient number of properties want to do this," Johnson said, "which we would prefer instead of condemnation. We'd like to avoid condemnation if possible." Condemnation refers to applying for right of way by eminent domain.

The BPA has held negotiations with property owners for rights of way to build its new Big Eddy-Knight transmission line. Some sources speaking on condition of anonymity have indicated significant issues with those discussions, though Johnson says work continues on the line.

This page intentionally left blank.

From: don curtis
Sent: Thursday, November 15, 2012 11:27 AM
To: BPA I-5 Corridor Reinforcement Project
Subject: I-5 Corridor Reinforcement Project

14879-1

I just received the information on the I-5 Corridor Reinforcement Project in the mail.
 Can you tell me if my property is impacted by this route?

Sincerely,

Don Curtis

From: "Mark A Korsness (BPA) - TEP-TPP-3"
To:
Sent: Monday, November 19, 2012 9:33:25 AM
Subject: RE: I-5 Corridor Reinforcement Project

Don, very good talking to you today. Please do not hesitate to call me sometime to discuss further.
 Thanks..... Mark Korsness

From: don curtis
Sent: Wednesday, November 21, 2012 5:11 AM
To: Korsness, Mark A (BPA) - TEP-TPP-3
Subject: Don Curtis Re: I-5 Corridor Reinforcement Project

14879-2

Mark, Thanks so much!
 Would it be possible for you to send me a small copy of my parcel with the tower and what direction the wires are running through to scale.

Thanks Mark,

Don Curtis

14879-1 BPA contacted the commenter and provided a map of his property. BPA's Preferred Alternative would not cross the property.

14879-2 Please see the response to Comment 14879-1.



[image/png:Snagit1.png]

[image/png:Snagit1.png]

This page intentionally left blank.

14879

From: don curtis
Sent: Monday, November 26, 2012 8:46 PM
To: Korsness,Mark A (BPA) - TEP-TPP-3
Subject: Don Curtis str F13 Re:

14879-3

Thanks Mark, My son lives at _____, Parcel #
Will his property be affected? Don

From: "Mark A Korsness (BPA) - TEP-TPP-3"
To: "don curtis"
Sent: Friday, November 23, 2012 11:06:23 AM

Don, I hope these help.
The proposed easement (green) is 150' wide.
The angel tower is number F13.
The access road shown going down the driveway from Quick Road will probably not be the road we use. Instead we will likely access from Gassman Road.
Thanks.....Mark Korsness :



- 14879-3 BPA provided a map of the property to the commenter. The property is not directly affected by any proposed project components, but it is near BPA's Preferred Alternative.



[image/png:Snagit1.png]

This page intentionally left blank.

From: "Mark A Korsness (BPA) - TEP-TPP-3"
To: "don curtis" <
Sent: Wednesday, November 28, 2012 5:21:23 PM
Subject: BPA

I do not think we cross your sons property.
 Does that sound correct, looking at the attachment?
Mark

From: don curtis
Sent: Thursday, November 29, 2012 9:29 AM
To: Korsness,Mark A (BPA) - TEP-TPP-3
Subject: Re: BPA

14879-4

Mark, Thanks so much. It looks like it does not cross his property.
 Will you be at the School meeting coming up on the 4th at the CR Elementary School?
 Don

From: "Mark A Korsness (BPA) - TEP-TPP-3"
To: "don curtis"
Sent: Monday, December 3, 2012 4:32:23 PM
Subject: RE: BPA

I don't plan on it. The December meetings will be run by people who can show you how to navigate through the Draft E and make comments.
 Do not hesitate to contact me though if you would like to chat or get together.
 I will be attending the January and February meetings.
 Thanks..... Mark

From: don curtis
Sent: Thursday, December 06, 2012 12:49 AM
To: Korsness,Mark A (BPA) - TEP-TPP-3
Subject: Re: BPA

14879-5

Hi Mark, How would compensation work for the tower and land use? Don

From: Korsness,Mark A (BPA) - TEP-TPP-3
Sent: Thursday, December 06, 2012 8:50 AM
To: 'don curtis'
Subject: Don Curtis RE: BPA

Negotiated one time payment for 150' wide easement for the transmission line.

14879-4 The December 4, 2013 meeting at Castle Rock Elementary School was a drop-in session intended to help people find information in the Draft EIS.

Members of the design team were available to answer questions at an open house and listening session that BPA hosted on February 4, 2013 at Castle Rock Elementary School.

14879-5 Please see the response to Comment 14566-9.

March 20 2013

To Mark Korsness,
Project manager I-5
Corridor project.

Mark,

I am asking again for you to move your proposed powerline away from my property so I won't lose value to my home, land and my retirement.

We have an existing powerline corridor that could be rebuilt and the gray line (further north, further east) that would affect the least amount of people and cause less damage overall. These routes would allow for easier expansion in the future.

14880-1

So Mark, please move the route. I will never be able to recover the damages this loss of value will inflict.

Thank You for your time,



John Opsahl

- 14880-1 BPA talked with and met with the commenter. The commenter's property is not on the proposed right-of-way. Routes farther east and north were considered. Please see the response to Comment 14341-2.



February 21, 2013

I-5 Corridor Reinforcement Project

Re: Segale Properties LLC Comments on Draft Environmental Impact Statement for Proposed I-5 Corridor Reinforcement Project

To Whom it May Concern,

14881-1 Segale Properties LLC (Segale) is the owner of the property located at north of Castle Rock, WA, within Cowlitz County (Property) which consists of tax parcels WJ0301009, WJ0301010 and WJ0211016. The Property is within two routes identified as alternatives by the Bonneville Power Administration (BPA) in the I-5 Corridor Reinforcement Project (Project) draft environmental impact statement (EIS). Segale's Property was used as a receiving site for 1.25 million cubic yards of dredge spoil sand and gravel placed pursuant to a contract with the U.S. Army Corp of Engineers following the eruption of Mt. St. Helens in 1980. Segale has a special use permit, issued by Cowlitz County, that authorizes the removal of the sand and gravel (see Attachment A). Segale also has an approved Reclamation Plan from the Department of Natural Resources (see Attachment B). Following removal of the sand and gravel pile, Segale's intended use of the Property will include either residential or commercial development, or both. The Central Alternative, Option 1, (the Preferred Alternative) and the Ease Alternative, Option 1, place tower F/17 just to the north of the Property and include a proposed access road across Segale's property. BPA's Project has the potential to negatively impact both Segale's current and future use of its Property.

14881-2 The Property totals 27 acres and the elevation of the sand and gravel piles reaches 126 feet. Segale has authorization to mine the pile to an elevation of approximately 70 feet (see Grading Plan attached as Exhibit C). Segale's permits are valid for twenty years and it is unlikely Segale will mine to the proposed final grades before BPA's Project completion year of 2018. Therefore, there is potential for conflict between BPA's proposed road construction and Segale's mining.

14881-3 Additionally, the proposed location of tower F/17 appears to be within the vicinity of a wetland. A wetland buffer is located on the northern edge of Property, though the wetland for which the buffer applies is located on the parcel to the north of the Property (see Critical Area Permit attached as Exhibit D).

- 14881-1 Thank you for your comments. Specific comments are addressed below.
- 14881-2 Please see the responses to Comments 14097-1 and 14119-2. BPA contacted the commenter and discussed the commenter's concerns about potential impacts to his plans for his property. The proposed access road has been moved. If BPA decides to build this project, BPA would meet with the commenter to discuss the schedule of construction activities and determine specific conditions of transmission line and road easement agreements to minimize impacts to future mining operations.
- 14881-3 The commenter is correct. The proposed right-of-way and tower location have been changed to avoid the wetland.

14881

- 14881-4 Segale is particularly concerned with the noise impacts associated with the Project post-completion, and the aesthetic impacts. Chapters 7.2.2 and 7.2.3 of the DEIS do not adequately rate the scenic quality of the landscape located adjacent to the Cowlitz River, including the Segale Property. Because the scenic quality of the landscape is undervalued the impacts of the Project are underrated. Segale disagrees that the visual impact of the Central and East Alternatives is simply low-to-moderate. Segale is also concerned that the DEIS does not adequately disclose the visual impacts of the Central and East Alternatives because there are no pictures showing the viewpoint at the point where the Project crosses the Cowlitz River north of Castle Rock, an area where the visual impact is the highest.
- 14881-5

- 14881-6 Segale is directly affected by the County's proposed action and as such expects to be included in all aspects of the EIS process, including review of draft and final reports and studies and participation in any technical meetings.

Please contact me at _____ or _____ if you have any questions.

Regards,

SEGALE PROPERTIES LLC



Jami Balint
Company Counsel

Cc: Kevin Snyder (via Email)
Mark Segale (via Email)

- 14881-4 Please see the response to Comment 14331-2.
- 14881-5 The EIS does not rate the scenic quality of any single parcel, landmark or crossing. The analysis compares four action alternatives, each more than 70 miles long, and the No Action Alternative.
Please see the response to Comment 14171-10 for further explanation of the methodology used in the visual assessment.
Photographs and simulations are included in the Final EIS for the Castle Rock area (see Figures 7-11 through 7-13).
- 14881-6 BPA makes project materials available to the public on the project website: www.bpa.gov/goto/i5. BPA continually updates the public on project developments through media outlets in the project area and by distributing newsletters to the project mailing list. BPA has provided opportunities for the public to talk to project staff during public meetings held during major milestones of the NEPA process. BPA held six public meetings throughout the project area during the Draft EIS comment period. Project staff can be contacted at any time using the information found on the "Contact Us" page of the project website. BPA will continue to make project information publicly available throughout the life of the project.

See also the responses to Comments 14097-1 and 14119-2.

14881_attachment

1 the Cowlitz County Noise Nuisance Code (CCC 10.25) along with any other applicable Cowlitz
2 County Codes and ordinances shall be met.

3 5. The operator of the surface mine shall keep all public roads clean and free of
4 tracked and/or spilled materials from the operation. Should excessive materials be tracked onto
5 the County roadway, it shall be the responsibility of the operator of the surface mine operator to
6 conduct cleanup.

7 6.. Construction or reconstruction of any driveway approaches connecting to Cowlitz
8 View Dive and/or any construction work within the County road right-of-way shall require a
9 permit from the Cowlitz County Public Works Department.

10 7. Warning signs shall be placed on site at intervals such that each sign is visible
11 from the next. The signs shall be of sufficient size as to be legible, and should warn of active
12 mining operations and prohibit trespass. The signs shall be maintained in good repair until
13 mining and reclamation operations have ceased.

14 8. The Applicant shall identify the edge of the wetland buffer as it impacts the
15 project site, and the buffer shall be signed according to the requirements of CCC
16 19.15.170(H)(2). These signs shall be maintained in good repair until the completion of the
17 mining and reclamation activities..

18 9. No mining or reclamation activity shall occur within the Shorelines Management
19 Zone of the Cowlitz River unless such activity is permitted in accordance with the Cowlitz
20 County Shoreline Master Program.

21 10. The Applicant shall provide a Level 1 Hydrogeologic Study meeting the
22 requirements of CCC 19.15.160(C)(3) prior to the commencement of any mining activity. This
23

25

*Special Use Permit - 2***COWLITZ COUNTY HEARING EXAMINER**

4 of 11

1 report shall be subject to the approval of the Building and Planning Department, and a critical
2 areas permit obtained upon approval of the study.

3 11. Erosion control facilities should be implemented and maintained throughout the
4 life of the mining operation. Documentation of the approved NPDES permit indicating
5 coverage of the site shall be provided to the Department of Building and Planning prior to the
6 commencement of mining activities.

7 12. Fugitive particulate matter emissions to the atmosphere must be minimized by the
8 use of approved dust suppression methods in order to prevent a health hazard and/or nuisance
9 situation involving adjoining properties or roadways. Prior to rock crushing activities, the
10 Applicant shall provide a copy of the approved SWCAA Permit to the Department of Building
11 and Planning.

12 13. Noise emanating from the site shall not be allowed to exceed the Maximum
13 Environmental Noise Levels as identified in WAC 173-60-040.

14 14. The hours of operation for the excavation, processing, and hauling related
15 activities of the entire mine shall be during daylight hours between 7:00 a.m. and 6:00 p.m.,
16 provided, that crushing activities shall cease prior to 5:00 p.m.

17 15. Any lighting implemented at the mine site shall be arranged to minimize light and
18 glare onto adjacent property.

19 16. The Applicant shall inform the Department of Building and Planning in writing if
20 any party other than the Applicant operates the surface mine. Such party shall agree in writing to
21 comply with all conditions of permit approval. Such agreement shall be signed and notarized,
22 and a copy filed with the Department of Building and Planning prior to commencement of any
23 excavation activity.

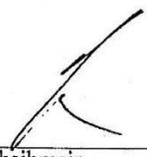
24 *Special Use Permit - 3*

COWLITZ COUNTY HEARING EXAMINER

14881_attachment

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25

DATED this 15 day of April, 2011.

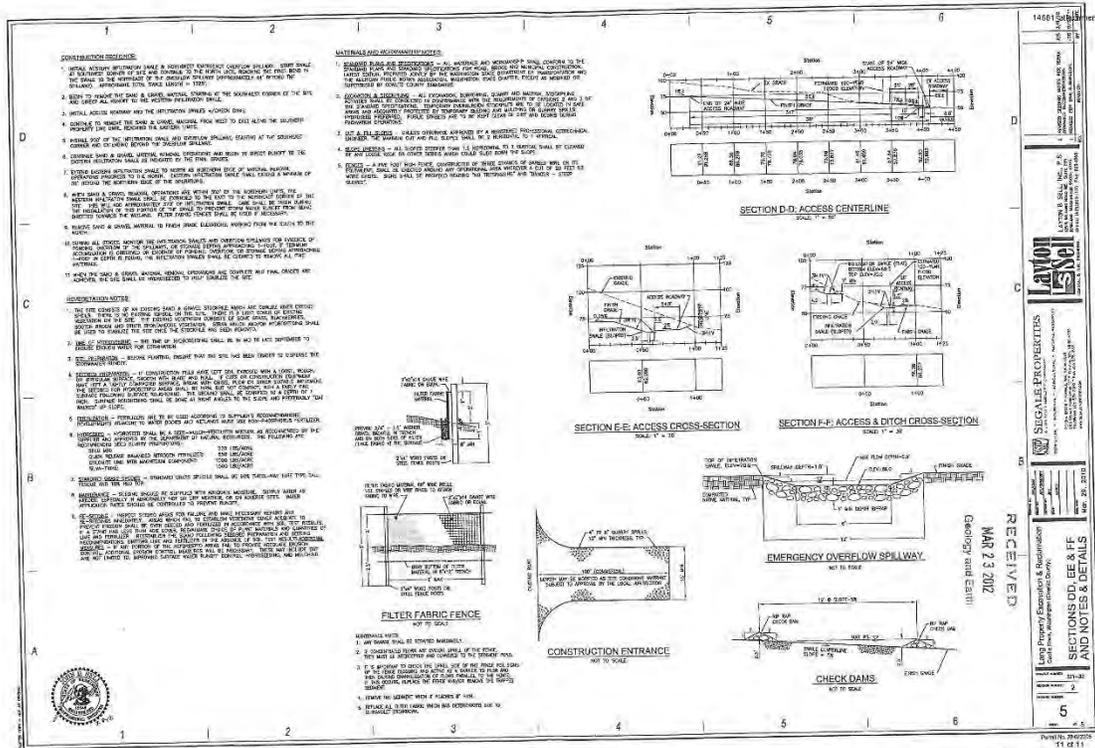


Mark C. Scheibmeir
Cowlitz County Hearing Examiner

Special Use Permit - 4

COWLITZ COUNTY HEARING EXAMINER

6 of 11



This page intentionally left blank.

14882

JoAnn Bas
Executive Assistant
Power Services

From: Korsness,Mark A (BPA) - TEP-TPP-3
Sent: Monday, November 19, 2012 9:49 AM
To: Bas,JoAnn L (BPA) - P-6
Subject: RE: I-5 tower question

Unlikely at this point that it would have a light on it. That is not determined until later, but typically it is just on river crossing towers. Is there an address I can look up for her property?Mark

From: Bas,JoAnn L (BPA) - P-6
Sent: Monday, November 19, 2012 9:16 AM
To: Korsness,Mark A (BPA) - TEP-TPP-3
Subject: I-5 tower question

Mark,

14882-1

I'm hoping you could answer a couple of questions regarding one of the towers on the new I-5 transmission line that you've been working on. My sister owns property along the proposed line and she'd like to know how tall the tower will be and if it will have a blinking red light on it. The tower is numbered F/36. Is that something you can answer?

JoAnn Bas
Executive Assistant
Power Services

- 14882-1 Appendix B1 of the EIS details the proposed right-of-way configuration and anticipated tower heights for every project segment. The lighting of transmission towers is discussed in Section 3.2.1, Tower Types. Lighting needs for towers would be determined as part of the final design for the project. At this time, this particular tower is proposed to be 169 feet tall and is not proposed to be lighted.

14882-2

From: Bas,JoAnn L (BPA) - P-6
Sent: Monday, November 19, 2012 9:52 AM
To: Korsness,Mark A (BPA) - TEP-TPP-3
Subject: RE: I-5 tower question

Her address is:

From: Korsness,Mark A (BPA) - TEP-TPP-3
Sent: Monday, November 19, 2012 9:55 AM
To: Bas,JoAnn L (BPA) - P-6
Subject: RE: I-5 tower question

Yes, we do just miss her property, but we are a long ways from her house.
 Let her know she can call me anytime.
 Thanks... Mark

From: Bas,JoAnn L (BPA) - P-6
Sent: Monday, November 19, 2012 10:03 AM
To: Korsness,Mark A (BPA) - TEP-TPP-3
Subject: RE: I-5 tower question

14882-3

Thank you. That is very kind of you. We've been trying to figure out how visible the tower will be from her back patio but it's hard to tell from the map.

JoAnn Bas
 Executive Assistant
 Power Services

From: Korsness,Mark A (BPA) - TEP-TPP-3
Sent: Monday, November 19, 2012 10:42 AM
To: Bas,JoAnn L (BPA) - P-6
Subject: RE: I-5 tower question

What is her name?

From: Bas,JoAnn L (BPA) - P-6
Sent: Monday, November 19, 2012 11:03 AM
To: Korsness,Mark A (BPA) - TEP-TPP-3
Subject: Peggy Burnham RE: I-5 tower question

Peggy Burnham

JoAnn Bas
 Executive Assistant
 Power Services

14882-2 Please see the response to Comment 14882-1.

14882-3 Please see the response to Comment 14882-1.

14883

From: Mark Heckert
Sent: Saturday, January 05, 2013 11:27 AM
To: Pansky, Tom (BPA) - KEWB-4
Subject: GIS layers for I-5 Corridor Reinforcement Project

Hi Tom,

14883-1 | Can you please tell me if the map layers for the I-5 corridor project are available, and how I may obtain them?

Thanks

Mark Heckert

H&S Consulting

From: Korsness, Mark A (BPA) - TEP-TPP-3
Sent: Monday, January 07, 2013 2:43 PM
To:
Subject: I-5

Mark, I am the Project Manager for the I-5 project. How can I help you?

.....**Mark**

From: Mark Heckert
Sent: Monday, January 07, 2013 2:49 PM
To: Korsness, Mark A (BPA) - TEP-TPP-3
Subject: RE: I-5

14883-2 | Hi Mark,
 Thanks for your reply. I would like to obtain the shapefile of the I-5 transmission corridor, if it is publically available.

Thanks

Mark Heckert

From: Korsness, Mark A (BPA) - TEP-TPP-3
Sent: Monday, January 07, 2013 2:55 PM
To: 'Mark Heckert'
Subject: RE: I-5

Are you an affected land owner or who do you represent?

14883-1 BPA referred the commenter to the project website and interactive map.

Please see the response to Comment 14590-1.

14883-2 Please see the response to Comment 14883-1.

From: Mark Heckert
Sent: Monday, January 07, 2013 2:59 PM
To: Korsness,Mark A (BPA) - TEP-TPP-3
Subject: RE: I-5

14883-3 | Representing a Co. preparing to bid on the ESA habitat, wetlands, and wildlife mitigation needs for the project.
Thanks
Mark Heckert

From: Korsness,Mark A (BPA) - TEP-TPP-3
Sent: Monday, January 07, 2013 3:45 PM
To: 'Mark Heckert'
Subject: Mark Heckert

Please work with the Contracting Officer for that contract to secure the information you need to bid on the project.
Thanks.....Mark

14883-3 Please see the response to Comment 14590-1.

14884-1

From: Suzy S Sivyer
Sent: Thursday, December 27, 2012 10:08 AM
To: Korsness,Mark A (BPA) - TEP-TPP-3
Subject: Suzy Sivyer's Dole Valley Property

Hi Mark - What a small world - was great talking with you.
Property is
My address is
Phone
Email is
Compelled to attach a picture of my personal swimming hole "slice of heaven" I took last Summer.
Looking forward to working with you for a win-win ;-))

Suzy Sivyer

From: Korsness,Mark A (BPA) - TEP-TPP-3
Sent: Wednesday, January 02, 2013 11:13 AM
To: 'Suzy S Sivyer'
Subject: Suzy Sivyer's Dole Valley Property

Thanks Suzy. When you get a chance, log on and be looking at the interactive map and give me a call.
Thanks..... Mark

14884-1 BPA contacted the commenter and explained the information available on the interactive map near her property.

From:
To:
Date: Fri, 4 Jan 2013 10:42:36 -0800
Subject: Suzy Sivyer's Dole Valley Property

Suzy, please go to www.bpa.gov
 On the bottom right of the page is a picture of a tower and "I-5 Reinforcement" written over the top.
 Please click on that picture, then about half way down on the right of that page click on "interactive map".
 That will take you to the aerial photo map. You can then double click on the map to zoom in to your area, or use the
 search function in the upper right hand corner and type in the address of the property.
 Call once to get there or call if you have questions.
 Thanks.....Mark

From: Suzy S Sivyer
Sent: Friday, January 04, 2013 9:04 PM
To: Korsness,Mark A (BPA) - TEP-TPP-3
Subject: RE: Suzy Sivyer's Dole Valley Property

14884-2

Mark - I am not great at real life directions, but I gave it the old college try. I went to map and plugged in Trent's
 property address, but that just showed me his house & outbuildings. Sorry I do not have lat & longitude coordinates. I
 only have tax lot/sec/township/range nos. for both my properties up there, but the interactive map doesn't recognize
 those numbers. Wanna try Monday morning?

Suzy

From:
To:
Date: Mon, 7 Jan 2013 07:54:39 -0800
Subject: RE: Suzy Sivyer's Dole Valley Property

You can also just double click on the general area of the property, and it will zoom in. Do that until the parcel boundaries
 show up and locate the land that way. I will be at my desk after 2:00 this afternoon.....Mark

From: Suzy S Sivyer
Sent: Monday, January 07, 2013 1:10 PM
To: Korsness,Mark A (BPA) - TEP-TPP-3
Subject: Suzy Sivyer's Dole Valley Property
Attachments: 1-7-13 BPA Line at Dole Valley.jpg

14884-3

Mark - I have been doing some homework all morning to try to pin down where the proposed line is in relationship to my
 properties. Attached is a scan of a very rough sketch cross-referencing the Clark County GIS maps. FYI that bend in
 Rock Creek is the waterfall/swimming hole. Please call me this afternoon when you have time. Also I will be at
 Headquarters tomorrow in Rm. 155 to help with Science Bowl training from 1-3 ;-))

Suzy

14884-2 Please see the response to Comment 14884-1.

14884-3 Please see the response to Comment 14884-1.

14884

From: Suzy S Sivyer
Sent: Monday, January 07, 2013 4:49 PM
To: Korsness, Mark A (BPA) - TEP-TPP-3
Subject: Suzy sivyer

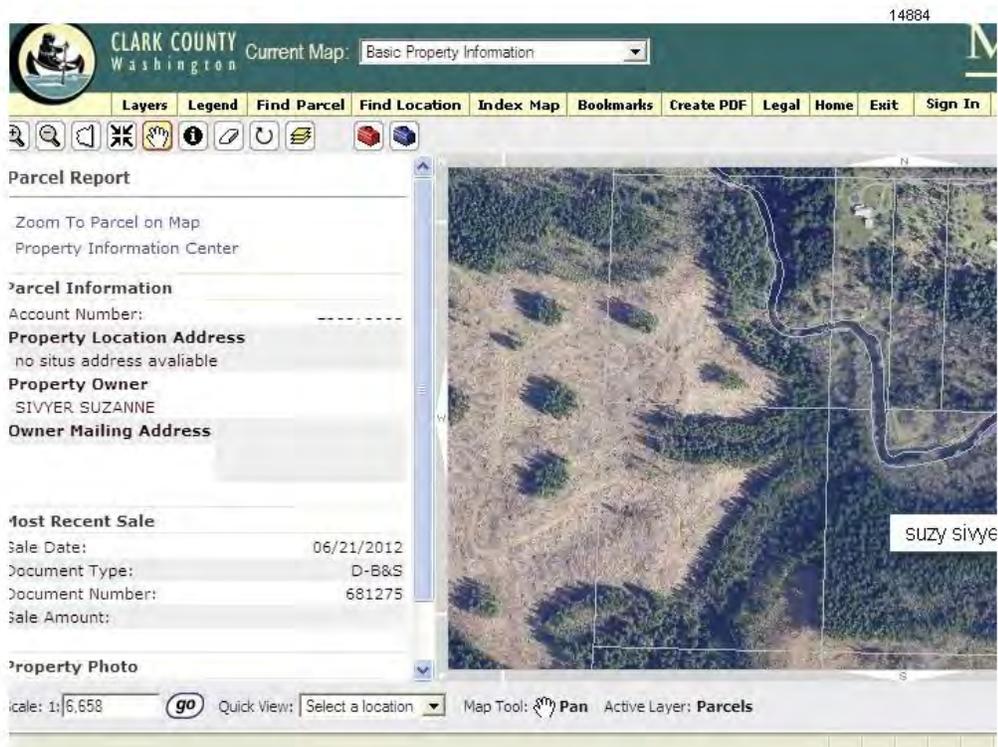
14884-4

Must be. Sure looks wierd from this perspective. Since I haven't been privy to the tax papers before now, nice to have some help actually locating it. Thanks a bunch!

Suzy

From:
To:
Date: Mon, 7 Jan 2013 16:23:16 -0800
Subject: FW: Suzy sivyer

Does this look right?



14884-4 Please see the response to Comment 14884-1.

Dear Mr. Korsness 14885

14885-1 You may take this as just another angry note from a home owner in the Kaskillah development but I hope you read it and take the sentiments to heart. Many of us feel at this time that our government is letting us down. The fiscal cliff looms and we have the least effective Congress in modern history. Many of us also feels that BPA has also let us down and is just another governmental agency with little regard for the citizens who they should be serving. While we may see the need for additional power lines we resent being on the hook for years seemingly without any evidence that we are being listened to. We resent the apparent placement of higher value on DNR (who owns it?)land than on private property. I agree with my neighbor who wrote the following to you earlier:

14885-2 "I strongly urge you to move Towers V/27P/1, P/2, P/3 and P/4 To the east approximately 990 feet to run due south of tower V/26. This will 1) Cost less. 2)Be shorter. 3) Have greater access from Berry Road, a public road. You will not have easy access through the Kaskillah neighborhood. There is a very sharp 90 degree turn surrounded by mature trees that is very difficult for tractor trailer traffic to negotiate. Numerous home construction vehicles have been stuck for several hours. The roads in this neighborhood are privately purchased and very brittle. Any damage will be documented and require repair. 4) Most importantly, these towers will not have a devastating effect on the lives of several families.

14885-3 Tower V/27P/1 is 150 feet from one home and 300 feet from another."

14885-4 It would be wonderful to hear back from you

14885-5 Sincerely,
Walter J McDonald MD

14885-6 Thanks for your prompt reply.
I reside at

My home phone is
Will call next week
I appreciate your willingness to talk
Walter McDonald

14885-1 BPA believes that public engagement results in better information and allows us to make better-informed decisions. We are reviewing all comments, evaluating the potential impacts the public has shared with us and will use the information to help determine how we could reduce those impacts. In the Draft EIS, we refer to comment summaries that capture themes from all comments received and include all comments as appendices. These comment summaries are available on the project website.

BPA has considered multiple options as suggested by the public, although we are not always able to accept every suggestion. This Final EIS includes our responses to the comments we received from the public and any changes we have made.

We understand that people would like BPA to make a decision quickly. We believe it is important to involve the public and complete a thorough review of the project's potential impacts so that we can make a well-informed decision and avoid choosing poorly because of haste.

14885-2 Please see the responses to Comments 14097-1 and 14119-2.

14885-3 Please see the response to Comment 14119-2.

14885-4 Please see the response to Comment 14097-1.

14885-5 BPA contacted the commenter.

14885-6 BPA contacted the commenter.

PATTY MURRAY
WASHINGTON

14889

COMMITTEES:
APPROPRIATIONS
BUDGET
HEALTH, EDUCATION, LABOR,
AND PENSIONS
RULES AND ADMINISTRATION
VETERANS' AFFAIRS

United States Senate
WASHINGTON, DC 20510-4704

March 20, 2013

Mr. Mark Korsness
Project Manager
Bonneville Power Administration

Dear Mr. Korsness:

14889-1

I wish to bring to your attention a letter from, Ms. Cheryl Brantley, who has concerns with Bonneville Power Association's proposed I-5 Corridor Reinforcement Project. For your benefit, I have enclosed a complete copy of her correspondence. It is my understanding the comment period is ending soon and I would appreciate you taking the time to review my constituent's concerns.

Since Ms. Brantley's concerns are in regard to the I-5 Corridor Reinforcement Project, I am respectfully deferring this matter to you for further review and consideration. I appreciate any guidance you may provide to my constituent.

Sincerely,



Patty Murray
United States Senator

PM\ae

1 of 3

14889-1 Thank you for providing us with your constituent's comments. Specific comments are addressed below.

14889

From: Cheryl Brantley
Sent: Saturday, March 16, 2013 2:44 PM
To:
Subject: Citizen group request RE: Bonneville Power Administration I-5 Corridor Reinforcement Project

Senator Murray,

14889-2 Southwest Washington private landowners are under fire with the threat of their land being taken by a federal agency, Bonneville Power Administration. BPA owns most of the right-of-way on their existing transmission corridor, but has chosen to take **new** private land for their I-5 Corridor Reinforcement Project.

Our board has worked closely with these landowners and they need your help.

14889-3 BPA did not perform in depth studies on their Preferred Alternative of known toxic waste dumps and threaten to disturb these sites by digging footings for the transmission towers sometimes deeper than 80! feet (Reynolds fluoride plume at the Oregon southern end of the project).

14889-4 Also of concern for the nearby shallow private water wells and local creeks that flow into the North Fork of the Lewis River is the old International Paper Mill site, where known PCB barrels are buried in the same locations tower footings are planned.

WA DOE Hazard site list FS ID Clark County:
30204: Chelatchie Tank Farm (Rank 4)
1031: IPC Plywood Mill (Rank 5)
1032: IPC Solid Waste Site (Rank 2)

14889-5 BPA did not perform a "feet on the ground" study of wetlands on their Preferred Alternative, as per their Draft EIS. And have only used maps and geographical data. Using those methods would not find all areas encumbered by wetlands.

14889-6 We demand that Bonneville Power Administration requests a permit from the Army Corps of Engineers and Department of Ecology for their West Alternative (where they already own rights to build) using double- or triple-circuit towers in wetlands.

14889-7 BPA has not done a full study of **all** alternatives and we believe they should before they choose a final route.

14889-8 We've worked closely with the communities impacted by this project and listened to their concerns about the impact this project will have on their land. Also attached is a compiled list of their requests and we are asking you to include those requests in your comments to BPA and the Army Corps of Engineers.

2 of 3

- 14889-2 Comment noted.
- 14889-3 Please see the responses to Comments 14683-9, 14775-2, 14775-11, 14791-21 and 14791-22.
- 14889-4 Please see the responses to Comments 14683-6, 14683-9, and 14775-2.
- 14889-5 The commenter is correct that the study area was mapped using a number of sources including wetland delineations at the Sundial, Casey Road, and Baxter Road substation sites, aerial imagery interpretation, National Agriculture Imaging Program (NAIP) imagery, LIDAR imagery, U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory, Natural Resources Conservation Service (NRCS) hydric soils, U.S. Geological Survey (USGS) topography, and WDNR hydrography. Between the Draft and Final EIS, BPA did conduct wetland delineations in all areas along the Preferred Alternative where impacts could occur.
- 14889-6 Please see the response to Comment 14596-5.
- 14889-7 Please see the response to Comment 14596-1.
- 14889-8 Comment noted.

Would you please take a look at the attachments and comment to BPA and the Army Corps of Engineers on these issues. **The deadline to comment is noon, March 25, 2013.**

Thank you in advance for helping us fight for these private landowners,

Cheryl Brantley

A Better Way for BPA
<http://abetterway4bpa.org>

This page intentionally left blank.

14891

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

BPA's Proposed I-5 Corridor Reinforcement Project Draft environmental impact statement comment form

Public review of and comment on this draft EIS will continue through ~~March 1, 2013~~. Comments should be as specific as possible, with references to particular pages, sections and chapters. Additional or clarifying information that should be considered is helpful. Factual corrections are appreciated. BPA staff will review all comments received and respond to them in the final EIS.

Name (will be included with your comment in the final EIS) B.A. & D.P. DeRozier

Address _____

Please add me to the mailing list

Please remove me from the mailing list

Comments:

14891-1

After looking @ the map which was displayed @ the community meeting at the Castle Rock Grate School, we said help but wonder why you have picked the route you have.

It looks like you could follow the line that comes North from Oregon up through Alston, Oregon Northward to Mowbray Creek Substation Site on north to Baxter Road Substation Site to the Casey Road Substation Site.

14891-2

Most of us SW Washington residents are smart enough to know that you won't be going through Weyerhaeuser property without paying out BIG BUCKS!

The current BPA line runs through property we own in East Kelso, now you want to run across our home property in the Pleasant Hill Area, deeming this property unbuildable as well! NO THANK YOU! Please — run your new line along the current right of way

Darlene P. Starnes

**COMMENT PERIOD EXTENDED
UNTIL NOON ON MARCH 25, 2013**



1 of 1

- 14891-1 The selection of alternatives for consideration in the EIS, including the Preferred Alternative, included the need to balance many factors, such as managing costs for regional ratepayers, BPA's role as responsible environmental stewards, and meeting the goal of operating a reliable transmission system. BPA considered many factors when identifying its Preferred Alternative.

Please see BPA's issue brief at: <http://www.bpa.gov/Projects/Projects/I-5/Documents/BPA-I-5-Issue-Brief-Preferred-Alternative-Nov2012.pdf>.

Section 4.7.2.1, Alternate Routes from Castle Rock, Washington to near Wilsonville, Oregon (Pearl Routes) discussed how a new transmission line on the route the commenter suggested was considered but eliminated from further study.

- 14891-2 Comment noted.

Steven,

14894

14894-1 I previously submitted concerns regarding the proposed location of the new transmission lines across my property.

I just received the public notice of January 4th and wanted to restate my concerns regarding my property.

14894-2 The property () is a large parcel with amazing views to the south of Portland, Hood and the Columbia. This type of property is extremely rare and it took me well over a decade to find the perfect piece of land. After purchasing the property, I spent over two years of county process for a comprehensive plan and zoning change that allows for four estate quality building sites. I've also spent hundreds of thousands of dollars to maintain, improve and manage the timber. The value all of these sites is ruined by the location of the proposed line along with the loss of all future uses of the property. The financial loss resulting from the location of the proposed lines will be extraordinary.

14894-3 I previously requested that the location of the towers and transmission lines be relocated and if this were not possible that an explanation of how my financial losses will be addressed. No response has ever been provided. The location of the towers and lines are in

1

1 of 2

14894-4 just about the worst possible location for this property. I do understand that the lines must go somewhere but I'm extremely disappointed by the years that project has tied up my property. It is not right that the BPA can cause such enormous damage to all of the property owners for years before they even have the project funded. I have carrying costs on the

14894

14894-5 property and it would be reasonable to expect that BPA should have to pay me and every other property owner that has been tied up for years over this project.

14894-6 I would like to discuss my concerns with you and try to understand how I will be compensated for my losses as it appears the lines will go through my property despite my objections.

Regards,

Daryn Chapman

Classification: UNCLASSIFIED
Caveats: NONE

- 14894-1 Comment noted.
- 14894-2 Please see the response to Comment 14104-2.
- 14894-3 Please see the response to Comment 14097-1.
- 14894-4 BPA understands the commenter's desire to have updated information and learn about our project decisions as quickly as possible. We want to ensure that we provide a complete and comprehensive environmental review for consideration and comment. That takes time. The additional time allows BPA to consider the comments it has received about the project and complete environmental analysis of issues identified by landowners and stakeholders. This will help BPA make a well-informed decision about whether, and where, to build a new line and substations.
- 14894-5 BPA can only pay consideration for land rights acquired.
- Under NEPA, BPA cannot make a final decision about the proposed project until after it completes the Final EIS and allows for a 30-day "waiting period" from the time the Final EIS is issued. That decision then will be announced in the Record of Decision for the project. The Record of Decision will determine whether BPA will proceed with this project.
- 14894-6 BPA contacted the commenter and answered his questions.

14900

KIRA A SUNDERLAND

03/25/2013

14900-1

Use the West alternative. It has less damage to the environment, less cost passed on to the public, less land needing to be stolen from private citizens. That said, use the cost saving to protect the homes of those who it would impact in that area. Double circuit the lines and bury them underground, thus reducing the visual and health impacts and improving the protection and insulation of the lines along BPA's right of way.

14901

GREEN MEADOWS NEIGHBORHOOD ASSOCIATION, WALTER DAVID SOCOLOFSKY

03/23/2013

14901-1

We say avoid I-5 corridor which affects too many families financially and psychologically. KEEPROUTE IN LOW POPULATION AREAS.

Thank you

WD Socolofsky

14900-1 Please see the responses to Comments 14460-1, 14331-3 and 14331-10.

14901-1 Comment noted.

Please acknowledge receipt of this petition and publish the same as a general comment on the project web site and records.

BPA, choose the West Alternative!

Bonneville Power Administration intends to build a new 500 kV transmission corridor, known as the I-5 Corridor Reinforcement Project, through Clark and Cowlitz Counties. BPA's choice of the Central Alternative as its preferred alternative defies logic and ignores the facts. Our goal is to minimize the impact this project will have on private land-owners, the environment and scenic beauty by advocating a route that takes the least amount of land. The West Alternative is the route that accomplishes this goal. The issues are:

14919-1

1. **Landowner Rights:** BPA would need to acquire an estimated **94 acres** of private land along the **EDGES** of its existing right-of-way, the West Alternative. In contrast, on the Central Alternative, BPA would need to acquire 69 miles of new easement, **INVADING** and destroying **1255 acres** as it passes **THROUGH** new private land.
2. **Cost:** According to BPA's estimate, it will cost **74 million more dollars** to build on the Central Alternative than on the existing corridor, the West Alternative.
3. **Environmental Impact:** There is minimal damage to the environment by using the BPA-owned West Alternative, an existing transmission corridor with a 70-year history. Using the Central Alternative would require many new river and stream crossings in areas that are home to threatened and endangered species.

We ask BPA to recognize these facts concerning the impact a new transmission corridor would have on rural homeowners, private land and landowner rights, the environment, the scenic areas that would be permanently damaged, and the productive timberland that would be forever lost. We ask you to choose the route that takes the least amount of new land. **Choose the West Alternative.**

Name	Address	Date
Sign: <u><i>Jeanette Doherty</i></u>		12-2-12
Print: JEANNETTE DOHERTY		
Sign: <u><i>Crystal Folsom</i></u>		12-3-12
Print: CRYSTAL FOLSOM		
Sign: <u><i>Windy Gray</i></u>		12/3/12
Print: Windy Gray		
Sign: <u><i>Sonia Macy</i></u>		12/3/12
Print: Sonia Macy		
Sign: <u><i>Phoebe Senowitz</i></u>		12.3.12
Print: Phoebe SENOWITZ		
Sign: <u><i>RW Imholte</i></u>		12-3-12
Print: RW IMHOLTE		
Sign: <u><i>Frank James II</i></u>		12-3-12
Print: Frank James II		
Sign: <u><i>Bruce Bosse</i></u>		12/3/12
Print: Bruce Bosse		
Sign: <u><i>Chuck Arnst</i></u>		12/3/12
Print: CHUCK ARNST		
Sign: <u><i>Edward M Roane</i></u>		12/4/12
Print: EDWARD M ROANE		

14919-1 Comment noted.

14919_petition

Please acknowledge receipt of this petition and publish the same as a general comment on the project website and records.

BPA, choose the West Alternative!

Bonneville Power Administration intends to build a new 500 kV transmission corridor, known as the I-5 Corridor Reinforcement Project, through Clark and Cowlitz Counties. BPA's choice of the Central Alternative as its preferred alternative defies logic and ignores the facts. Our goal is to minimize the impact this project will have on private landowners, the environment and scenic beauty by advocating a route that takes the least amount of land. The West Alternative is the route that accomplishes this goal. The issues are:

- 1. Landowner Rights:** BPA would need to acquire an estimated **94 acres** of private land along the **EDGES** of its existing right-of-way, the West Alternative. In contrast, on the Central Alternative, BPA would need to acquire 69 miles of new easement, **INVADING** and destroying **1255 acres** as it passes **THROUGH** new private land.
- 2. Cost:** According to BPA's estimate, it will cost **74 million more dollars** to build on the Central Alternative than on the existing corridor, the West Alternative.
- 3. Environmental Impact:** There is minimal damage to the environment by using the BPA-owned West Alternative, an existing transmission corridor with a 70-year history. Using the Central Alternative would require many new river and stream crossings in areas that are home to threatened and endangered species.

We ask BPA to recognize these facts concerning the impact a new transmission corridor would have on rural homeowners, private land and landowner rights, the environment, the scenic areas that would be permanently damaged, and the productive timberland that would be forever lost. We ask you to choose the route that takes the least amount of new land. **Choose the West Alternative.**

Name	Address	Date
Sign: <i>Jared Larwick</i>		12/10/12
Print: Jared Larwick		
Sign: <i>Kelly Kargola</i>		12/11/28
Print: Kelly Kargola		
Sign: <i>Katherine Compton</i>		
Print: Katherine Compton		
Sign: <i>James Coles</i>		
Print: James Coles		
Sign: <i>EM</i>		
Print: Emily G. Ruble		
Sign: <i>Gray Cunningham</i>		
Print: Gray Cunningham		
Sign: <i>Tom Atkins</i>		
Print: Tom Atkins		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		

Please acknowledge receipt of this petition and publish the same as a general comment on the project website and records. ^{14919 petition}

BPA, choose the West Alternative!

Bonneville Power Administration intends to build a new 500 kV transmission corridor, known as the I-5 Corridor Reinforcement Project, through Clark and Cowlitz Counties. BPA's choice of the Central Alternative as its preferred alternative defies logic and ignores the facts. Our goal is to minimize the impact this project will have on private landowners, the environment and scenic beauty by advocating a route that takes the least amount of land. The West Alternative is the route that accomplishes this goal. The issues are:

- 1. Landowner Rights:** BPA would need to acquire an estimated **94 acres** of private land along the **EDGES** of its existing right-of-way, the West Alternative. In contrast, on the Central Alternative, BPA would need to acquire 69 miles of new easement, **INVADING** and destroying **1255 acres** as it passes **THROUGH** new private land.
- 2. Cost:** According to BPA's estimate, it will cost **74 million more dollars** to build on the Central Alternative than on the existing corridor, the West Alternative.
- 3. Environmental Impact:** There is minimal damage to the environment by using the BPA-owned West Alternative, an existing transmission corridor with a 70-year history. Using the Central Alternative would require many new river and stream crossings in areas that are home to threatened and endangered species.

We ask BPA to recognize these facts concerning the impact a new transmission corridor would have on rural homeowners, private land and landowner rights, the environment, the scenic areas that would be permanently damaged, and the productive timberland that would be forever lost. We ask you to choose the route that takes the least amount of new land. **Choose the West Alternative.**

Name	Address	Date
Sign: <u>Laura Venneri</u>		12-4-12
Print: <u>Laura Venneri</u>		
Sign: <u>Robert J. Alexander</u>		12/4/12
Print: <u>Robert J. Alexander</u>		
Sign: <u>Dorey Zitt</u>		12/6/12
Print: <u>Dorey Zitt</u>		
Sign: <u>Debra Zitt</u>		12-6-12
Print: <u>Debra Zitt</u>		
Sign: <u>Kenton Spoker</u>		12-6-12
Print: <u>Kenton Spoker</u>		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		

Please acknowledge receipt of this petition and publish the same as a general comment on the project website and records. ^{14919 petition}

BPA, choose the West Alternative!

Bonneville Power Administration intends to build a new 500 kV transmission corridor, known as the I-5 Corridor Reinforcement Project, through Clark and Cowlitz Counties. BPA's choice of the Central Alternative as its preferred alternative defies logic and ignores the facts. Our goal is to minimize the impact this project will have on private landowners, the environment and scenic beauty by advocating a route that takes the least amount of land. The West Alternative is the route that accomplishes this goal. The issues are:

- 1. Landowner Rights:** BPA would need to acquire an estimated **94 acres** of private land along the **EDGES** of its existing right-of-way, the West Alternative. In contrast, on the Central Alternative, BPA would need to acquire 69 miles of new easement, **INVADING** and destroying **1255 acres** as it passes **THROUGH** new private land.
- 2. Cost:** According to BPA's estimate, it will cost **74 million more dollars** to build on the Central Alternative than on the existing corridor, the West Alternative.
- 3. Environmental Impact:** There is minimal damage to the environment by using the BPA-owned West Alternative, an existing transmission corridor with a 70-year history. Using the Central Alternative would require many new river and stream crossings in areas that are home to threatened and endangered species.

We ask BPA to recognize these facts concerning the impact a new transmission corridor would have on rural homeowners, private land and landowner rights, the environment, the scenic areas that would be permanently damaged, and the productive timberland that would be forever lost. We ask you to choose the route that takes the least amount of new land. **Choose the West Alternative.**

	Name	Address	Date
✓	Sign: <u>[Signature]</u>		
	Print:		12-3
✓	Sign: <u>Lucinda Loudon</u>		
	Print: <u>Lucinda Loudon</u>		12-3-2012
✓	Sign: <u>[Signature]</u> Todd Miller		
	Print:		12/3/12
	Sign: <u>[Signature]</u> Theresa Walk		
	Print: <u>Theresa Walk</u>		12-3-12
✓	Sign: <u>[Signature]</u> Lori Walker		
	Print:		
	Sign: <u>[Signature]</u> Pamela Graham		
	Print: <u>Pamela Graham</u>		
	Sign: <u>[Signature]</u> Anthony Graham		
	Print: <u>Anthony Graham</u>		
✓	Sign: <u>[Signature]</u> Wendy Johnson		
	Print: <u>Wendy Johnson</u>		
✓	Sign: <u>[Signature]</u> James J. Rekucki		
	Print: <u>James J. Rekucki</u>		
	Sign: <u>[Signature]</u> Laurie A. Rekucki		
	Print: <u>Laurie A. Rekucki</u>		

Please acknowledge receipt of this petition and publish the same as a general comment on the project website and records. ^{14919 petition}

BPA, choose the West Alternative!

Bonneville Power Administration intends to build a new 500 kV transmission corridor, known as the I-5 Corridor Reinforcement Project, through Clark and Cowlitz Counties. BPA's choice of the Central Alternative as its preferred alternative defies logic and ignores the facts. Our goal is to minimize the impact this project will have on private landowners, the environment and scenic beauty by advocating a route that takes the least amount of land. The West Alternative is the route that accomplishes this goal. The issues are:

- 1. Landowner Rights:** BPA would need to acquire an estimated **94 acres** of private land along the **EDGES** of its existing right-of-way, the West Alternative. In contrast, on the Central Alternative, BPA would need to acquire 69 miles of new easement, **INVADING** and destroying **1255 acres** as it passes **THROUGH** new private land.
- 2. Cost:** According to BPA's estimate, it will cost **74 million more dollars** to build on the Central Alternative than on the existing corridor, the West Alternative.
- 3. Environmental Impact:** There is minimal damage to the environment by using the BPA-owned West Alternative, an existing transmission corridor with a 70-year history. Using the Central Alternative would require many new river and stream crossings in areas that are home to threatened and endangered species.

We ask BPA to recognize these facts concerning the impact a new transmission corridor would have on rural homeowners, private land and landowner rights, the environment, the scenic areas that would be permanently damaged, and the productive timberland that would be forever lost. We ask you to choose the route that takes the least amount of new land. **Choose the West Alternative.**

Name	Address	Date
Sign: <u>Andrew J Ogden</u>		
Print: <u>Andrew J Ogden</u>		<u>12/4/12</u>
Sign: <u>Suzanne E Sabata</u>		
Print: <u>Suzanne E. Sabata</u>		<u>12/4/12</u>
Sign: <u>Reynold Sabata</u>		
Print: <u>Reynold Sabata</u>		<u>12-4-12</u>
Sign: <u>Dan Schnabel</u>		
Print: <u>Dan Schnabel</u>		<u>12-4-12</u>
Sign: <u>Rogina Agren</u>		
Print: <u>Rogina Agren</u>		<u>12-4-12</u>
Sign: <u>Brian Agren</u>		
Print: <u>Brian Agren</u>		<u>12-4-12</u>
Sign: <u>Nathan Hyde</u>		
Print: <u>Nathan Hyde</u>		<u>12-4-12</u>
Sign: <u>Tessie Cherrington</u>		
Print: <u>Tessie Cherrington</u>		<u>12-4-12</u>
Sign: <u>Roseanna Cherrington</u>		
Print: <u>Roseanna Cherrington</u>		
Sign: <u>Gene Fyfe</u>		
Print: <u>Gene Fyfe</u>		

Please acknowledge receipt of this petition and publish the same as a general comment on the project website and records. ^{14919 petition}

BPA, choose the West Alternative!

Bonneville Power Administration intends to build a new 500 kV transmission corridor, known as the I-5 Corridor Reinforcement Project, through Clark and Cowlitz Counties. BPA's choice of the Central Alternative as its preferred alternative defies logic and ignores the facts. Our goal is to minimize the impact this project will have on private landowners, the environment and scenic beauty by advocating a route that takes the least amount of land. The West Alternative is the route that accomplishes this goal. The issues are:

- 1. Landowner Rights:** BPA would need to acquire an estimated **94 acres** of private land along the **EDGES** of its existing right-of-way, the West Alternative. In contrast, on the Central Alternative, BPA would need to acquire 69 miles of new easement, **INVADING** and destroying **1255 acres** as it passes **THROUGH** new private land.
- 2. Cost:** According to BPA's estimate, it will cost **74 million more dollars** to build on the Central Alternative than on the existing corridor, the West Alternative.
- 3. Environmental Impact:** There is minimal damage to the environment by using the BPA-owned West Alternative, an existing transmission corridor with a 70-year history. Using the Central Alternative would require many new river and stream crossings in areas that are home to threatened and endangered species.

We ask BPA to recognize these facts concerning the impact a new transmission corridor would have on rural homeowners, private land and landowner rights, the environment, the scenic areas that would be permanently damaged, and the productive timberland that would be forever lost. We ask you to choose the route that takes the least amount of new land. **Choose the West Alternative.**

Sign:	Name	Address	Date
	Richard Johnston		Dec 3 2013
Print:	Richard Johnston		
Sign:	Michael S. Waller		
Print:	Ronda M. Morrow		
Sign:	Tracy Lay		
Print:	Tracy Lay		
Sign:	Sharon Holt		
Print:	SHARON HOLT		
Sign:	Sharon Schlink		
Print:	SHARON Schlink		
Sign:	Kellym Harman		
Print:	Kellym Harman		
Sign:	Robert W. Kerha		
Print:	Robert W. Kerha		
Sign:			
Print:			
Sign:			
Print:			
Sign:			
Print:			

14919 petition

Please acknowledge receipt of this petition and publish the same as a general comment on the project website and records.

BPA, choose the West Alternative!

Bonneville Power Administration intends to build a new 500 kV transmission corridor, known as the I-5 Corridor Reinforcement Project, through Clark and Cowlitz Counties. BPA's choice of the Central Alternative as its preferred alternative defies logic and ignores the facts. Our goal is to minimize the impact this project will have on private landowners, the environment and scenic beauty by advocating a route that takes the least amount of land. The West Alternative is the route that accomplishes this goal. The issues are:

- 1. Landowner Rights:** BPA would need to acquire an estimated **94 acres** of private land along the **EDGES** of its existing right-of-way, the West Alternative. In contrast, on the Central Alternative, BPA would need to acquire 69 miles of new easement, **INVADING** and destroying **1255 acres** as it passes **THROUGH** new private land.
- 2. Cost:** According to BPA's estimate, it will cost **74 million more dollars** to build on the Central Alternative than on the existing corridor, the West Alternative.
- 3. Environmental Impact:** There is minimal damage to the environment by using the BPA-owned West Alternative, an existing transmission corridor with a 70-year history. Using the Central Alternative would require many new river and stream crossings in areas that are home to threatened and endangered species.

We ask BPA to recognize these facts concerning the impact a new transmission corridor would have on rural homeowners, private land and landowner rights, the environment, the scenic areas that would be permanently damaged, and the productive timberland that would be forever lost. We ask you to choose the route that takes the least amount of new land. **Choose the West Alternative.**

Name	Address	Date
Sign: <u>[Signature]</u>		
Print: <u>ROLAN West</u>		12-2-2012
Sign: <u>[Signature]</u>		
Print: <u>BARBARA ELY</u>		
Sign: <u>[Signature]</u>		
Print: <u>Paula Overholtzer</u>		
Sign: <u>[Signature]</u>		
Print: <u>Reva Buck</u>		
Sign: <u>[Signature]</u>		
Print: <u>Chris Overholtzer</u>		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		

14919_petition

Please acknowledge receipt of this petition and publish the same as a general comment on the project website and records.

BPA, choose the West Alternative!

Bonneville Power Administration intends to build a new 500 kV transmission corridor, known as the I-5 Corridor Reinforcement Project, through Clark and Cowlitz Counties. BPA's choice of the Central Alternative as its preferred alternative defies logic and ignores the facts. Our goal is to minimize the impact this project will have on private landowners, the environment and scenic beauty by advocating a route that takes the least amount of land. The West Alternative is the route that accomplishes this goal. The issues are:

1. **Landowner Rights:** BPA would need to acquire an estimated **94 acres** of private land along the **EDGES** of its existing right-of-way, the West Alternative. In contrast, on the Central Alternative, BPA would need to acquire 69 miles of new easement, **INVADING** and destroying **1255 acres** as it passes **THROUGH** new private land.
2. **Cost:** According to BPA's estimate, it will cost **74 million more dollars** to build on the Central Alternative than on the existing corridor, the West Alternative.
3. **Environmental Impact:** There is minimal damage to the environment by using the BPA-owned West Alternative, an existing transmission corridor with a 70-year history. Using the Central Alternative would require many new river and stream crossings in areas that are home to threatened and endangered species.

We ask BPA to recognize these facts concerning the impact a new transmission corridor would have on rural homeowners, private land and landowner rights, the environment, the scenic areas that would be permanently damaged, and the productive timberland that would be forever lost. We ask you to choose the route that takes the least amount of new land. **Choose the West Alternative.**

Name	Address	Date
Sign: <i>[Signature]</i>		
Print: <i>[Signature]</i>		
Sign: <i>[Signature]</i>		
Print: <i>[Signature]</i>		
Sign: <i>[Signature]</i>		
Print: <i>[Signature]</i>		
Sign: <i>[Signature]</i>		
Print: <i>[Signature]</i>		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		

14919_petition

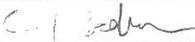
Please acknowledge receipt of this petition and publish the same as a general comment on the project website and records.

BPA, choose the West Alternative!

Bonneville Power Administration intends to build a new 500 kV transmission corridor, known as the I-5 Corridor Reinforcement Project, through Clark and Cowlitz Counties. BPA's choice of the Central Alternative as its preferred alternative defies logic and ignores the facts. Our goal is to minimize the impact this project will have on private landowners, the environment and scenic beauty by advocating a route that takes the least amount of land. The West Alternative is the route that accomplishes this goal. The issues are:

- 1. Landowner Rights:** BPA would need to acquire an estimated **94 acres** of private land along the **EDGES** of its existing right-of-way, the West Alternative. In contrast, on the Central Alternative, BPA would need to acquire 69 miles of new easement, **INVADING** and destroying **1255 acres** as it passes **THROUGH** new private land.
- 2. Cost:** According to BPA's estimate, it will cost **74 million more dollars** to build on the Central Alternative than on the existing corridor, the West Alternative.
- 3. Environmental Impact:** There is minimal damage to the environment by using the BPA-owned West Alternative, an existing transmission corridor with a 70-year history. Using the Central Alternative would require many new river and stream crossings in areas that are home to threatened and endangered species.

We ask BPA to recognize these facts concerning the impact a new transmission corridor would have on rural homeowners, private land and landowner rights, the environment, the scenic areas that would be permanently damaged, and the productive timberland that would be forever lost. We ask you to choose the route that takes the least amount of new land. **Choose the West Alternative.**

Name	Address	Date
Sign: 		12/11/12
Print: Geoff B... ..		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		

14919_petition

Please acknowledge receipt of this petition and publish the same as a general comment on the project website and records.

BPA, choose the West Alternative!

Bonneville Power Administration intends to build a new 500 kV transmission corridor, known as the I-5 Corridor Reinforcement Project, through Clark and Cowlitz Counties. BPA's choice of the Central Alternative as its preferred alternative defies logic and ignores the facts. Our goal is to minimize the impact this project will have on private landowners, the environment and scenic beauty by advocating a route that takes the least amount of land. The West Alternative is the route that accomplishes this goal. The issues are:

- 1. Landowner Rights:** BPA would need to acquire an estimated **94 acres** of private land along the **EDGES** of its existing right-of-way, the West Alternative. In contrast, on the Central Alternative, BPA would need to acquire 69 miles of new easement, **INVADING** and destroying **1255 acres** as it passes **THROUGH** new private land.
- 2. Cost:** According to BPA's estimate, it will cost **74 million more dollars** to build on the Central Alternative than on the existing corridor, the West Alternative.
- 3. Environmental Impact:** There is minimal damage to the environment by using the BPA-owned West Alternative, an existing transmission corridor with a 70-year history. Using the Central Alternative would require many new river and stream crossings in areas that are home to threatened and endangered species.

We ask BPA to recognize these facts concerning the impact a new transmission corridor would have on rural homeowners, private land and landowner rights, the environment, the scenic areas that would be permanently damaged, and the productive timberland that would be forever lost. We ask you to choose the route that takes the least amount of new land. **Choose the West Alternative.**

Name	Address	Date
Sign: <u>Steve Krueger</u>		
Print: <u>Steve Krueger</u>		12-14-12
Sign: <u>Ray Richards</u>		
Print: <u>Ray Richards</u>		12-21-12
Sign: <u>Mica Doherty</u>		
Print: <u>Mica Doherty</u>		
Sign: <u>Steve Rutledge</u>		
Print: <u>Steve Rutledge</u>		
Sign: <u>Patrick Belle-Isle</u>		
Print: <u>PATRICK BELLE-ISLE</u>		
Sign: <u>Hope G McElligott</u>		
Print: <u>Hope G McElligott</u>		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: _____		
Print: _____		
Sign: <u>MARCIA RUTLEDGE</u>		
Print: <u>Marcia Rutledge</u>		

This page intentionally left blank.