



**King County  
Rural Forest Commission**  
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*Doug McClelland*  
Chair  
Washington State Department of  
Natural Resources

October 5, 2001

*Ken Konigsmark*  
Vice Chair  
Open Space/Trails Advocate

Lou Driessen, Project Manager  
Bonneville Power Administration  
PO Box 3621  
Portland, Oregon 97208

*Jean Bouffard*  
Rural Cities Representative

Dear Mr. Driessen:

*Gordon Bradley*  
University of Washington  
College of Forest Resources

On behalf of the King County Rural Forest Commission, I would like to comment on the proposed Kangley-Echo Lake Transmission Line Project. The Rural Forest Commission is an advisory body appointed by the King County Executive and Council to make recommendations on issues pertaining to forestland and forestry in the County. As such, our comments are limited to the issue of the project's impact on forestland in King County.

*Rudy Edwards*  
Mt. Baker Snoqualmie  
National Forest

*Louis Kahn*  
Landowner

*Steven H. Ketz*  
Weyerhaeuser Company

*Bill Kombol*  
Forest Landowner

*Matt Mattson*  
Snoqualmie Tribe

*Fred C. McCarty*  
Forest Landowner

*Andrew W. Schwarz*  
Forest Landowner

*David Warren*  
Pacific Forest Trust

While we understand the need to provide the region with an adequate and reliable supply of electrical power, we have serious concerns about the impacts on forestland of the proposed alternative outlined in the Draft Environmental Impact Statement for this project. The forests of the Cascade foothills are a very valuable resource to this region. They are ecologically different from the higher elevation forests of the Cascades and provide habitat for a large variety of wildlife and fish species. They provide us with a source of clean drinking water, and they help clean the air. Much of the privately owned forestland also supports timber production as well as any forestland in the world.

This valuable resource is extremely threatened by encroaching development, and King County has allocated substantial resources to keeping the forest landscape forested and to establishing a critical ecological connection between the Cascade Mountains, Tiger Mountain State Forest, Taylor Mountain, Rattlesnake Ridge, and the Cedar River Watershed. The City of Seattle has also invested in the future of the region's forest landscape by ensuring the preservation of the Cedar River Watershed and developing a Habitat Conservation Plan that will restore old growth forests to the watershed that provides 1.5 million people with their drinking water.

The National Environmental Policy Act requires that an EIS address possible conflicts with local land use plans and policies. The King County Comprehensive Plan outlines the following policies focused on the conservation of forestland:

R- 506 Land uses, utilities and transportation facilities adjacent to Designated Agriculture and Forest Production Districts and Designated Mineral Resource Sites, shall be sited and designed to ensure compatibility with resource management.

R- 523 Structures within the Forest Production District should be sited to maintain the productivity of the district. Site plan requirements should limit impervious surface, provide for fire control, protect domestic water supply and prevent conflicts with forest management.

R- 531 King County promotes forest management that achieves long-term forest health, protection of watersheds, sensitive areas and habitat to support fish and wildlife populations, protection of threatened and endangered species, and preservation and economic viability of working forests.

The DEIS does not adequately address how the proposed alternative complies with these policies. The expansion of the existing power line will result in the elimination of as much as 300 acres of forestland to accommodate the right-of-way, the expansion of the sub-station, and the staging areas. This clearing not only results in lost forestland, but also contributes to the fragmentation of the landscape. The DEIS states that the impact to forestland would be low, but we believe the loss of those acres in a forest ecosystem as threatened as this one is not an insignificant impact. Indeed, it is quite significant and is not in line with the King County policies outlined above.

The DEIS also fails to explain the need for an additional power line or account for the cumulative impact of BPA's power lines throughout the region. BPA power lines have resulted in the loss of a substantial amount of forestland in eastern King County, and we question not only whether this line is necessary, but also how it fits with BPA's future plans to address the growing population in the County. The DEIS needs to evaluate the impact of this project in the larger scope of BPA's work Countywide.

Based on the above concerns, the Rural Forest Commission makes the following recommendations:

- BPA needs to publish a supplemental DEIS that addresses the true impact of clearing up to 300 acres of forestland and how that contradicts policies laid out in King County's 2000 Comprehensive Plan. The supplemental DEIS should also address the cumulative impacts on forestland of BPA's projects throughout the County and better explain the need for this project.
- BPA should give more serious consideration to other alternatives, including rebuilding the existing transmission towers and adding a second circuit within the current corridor. While this alternative may be more costly in the short term, we question whether it may in fact be more appropriate when the long term cost of lost forestland is taken into account.

Lou Driessen, Project Manager

October 4, 2001

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- If Alternative 1 does prove to be the best alternative after a more thorough analysis, then we suggest that BPA mitigate the loss of forestland by acquiring and protecting similar forest land in the vicinity that is threatened with conversion to non-forest uses. Such mitigation is similar to the county's requirements for mitigating development of wetlands. If mature forests such as those that would be impacted in the Cedar River Watershed cannot be found, then the agency's mitigation should be discounted, or additional acreage should be acquired to offset the reduced quality of the forest. As mentioned, the forests in King County's foothills are a threatened resource, and the County is working hard to prevent the conversion of this forestland to non-forest use. There are several parcels adjacent to the Cedar River Watershed, on Taylor Mountain, and in the Rock Creek Watershed that are quite threatened, and it would be very appropriate for BPA to mitigate the impact caused by this project by conserving forest in these areas.
- Finally, BPA needs to better address the management of the land within its power line right-of-ways. While we do not condone the loss of forestland, the impact of BPA corridors on the ecological health of the region, and on the species that thrive in the foothills, could be lessened by managing the right-of-ways to control noxious weeds and planting native species that contribute to the health of the landscape.

We thank you for considering these comments, and we look forward to working with BPA and King County in efforts to develop a constructive solution.

Sincerely,



Doug McClelland

Chair, King County Rural Forest Commission

cc: Ron Sims, King County Executive  
Larry Phillips, King County Councilmember  
David Irons, King County Councilmember  
Suzanne Flagor, Seattle Public Utilities, Watershed Management Division  
Lori Grant, Executive Office  
Pam Bissonnette, Director, Department of Natural Resources  
Benj Wadsworth, Forestry Program Analyst