Kangley-Echo Lake Transmission Line Project
Final Environmental Impact Statement

Responsible Agency: U.S. Department of Energy, Bonneville Power Administration (BPA)

Cooperating Agency: U.S. Department of Agriculture, Forest Service (USFS)

Title of Proposed Project: Kangley-Echo Lake Transmission Line Project

State Involved: Washington

Abstract: BPA is proposing to build a new transmission line to accommodate increasing demand for electricity and ensure reliability in the Puget Sound area. The Proposed Action would construct a new line that would connect to an existing transmission line near the community of Kangley, and then connect with BPA’s existing Echo Lake Substation. The major purpose of this proposal is to improve system reliability in the King County area. An outage on an existing line during times of heavy use, such as during a winter cold snap, could cause voltage instability and a loss of power in the King County area. System planners have projected total system load using normal growth in demand and determined that system instability could have developed as early as the winter of 2002-03.

Besides meeting this need for system reliability, this project would enhance the United States’ delivery of power to Canada as required under the Columbia River Treaty of 1961.

BPA described and analyzed transmission route alternatives in a draft environmental impact statement (DEIS) released in June 2001 and additional transmission route alternatives and a non-transmission alternative in a supplemental draft environmental impact statement (SDEIS) released in January 2003 (the SDEIS incorporated the original DEIS and new information developed for the SDEIS). The Proposed Action and Alternatives 2, 3, 4A and 4B cross the Cedar River Municipal Watershed. Alternatives A and C are located to the west of the Cedar River Municipal Watershed boundary. Alternatives B and D are also outside the Cedar River Municipal Watershed and cross the Mt. Baker-Snoqualmie and Okanogan-Wenatchee National Forests. Under all transmission alternatives, Echo Lake Substation would be expanded about three acres to the east and new equipment to accommodate the new line would be installed. The non-transmission alternative considered several non-transmission measures to defer the need for a transmission line. BPA also analyzed a No Action Alternative.

This abbreviated final environmental impact statement (FEIS) contains the changes made to the SDEIS, comments received on the DEIS and the SDEIS, and BPA’s written responses to the comments. The FEIS should be used as a companion to the SDEIS, which contains the full text of the affected environment, environmental analysis and appendices.

BPA expects to issue a Record of Decision on the proposed project in August 2003.

For additional information, contact:
Gene Lynard (KEC-4), Project Environmental Lead
Bonneville Power Administration
P. O. Box 3621
Portland, Oregon 97208
Telephone: (503) 230-3790
Email: gplynard@bpa.gov

Floyd Rogalski, Natural Resource Planner
Cle Elum Ranger District
803 W. 2nd Street
Cle Elum, WA 98922
Telephone: (509) 674-4411 ext 315
Email: frogalski@fs.fed.us

For more copies of this document, please call 1-800-622-4520 and ask for the document by name. The abbreviated FEIS and the SDEIS Summary are also available on the Internet at: www.efw.bpa.gov.

# Table of Contents

**Chapter 1— Summary** ......................................................................................................... 1-1

**Chapter 2 — Comments and Responses on the DEIS** .......................................................... 2-1

**Chapter 3 — Comments and Responses on the SDEIS** ....................................................... 3-1

## Appendices
- Appendix A  Addition to Appendix A, Final Fisheries Technical Report
- Appendix D  Final Wetlands Technical Report
- Appendix F  Geology, Soil, Climate, and Hydrology Technical Report
- Appendix U  Addition to Appendix U, Letter from the National Marine Fisheries Service
- Appendix Y  Drinking Water Regulations
- Appendix Z  Updated EMF Information
- Appendix AA Letter from the U.S. Fish and Wildlife Service

## Maps
- Map 1  Proposed Action and Alternatives on the Cedar River Watershed .............................. follows page 1-2
- Map 2  Additional Alternatives Considered ............................................................................. follows page 1-4
- Map 9  Recreation and Ownership Alternatives A and C ...................................................... follows page 1-8
Chapter 1 — Summary

This is the final environmental impact statement (FEIS) for Bonneville Power Administration's (BPA) proposed Kangley-Echo Lake 500-kV Transmission Line Project. This document has been prepared as an "abbreviated" FEIS pursuant to the Council on Environmental Quality’s (CEQ) National Environmental Policy Act (NEPA) regulations because there have been no substantial changes to the proposed action, alternatives, or environmental analysis presented in the Supplemental Draft EIS (SDEIS) (dated January 2003), which incorporated the original Draft EIS (DEIS), for this project. Consistent with 40 C.F.R. 1503.4(c), this abbreviated FEIS provides comments received on the DEIS and the SDEIS, agency responses to these comments, and any changes made to the SDEIS. This FEIS should be used as a companion document to the SDEIS, which contains the full text of the affected environment, environmental analyses, and appendices. For readers of this FEIS who do not already have a copy of the SDEIS, copies may be obtained by:

- Calling BPA's document request line at 1-800-622-4520; record your name, address, and which documents you would like, or
- Accessing a Summary of the SDEIS on BPA's Web site at http://www.bpa.gov/; look for environmental analysis, Active Projects, or
- Writing to Bonneville Power Administration Public Information Office – CGIL-1 P.O. Box 12999 Portland, Oregon 97212

The remainder of this summary provides an overview of the proposed action and alternatives, the lead and cooperating agencies, the comment period for the DEIS and SDEIS, and changes to the SDEIS. Chapter 2 presents comments (copies of letters, e-mails, comment forms, and public meeting comments) on the DEIS and agency responses to these comments. Chapter 3 presents comments (copies of letters, e-mails, comment forms and meeting transcripts) received on the SDEIS and agency responses to these comments.
Summary of the Proposed Action

BPA proposes to build a single-circuit 500-kV transmission line from a tap point on an existing 500-kV line near Kangley, Washington, to its Echo Lake Substation near North Bend, Washington (see Map 1). The proposed route for this line, also called Alternative 1, is about nine miles long. About five miles of the proposed route would go through the Cedar River Municipal Watershed. In addition, Echo Lake Substation would be expanded about three acres to the east and new equipment would be installed there to accommodate the new line (common to all transmission alternatives).

This alternative was proposed because it would be located immediately parallel to an existing BPA existing 500-kV transmission line, the Raver-Echo Lake Transmission Line. Locating a new line next to an existing one reduces right-of-way (ROW) clearing needed for the new line and reduces the need for additional access roads. Lattice steel transmission towers would support the 500-kV transmission line. These structures average 135 feet high, with the average span between towers of about 1,150 feet.

Summary of Alternatives

Alternative 2

Alternative 2 would originate from a tap point about 1.5 miles east of the tap point for the Proposed Action and traverse northwest about three miles before continuing north paralleling the existing Raver-Echo Lake Transmission Line into Echo Lake Substation. (See Map 1.) This alternative would be approximately nine miles long.

Alternative 3

Alternative 3 would begin at the same tap point as Alternative 2. From this point, it would traverse northeasterly then turn north-northwesterly to Echo Lake Substation. This alternative would be about 10.2 miles long. (See Map 1.)

Alternative 4A

Alternative 4A would begin at the same tap point as Alternative 2. About one-third of the way along Alternative 2, this alternative turns northwest to connect with the Proposed Action. This alternative would be about 9.5 miles long. (See Map 1.)
PROPOSED ACTION and ALTERNATIVES on the CEDAR RIVER WATERSHED

Map 1

- **Existing Transmission Lines**
- **Proposed Transmission Line**
- **Alternatives Under Consideration**
- **BPA Substation**
- **Alternative**

May 09, 2003
Alternative 4B

Alternative 4B would begin at the same tap point as Alternative 2. About half way along Alternative 2, this alternative would traverse southwest to connect with the Proposed Action. This alternative would be about 9.2 miles long. (See Map 1.)

Alternative A

Alternative A would require construction of about 20 miles of new 500-kV transmission line on mostly rural residential land, on mostly existing ROW. The alternative would use a vacant ROW between the tap point along the existing transmission line near Kangley, to a point near Covington Substation, immediately north of a portion of an existing 230-kV transmission line. Some new ROW would need to be acquired around the northeast side of Covington Substation to connect two transmission line ROWs. (See Map 2.)

BPA is considering an option for a portion of this alternative that would impact fewer homes. This option would run through Covington Substation on mostly BPA-owned land.

The existing single-circuit 230-kV line from Covington Substation to the north to a tap point on an existing double-circuit 500-kV transmission line would need to be torn down and replaced with a new double-circuit transmission line. This new transmission line would have a 230-kV line on one side and a 500-kV line on the other. The 500-kV circuit would tap an existing vacant 500-kV circuit on the existing double-circuit 500-kV line coming from the west to take the power into Echo Lake Substation.

Alternative B

For this alternative, 35.6 miles of the existing 345-kV single-circuit transmission line and towers between Stampede Pass and Echo Lake Substation would be torn down and new double-circuit towers erected to accommodate two new 500-kV lines. Using the same design as the Proposed Action, Alternative B would tap an existing 500-kV line just east of Stampede Pass and divert power to Echo Lake Substation. The new double-circuit line would operate on one side at 345-kV (like the existing line) and the other at 500-kV. This alternative crosses the Mt. Baker-Snoqualmie and Okanogan-Wenatchee National Forests. (See Map 2.)
**Alternative C**

Alternative C has two options, Option C1 and Option C2. Option C1 is approximately 10.1 miles long and Option C2 is approximately 10.6 miles long. (See Map 2.) Both would require new ROW away from existing transmission lines. Option C1 would begin at Raver Substation and proceed 2.5 miles west immediately north of and parallel to an existing double-circuit 500-kV transmission line on new 150-foot-wide ROW, before turning north and traveling about 7.6 miles on new 150-foot ROW through the rural residential areas of Ravensdale and Hobart. The proposed line would then tap the vacant circuit on an existing double-circuit 500-kV transmission line, west of Echo Lake Substation, just north of State Route 18. Power would be carried by this existing transmission line into Echo Lake Substation, following the completion of a short segment at Echo Lake Substation similar to that described at the north end of Alternative A.

Option C2 would begin at a tap point on an existing 500-kV double-circuit transmission line near Kangley, about 2.8 miles northeast of Raver Substation, and traverse about 4.5 miles west within a vacant transmission line ROW immediately north of a 230-kV transmission line, before turning north and continuing on the same alignment as Option C1 into Echo Lake Substation.

**Alternative D**

Alternative D would tap an existing 500-kV line just east of Stampede Pass and divert power to Echo Lake Substation over 35.6 miles of new single-circuit 500-kV transmission line. (See Map 2.)

Alternative D has two options, Option D1 and Option D2. Option D1 is located immediately adjacent to and south of the existing 345-kV line; Option D2 is located immediately adjacent to and north of this line. Either option would entail acquiring and clearing a new 150-foot wide ROW and building a new 500-kV single-circuit transmission line. Both options cross the Mt. Baker-Snoqualmie and Okanogan-Wenatchee National Forests.

**Non-Transmission Alternative**

For this alternative, BPA would use a broad range of alternatives including Demand-Side Management, Distributed Generation, large scale Generation, and Demand Response and Direct Load Control that might defer the need for a new 500-kV transmission line.

**No Action Alternative**

No new line would be built.
Map 2

ADDITIONAL ALTERNATIVES CONSIDERED

Legend

- Existing BPA Transmission Lines
- Proposed Transmission Line
- Alternatives Under Consideration
- BPA Substations

Alternatives

A. Construct New Single-Circuit 500-kV Line from tap near Kangley to Covington Substation. Rebuild portion of Covington - Maple Valley 230-kV to Double-Circuit 500-kV.

B. Rebuild Portion of Rocky Reach-Maple Valley 345-kV to Double-Circuit 500-kV from East of Stampede Pass to Echo Lake Substation.


D. Construct New Single-Circuit 500-kV Line from East of Stampede Pass Adjacent to Rocky Reach-Maple Valley Line.
Lead and Cooperating Agencies

BPA is the lead federal agency on this project and supervises the preparation of the EIS. Alternatives B and D would cross land managed by the U.S. Forest Service (Mt. Baker-Snoqualmie and Okanogan-Wenatchee National Forests). The USFS has agreed to cooperate in the EIS process.

Draft and Supplemental EIS Comments

The Draft EIS was distributed to agencies, tribes, groups, individuals and libraries in June 2001. A 45-day public review period was extended until September 4, 2001 based on requests for more time to review and comment on the document. A public meeting was held on August 1, 2001 in Maple Valley, Washington to accept public comment on the draft document. During the comment period BPA received over 700 comments. Issues raised in the comments included the following: the need for the project; alternatives considered; impacts to the Cedar River Municipal Watershed and water quality; fish and wildlife; cultural resources; and other subjects. Copies of comments made on the DEIS and BPA’s responses to those comments are in Chapter 2.

After reviewing the comments and refining the cost estimates associated with BPA’s preferred alternative, BPA decided to prepare a SDEIS that re-evaluated four route alternatives not analyzed in detail in the DEIS. BPA also initiated a study of non-transmission line alternatives to consider.

BPA completed the SDEIS in January 2003 and released it for a 45-day comment period.

BPA hosted four public meetings during the comment period: Monday, February 3, in North Bend; Tuesday, February 4, in Seattle; Wednesday, February 5, in Maple Valley; and Thursday, February 6, in Covington. An additional meeting explaining BPA’s study of a Non-Transmission Alternative for the SDEIS was held in Seattle on February 4. During the public meetings, attendees were invited to interact with BPA staff, ask questions and give comments; comments were recorded at the meetings. About 150 people attended the public meetings for the SDEIS.

BPA received over 250 comments during this comment period. Issues raised in the comments included the following: the need for the project; the alternatives considered and their costs; proposed and suggested mitigation; impacts to the Cedar River Municipal Watershed and water quality; fish and wildlife; cultural resources; impacts to
property values; and other subjects. Copies of comments made on the SDEIS and BPA’s responses to those comments are in Chapter 3.

Changes to the Supplemental Draft EIS

There are no major changes to the SDEIS that was released in January 2003. The following are additions or corrections made to the SDEIS.

In the SDEIS, BPA proposed restricting ground-disturbing activities to the dry season (May through September). Construction for this project is anticipated to begin in early to mid-August 2003. Under a compressed project schedule designed to allow for transmission line energization by December 31, 2003, initial construction activities would focus on critical areas in the Cedar River Watershed. First consideration would be given to areas next to the Cedar River crossing, Rock Creek and Brew Hill. Infrastructure items constructed first would include the following: road upgrading, road building, access road removal from service, cross drain and approach culvert installation, logging activities, tower footing excavation/borings and installation, counterpoise excavation/grounding well boring and installation, tensioning/reel site establishment, and site stabilization.

After September 30, construction activities would continue in the CRW spreading focus to areas outside of the CRW, and would operate under the more stringent wet season construction requirements. Final project stabilization and restoration is not anticipated until late summer 2004, possibly longer depending on vegetation success.

At the time the SDEIS was released, BPA had not gained permission to cross the Cedar River by helicopter with any logs removed for construction. The City of Seattle has granted permission to fly over the Cedar River with logs as long as there is monitoring.

The SDEIS stated that no new bridges would be needed for this project. One temporary bridge crossing, running from upland bank to upland bank, may be needed for construction. The bridge would be removed after construction.

Addition to Appendix A, Final Fisheries Technical Report includes corrected information about streams potentially affected by Alternatives 1–4.

Appendix D, Final Wetlands Technical Report, has been changed to state that no wetlands would be filled.

In Appendix E, Table 4, the description of the width of the right-of-way was incorrect. The correct width is 150 feet.
Chapter 1 — Summary

The Appendix F included in the SDEIS was not the correct document. The correct document is now available.

There is an addition to Appendix U. The addition is a recent letter from the National Marine Fisheries Service.

Appendix Y, Drinking Water Regulations, has been added. This appendix includes reports from Shannon and Wilson, Inc. to BPA concerning impacts to drinking water supplies in the project area.

Updated information about electromagnetic fields developed for another BPA transmission project has been added (see Appendix Z).

Appendix AA has been added. This appendix includes a recent letter from the U. S. Fish and Wildlife Service.

Map 9 has been corrected to indicate property that is owned by BPA.
Chapter 2 — Comments and Responses-DEIS

In this Chapter comments from:

- Federal Agencies
- State Agencies
- Local Agencies
- Tribes
- Groups and Individuals
- Public Meetings

Bonneville Power Administration (BPA) sent the Draft EIS (DEIS) to the public for comments on the Proposed Action and alternatives. The Draft EIS was distributed to agencies, groups, individuals, and libraries in June 2001. A 45-day public review period was extended to September 4, 2001 at the request of some commenters. A public meeting was held in Maple Valley, Washington on August 1, 2001 to review and receive comments on the Draft EIS. These comments were all captured and catalogued. As a result of the comments on the DEIS, BPA decided to analyze four additional action alternatives in more detail and to more fully explore non-transmission alternatives. Six additional scoping meetings were held to gather additional issues and concerns for the new alternatives in June 2002. BPA received over 1,600 comments during this additional scoping time. Since then, BPA has completed a supplemental draft environmental impact statement (SDEIS) for the proposed Kangley-Echo Lake Transmission Line Project. The SDEIS was released to the public for a 45-day review and comment period that ended on March 1, 2003. Five public meetings were held at various locations in King County during the week of February 3-6 to gather public comments on the SD EIS.

This chapter contains the written comments from letters, e-mails, and comment sheets received during the comment period for the DEIS and BPA’s responses to those comments. It also contains the oral comments from the public meeting in August 2001 and telephone calls received during the comment period. Chapter 3 contains the written and oral comments received during the comment period for the SDEIS and BPA’s responses to those comments. Letters and comment sheets were given numbers in the order they were received. Separate issues in each letter were given separate codes. For example, letter 394 might have issues 394-001, 394-002, and 394-003 identified within its text. Comments from the public meeting were also numbered. BPA prepared responses to each of these individual comments.

The chapter is organized in the following sequence: comments from federal agencies are followed by comments from state agencies (page 2-13), local agencies (page 2-17), tribes (page 2-107), then groups and individuals (page 2-115). Comments from the public meeting are at the end of the chapter (page 2-205). Because we have organized comments this way and often reference responses to other comments, please use the numerical list on the back of this page for reference. A listing of related comments by issue is at the end of the chapter on page 2-218.
(Comments on the DEIS begin with BPA log #338; earlier letters were for scoping)

<table>
<thead>
<tr>
<th>Comment Letter Number</th>
<th>Begins on Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>338</td>
<td>2-117</td>
</tr>
<tr>
<td>339</td>
<td>2-117</td>
</tr>
<tr>
<td>340</td>
<td>2-118</td>
</tr>
<tr>
<td>341</td>
<td>2-120</td>
</tr>
<tr>
<td>342</td>
<td>2-121</td>
</tr>
<tr>
<td>343</td>
<td>2-122</td>
</tr>
<tr>
<td>344</td>
<td>2-123</td>
</tr>
<tr>
<td>345</td>
<td>2-124</td>
</tr>
<tr>
<td>346</td>
<td>2-124</td>
</tr>
<tr>
<td>347</td>
<td>2-126</td>
</tr>
<tr>
<td>348</td>
<td>2-127</td>
</tr>
<tr>
<td>349</td>
<td>2-128</td>
</tr>
<tr>
<td>350</td>
<td>2-130</td>
</tr>
<tr>
<td>351</td>
<td>2-130</td>
</tr>
<tr>
<td>352</td>
<td>2-131</td>
</tr>
<tr>
<td>353</td>
<td>2-132</td>
</tr>
<tr>
<td>354</td>
<td>2-133</td>
</tr>
<tr>
<td>355</td>
<td>2-134</td>
</tr>
<tr>
<td>356</td>
<td>2-135</td>
</tr>
<tr>
<td>357</td>
<td>2-136</td>
</tr>
<tr>
<td>358</td>
<td>2-136</td>
</tr>
<tr>
<td>359</td>
<td>2-137</td>
</tr>
<tr>
<td>360</td>
<td>2-137</td>
</tr>
<tr>
<td>361</td>
<td>2-138</td>
</tr>
<tr>
<td>362</td>
<td>2-139</td>
</tr>
<tr>
<td>363</td>
<td>2-140</td>
</tr>
<tr>
<td>364</td>
<td>2-141</td>
</tr>
<tr>
<td>365</td>
<td>2-142</td>
</tr>
<tr>
<td>366</td>
<td>2-143</td>
</tr>
<tr>
<td>367</td>
<td>2-144</td>
</tr>
<tr>
<td>368</td>
<td>2-145</td>
</tr>
<tr>
<td>369</td>
<td>2-145</td>
</tr>
<tr>
<td>370</td>
<td>2-146</td>
</tr>
<tr>
<td>371</td>
<td>2-147</td>
</tr>
<tr>
<td>372</td>
<td>2-147</td>
</tr>
<tr>
<td>373</td>
<td>2-148</td>
</tr>
<tr>
<td>374</td>
<td>2-148</td>
</tr>
<tr>
<td>375</td>
<td>2-149</td>
</tr>
<tr>
<td>376</td>
<td>2-149</td>
</tr>
<tr>
<td>377</td>
<td>2-150</td>
</tr>
<tr>
<td>378</td>
<td>2-151</td>
</tr>
<tr>
<td>379</td>
<td>2-154</td>
</tr>
<tr>
<td>380</td>
<td>2-154</td>
</tr>
<tr>
<td>381</td>
<td>2-155</td>
</tr>
<tr>
<td>382</td>
<td>2-156</td>
</tr>
<tr>
<td>383</td>
<td>2-165</td>
</tr>
<tr>
<td>384</td>
<td>2-167</td>
</tr>
<tr>
<td>385</td>
<td>2-168</td>
</tr>
<tr>
<td>386</td>
<td>2-169</td>
</tr>
<tr>
<td>387</td>
<td>2-170</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment Letter Number</th>
<th>Begins on Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>388</td>
<td>2-171</td>
</tr>
<tr>
<td>389</td>
<td>2-172</td>
</tr>
<tr>
<td>390</td>
<td>2-15</td>
</tr>
<tr>
<td>391</td>
<td>2-172</td>
</tr>
<tr>
<td>392</td>
<td>2-173</td>
</tr>
<tr>
<td>393</td>
<td>2-174</td>
</tr>
<tr>
<td>394</td>
<td>2-19</td>
</tr>
<tr>
<td>395</td>
<td>2-79</td>
</tr>
<tr>
<td>396</td>
<td>2-175</td>
</tr>
<tr>
<td>397</td>
<td>2-176</td>
</tr>
<tr>
<td>398</td>
<td>2-5</td>
</tr>
<tr>
<td>399</td>
<td>2-177</td>
</tr>
<tr>
<td>400</td>
<td>2-178</td>
</tr>
<tr>
<td>401</td>
<td>2-180</td>
</tr>
<tr>
<td>402</td>
<td>2-181</td>
</tr>
<tr>
<td>403</td>
<td>2-183</td>
</tr>
<tr>
<td>404</td>
<td>2-184</td>
</tr>
<tr>
<td>405</td>
<td>2-109</td>
</tr>
<tr>
<td>406</td>
<td>2-185</td>
</tr>
<tr>
<td>407</td>
<td>2-186</td>
</tr>
<tr>
<td>408</td>
<td>2-187</td>
</tr>
<tr>
<td>409</td>
<td>2-100</td>
</tr>
<tr>
<td>410</td>
<td>2-188</td>
</tr>
<tr>
<td>411</td>
<td>2-7</td>
</tr>
<tr>
<td>412</td>
<td>2-189</td>
</tr>
<tr>
<td>413</td>
<td>2-103</td>
</tr>
<tr>
<td>414</td>
<td>2-189</td>
</tr>
<tr>
<td>415</td>
<td>2-190</td>
</tr>
<tr>
<td>416</td>
<td>2-191</td>
</tr>
<tr>
<td>417</td>
<td>2-192</td>
</tr>
<tr>
<td>418</td>
<td>2-192</td>
</tr>
<tr>
<td>419</td>
<td>2-193</td>
</tr>
<tr>
<td>420</td>
<td>2-193</td>
</tr>
<tr>
<td>421</td>
<td>2-194</td>
</tr>
<tr>
<td>422</td>
<td>2-195</td>
</tr>
<tr>
<td>423</td>
<td>2-195</td>
</tr>
<tr>
<td>424</td>
<td>2-196</td>
</tr>
<tr>
<td>425</td>
<td>2-197</td>
</tr>
<tr>
<td>426</td>
<td>2-198</td>
</tr>
<tr>
<td>427</td>
<td>2-199</td>
</tr>
<tr>
<td>428</td>
<td>2-200</td>
</tr>
<tr>
<td>429</td>
<td>2-201</td>
</tr>
<tr>
<td>430</td>
<td>2-202</td>
</tr>
<tr>
<td>431</td>
<td>2-203</td>
</tr>
<tr>
<td>432</td>
<td>2-203</td>
</tr>
</tbody>
</table>

Public Meeting

2-205
Federal Agencies
The trees that would be impacted do not currently have owls in them, and the Proposed Action would minimize the impacts to the extent practicable. BPA is using approved protocols to survey for spotted owls during the nesting period for the species. No owls have been found to date.

Adding all forest impacts together, the total still represents a very small percentage (1/10 of 1 percent) of that type of habitat that will remain available for spotted owl use within the HCP. BPA would mitigate for adverse impacts. BPA has consulted with USFWS on potential effects to the northern spotted owl, and will conclude that consultation prior to project construction.

Additional information on consultation is found on page 5-2 of the SDEIS. An updated description of potential impacts to the northern spotted owl is found in Sections 4.7.2 and 4.7.3 of the SDEIS.
of the proposed action on interior forest habitat may impact the amount of suitable
nesting habitat in the future.

3. The project will widen the utility corridor by an additional 150 feet, effectively
doubling the width of the opening along the 9 mile stretch. Research has
documented that spotted owls are highly susceptible to predation by great horned
owls, particularly when crossing openings.

The BA and DEIS did not adequately address the increased risk of predation to spotted owls and
the long-term effects of having a large gap that destroys an otherwise intact watershed. The
assessment and DEIS should include an analysis of the effects of the proposed action on interior
forest habitat and the impacts of large openings on forest-dependent species, addressing both
short and long-term (>50 years) impacts. This information will be used to evaluate effects and to
quantify incidental take of spotted owls resulting from the project.

The DEIS should also include an evaluation of land parcels of similar value that could be
acquired in order to mitigate for the permanent impact to habitat in the Cedar River Watershed
(specifically lands included in Seattle City Light’s HCP) caused by the proposed action.
Replacing forest habitat lost as a result of the proposed action will minimize impacts to listed
species.

While addressing the information needs listed above, we recommend that the Bonneville Power
Administration request initiation of formal consultation for this project. When the information is
received, formal consultation can be initiated. If you have any further questions, please contact
Martha Jensen at (360) 753-9500 or John Gutenberger at (360) 753-6044.

Sincerely,

Ken S. Berg, Manager
Western Washington Office

cc: Jones and Stokes, Bellevue (H. Tate)
BPA, Communications, Portland

References


Forsman, E., E.C. Meslow, H. Wight. 1984. Distribution and Biology of the Spotted Owl in

411-001 Comment noted.

411-002 BPA disagrees with EPA over its assessment that the DEIS provides no information about the proposed project’s impacts to the Cedar River Municipal Watershed. Chapter 4, Environmental Consequences, identifies impacts for each of the 14 resources identified, including the short-term impacts (construction), and long-term impacts (operation and maintenance). With regard to the City’s newly adopted HCP, BPA disagrees with the EPA’s assessment that the project “does not appear to comply” with the HCP, which allows no logging within the watershed. The City of Seattle’s HCP for the Cedar River Municipal Watershed is a plan between the signatories, i.e., between the City of Seattle and the U.S. Fish and Wildlife Service and the National Marine Fisheries Service. The plan covers only actions by the City of Seattle, and does not disallow all logging within the watershed, only “commercial logging.”

BPA’s purpose is not to commercially log merchantable timber within the Cedar River Municipal Watershed, only to clear a right-of-way to construct a high voltage transmission line between the existing Shultz-Raver No. 2 Transmission Line near the community of Kangley and connect the line to the existing BPA Echo Lake Substation, nine miles north of the tap point. Removing trees to safely construct, operate and maintain the proposed transmission is incidental to constructing the power line. To replace the 1/10 of one percent of the forested habitat that would be converted to non-forest uses within the 90,546-acre Cedar River Municipal Watershed, BPA would acquire other lands that would be conveyed to SPU’s landholdings to mitigate for this loss of forest habitat. See response to Comment 340-002. Additionally, BPA would undertake mitigation within the CRW to mitigate for altering forested wetlands and converting them to scrub/shrub wetlands.
2

Major Concerns

The EPA has serious concerns about the DEIS's adequacy. The draft provides no information about the transmission line's impacts to the Cedar River watershed. The region's operating water supply and a source of water to 1.3 million people. The project does not appear to comply with the City of Seattle's Habitat Conservation Plan (HCP), which allows for logging within the watershed. The HCP also addresses Endangered Species (ESA) and natural resource issues. The city of Seattle has asked in a letter to BPA that "Seattle Public Utilities (SPU) will not accept any need to modify the HCP as a consequence of BPA's activities."

The language in the draft is confusing and contradictory. As an example, (summarized, page 11) "Each of the alternatives would cross some fish-bearing streams. The fish resources in the study area include resident and anadromous species." However, another statement on the same page says, "Both chum salmon and bull trout are potentially, though not likely, present in the streams crossed by each of the action alternatives." BPA should clarify this information and state it in the DEIS.

Purpose and Need and Range of Alternatives

We recommend that the purpose and need statement be presented briefly, specifying the need for the project (40 CFR 1502.13). Describe the need in one or two sentences. Then, if needed, establish a contextual setting for the project, follow the need statement with a separate, in-depth background discussion. Avoid putting a laundry list of objectives in the purpose and need statement itself. Instead, discuss these objectives later in the purpose and need section as additional benefits to be derived from the project.

The DEIS says that BPA will use four purposes to choose among the alternatives, including maintaining environmental quality, and minimizing impacts to the human environment through the selection and transmission line design. Please explain how environmental quality can be maintained when the proposed project, as well as the four other alternatives, go through a watershed.

We are concerned with constraints on alternatives because of the Purpose and Need statement. Chapter 2, pages 17 and 18, briefly discusses alternatives considered but eliminated. One alternative was dropped because the transmission line couldn't be taken out of service long enough to be rebuilt, and two others were dropped because of costs. The range of alternatives should be expanded to include a route around the west side of the Cedar River Watershed through the communities of Holliwell and Ravensdale. BPA eliminated this route due to lead costs and impacts to residents.

Question 2A in NEPA's Forty Most Asked Questions states that "Section 1502.14 requires the EIS to examine all reasonable alternatives to the proposal. In determining the scope

411-003 These sentences have been changed to clarify the information and additional information was included in the SDEIS.

411-004 Comment noted.

411-005 Environmental quality includes both the natural environment and the built environment, together with the human environment. To maintain the environmental quality in a region, the health of the natural environment and the built environment needs to be protected. BPA is the federal power-marketing agency that markets power generated at federal dams and a nuclear power plant in the Northwest. This power is sold to public and private utility customers and direct service industries throughout the area. Electric power is needed by all modern societies to maintain and promote economic health of an area as well as to maintain human health and safety. BPA provides this public service as required by law, while minimizing any disturbance to the natural environment and meeting all applicable federal, state and local laws and regulations.

411-006 In response to this and other comments on the range of alternatives in the DEIS, BPA analyzed four alternatives outside of the CRW and explored the non-transmission alternatives in more detail in the SDEIS. See pages 2-20 through 2-52 of the SDEIS.

411-007 See response to Comment 411-006.

411-008 The EIS does clearly say what fish are thought to use each stream, and cites a relevant authority for each. Most of these fish distribution data are based on information in published databases, which are based on surveys by WDFW, King County and Seattle biologists. However, a detailed field survey is required to conclusively identify whether a stream is or is not occupied by a given species. We believe that such surveys are unnecessary for the purposes of this analysis. This is because the analysis presented in the DEIS assumed that all salmonids potentially present in each stream were in fact present, and impacts were evaluated in accordance with that assumption. Moreover, the act of performing those surveys would itself have a potentially high impact.
The environmental analysis assumes that all streams that would be crossed are fish-bearing. Tall-growing vegetation would need to be cleared in the proposed right-of-way, including the riparian area of Deep Creek. Low-growing vegetation would be planted in the riparian area of Deep Creek to mitigate for the vegetation cleared to the extent possible.

In siting its transmission facilities, BPA uses information from the environmental process. It first tries to avoid sensitive resources. Where these resources cannot be avoided, the impacts are minimized. As for its purpose, BPA builds major electrical transmission facilities, i.e., high voltage power lines and substations and switching stations. Transmission lines, by necessity, are linear facilities, and as such have difficulty avoiding all sensitive resources, many of which are also linear in nature such as streams, and their associated riparian and wetland areas. BPA recognizes that local, state and federal agencies have adopted standards to protect sensitive areas, and BPA does meet these standards to the extent that it can. BPA would do so, however, only after designing its facilities to meet the National Electric Safety Code, and its own clearing criteria, so that it could safely and reliably construct, operate and maintain its electrical transmission system.

It is true that selection of the No Action Alternative at the conclusion of the environmental process does not mean that there would never be a need for future transmission projects, only that no line would be considered for construction in that general area in the near future.
Chapter 2 — Comments and Responses - DEIS

BPA simply made an observation here that facilities “in the future” generally cost more than things have in the past, and that this is generally true for such things as land, materials and labor.

BPA did prepare a biological assessment (BA) and submitted the document to the USFWS and the NMFS in July 2001. The USFWS has indicated to BPA that it could not concur in BPA’s finding that the Proposed Action “May affect, but is not likely to adversely affect the northern spotted owl.” As a result, BPA has prepared an addendum to the BA, addressing the FWS additional request for more information and submitted this information to the FWS along with a request to enter into formal consultation with them on this issue.

In January 2002, NMFS sent a letter to BPA concurring with its effect determination of “may affect, but not likely to adversely affect” for Puget Sound chinook and their designated critical habitat. This letter notified BPA that the NMFS was concluding section 7 consultation with BPA in accordance with 50 CFR 402.14 (b)(1). See Appendix U of the SDEIS and of the FEIS for copies of letters from NMFS. BPA’s BA covered the impacts of the Proposed Action on federally-listed and candidate species only; therefore, a number of species listed in your letter were not addressed. These include the Pacific lamprey, river lamprey, northern goshawk, black swift, merlin, olive-sided flycatcher, and piliated woodpecker. Five species of bats potentially occur in the area.

Please disclose the results of biological assessments and opinions (40 CFR 1502.25 (a)) in the FEIS. By doing this, the FEIS would demonstrate that the Endangered Species Act (ESA) procedures are being followed and that any listed species is being protected.

Water Quality

According to the EIS (Ch.4-17), the transmission line will cross the Cedar River, Rock Creek and three small tributaries of Rock Creek, the Raging River and two tributaries of the Raging River. At Rock Creek and its tributaries, the right-of-way clearing may remove all trees, exposing the creek to more direct sunlight, possibly causing a slight increase in water temperature.

The anti-degradation requirement under the Clean Water Act (CWA) applies to those streams where water quality standards are presently being met. These provisions prohibit degrading the water quality unless an analysis (which involves a public process) shows that important economic and social development necessitate degrading water quality. The Washington State Department of Ecology (DOE) must be satisfied with the analysis and grant permission to lower, but not violate water quality. Please discuss how you will be in compliance with the anti-degradation requirement.

Other Concerns

Roads: BPA states that “precise road locations have not been defined.” (Ch.2 -7)
Section 2.1.1.5 of the SDEIS was updated to include the most current information about access roads.

The commenter is correct, the DEIS does state this. Since the release of the DEIS, our cultural resources consultant completed a detailed survey of the project area. Also, the Muckleshoot Tribe Culture Committee representatives have indicated to BPA that they would like to have a cultural monitor to be present whenever any ground disturbing activities would take place associated with project activities. We will comply with this request.

BPA is working with SPU on the Storm Water Pollution Prevention Plan (SWPP). It will be completed and reviewed before construction if BPA decides to build Alternative 1. Additional information about the SWPP was included in the SDBS.

Thank you for the opportunity to review this draft EIS. Please contact Val Varney (206) 553-1901 if you have any questions.

Sincerely,

Judith Lockavitz Lee, Manager
Geographic Implementation Unit
State Agencies
390-001 Comment noted. The DEIS prepared for the proposed project contained Chapter 3, Affected Environment. This chapter describes the existing environment (conditions) that may be affected by the project alternatives.

390-002 Please see response to Comment 382-017.

390-003 Comment noted. Should a decision be made to build the line, BPA would purchase the land rights from the Department of Natural Resources to build that portion of the project that would cross state land, however, BPA would not replace public lands in addition to the land rights that would be acquired. The state could, if it chose, use the funds obtained from BPA to acquire the easement for the purpose of acquiring additional lands. This decision would be left to the Department of Natural Resources.

See also response to Comment 340-002.

BPA will strive to meet the substantive standards and policies of the Washington Forest Practices Act wherever possible. BPA and the Washington DNR have agreed that BPA is exempt from acquiring a FPA permit when BPA documents that its easements create federal ownership of the timber. As such, BPA will not be securing a FPA permit for this project. BPA will meet the applicable water quality standards for road construction.

BPA will strive to meet the substantive standards and policies of the Washington Forest Practices Act wherever possible. BPA and the Washington DNR have agreed that BPA is exempt from acquiring a FPA permit when BPA documents that its easements create federal ownership of the timber. As such, BPA will not be securing a FPA permit for this project. BPA will meet the applicable water quality standards for road construction.
Local Agencies
BPA acknowledged these concerns and prepared a SDEIS, which was released in January 2003.
supply for 1.3 million people. We request that BPA issue a Supplemental DEIS (along with the associated public comment period) that corrects these serious flaws, clearly and accurately assesses the true environmental impacts of this project, and is compliant with NEPA regulations and guidance.

SPU has the following comments on the DEIS. Five separate attachments to this cover letter are included in this submittal. The first attachment contains general comments on the DEIS followed by specific comments on the DEIS. Each of the subsequent four attachments provide comments on each of the four BPA DEIS technical appendices (A, Fisheries; B, Wildlife; C, Vegetation; and D, Wetlands). Because the DEIS is largely a distillation of its technical appendices, SPU’s comments on the technical appendices will also apply to the DEIS. In addition, there is much boilerplate text used in the DEIS and its appendices. To minimize redundancy, SPU has attempted to comment only once in such cases, but those comments would apply to other documents for which the comments are relevant.

If you have questions or require further information, please contact Jim Erickmann at (206) 233-1512 or Clay Antieau at (206) 233-2711. Regarding cultural resources, please contact SPU’s staff archaeologist, Tom Minichino at (206) 233-6630.

Sincerely,

Suzanne Flagr
Director
Watershed Management Division
Seattle Public Utilities

Attachments:
1) SPU comments on BPA DEIS
2) SPU comments on BPA DEIS Appendix A (Fisheries)
3) SPU comments on BPA DEIS Appendix B (Wildlife)
4) SPU comments on BPA DEIS Appendix C (Vegetation)
5) SPU comments on BPA DEIS Appendix D (Wetlands)

cc: Dennis Anderson, Muckleshoot Indian Tribe
Maria Cantwell, U.S. Senate
Craig Hansen, USFWS
Hardev Jig, Seattle City Light
Steve Landino, NMFS
Patty Murray, U.S. Senate
Seattle Mayor Paul Schell
King County Executive Ron Sims
Val Varney, EPA
Chapter 2 — Comments and Responses - DEIS

Seattle Public Utilities' Response
August 30, 2001

GENERAL COMMENTS (GC)

GC-1: The “purpose and need” for the proposed project is neither substantiated nor clearly defined.

There is no explanation of the electrical transmission system serving the King County area that supports the necessity of the proposed line. Instead, the DEIS asserts without substantiation that this specific line is necessary to maintain system reliability. At a minimum, system plans or a regional analysis should be referenced, along with a description of other improvements BPA is considering in the near and distant future so that readers can understand why this specific (and relatively small) link in a much larger system is necessary. In SPU’s conversations with BPA staff, it has also been unclear if the need to construct a redundant transmission line for system reliability and the relative location of that line are legal requirements or policy choices. The legal and policy contexts of the project should be clearly distinguished in the DEIS.

Furthermore, the “purpose and need” is the basis for defining alternatives. NEPA only requires that reasonable alternatives be considered. “Reasonable alternatives,” however, include those alternatives that can meet the objectives (as defined by the purpose and need) of the proposal. Without a clearly defined purpose and need, the range of reasonable alternatives is very large—much larger than the range of alternatives considered in the DEIS (see General Comment 2, below).

GC-2: The range of alternatives evaluated in detail is too narrow.

The DEIS does not provide sufficient analysis of alternatives outside of the Cedar River Watershed to support their elimination without detailed evaluation. The DEIS cites impacts to “developed land and people living in the area.” The potential for these impacts is obvious, but without further explanation there is no support for dismissing these alternatives just because they would have impacts. All of the alternatives included in the DEIS also have impacts, and yet they were not dropped from consideration. Without criteria and explanation, there is no justification for dropping certain alternatives and narrowly limiting the range of alternatives considered in the DEIS. The DEIS should evaluate the range of reasonable alternatives. This type of comparison of alternatives and impacts to the built and natural environments is precisely what an EIS is supposed to provide. Dropping certain alternatives due to cost concerns may be supported by detailed cost justifications presented in the DEIS.

Further, NEPA requires that federal agencies consider alternatives just as can accomplish the objectives of the proposal, but at a lower environmental cost. This includes considering mitigation measures that could avoid or reduce impacts of the proposed action. The DEIS is silent on the most common types of mitigation measures that could address some of the high and significant impacts that would result from the proposed action (see General Comment 9).

394-002 BPA performed a regional system analysis that supported the need for the project. This joint study was coordinated with Seattle City Light, Snohomish County PUD, Tacoma City Light and Puget Sound Energy. BPA also received letters of support stating the project is the right choice from Seattle City Light, Tacoma City Light and Snohomish County PUD. The technical studies that are part of the analysis include computer simulations of projected power flow. (See SDEIS Appendix H, available on request.) The DEIS did contain the salient issues with regard to why this project is needed.

Other improvements BPA is considering in the area are: a new 230/500-kV transformer at Sno King Substation; and system additions at Bothell, Monroe, Sno King and Snohomish substations. In addition, the need for a 500-kV transmission line from Echo Lake Substation north to Monroe Substation is being studied. No decision about this project has been made. These projects are proposed in response to growing Puget Sound area load and the Treaty return to Canada. Also see Section 1.2.1 and Appendix M of the SDEIS and the response to Comment 1942-006.

394-003 The description of the purpose and need for the project is greatly expanded in Chapter 1 of the SDEIS.

394-004 See response to Comment 411-006.

394-005 Comment noted.
394-006 Comment noted. Information that has become available since the DEIS was published was included in the SDEIS. The Proposed Action is described in more detail in Section 2.1 of the SDEIS, including a variety of mitigation measures. Design information used for the biological assessment was not available when the DEIS was being produced. BPA typically uses site-specific information and information gained from past transmission line development to estimate and fully disclose potential impacts.

394-007 Please see response to Comment 394-006.

394-008 BPA has submitted a consistency determination under the Coastal Zone Management Act to the Washington Department of Ecology. The Department of Ecology concurred with BPA’s determination that the proposed project was consistent with the Coastal Zone Management Act. See Section 5.11.2 and Appendix V of the SDEIS.

394-009 BPA intends to provide compensatory mitigation for project impacts, including permanent protection of adjoining lands. Please see response to Comment 340-002. The USFWS and NMFS have assessed the proposed project’s impacts on the HCP and have concluded that the HCP will retain its value and function (see Appendix U and Appendix AA of the FEIS).

394-010 On March 16, 2001, BPA met with representatives of federal agencies with ESA jurisdiction (USFWS and NMFS) to discuss the purpose and need for the project, alternatives considered, potential impacts and NEPA and HCP processes. A SPU representative was present at this meeting. BPA prepared a biological assessment to evaluate the potential effects of the Proposed Action on listed and candidate threatened and endangered species, and designated or proposed critical habitat. The BA was prepared pursuant to the final rules for interagency cooperation under the Endangered Species Act (ESA) (50 CFR 402.12; June 3, 1986). BPA initiated formal consultation with the USFWS on the northern spotted owl. NMFS has concurred with BPA’s determination that there will not be any adverse impacts to federally-listed anadromous fish (see Appendix U of the SDEIS and FEIS).
NEPA regulations require that an EIS discuss possible conflicts between the proposed action and the objectives of federal, state, and local land use plans, policies and controls. Where inconsistency exists (as for example regarding King County’s sensitive areas and Shoreline Management provisions), the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law (40 CFR 1506.2(d)).

In its scoping letter, SPU identified the need for BPA to address effects of the project on the federally sanctioned and approved HCP. BPA indicates that USFWS and NMFS will have to “decide if the transmission line facilities require any change to the existing Habitat Conservation Plan.” The DEIS does not discuss the proposed action’s impacts on the CRW HCP. SPU is stating its position clearly: 1) SPU will not accept any need to modify the HCP as a consequence of BPA’s activities; and 2) BPA must provide mitigation for any impacts that reduce the conservation value of the City’s HCP that, at a minimum, compensates for that reduction in value.

BPA also failed to coordinate with federal agencies on Endangered Species Act prior to releasing the DEIS. The DEIS fails to fully assess impacts on endangered and threatened species such as Chinook salmon, coho salmon, and marbled murrelets (see specific comments elsewhere in this comment letter).

The DEIS is largely silent regarding any determination of the significance of impacts. The DEIS uses the terms “low, medium, and high” to describe impacts. This assesses making relative comparisons among the alternatives considered, but it avoids identifying whether or not these impacts are “significant.” Based on the NEPA regulations definition of “significant,” many of the impacts identified in the DEIS would qualify. However, the DEIS fails to disclose this information. Thus, the public and other agencies, as well as decision-makers, do not have adequate information to review. Because of the importance of “significant impacts” in the NEPA process, failure to disclose this information undermines the very intent of NEPA itself.

The DEIS says very little about the decision-making process regarding this proposed action. It says almost nothing about the decision BPA has already made regarding narrowing the range of alternatives and the currently preferred alternative (excluding who made those decisions, when, how, and why). This is important because NEPA regulations prohibit federal agencies from limiting the choice of reasonable alternatives until a Record of Decision (ROD) has been issued (40 CFR 1506.1(a)). The fact that specific, known design information for the Proposed Alternative has been developed (and was omitted from the DEIS) suggests that BPA has limited the choice of reasonable alternatives prior to the ROD, and indicates this DEIS does not fully disclose environmental impacts.

The DEIS also says very little about the remainder of the process. What happens after the DEIS, and what criteria will be used? For example, will BPA confirm a preferred alternative after the DEIS? Will all of the alternatives be reviewed in greater detail in the FEIS, or will it just cover the preferred alternative? What will BPA take final action? How will that decision be made?

BPA believes that presenting the extent of the potential impacts in four defined impact levels (no impacts, low impacts, moderate impacts, and high impacts) provides helpful information to the reader and the decision maker since each level is defined and specific to the resource impacted. Readers are then able to evaluate the “significance” of the impact based on the potential change to the resource.

Please see responses to Comments 411-006 and 394-007. The expanded range of alternatives in the SDEIS allows BPA to determine which course of action best meets the purpose and need described in the SDEIS. The fact that BPA chose to more fully analyze additional alternatives shows that BPA has not limited the choice of reasonable alternatives prior to the Record of Decision.

BPA disclosed its preferred alternative in the SDEIS and has included more information on the various alternatives. Alternative 1 remains BPA’s preferred alternative. BPA’s Administrator will make a decision on this project using the information developed during the NEPA process. The Administrator will make a final decision in a Record of Decision at least 30 days after the publication of this FEIS, as required by Council on Environmental Quality regulations. If the Administrator decides on one of the action alternatives, BPA would initiate action after the Record of Decision is signed and after all required permits and other legal obligations are met.

It was BPA’s intention to respond to all scoping comments in the DEIS. Many of the comment examples raised have been addressed in more detail in the SDEIS. Please see responses to individual comments from letter 394 to determine how and where additional information on specific issues raised during scoping were addressed in the SDEIS.

Mitigation will be addressed in the appropriate detail in the Mitigation Action Plan to be prepared for this project, and in association with permitting discussions with the appropriate federal, state, and local regulatory agencies.

BPA has purchased land that could replace that lost within the Cedar River Watershed and is in the process of purchasing more
Chapter 2 — Comments and Responses - DEIS

2-24

GC-8: Scoping comments from the City of Seattle were not addressed in the DEIS.

Scoping letters from SPU and SCI (October 2, 2000) raised several specific points that are not addressed in the DEIS. These issues include the purpose and need for the project, alternatives outside of the CRW, effects on the drinking water supply during construction, and effects of the proposed transmission line on the HCP, among others. Such omission is contrary to CEQ guidance that states “Every issue that is raised as a priority matter during scoping should be addressed in some manner in the EIS, either by in-depth analysis, or at least a short explanation showing that the issue was examined, but not considered significant for one or more reasons” (CEQ 1981).

394-014

394-016 Comment noted. The DEIS omitted the results of the cultural resource survey since the survey had not yet been completed at the time the DEIS was released. HRA performed a thorough survey of the preferred route and located a logging feature and a trench feature, neither of which appears to be eligible for the National Register of Historic Places. The contractor conducted further work at the trench feature, at the request of OAHP and the Muckleshoot Tribe. SPU protocols for cultural surveys were followed. Appendix X has standards of protection required for any new finds during construction.

394-017 The statement that impact to cultural resources is expected to be low was based on a sensitivity study of the project (DeBoer 2000). The Draft Cultural Resource Survey Technical Report (Bialas 2001), based on an intensive survey with subsurface testing, located only two cultural resources and determined both as not eligible for listing in the National Register of Historic Places.

394-018 Additional information regarding the Cedar River Watershed and its importance as a source of drinking water was included in the SDEIS.

394-019 Additional information regarding the Cedar River Watershed and the potential impacts of the proposed project to the drinking water supply was included in the SDEIS.

394-020 BPA created an extensive mailing list based on the mailing list developed for the Cedar River Watershed HCP. The purpose of the mailing list was to identify elected officials and individuals and groups who could be affected by the project. The mailing list included local, state and federally elected officials, tribes, environmental groups, landowners and others.

394-021 Please see response to Comment 382-011.

394-022 Use of existing crossings of major rivers and streams is proposed as follows: for the purpose of compensatory mitigation. Please see response to Comment 340-002.
• Rock Creek — existing county road crossing and BPA access road.

• Raging River — no access road crossings.

One temporary bridge may be needed for construction. No water-crossing culverts need to be replaced or installed for construction. BPA is in the process of pursing permits for replacing some existing culverts to allow for fish passage. See Section 2.1.1.5 of the SDEIS.

394-023 The DEIS does clarify potential for impacts from vegetation clearing both within the 150-foot ROW and outside. In many cases, however, this is classified as vegetation clearing and not specific to whether that clearing is inside or outside the ROW. The clearing of vegetation, no matter where it occurred, would have similar impacts.

394-024 Please see response to Comment 394-017.

394-025 Construction equipment and log trucks would need to be brought into the project area, if a decision were made to build the project. These vehicles would operate under the weight requirements as identified by the State of Washington, and if those weight limitations would be exceeded, permits would need to be obtained prior to any work being undertaken.

394-026 Vehicles and other construction equipment that use diesel, gasoline and/or hydraulic systems would be used to construct the project. In addition, maintenance and refueling of the equipment would be required. Oil or fuel spills could impact the Cedar River water quality. However, substantial construction activities, such as tower placement or road construction, would not be in proximity to water bodies such that a spill, which would involve a relatively small volume (such as from a hydraulic hose breaking) would impact the water supply. A detailed Stormwater and Pollution Prevention Plan (SWPP), or similar document, such as a Water Quality Control Plan (WQCP), would include a Spill Prevention and Contingency Plan. These plans would be prepared and approved by regulating agencies, including Seattle Public Utilities (SPU) and the Washington State Department of Health (DOH) prior to project construction. BPA would also hire an
independent inspector with stop-work authority to monitor ongoing construction activities. Logging activities, which include the use of log trucks, yarding towers, and ground-based yarding equipment, have previously been allowed within portions of the Cedar River Watershed. In addition, SPU maintenance vehicles also operate within the Watershed. If SPU maintains a WQCP and/or SWPPP or similar plan regarding contingencies for spills within the Watershed, including their prevention and response, the BPA's SWPPP for the proposed project would include similar contingencies.

No substantial earth-disturbing construction projects, such as road building or tower construction, are anticipated immediately adjacent to or near water bodies that drain into the Cedar River drinking water supply. Clearing of most timber within the ROW will be required. Riparian areas would be spanned, however, some clearing would be required in riparian areas. Much of the proposed alignment is along low- to moderate-sloping ground and in soils that have a low susceptibility to surface erosion, such that there is a low potential for project-related mass wasting events and soil erosion; hence, a low probability of impacts to drinking water supplies. An Erosion and Sediment Control Plan (ESCP), or similar document, such as a WQCP, will be prepared and approved by the regulating agencies prior to project construction. The ESCP will include Best Management Practices (BMPs) that will be implemented as needed to reduce the potential for turbidity events. Where the project crosses steeper ground and/or more sensitive soils, more strict BMPs, including seasonal work restrictions and sediment barriers, can be implemented.

Section 3.4 of the revised Fisheries Technical Report (Appendix A) discusses the role of shade as a control on stream temperature in the streams that would be affected. Section 4.6.2.1 of the SDEIS discusses how stream temperature would likely be affected by construction of the transmission line. Likely effects on stream temperature are also discussed in the biological assessment for the proposed transmission line.

The length of the preferred route is just a little less than the stated 9 miles thus accounting for the 152 acres stated in the DEIS. Please see responses to Comments 366-002, 382-011 and 394-108.
2-27

Chapter 2 — Comments and Responses - DEIS

September 4, 2001

Page 7

2.1.11 Transmission Structures

394-033 BPA disagrees that impacts would be greater than those stated in the EIS. Please see response to Comment 340-002 for information about mitigation.

394-030 BPA does not expect any major impacts to public health and the drinking water supply during construction and operation of the proposed project. Mitigation is proposed to reduce the risk of impacts. Impacts to surface water and ground water would be low.

394-031 The data used for these studies is a compilation of all customers load forecasts, the existing transmission system, expected generation condition forecasts and expected interchange of power among utilities. BPA prepares this study annually and it is also used by other Northwest utilities. For the particular study that led to this proposed project, in addition to the forecasts, these assumptions were used: extreme cold weather load in the Northwest (similar to the Arctic Express of 1989); all available thermal generation in the Puget Sound Area is running (at lower generation levels the project would be needed earlier) and Intalco Load on (Intalco presently holds a transmission contract with BPA to serve the smelter although the smelter is not currently operating. However, BPA has included the load in studies because the transmission capacity has to be available because the load could return at any time). At the time of the studies, the joint study utilities (Seattle City Light, Snohomish County PUD, Tacoma City Light and Puget Sound Energy) approved these assumptions. See Section 1.2.1 of the SDEIS.

394-032 Cost estimates have been expanded in the SDEIS. See Sections 2.1.4, 2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.2.5.12, 2.2.6.12, 2.2.7.12, and 2.2.8.12. The mitigation that would be included with each alternative and an estimate of the costs are included in these sections.

394-033 Helicopter construction techniques would be required for the proposed action if BPA decides to build a transmission line.

394-034 Table 2-1 has been expanded in the SDEIS to clarify the areas where full clearing is likely within the right-of-way, and where
partial clearing would be evaluated (the removal of danger trees). In the areas identified as partial clearing, the remaining trees will be protected as much as practicable. Figure 4 has also been added to the SDBS to graphically show the difference between horizontal distance and slope distance. The range of clearing shown in Table 2-1 is an example based on the average height of trees given, of the distances from centerline to the furthest tree to be cut as a danger tree. This is merely an example. There may be instances where the trees are taller than the average and individual trees could be removed at distances even farther than those listed in the table, but these instances would be few.

The 50-foot easement is a road easement. Please see response to Comment 382-009.

- See response to Comment 394-034.
- See response to Comment 340-004.
- The description of the types of impacts that could be expected from constructing and maintaining access roads, and an approximation of their acreage were included, as that was the best available information BPA had in its possession. Information was updated in the SDBS.

- The 20-foot width was used for calculations because it would be closer to the average disturbed width. The 50-foot width is used for acquisition purposes outside of the purchased power line right-of-way. Many of the proposed access roads to be constructed are spur roads from existing power line or watershed system roads and would be short. This type of access road is not constructed to the same standard as a longer system access road. The road would be constructed using an in or out-slope type of design that does not require ditching. The typical disturbed width would be less than 20 feet.

Typically all temporary road and staging areas are re-vegetated. Staging areas were not included in the analysis.

- BPA access roads are not impervious. While it is true that the roads have rocked surfaces, the surface is not impermeable.
Chapter 2 — Comments and Responses - DEIS

BPA Kangley—Echo Lake DEIS
September 4, 2001
Page 9

394-045

Wetlands: Impacts are much greater than stated, especially to extensive forested wetlands in the CRW.

Cultural Resources: Potential for impact to archaeological resources or Traditional Cultural Properties are uncertain but could be substantial.

Public health and safety: The DEIS fails to mention potential public health issues associated with impacts on the drinking water supply during construction and operation.

CHAPTER 3—AFFECTED ENVIRONMENT

3.1 Land Use

394-046

The DEIS should disclose that land use impacts would be “high” in the CRW, so the proposed project would substantially reduce conservation measures in the City’s HCP, which is a primary land-use commitment in the project area.

Also, the DEIS does not adequately describe project details for (and subsequently, potential impacts of) road construction and maintenance, rock source, and construction staging. Clearly, there will be impacts to the transportation system in the CRW; most CRW roads and transportation structures are not adequately constructed to carry large volumes of timber or construction equipment and materials. For example, the DEIS does not identify haul routes for rock or timber, rock source for culverts, location of new access roads; location of upgrades to existing roads for bridge crossings, turning radii, width, slope and other geometry; and surface; location of staging areas; and compensatory mitigation for unavoidable adverse impacts caused by these facilities and activities. The DEIS does not mention the new DNR rules for road BMPs. Also, the DEIS does not address who will bear the cost of on-going maintenance of new access roads and transportation structures (such as bridges and gates). Also, SPU has important safety concerns with drilling, shooting, and transport of explosives in the CRW, these proposed activities are not adequately described. The DEIS also fails to specify timber haul routes, yet selection of routes will have a major influence on the magnitude and nature of impacts both in the CRW (on habitats and species) and outside the CRW (on public roadways).

3.1.2 Cedar River Watershed

394-047

"...Seattle owns title to all but a small portion of the Cedar River Watershed."

This is stated ambiguously. The City of Seattle owns only that portion of the Cedar River watershed that lies upstream of Landerhill. The DEIS should state this unambiguously.

3.4.8 King County

394-048

The DEIS should acknowledge that the Taylor Mountain site (Manke Property) is used by hikers and equestrians.

NOTE: In general, most of the subsequent sections in Chapters 3 and 4 pertaining to fisheries, wildlife, vegetation, and wetlands were condensed versions of the text in the corresponding Technical Reports. Thus, all SPU comments on appendices A, B, C, and D (which see) can be considered to apply to sections in these Chapters as well. Statements from the DEIS are shown in BPA roads are not constructed like the system roads within the CRW or tree farms in the region. Those roads are built to withstand heavy traffic while BPA access roads (unless they are to become part of a private ownership road system) are built for line construction then limited line maintenance. The roads are designed and constructed to a standard consistent with existing drainage design practices.

Existing standards are used to design erosion control measures and are employed as soon as construction begins. An erosion control plan is filed prior to start of construction.

394-040

At the time of publishing the DEIS, sufficient line design information was not available, i.e., tower locations. Some preliminary information was noted but site-specific data was not available without the tower locations. All stream crossing information is now available and structure design has been completed. See response to Comment 394-022. The map presented in Figure 5 of the Wetlands Technical Report (revised Appendix D) shows where all the proposed towers and new roads would be located.

394-041

The location of staging areas are determined by BPA’s construction contractors and are not known at this time. No staging areas will be allowed on the Cedar River Watershed. Staging areas were not included in the analysis because they will be chosen by the contractor, if a contract is awarded.

394-042

Overall cost estimates are included in the SDEIS for each alternative. The costs are based on “typical per unit” costs. Those costs are modified with any additional information available. See response to Comment 394-032.

394-043

In total these three hydroelectric plants generate 15.5 MW maximum. The total Puget Sound area load in 2003 for extra heavy cold weather is about 10,000 MW. The three plants could serve only about 0.155 percent of the total area load or in other words could serve about 8 percent of one year’s load growth. These are very small generators and as such are usually netted with load near the generator. Although the generators are rated for 15.5 MW, the actual generation available during extreme winter cold weather may be much
less due to freezing and reduced runoff due to the cold weather. These projects were not considered in the decision making process because there impact is minor.

394-044 and 394-045 Table 2-2 is a summary table of impacts. Table 2-2 was updated and incorporated into the SDEIS as Table 2-3. The DEIS and the SDEIS addressed these specific issues in more detail in their chapters on effects, Chapter 4. See the list of issues and related comment numbers at the end of this chapter. This list includes comments and responses that address HCP impacts, access roads, water quality, fisheries, wetlands, and cultural resources. Additional information on fisheries is found in Appendices A, N and U of the SDEIS. Additional information for Appendix A is in the FBEIS. Additional information about wetlands is in Appendix D (also revised for the FBEIS), and Appendix Q of the SDEIS.

394-046 Comment noted.

394-047 At the time the DEIS was being assembled, BPA had not conducted a field review of the existing access road system including drainage structures. During the field review of the road system within the CRW, a review that included both previously-acquired system roads (roads for which BPA has acquired rights of use) and unspecified roads, road quality was evaluated. BPA concluded that with few exceptions the existing watershed system roads were capable of withstanding the travel of line construction vehicles because the roads were originally constructed for logging activities. In most cases rock depths exceeded 12 inches and all roads were ditched and drained and kept in good serviceable condition. The exceptions would be the weight limitation placed on the Cedar River Bridge east of the existing power line right-of-way and some “soft” spots on some roads that would require additional rock. Existing drainage structures were adequate; removing and or replacing them would only add to disturbance and siltation.
BPA does not plan to construct any additional through access roads. While there will be new road construction, all roads within the CRW will be dead-ended. Most new roads will be short, accessing only one or two towers and most are being constructed because the existing route to travel along the existing right-of-way has been designated as a wetlands or wetlands buffer. Some existing routes would be closed and allowed to revegetate naturally. All material will move along designated routes approved and acquired if in private ownership by BPA. Movement of materials on public roadways is the responsibility of the construction contractor.

Rock sources have not been identified. Location and material acceptability are the responsibility of the contractor. BPA provides specifications only.

Staging areas are the responsibility of the contractor. BPA does acquire the main materials yard where steel and conductor may be picked up.

BPA bears all maintenance responsibility for roads and facilities it constructs whose sole function is construction and maintenance of the power line and right-of-way. If BPA acquires a right of easement along an existing road it will be responsible for maintenance during the construction period, and will pay for damage caused by BPA’s use after construction. If BPA constructs a gate or installs a drainage structure along an existing privately owned road, BPA may accept full responsibility for maintenance of the unit depending on formal agreement with the fee owner of the property.
operation of the proposed project should not result in a detectable degradation of the ground water quality. This information has been added to the SDEIS. See also Appendix Y.

394-051 Comment noted. This information is found in Section 3.6.4 of the SDEIS.

394-052 Comment noted. Every reasonable effort would be employed to avoid potential impacts from project construction and operation to the drinking water supplies.

394-053 BPA understands that this WQCP is an instrument used to modify the Watershed Control Program (WCP) that has been adopted by state and federal agencies to maintain the water quality in the Cedar River Watershed. BPA would work with the City to help prepare a modification to the WQCP.

394-054 If BPA decides to build a line, it would strive to meet the requirements of all regulations to maintain a clean and safe drinking water source. As previously stated, appropriate plans will be designed, approved and implemented to avoid impacts, such as spills and turbidity plumes, to the drinking water source.

394-055 and -056 Impacts to Chinook and coho salmon are addressed in Section 3.2.4 of the Fisheries Technical Report (Appendix A) and further detail is provided in the Biological Assessment for the proposed transmission line. The results of informal consultation with NOAA Fisheries on these species are described in Section 5.2 and Appendix U of the SDEIS. Appropriate compensatory mitigation for habitat impacts is planned. See response to Comment 340-002. Impacts to steelhead are discussed in Sections 3.0 and 4.0 of the Fisheries Technical Report.

394-057 Comment noted.

394-058 The distribution of streams providing potential anadromous fish habitat is based on maps presented in the Final Cedar River Watershed HCP (City of Seattle 2000).

394-059 Type 4 streams are defined as non-fish-bearing under the Washington Forest Practice Rules (WFPB 2000). The Final Cedar River Watershed HCP (City of Seattle 2000) does not identify any streams classified as Type 4 as being fish-bearing.
This information has been added to the SDEIS.

The relationship between the two streams has been clarified in the SDEIS and the revised Fisheries Technical Report (Appendix A).

Methodology for analysis of riparian shade is based on that presented in revised Appendix D of the Watershed Analysis Manual, Version 4, published by the Washington Department of Natural Resources. Model predictions were further verified using program SSSHADE and SSTEMP (Bartholow, J. 1989. Stream Segment Temperature Model (SSTEMP) Version 3.5. Temperature Model Technical Note # 2. Fort Collins, U.S. Fish and Wildlife Service). These models show negligible temperature effects resulting from altering 10 percent shade cover on a 1,000-foot long stream reach. The data presented in the Fisheries Technical Report (revised Appendix A) support the report’s conclusions. These findings are fully consistent with the most detailed analysis of the shade-temperature relationship yet performed for Washington Streams: Sullivan, K. J.; Tooley, J.; Doughty, K.; Caldwell, J. E. and Knudsen, P. A. 1990. Evaluation of prediction models and characterization of stream temperature regimes in Washington. TFW-WQ3-90-006. Timber Fish & Wildlife, Department of Natural Resources, Olympia, Washington.

Comment noted.

This information has been included.

The project vicinity has been enlarged and is described along with the approach to addressing wildlife impacts in Section 3.8 of the SDEIS. In general, there are two levels at which wildlife habitat is discussed. The broad project vicinity is used to address issues related to wide-ranging species, migratory species, and species with large home ranges. The project area, defined as the area within 0.25 miles of the proposed project, is addressed in more detail because the potential impacts of the project would likely be focused within that area.

The list of species with federal or state protection status has been updated in Table 2 of the Wildlife Technical Report (Appendix
The decision to preclude species that were not expected to occur in the project area was based on the habitat requirements for the individual species. Species with large home ranges were excluded based on the lack of habitat within the boundaries described under project vicinity. Wording in Table 3 of Appendix B was changed to “not expected to occur in project vicinity” for these species. The remainder of the species in Table 3 are either habitat specialists or low mobility species and habitat for them does not occur in the project area or vicinity.

Potential impacts to species with large home ranges are discussed in general terms in Section 4.7.2 of the SDEIS and changes in the amount of habitat available for species in the project area are displayed in Table 4-10 of the SDEIS.

Comment noted. The project vicinity was enlarged in the SDEIS to include the upper watershed. Table 2 of the Wildlife Technical Report (Appendix B) lists marbled murrelet as “may occur in the project vicinity.” The risk of bird collision with transmission lines is discussed in Section 4.7.2.4 of the SDEIS.

While signs of nesting activity were not observed during field reconnaissance surveys for this project, and the area does not meet the usual description of pileated woodpecker nesting habitat (as in Rodrick and Milner 1991), Section 4.1.2 of the Wildlife Technical Report (Appendix B) was revised to reflect the comment.

According to existing data sources (i.e., the Cedar River Watershed HCP [City of Seattle 2000] and the WDFW Priority Habitats and Species Database [WDFW 2000]) no peregrine falcon eyries occur in the Cedar River Watershed or in the project vicinity, as defined in the Wildlife Resources Report, Section 3.3.

This information was not provided in the Vegetation Technical Report (Appendix C) or the Wetlands Technical Report (revised Appendix D). However, we do not feel it is necessary to collect or present the information because it would not substantively contribute to the impact analysis, or the identification of potential significant impacts as required under the National Environmental Policy Act. Riparian vegetation at the Cedar...
River crossing will be minimally impacted by the construction of the new line. The design includes taller, double-circuit towers on each side of the Cedar River. The tower design and location would reduce greatly the vegetation clearing required.

394-070 and -071 The discussion of wetland buffers within the Wetlands Technical Report (revised Appendix D) provides a brief overview of some of the functions provided by intact buffers. The purpose of this discussion is to outline general functional benefits from intact wetland buffers and not to detail the entire suite of buffer functions including benefits to water quality, water supply, stream temperature, bank stability, and the associated benefits for fish, amphibians, and other species. However, we do not feel it is necessary to collect or present additional information because it would not substantively contribute to the impact analysis, or the identification of potential impacts as required under the National Environmental Policy Act.

The DEIS did refer to the mapped, ancient deep-seated landslide which is on the southeastern flank of Brew Hill along the preferred Alternate 1 route (see Section 4.4.2). The DEIS also referred the reader to the technical appendix (Appendix F of the DEIS) for additional details regarding this landslide. The mapped, deep-seated landslide hazard along the Alternate 3 route in the Steele Creek basin is not referred to in the DEIS, but is discussed in the technical appendix. Evidence of recent or historical mass movement in these mapped, deep-seated landslide areas was not observed.

Several inner gorges are encountered along the alternative alignments where the alignments cross rivers or creeks. These areas are discussed as potential shallow landslide and soil erosion areas in the technical appendix. Roads and towers would not be placed on the steep slopes within these inner gorges. Instead, towers would be placed on the flatter slopes on either side of the gorges and the transmission lines would span these drainages. As a result, the potential for project-related landslides in these areas is remote.

Soil erosion is discussed in Section 4.4.1.1 of the SEIS and in the technical appendix. Soil erosion BMPs are discussed in Section 4.4.2.1 of the SEIS and in the technical appendix.
Chapter 2 — Comments and Responses - DEIS

394-073 See response to Comment 394-050.

394-074 Comment noted.

394-075 Since herbicides will not be used within the CRW, it is not possible for herbicides to contaminate the Cedar River. The statement in the EIS has been changed to reflect that.

394-076 A site-specific Spill Prevention and Control (SPC) Plan will be prepared that covers the project scope of work (including equipment, materials, and activities).

This SPC Plan shall address the procedures, methods and equipment to prevent discharge of oil (i.e., petroleum products) into or upon the navigable waters of the United States. This SPC plan also shall meet the requirements of the State of Washington, which specify the spill response, cleanup, and disposal requirements of oil. In addition, BPA requires that this SPC Plan be prepared to include all hazardous substances (including oil and other petroleum products) associated with the scope of work.

394-077 Section 4.2 of the Fisheries Technical Report (Appendix A) describes operations and maintenance impacts of Alternative 1 (the Proposed Action).

394-078 Cumulative impacts of vegetation clearing are described in Section 4.1.3 of the Fisheries Technical Report (Appendix A).

394-079 Please see response to Comment 382-017.

394-080 Comment noted. BPA has sited the proposed transmission towers and access/spur roads to avoid streams, wetlands and riparian areas. While none of these facilities would be located in these sensitive areas, some clearing would be required in wetlands and riparian areas particularly where those areas are found within the proposed right-of-way. Table 4-5 displays information on the amount of riparian vegetation that may be cleared. BPA would attempt to minimize the amount of clearing in riparian areas.

394-088 The DEIS concludes that the impacts are high but can not be mitigated. This is significant considering BPA’s important responsibilities and commitments under the Endangered Species Act and Northwest Power Act to protect, mitigate, and enhance regional salmon runs. This conclusion also suggests the proposed action is unable to be compliant with the ESA and its regional implementation. The DEIS should disclose this situation and its associated consequences.

… all streams in the project area are too warm to support bull trout spawning habitat.

394-089 The DEIS should provide data or an appropriate reference to support this contention.

4.6.2.12 Cumulative Impacts

“Cumulative impacts on fish and other aquatic resources are those impacts that act not only on the local area where the impact occurs, but at every point downstream that is influenced by the impact.”

394-090 This is an incorrect definition of cumulative impacts. The DEIS is describing indirect, not cumulative impacts. Cumulative effects are those effects from any number of sources within an area or watershed that are additive. One significant omission in this analysis, as mentioned in the review of the Fisheries Technical Report, is the lack of consideration of cumulative effects connected to the existing transmission ROW and the proposed ROW.

“Fine Sediment Load — The sensitivity of a watershed to the cumulative effects of additional sediment load depends on the distribution of resources sensitive to fine sediment inputs, such as spawning beds, as well as the quantity and location of fine sediment sources, soils, slopes, vegetation cover, and flow regime. If the Proposed Action were implemented, fine sediment production would continue to be low.”

In general, most of Chapters 3 and 4 pertaining to fishery, wildlife, vegetation, and wetlands are condensed versions of the text in the corresponding technical reports. This DEIS statement is an example of how confusing material for the DEIS from the Fisheries Technical Report resulted in an inadequate discussion of the issue. The first sentence fragment in this citation above describes the potential generic effects; the second concludes, with no supporting analysis presented, that the effects are low. In addition, as discussed in SPU’s review of the Fisheries Technical Report, the analysis of sediment impacts is deficient.

LWD Recruitment

“… (which do not spawn in such warm streams.)”

394-092 The DEIS should provide data or an appropriate citation to support this contention.

Table 4-4

This table contains incorrect information. For example, based on data provided in Burton (1999), the earliest confirmed sighting of Chinook salmon in the Cedar River is August 18. Based on data in Burton (1997), the latest recorded steelhead spawning is June 11, and the latest date of completion of steelhead
spawning is August 11. The DEIS and its environmental analyses should be based on correct information on the affected natural resources. This is to revise to include correct information. Also, this or another table should address lamprey species in the same manner. (Burton, Karl, 1997. Cedar River steelhead monitoring program annual report. Seattle Public Utilities.)

Section 4.7 Wildlife

4.7.1 Impact Levels

BPA is working with SPU to assure that all activities on the Watershed meet SPU standards to the extent practicable.

At the time the Fisheries Technical Report (Appendix A) was prepared in late 2000, the Final Cedar River Watershed HCP (City of Seattle 2000) was not yet available to the public, in spite of the fact that the HCP had been approved by the Seattle City Council in April 2000. The Final HCP has since become available. The findings reported in the Fisheries Technical Report were revised to be consistent with Final HCP. Text in the SDEIS was changed to reflect these revisions.

See response to Comment 394-081.

An undetermined number of new cross drain culverts will be installed and we will be replacing other culverts of this type. BPA acknowledges that there are problems associated with some of its existing culverts on its access roads on the Raverv-Echo Lake right-of-way within the Cedar River Watershed. BPA is committed to addressing these problems with SPU, the landowner, and the Washington State Department of Fish and Wildlife.

See response to Comment 394-081.

See response to Comment 394-081.

Comment noted. Please see response to Comment 394-076.

BPA has included more information concerning potential impacts to endangered species in the SDEIS. The commenter states that the DEIS concludes that the impacts are high but cannot be mitigated. BPA respectfully disagrees with the commenter's interpretation. The DEIS makes it clear that two of the three waterways which may potentially provide habitat to listed fish in the future (once the proposed downstream fish ladder is completed thereby opening up the Cedar and Raging rivers to migration), would have low impacts. A third waterway, the Cedar River, may have high impacts if large conifers were cut and removed, but this would not be needed. There are currently no listed fish in the project's action area, and during construction no trees will be cut near the Cedar River.
Concerning the comments on the ESA, BPA fully intends to fully comply with its obligations under the Endangered Species Act. After submitting a biological assessment to the U.S. Fish and Wildlife Service, FWS concurred with BPA’s “not likely to adversely affect” determination on the bull trout, marbled murrelet, bald eagle, grizzly bear, gray wolf, and Canada lynx and did not identify any other federally-listed endangered species that would be adversely affected by the project. Consultation on the spotted owl will be completed prior to construction.

With respect to the NMFS, we received letters from them stating that they expect the effects of the Proposed Action to be discountable or insignificant. Their letters announce the conclusion of our informal consultation with them in accordance with 50 CFR 402.14(b)(1) (see Appendix U of the SDEIS and FEIS).

394-089 No bull trout spawning areas have been identified in western Washington at elevations of less than 2,000 feet (King County Department of Natural Resources, 2000). See Section 4.1.3.1 of the revised Fisheries Technical Report (Appendix A).

394-090 The analysis of cumulative impacts has been changed in the SDEIS. The beginning of Chapter 4 includes the definition of cumulative impacts and lists the foreseeable future actions that were considered in estimating cumulative impacts to individual resources.

394-091 The Fisheries Technical Report (Appendix A) was included as an appendix to the DEIS because the EIS is written, according to CEQ regulations, in plain language the public and decision-makers can understand. The full findings of the analysis are in the technical report so that reviewers interested in the details of the analysis can read them. The DEIS contained sufficient information to assess the potential impacts of the Proposed Action in accordance with NEPA requirements.

394-092 See response to Comment 394-089.

394-093 and -094 Table 5 of the Fisheries Technical Report (Appendix A) has been revised to include this information. Information on the lamprey is outside the scope of this project.
Section 4.1 of the Wildlife Technical Report (Appendix B) was revised to include a more detailed analysis about the issues of travel or dispersal barriers and how it affects the behavior of animals. More information was added to the SDEIS.

Section 4.1 of the Wildlife Technical Report (Appendix B) was revised to include a more detailed analysis about the issues of collision and electrocution. Additional information has been added to the SDEIS. Electrocutions associated with high voltage transmission lines are extremely rare. BPA is currently helping to develop improved technology for monitoring bird collisions in cooperation with the Edison Electric Institute. BPA is providing funding and expertise in a study to test a bird strike indicator, a device clipped onto overhead ground wires to monitor and store impacts with the wire. Some of these devices are being tested in areas of known bird strikes that have been previously studied in the Audubon Wildlife Refuge in North Dakota. If they prove to be a useful tool, these devices will be placed for monitoring in the areas identified as having the highest need.

Although ruffed grouse are likely to be present in the project area given the habitat types available, they do not meet any of the criteria for inclusion in the analysis, as described in Section 3.3.2 of the Wildlife Technical Report (Appendix B), and so were not included in the analysis. Blue grouse do meet the criteria, as a species of local concern, and because the habitat modeled for this species by Smith et al. (1997) for the Washington State Gap Analysis included mixed and coniferous forest habitats at all elevations, this species was included as potentially occurring in the project area.

Comment noted. Please see response to Comment 340-002.

BPA knows of no mortality issues involving avian species with its existing Raver-Echo Lake power line in the project area; however, the existing line has no overhead ground wire, and the proposed line would contain an overhead ground wire over the length of the project. To mitigate for the potential for collision...
with the overhead ground wire, BPA would install bird flight diverters over the Cedar and Raging rivers as a part of the project. This apparatus should allow any birds using these wildlife corridors to see the overhead ground wire and avoid the potential for bird strike. BPA believes avoiding the potential for mortality is preferable to offering compensatory mitigation for its occurrence.

394-101 With the exception of installing bird flight diverters on the overhead ground wire over the riparian areas of the Cedar and Raging rivers, no alterations would be made to the proposed structures or line configurations to prevent and/or minimize negative impacts to any avian species in the area since none would be necessary. Since the proposed conductors would be spaced a minimum of 21 feet apart, it would be unlikely that any bird could come in contact with two conductors at the same time, thus avoiding any potential for electrocution. And raptor collisions with power lines are relatively rare. For more information, please see Section 4.1.1 of the revised Final Wildlife Technical Report, entitled “Impacts common to All Transmission Line Alternatives” in Appendix B.

394-102 The details about these mitigation measures will be included in the Mitigation Action Plan for this project. We will include leaving existing snags and the creation of new snags to both preserve existing habitat and the creation of new wildlife habitat, where possible.

394-103 The location of towers and access roads have been developed to help reduce the amount of riparian vegetation impacted.

394-104 The cumulative effects analysis was updated in the SDEIS. Section 4.7.2.11 discusses cumulative effects associated with the Proposed Action. Table 4-9 in the SDEIS displays potential cumulative impacts for each of the alternatives. Although BPA would require additional access roads, SPU is planning on obliterating some of its current access roads. BPA has acquired a 352-acre parcel of land north of the CRMW to prevent future development (except for the Proposed Action and future transmission lines) as mitigation for the forestland that would be impacted by the Proposed Action. See also response to
In its scoping letter, SPU identified the need for BPA to address effects of the project on the drinking water supply. The DEIS completely fails to discuss the risks to the drinking water supply during project construction for any of the alternatives. These risks include the risk of spills that could contaminate the water and the risk of turbidity events that could have serious regulatory and public health consequences for SPU. See also SPU’s comment under Environmental Consultation, Review, and Permit Requirements, immediately below.

CHAPTER 5—CONSULTATION, REVIEW AND PERMIT REQUIREMENTS

The DEIS should include a new section on the Washington Department of Health (DOH) Rules for Group A Public Water System (246-200 WAC). This section would summarize the federal Safe Drinking Water Act and subsequent regulations that require a high level of protection for a source of unfiltered drinking water such as the Cedar River. Because SPU’s Cedar River source is unfiltered, SPU is required to control the watershed in accordance with a DOH-approved control program. Obviously, the currently approved control program does not address BPA’s proposed project. For previous construction by SPU and SCL in the watershed, SPU required development of a project-specific Water Quality Control Program (WQCP) that could be approved by DOH as a supplement to the permanent control program. Typically, the program was prepared by a specialty sub-consultant in the consultant design team. SPU would require BPA to produce a WQCP for this project that would be acceptable to SPU and DOH.

5.2.1 Federal List

The DEIS incorrectly states that marbled murrelet is not expected to occur in the project area. Murrelets have been detected in the upper watershed, where they are possibly breeding, and can be expected to fly along the Cedar River to these areas. Thus, this species is at risk of colliding with power lines in the CRW. The DEIS should address this and provide a suitable analysis of impacts.

5.4 Heritage Conservation

The DEIS states that no culturally modified trees were found in the project area, but SPU believes that the Muckleshoot Tribe may have observed some of these in the project area. [Contact Tom Minichillo.]

5.5 Federal, State, Areswide, and Local Plan and Program Consistency

As previously mentioned, the DEIS fails to mention how BPA intends to meet the intent of local sensitive areas regulation such as King County Sensitive Areas Ordinance. BPA is required to meet the standards in this ordinance, which would not occur under measures describe in the DEIS. The DEIS should acknowledge this requirement and indicate how it will meet the intent of such local and state regulations.

5.5.9 City of Seattle Cedar River Watershed Habitat Conservation Plan

The DEIS should acknowledge this proposed action is not a “covered activity” under the HCP (the primary land management document/direction in the project area) and then commit to not diminishing the conservation commitments in the HCP. The DEIS should explicitly describe how it intends to avoid diminishing HCP conservation commitments (for example, by committing to providing appropriate and effective compensatory mitigation).

5.17 Underground Injection Permits under the Safe Drinking Water Act

Comment 340-002. For these reasons, the cumulative impact of the Proposed Action is low to moderate.

394-105 Comment noted. BPA agrees.

394-106 See response to 366-002. We will be using a stable tree criteria.

394-107 Table 4-6 from the DEIS has been deleted. See Table 4-10 in the SDEIS.

394-108 Mitigation for soil disturbance and the possibility of introduction of noxious weeds would include any or all of the following:

- Reseeding disturbed areas with a seed mix acceptable by BPA and SPU;
- Washing of construction and maintenance vehicles to prevent spread of seed from one source to another;
- Treatment of known noxious weeds through manual or mechanical measures.

394-109 Comment noted. The statement has been revised in the SDEIS.

394-110 See response to Comment 382-017.

394-111 BPA has been meeting with the Muckleshoot Culture Committee on the proposed project since early 2000. One of the Tribe’s chief concerns is what impact the proposed project would have on cultural resources important to the Tribe. BPA is working with the committee to site the proposed project with the least impact on cultural resources.

If BPA were to decide to construct the proposed project, BPA would obtain land rights from the property owners to do so, including Seattle Public Utilities. BPA obtains easement rights to construct, operate and maintain its transmission facilities; however, the land within the right-of-way remains in fee ownership of the property owner. Although BPA has offered to move its facilities, given certain constraints, to avoid cultural resources, the Tribe needs to work with the landowner regarding harvesting any resources important to the Tribe.

394-112 BPA would commit to these mitigation measures. With respect to the noxious weed issue, BPA is willing to work with the
landowner in controlling noxious weeds on BPA's existing right-of-way attributable to BPA's actions or inactions, as well as to prevent the proliferation of noxious weeds on the proposed right-of-way within the CRW that would also be attributable to BPA actions or inactions. Preventing the spread of noxious weeds is an ongoing maintenance objective of BPA, but it must be undertaken in concert with landowner help, particularly where the noxious weed problem exists adjacent to BPA's rights-of-way as well.

BPA has sited all of its facilities, tower sites, access roads and substation expansion to avoid filling any jurisdictional wetlands. Although approximately 14 acres of forested wetlands would be converted from forested wetlands to scrub/shrub wetlands, this clearing would be undertaken by hand clearing only. No mechanized land-clearing equipment would be allowed in these wetlands. BPA believes in avoidance first, minimization next and then providing compensatory mitigation where necessary.

Additional information was developed for the draft EIS after the Wetlands Technical Report was prepared. The most recent information was included in the SDEIS.

The sentence was changed.

Please see response to Comment 394-029.

Impacts to amphibian habitat are described in Section 4.1.2 of the Wildlife Technical Report (Appendix B), with habitat loss expected to be the major potential impact for these species.

Please see response to Comment 340-002.

Please see response to Comment 394-016.

With respect to construction noise, the Muckleshoot Culture Committee has expressed a concern about construction noise impacts on fawning and calving by the deer and elk populations within the CRW. By the time BPA would initiate construction activities (in August), the deer and elk-birthing season would have ended. Our understanding is that fawning and calving are usually completed by June 15th. BPA will do its
best to honor this request while still trying to have the line energized when it would be needed. The construction noise would be considered short-term and intermittent, and would occur only in specific locations until the project would be completed.

Regarding operation noise, Section 4.13.1 of the DEIS entitled “Predicted Audible Noise Levels” stated that the incremental noise contributed by the proposed line adjacent to the existing Raver-Echo Lake 500-kV line would only be about 1 dBA at the edge of the proposed right-of-way and would not be discernible. Wildlife such as deer and elk commonly use BPA rights-of-way to browse, and do not appear to be affected by the corona-generated audible noise.

With respect to the concern as to the potential effect of the new transmission line on CRW staff radio usage and reception, the DEIS, Section 4.13.5 entitled “Radio Interference” stated that the project’s overall radio interference is expected to be minimal.

394-121 Please see responses to Comments 394-051, 052, 053, and 054.

394-122 Information has been added to Chapter 5.

394-123 See response to Comments 394-096 and 394-066. The preferred power line route does not affect suitable nesting habitat for the marbled murrelet and will parallel the existing corridor, which substantially lessens any increase in risk associated with the new line. No noise disturbance associated with this project would be conducted within 0.25 miles of suitable or occupied habitat. Therefore, the project is not expected to increase the potential for incidental take.

394-124 A survey for culturally modified trees was conducted on and off the Cedar River Watershed. No culturally modified trees were found.

394-125 BPA intends to abide by the King County Sensitive Areas Ordinance including providing compensatory mitigation for altering forested wetlands within the proposed right-of-way. However, BPA disagrees with the commenter’s statement that
BPA is required to meet the standards in this ordinance. See also responses to Comments 395-018, -019, and -020.

394-126 The DEIS states (on Page 5-16) that the HCP covers only actions by the City of Seattle and activities undertaken by other agencies (such as BPA) within the CRW are not addressed by the HCP, and therefore, require separate review by USFWS and NMFS. The DEIS also stated “The BPA is consulting with both the FWS and NMFS to ensure compliance with the HCP.” See also Appendix U in the SDEIS and FEIS, and Appendix AA of the FEIS for the agencies’ opinions that the proposed project would not adversely affect the HCP.

Furthermore, BPA has purchased land to be used as compensatory mitigation to replace that which would be lost should BPA acquire land rights to site its transmission line through the CRW. Additional mitigation is under negotiations.

394-127 Construction and operation of the proposed BPA transmission line would not require the underground injection of water or wastes. BPA would comply with applicable regulations of federal, state and local agencies to protect drinking water supplies, in particular, Seattle Public Utilities, Washington State DOH, and the Cedar River Watershed, which provides drinking water to 1.3 million people.
This change has been made in Section 1.0 of the Fisheries Technical Report (revised Appendix A).

Because the Biological Assessment was prepared after the Fisheries Technical Report (Appendix A), it included mitigation actions such as avoidance of burning. The Fisheries Technical Report has been changed to reflect this new information. Because of the proximity of the adjacent 500-KV line that would remain energized during project construction, no burning would be allowed on the proposed right-of-way.

Additionally, burning would not occur at this project because the project is close to the Seattle-Tacoma CO maintenance area and the King County urban growth boundary. The state of Washington forbids burning in non-attainment and maintenance areas, and within the urban growth boundary. Additionally, the state forbids burning in any other area of the state when a reasonable alternative to burning is found to exist (WAC 173-425-040). According to the state, reasonable alternatives include chipping, woodwaste recycling, and landfilling. Rather than burn, BPA would pursue these alternatives. BPA typically does not burn slash and tries to avoid such practices not only for air quality reasons, but because soot from fires can cause flashovers from one transmission line to another, resulting in outages. This information was included in Section 4.14, Air Quality, of the DEIS.

BPA is committed to using Best Management Practices. See response to Comment 394-081.

See responses to Comments 366-002 and 382-009.

Section 5.15 of the SDBS describes how BPA intends to meet Clean Water Act requirements. The Stormwater Pollution Prevention Plan (SWPP) will describe in detail actions that will be taken to limit erosion impacts. Section 4.6.2.10 describes specific mitigation that will be undertaken to lessen impacts to fisheries. BMPs would include silt fences and hay bales and other such means that the contractor would use to keep sediments from reaching surface waters. The contractor is responsible for identifying which specific BMPs would be used to meet resource protection goals.
The DEIS and technical appendix should commit to ensuring all methods proposed in this section would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

"Trees would be cleared within the ROW as well as outside of the ROW to prevent trees from falling on the lines."

SPU is unable to comment effectively without more specific information about grading plans. As evidenced by information presented in the project’s BA, BPA has identified locations for towers and new roads and so should be able (in the DEIS and its technical appendices) to estimated the total amount of clearing for the proposed action. The DEIS and the technical appendices need to present a complete and accurate management, which includes the disclosure of such known project characteristics. Also, the DEIS and technical appendices should commit to ensuring all methods proposed in this section would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

1.1.1.3 Access Road Construction and Improvement

The DEIS and technical appendix should commit to ensuring all methods proposed in this section would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

"Access roads would be 16 ft wide, with additional road widths of up to 20 ft for curves."

SPU believes these road widths are excessive. The DEIS should explain and justify these road prism dimensions. SPU can not comment effectively without more specific information about road plans. As evidenced by information presented in the project’s BA, BPA has identified locations for new roads and so should be able (in the DEIS and its technical appendices) to firmly estimate the total amount of clearing/road-building for the proposed action.

The DEIS and the technical appendix fail to present a complete and accurate environmental analysis because they fail to disclose such known project characteristics as location and kinds of roads. Road locations depicted in the BA are often distant from the proposed action. The DEIS and technical appendix should explain and justify the location of these roads. The DEIS and the technical appendix should acknowledge that all road plans affecting the CRW would be subject to SPU review and approvals.

"...roads would be constructed and used outside the ROW."

"Where temporary roads are used..."

SPU can not comment effectively without more specific information on road plans. As evidenced by information presented in the project’s BA, BPA has identified locations for towers and new permanent and temporary roads and so should be able to firmly estimate the total amount of clearing for the proposed action.

Appendix A SPU Comments.doc
rupturing these tanks. The fueling pad shall be designed with impervious secondary containment capable of capturing any spills that may occur during fueling operations.

The bulk fuel storage area shall be designed with a temporary cover that also provides wind protection, and will have an impervious berm around the perimeter of the storage area. The bermed area should have a storage capacity of at least 110 percent of the largest container. The storage area shall be lined with a double layer of plastic sheeting or similar material.

**Mobile equipment fueling pads.** Construction equipment fueling on the ROW would use pickups with saddle-mounted tanks in their beds over portable chemically compatible secondary containment systems. Sorbent materials shall be used to protect the fueling nozzle as it is transferred to and from the fueling cradle and the vehicle being fueled. Pickup beds will be sealed to prevent any leakage. Fueling will only occur in designated fueling areas. Fuel tanks are not allowed to be topped off. All equipment fueling operations shall use pumps and funnels and absorbent pads. All fueling vehicles would leave the CRW daily. All fueling operations personnel shall be trained in SPCC procedures.

**Hand-carried Equipment.** Fueling of hand-carried equipment shall only take place in a mobile secondary containment system consisting of a covered truck with a sealed bed and lined with an appropriate chemically impervious material. All gas cans would be stored and hand-carried equipment fueled in this area. The transfer of fuel into portable hand-carried equipment would be performed using a funnel and/or hand pump. The fueling system and transport cans would be inspected daily. All fuel storage containers would be stored in a manner that reduces the possibility of spills. Gas cans would not be allowed outside of the secondary containment area. All hand-carried equipment fueling vehicles would be removed from the CRW at the end of each day.

**Spill Prevention.** Spill response kits will be located in the fueling area for easy access. The spill response kits at a minimum will include chemical resistant “zip-seal” storage bags, plastic sheeting, plastic drum liners, sorbent sheets, sorbent
booms/socks, granular oil sorbent, shovels, and overpack/salvage drums. Any spills shall be cleaned up immediately and the contaminated material properly disposed of. Accumulated storm water in secondary containment vessels shall be collected and disposed of properly. Additionally sediments and sediment-laden water containing oil on the construction site shall be captured and managed properly.

Additional spill prevention procedures will include daily and weekly inspections to ensure that spill controls are in place and remain effective. Any leaks from a fuel tank, equipment seal, or hydraulic line will be contained within a spill pad placed beneath potential leak sources. An undetected leak from parked equipment will be contained within the equipment staging area and cleaned up upon discovery. In addition to inspections, employees shall be trained on spill source and receptor recognition, spill prevention planning, spill prevention techniques, spill response measures, and spill reporting protocol. All employees are responsible for spill prevention and will respond to a leak as appropriate based on their level of training, or if a spill has occurred, they will assume a defensive posture and immediately notify the designated person responsible for assessing spills, implementing the SPC plan, and contacting regulatory agencies. Should the on-site personnel not have the training, equipment, or materials to clean up spills, a spill response contractor will be used.

Fire Safety. Fire extinguishers shall be located adjacent to spill kits in the material, equipment, and fueling staging areas. Smoking will not be allowed in construction and fuel staging areas and during re-fueling procedures. Smoking will only be allowed in designated areas. The Contractor must comply with forest fire laws, rules and regulations of the State of Washington (e.g., RCW 76.04 and WAC 332-24) and (WAC 332-24-405 Spark Emitting Equipment Regulations). Construction operations are subject to daily state fire precaution levels (FPL). The Contractor will need to check the level each day. The operators also need radio or telephone communications to report a fire. Vehicles will be equipped with fire extinguishers and spark arrestors. The local fire department is responsible for emergency containment procedures when called to the site. The fire department takes measures necessary to prevent fire
The known distribution of fish in the project area should be used in the analysis wherever it confirms a greater distribution than the remotely sensed data indicates. Some stream reaches that contain fish are not indicated as such in the analysis. Consultation with SPU Cedar Falls biologists may be beneficial. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

"The GIS database was not found to include any non-fish-bearing streams, so these streams were not inventoried. It is assumed that the project area contains at least twice as many non-fish-bearing streams as fish-bearing streams."

It is well-known that non-fish-bearing streams (Types 4 and 5) have a water quality impact on downstream reaches that are fish-bearing. The CRW HCP has a standard of 150 ft buffer for clearing on Type 4 and 100 ft for Type 5. Lack of inventory of Type 4 and 5 streams and lack of impact analysis on these streams are significant deficiencies in the DEIS and this technical appendix. The DEIS and technical appendix should inventory Type 4 and 5 streams and consider the potential impacts of the proposed action on fish-bearing streams. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

"Color aerial photographs were reviewed to collect information about the size and species composition of riparian vegetation, and the existing riparian shade, along all potentially affected streams. This review used methods established for watershed analysis in Washington (WFPB 1998). Field studies were undertaken to visit representative examples of fish-bearing streams, observe channel geomorphology and fish habitat, and ground-truth the aerial photograph progression."

"The statement conflicts with other statements in the DEIS and its technical appendices. The ROW would be 150 ft with or without towers; the DEIS indicates that clearing could occur in an area as wide as 400 ft. The DEIS and technical appendices need to speak consistently on the nature of project features (number location, width, etc.) of the proposed action."

This assumption is incorrect based on conflicting information provided in sections 1.1.1.2 and 1.1.1.5. The DEIS and technical appendices need to speak consistently on the nature of features of the proposed action.

5.2.1 Cedar River Watershed Habitat Conservation Plan

Any reference to "ecological reserve" in this or any other section of the DEIS or its technical appendices is incorrect. The "ecological reserve" as a "conservation strategy" is not included in the final signed version of Appendix A SPU Comments.doc

Chapter 2 — Comments and Responses - DEIS

BPA is proposing using a special footing design, micropiles, so that impacts would be reduced. No grading would be necessary except for the spur roads to each tower site and limited grading at tower sites on very steep slopes for micropile drilling equipment. The location of stringing sites are determined by BPA's construction contractors and are unknown at this time. It is likely that there would be one stringing site where there is an angle structure in the CRW. Other sites would likely be outside the CRW.

Blasting will not take place next to fish bearing streams.

Noise, particularly noise derived from activities not performed underwater, has not been shown to have any impact on salmonid fishes. The potential impacts of fine sediment such as dust on fish habitat are described in Section 4.6.2.3 of the SDEIS.

Restored to previous condition without changing the character of the road, if necessary.

Disturbed areas are to be reseeded with native seed mix as soon as construction is completed in that area. However, in many cases, locally adapted native plant materials are not available. Many native species available for restoration are actually from other areas, representing different genetics than existing vegetation. BPA would consult with the DNR, SPU, other agencies and Tribes about the appropriate seed mixtures to use.

BPA system planners are constantly studying the transmission system. BPA is proposing the Proposed Action since the capacity of the present system is near the limits of its capacity. If the limit would be exceeded during time of peak demand (during the and explosion, and to protect people and property in the event of a fire or explosion.
the HCP (2000). This section and any other references to the HCP should be revised, updated, and clarified throughout the DEIS and its technical appendices to reflect content of the final version of the HCP (2000).

3.2.1 CRW HCP

"...principal water supply for the City of Seattle..."

The Cedar River Watershed is not the principal water supply just for the citizens of Seattle, but numerous other communities as well (27 additional purveyors and communities), totaling 1.3 million people. The DEIS and technical appendix should accurately describe the role of the Cedar River Watershed.

3.4.1 Alternative 1

The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts. Several errors in this section suggest the environmental analysis for the CRW portion of the proposed action was not thorough. These errors include:

Segment C —

"...the floodplain (of the Cedar River) is not confined... (where it crosses the proposed ROW)"

The river is actually moderately confined within a glacial fluvial terrace.

"Currently, this reach of the Cedar River supports rainbow and cutthroat trout."

The Cedar River also contains non-salmonid species.

"Currently, this reach of the Cedar River supports rainbow and cutthroat trout."

Although this statement is true, it is misleading insofar as these two species occur in a ratio of approximately 99 to 1 (rainbow to cutthroat). The DEIS and technical appendix should state this clearly so as to not be misleading. The same clarification should be made in all other sections where similar statements occur.

"Once passage around the Landsburg Diversion Dam has been established (in September 2002), it is likely that the reach would support all anadromous species now prevented from upstream migration by the Landsburg Diversion Dam, including chinook, coho salmon, and steelhead."

Sockeye will be prevented from passage beyond Landsburg given the new passage facility. The DEIS and technical appendix should correct this statement in all sections in which it occurs in error.

Segment D —

"The affected streams have a pool-riffle morphology..."

As described in the paragraph above, many streams in this segment flow down relatively steep slopes (20 to 40 percent). Stream gradients on these slopes are generally too high to support pool-riffle morphology and are more commonly step-pool or cascade channel types.

"Rock Creek, downstream of this segment, is known to be used by cutthroat trout and, where it joins with the Walsh Lake diversion ditch, by coho salmon and Walsh Lake kokanee."

Rock Creek does not join with the Walsh Lake diversion ditch. It flows directly to the Cedar River and is not connected to the ditch. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

Data do not indicate that detailed analysis of Type 4 and 5 streams would substantively alter the findings of the analysis. The effects of the Proposed Action on such streams would be approximately the same as the effects on Type 3 fish-bearing streams, and those effects are detailed in Section 4.0 of the Fisheries Technical Report (revised Appendix A).

The module used was Appendix D, Riparian Function (WFPB 1998), which is the only module that describes methods for assessing riparian vegetation. A skilled aerial photograph interpreter has little difficulty interpreting stand structure using the quality of aerial photographs available for this analysis. Moreover, results were field-verified and, for that portion of the project within the Cedar River Watershed, corroborated by vegetation structure maps provided in the Draft Cedar River Watershed HCP (City of Seattle 1998).
Not all trees in the ROW would be removed. Transmission towers are typically sited on higher ground, and they generally span drainages and associated riparian areas. Siting towers in this manner would increase the likelihood that the conductors may be above riparian areas and may require less removal of vegetation. BPA would also leave/protect low-growing vegetation where possible.

The proposed right-of-way would be 150-feet wide. The right-of-way would cross riparian areas and ravines where some of this vegetation would not need to be taken. BPA tries to remove tall-growing woody vegetation from its rights-of-way and establish low-growing vegetation to maximize cost-effectiveness and minimize the environmental damage by having to continually revisit the rights-of-way to remove tall-growing species.

The affected streams have a much lower gradient. Streams with 20-40 percent gradient are generally regarded as non-fish-bearing and moreover are much less vulnerable to the types of impact discussed in the Fisheries Technical Report (Appendix A) than are pool-riffle streams, especially fish-bearing ones.
timber harvest would not happen if the transmission line was not constructed. It also fails to acknowledge the notion that impacts of the proposed vegetation clearing in the ROW would be long-term and ongoing—much longer and more disruptive than a timber harvest. The DEIS and technical appendices need to present an accurate description of the proposed action. More importantly, the CRW HCP provides long-term protection status to forests in the CRW. Thus, these forests will continue to age and provide increasingly unique, low elevation shag forest habitats in the rapidly developing Puget Sound region. The DEIS and technical appendix should acknowledge the unique long-term forest protection status provided by the HCP. BPA’s environmental analysis should be conducted recognizing the increasing regional biodiversity value of the forest it proposes to permanently clear.

"...or toxicity or deterioration of water quality from accidental spills of hazardous materials."

The DEIS and technical appendix should evaluate the potential of leaching of metals from the towers or lines, and the associated risks to water quality.

4.1 Construction Impacts
4.1.1 Impacts Common to All Action Alternatives
4.1.1.1 Impacts

Disturbance to Fish Habitat from Removal of Riparian Vegetation

"Riparian trees provide fish habitat by filtering runoff before it reaches the stream, shading the stream and reducing mid-summer temperatures, providing LWD to streams which increases habitat complexity, and providing organic matter to the stream which increases productivity in the aquatic food chain."

Riparian trees and vegetation also provide soil stability, shoreline stabilization, and insects as food.

"BPA would prepare a clearing plan ..."

All methods proposed in this plan would have to meet and be conducted by SPU standards and with SPU approval for all areas within CRW.

"... drainage features would be installed where needed in accordance with the Washington Forest Practices Rules (WSFPR).

SPU standards would have to be followed if they exceed WSFPR and would be subject to SPU approval for areas in CRW.

Culvert or Bridge Installation—

"Some fish in the stream along the proposed transmission line ROW, including sensitive species such as bull trout, steelhead, and salmon, migrate upstream to spawn."

Although it is mentioned elsewhere in the report that bull trout are not likely to be found in the project area due to warm stream temperatures, it is implied that they are here. The CRW HCP presents strong evidence that bull trout are not resident in the lower Cedar River system, but this source is not cited in this technical appendix. The DEIS and technical appendix need to present a complete and consistent analysis of fisheries and potential impacts.

"BPA would comply with guidelines for fish passage in the design ...."

The DEIS and technical appendix should commit to ensuring all pertinent plans would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

394-167 The relationship between the two streams has been clarified in Section 3.4.1 of the revised Fisheries Technical Report (Appendix A).

394-168 Comment noted.

394-169 Section 3.4.2 of the Fisheries Technical Report (Appendix A) has been revised to clarify this point.

394-170 Section 3.4.3 of the Fisheries Technical Report (Appendix A) has been revised to clarify this point.

394-171 Section 3.4.3 of the Fisheries Technical Report (Appendix A) has been revised to clarify this point.

394-172 Comment noted.

394-173 There is no inconsistency. New access roads outside the ROW would be distant from fish-bearing streams and have no potential to cause impacts to them. Temporary roads may be needed by the construction contractor for clearing trees and for access to pulling and reeling sites. Temporary roads would be located within the existing or new ROW in upland areas. One temporary bridge crossing, running from upland bank to upland bank, may be needed for construction. The bridge would be removed after construction. Temporary roads would be abandoned and the disturbed area would be reseeded.

394-174 Comment noted.

394-175 No toxic materials have been identified leaching from Bonneville Power Administration (BPA) lines or towers. BPA has reviewed the processes by which the steel to be used for towers in the CRW would be prepared to determine if hazardous materials could leach from the steel. The protective coating on these towers will be hot-dipped galvanization. This is a Zinc coating that fuses with the steel as well as coats it. This is the same process used to galvanize steel pipes for potable water transmission.

The galvanized steel is then dulled by dipping into acid. This gives the steel a darker appearance. The acid is rinsed off completely by dipping into a water bath.

Appendix A SPU Comments.doc
The last step in the coating process is to apply a white rust inhibitor (keeps white rust from forming while in transit). This is accomplished by dipping the steel into a solution of Sodium Dichromate, that when applied, fuses to the metal becoming Zinc Dichromate. This last step is optional and will be foregone for material entering the CRW.

The fasteners (bolts) are galvanized in the same process as indicated above. A lubricating wax is utilized as dictated by the ASTM A325 and ASTM A563 standards.

The aluminum conductors (lines) are essentially pure aluminum (99.4% Al) with galvanized steel cores. The aluminum (line) is essentially inert as it is coated with a layer of aluminum oxide. **NOTE:** Aluminum oxide is one of the most stable ceramics known. There are no oxidation inhibitors applied to ACSR conductors. The galvanizing on the steel core is sacrificial, as is the standard scheme with any galvanizing.

Insulators are essentially an inert entity being of porcelain/galvanized steel or EPDM polymer/galvanized steel. Either insulator type carries no corrosion inhibitor nor do they leach any compounds in significant quantities (if at all).

Section 4.1.1.1 of the Fisheries Technical Report (Appendix A) has been revised to note this point.

When the DEIS was written, not all information was available. The term “clearing plan” is not a plan per se — it is a clearing advisory based on topography and location of the conductor (sag and swing) that gives “safe” heights, i.e., heights that could be allowed given a few years growth at various distances from centerline. This advisory, in conjunction with other tools, aids in the selection of danger trees and retention of vegetation within the ROW. BPA will be preparing a clearing plan specific to the CRW with assistance from SPU staff.

See response to Comment 394-081.
They are not, due to (relatively) warm waters throughout the Raging River Watershed. However, the U.S. Fish and Wildlife Service does not regard the absence of high-quality bull trout habitat as proof of their absence from the Watershed; for example, it is conceivable that an anadromous individual could ascend the Raging River to the project area, in spite of the absence of suitable spawning habitat in the Raging River headwaters. These and related considerations are discussed in greater detail in the Biological Assessment for the proposed project. The USFWS did conclude that the project would not affect bull trout (U.S. Fish and Wildlife Service, February 23, 2002).

See response to Comment 394-081.

Areas of soil erosion would be expected along steep banks of a high-energy stream that is incising, such as was described for a section of Rock Creek. All but one of the soil units mapped along the southern and eastern flanks of Brew Hill, which Alternative 1 would cross, are indicated by the US Soil Conservation Service (presently referred to as the Natural Resource Conservation Service) to have a slight erosion hazard. An area of moderate soil erosion hazard is mapped in the headwaters of Rock Creek (soil unit 274, Welcome Loam, Figure 5, Sheet 2 of 3, Geology, Soil, Climate, and Hydrology Technical Report). For more information, see Appendix F of the FEIS.

Please see response to Comment 394-179.

Sedimentation is recognized as an effect in many parts of the Fisheries Technical Report (revised Appendix A) and is discussed at length in Section 4.1.1, Impacts Common to all Alternatives.

Thank you for your comment. However, in the absence of supporting data, this information is not sufficiently credible to be incorporated into the technical analysis.

No bull trout spawning areas have been identified in western Washington at elevations of less than 2,000 feet. Section 4.1.1.1 of the revised Fisheries Technical Report (Appendix A) provides an appropriate citation.
Please see response to Comment 340-002.

Please see responses to Comments 340-002 and 394-081.

See response to Comment 394-103.

See response to Comment 394-084. Sizing and design of drainage culverts is also described in Section 4.6.2.2 of the SDEIS. Section 4.4.2.1 also contains design guidelines for culverts.

The only riprap that would be used would be 6-inch light riprap as ditch lining associated with access road construction. The road where it would be used is located outside of any delineated wetlands and is not along a stream.

The SDEIS includes more design information. BPA knows of no mortality issues involving avian species with its existing Raver-Echo Lake power line in the project. All proposed facilities (towers, access roads and substation expansion) have been stited in uplands, and BPA would prepare an erosion and sediment control plan as required by the National Pollutant Discharge Elimination System, to control stormwater runoff until the site has become 70 percent stabilized, as required by the permit. BPA would file the stormwater permit with EPA, and also file a notice of termination at the time the temporary stormwater erosion control devices would be removed. BPA would also try to minimize the removal of any riparian vegetation.

Section 4.4.2.1 of the SDEIS describes a variety of mitigation measures that will be imposed to control erosion during and after construction.

Section 9.0 of the Fisheries Technical Report (Appendix A) includes a glossary that defines technical terms such as "riparian."

The Vegetation Management ROD is available upon request and can also be found on the Internet at: www.efw.bpa.gov/cgi-bin/PSA/NEPA/SUMMARIES/VegetationManagement_EIS285. It is not difficult to obtain.
As noted in Section 4.1.1.2 of the Fisheries Technical Report (Appendix A), impacts due to acoustic shock would be avoided by doing any required blasting when vulnerable life history stages are not present.

The existing transmission line was considered in the cumulative effects evaluation. The cumulative effects evaluation in Section 4.0 of the Fisheries Technical Report (Appendix A) was revised to make this clear.

BPA intends to conduct a water turbidity monitoring program of the Cedar River, prior to, during, and following the completion of construction activities. Although the details of the monitoring program have not been worked out, the landowner’s input (SPU) would be sought in how such a monitoring program would be conducted.

BPA is committed to conducting water turbidity monitoring to assure that its activities would not affect the water quality of the Cedar River Municipal Watershed; although the terms of such a monitoring program has not yet been determined.

With respect to maintenance activities, BPA tries to maintain all of its facilities on an as needed basis and has developed a long-term maintenance agreement with SPU for access road maintenance in the CRMW.

Section 4.1.1.4 of the revised Fisheries Technical Report (Appendix A) provides an appropriate citation.

Areas potentially affected by clearing at stream crossings are all identified in Figure 3 of the Fisheries Technical Report (Appendix A). Areas potentially affected by clearing of riparian forest are listed in Table 4 of the report. BPA was unable to obtain access to the CRMW to gather site-specific clearing information, so that data was unavailable.

The revised Fisheries Technical Report (Appendix A) acknowledges that potential coho salmon use of Rock Creek. However, coho salmon is not a listed species under the ESA and NMFS has found that listing is “not warranted.” Therefore, it is
"New roads would cross two fish-bearing streams, requiring that culverts or bridges be built."

Where would these features be located? Previous sections have not identified them. Reviewers are unable to assess environmental impacts without knowing where these new crossings would be.

Table 5

This table contains incorrect information. For example, based on data provided in Burton (1999), the earliest confirmed sighting of Chinook salmon in the Cedar River is August 18. Based on data in Burton (1997), the latest recorded steelhead spawning is June 11, and the latest date of completion of steelhead spawning is August 11. The DEIS and its environmental analyses should be based on correct information on the affected natural resources. This table should be revised to include correct information. (Burton, Karl, 1997. Cedar River steelhead monitoring program annual report. Seattle Public Utilities.)

4.1.3.6 Access Roads

Cumulative Impacts—Because all roads in the project area are currently managed to avoid delivery of fine sediment to fish-bearing streams, cumulative impacts due to roads would be low under each of the action alternatives.

This statement is unclear. Not all roads in the project area are currently designed or managed to avoid delivery of fine sediment to streams. Also, it is SPU’s opinion that BPA currently does not manage the roads it uses in the CRW such that delivery of fine sediment to fish-bearing streams is avoided. Roads in the CRW are the most significant sources of sediment to streams. Adding more than 1.5 mi of new roadway and impervious surface is a clear and significant cumulative impact. The DEIS and technical appendix need to state clearly what is meant by this statement and acknowledge the significant role of roads in contributing sediment to streams. SPU believes the cumulative impacts of adding such new roads are greater than “low.”

4.2 Operation and Maintenance Impacts

4.2.1 Impacts Comment to All Action Alternatives

"... routine monitoring of the transmission line."

In addition, BPA should be "on call" for response if notified of a problem or need for maintenance at any time by SPU.
394-208 BPA personnel are readily available to address any problem or need for maintenance.

394-209 The Fisheries Technical Report (revised Appendix A) does not contain any references to road inspection after storms.

394-210 Section 4.1.1.1 of the Fisheries Technical Report (revised Appendix A) states that vegetation clearing that is not performed in accordance with established regulatory standards is assumed to have a moderate or high impact on fish resources. As noted in the text, three different regulatory standards may apply. One of these is the Cedar River Watershed HCP (City of Seattle 2000). On other lands within the project area, the WDNR HCP (1997) or Washington Forest Practices Rules (WFPB 2000) may apply.

"During routine maintenance, BPA would also inspect roads, identify potential erosion problems, and correct any erosion problems identified."

An earlier section suggested that inspections would need to be done after storms.

5.3.1 CRW HCP

The DEIS and technical appendix should clearly acknowledge that the proposed action does not comply with riparian and stream protection provisions specified in the City’s HCP.
394-211 Comment noted.

394-212 BPA would gladly share the data within the clearing advisory and show SPU personnel how that data is used to aid in the selection of danger trees and retention of vegetation within the ROW.

394-213 There are but a few ways to value merchantable timber. The method most accepted within the appraisal industry is to value that timber through the Cost Approach — delivered prices less costs. There is mitigation proposed to replace any potential lost value of the CRW.

394-214 Burning will not be allowed. See response to Comment 394-129. Disposal of nonmerchantable timber is usually part of negotiations with landowners. On some property nonmerchantable timber is treated as slash and will be disposed of through a number of possible ways including lop and scatter, chipping, mulching, piling, etc. Some landowners prefer that the timber be left for their use. In wetlands, the trees cut would be left in the wetland, or removed by helicopter.

394-215 Some of the information needed to pinpoint the quantity of clearing needed along the streams throughout the Proposed Action area is not available at this time. More field work needs to be done to fully determine the amount of clearing that would be required.

394-216 Comment noted. These details would be worked out with each individual landowner at the time the land rights would be acquired.

394-217 BPA is proposing to use a new type of tower footing (micropiles) to reduce the amount of disturbance at and near each tower site. Please see Section 2.1.1.1.

394-218 The road surface (crown) of the roads designed to accommodate cranes and track hoes normally used to construct BPA's 500-kV towers, typically would be designed to be 16-feet wide for the linear portions of the roads and wider at turns to accommodate turning movements of the longer vehicles, such as the crane and log trucks. BPA roads typically range in width from 12 to 16 feet.

394-219 See response to Comment 394-147.
Chapter 2 — Comments and Responses - DEIS

394-217 The DEIS and technical appendix should describe how far beyond the footprint of the tower will this extensive clearing extend.

1.1.1.3 Access Road Construction

"Clearing and construction activities for new access roads would disturb an area about 20' wide..."

394-218 If the road itself is 20 feet wide, the disturbed area will extend beyond this. The DEIS and technical appendix should clearly indicate if this 20' is in addition to the road itself.

"...the roadbed would be repaired and reseeded as necessary."

394-219 The DEIS and technical appendix should specify that only native species would be used for revegetation activities in the CRW.

1.1.1.3 Storage, Assembly, and Refueling Areas

"...establish storage areas..."

The DEIS and technical appendix should address the locations for these facilities as well as related clearing/land-disturbance impacts, their adjacency to sensitive areas, and containment and fire safety design. The DEIS provides no descriptions or specifications for refueling or hazardous materials storage areas, which prevents effective review of the proposed action.

394-220 All refueling and hazardous material usage/storage facilities would be required by SPU to be outside CRW boundary. To protect the municipal water supply, SPU has "no-tolerance" objectives for spills or leaks of hazardous materials in the CRW. The DEIS and technical appendix should indicate how all spills would be prevented in the CRW.

1.1.1.5 Tower Site Preparation

"These disturbances could be as large as 370 ft radius..."

394-221 It is confusing to switch from an average reported total area of 30,000 square feet to a maximum radius of 370 ft, which is equivalent to 430,085 square feet. Total area should be reported in all cases so reviewers can effectively evaluate the actual impact.

"...remove selected trees in a 50-60 foot wide area on each side of the ROW."

394-222 This is inconsistent with the statements in Appendix C that a 75 ft removal zone would be used. The DEIS and its technical appendices need to present a complete and consistent description of the proposed action.

1.1.1.6 Tower Construction

"...helicopter tower erection could be used if access was not available or if sensitive resources would be encountered."

394-223 The DEIS and the technical appendix should define "sensitive resources." Is this the same as sensitive species?

1.1.1.9 Site Restoration and Clean-up

Appendix B SPU Comments.doc

394-220 See response to Comment 394-139.

394-221 BPA proposes using a new footing design for the proposed project. The new footing design would use what are known as micropiles instead of the standard footing design. See Section 2.1.1.1 of the SDEIS.

BPA would likely need to locate what is called a stringing or pull site within the CRW. These areas are selected by the contractor and would need to be agreed to by the landowner prior to their use in stringing conductors through the towers. These sites are typically about 1 acre, although they could be larger. Please see response to Comment 394-141.

394-222 The Final Wildlife Technical Report has been revised, as has the other technical study reports, to remove this statement that construction crews would remove selected trees in a 50 to 60 foot-wide area on each side of the proposed right-of-way. BPA would remove so-called "danger trees" off of the right-of-way that would pose a threat to the safe construction, operation and maintenance of the line. However, these trees would need to be identified on an individual basis and could be as far as 200 feet from the proposed right-of-way. See also response to Comment 394-217.

394-223 Sensitive resources include both sensitive species and habitats. This was clarified in Section 1.1.1.6 of the Wildlife Technical Report (Appendix B).

394-224 See response to Comment 394-147.

394-225 See response to Comment 394-147.

394-226 Analysis of potential impacts from habitat fragmentation within the Cedar River Watershed was expanded in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B). Habitat loss is analyzed in Section 4.1.2, and is discussed by alternative.

394-227 This discussion refers specifically to listed species. This was clarified in Section 1.3 of the Wildlife Technical Report.
Chapter 2 — Comments and Responses - DEIS

(Appendix B) to mean species listed under the Endangered Species Act, including northern spotted owl, bald eagle, and marbled murrelets. The project vicinity is not a known high use area for any of these species, and given the habitat conditions in the project area, high use by these species is not likely, as described in Section 3.3.2 of the Wildlife Technical Report (Appendix B) and supported by available data including WDFW PHS data (2000) and in Section 3.5 of the HCP for the Cedar River Watershed (City of Seattle 2000).

As described in Section 3.2, Study Area and Approach, of the Wildlife Technical Report (Appendix B), there are two landscape levels at which impacts are analyzed. The first is defined as the project vicinity, a large area encompassed by Kent-Kangley Road, to the south, Highway 18 to the west, Interstate 90 and Rattlesnake Ridge to the north, and the boundary between the lower and upper Cedar River Watershed, as defined in Map 6 of the Cedar River Watershed HCP (City of Seattle 2000), to the east. The second is a smaller area, 0.25 mile from the centerline of the project, and was chosen because the potential impacts of the project are expected to be focused within that area.

Potential impacts to species with large home ranges are discussed in general terms in Section 4.1.1.1 and changes in the amount of habitat available for species in the project area are discussed in Section 4.1.1.2. Impacts are presented as both a total acreage amount and as a percentage of the amount of that habitat type available within 0.25 mile on either side of the ROW project area. This latter number is provided as an index to the significance of the habitat removal, to give an understanding of how much is being removed compared to the availability in the immediate area.

Data concerning an unvalidated report of a spotted owl near Rattlesnake Ridge was not available to the authors and, given that it is unvalidated, would not change the analysis. Although Rattlesnake Ridge could provide suitable nesting habitat for peregrines, according to recent available information, specifically in the Cedar River Watershed HCP (City of Seattle 2000) and WDFW PHS data (2000), they are not known to nest there.
The DEIS and technical appendix fail to mention that the primary management goal of the CRW is water quality and water production for the City of Seattle. The DEIS and technical appendix should explicitly state that the proposed action is inconsistent with the CRW HCP.

3.3 Study Area and Approach

"Wildlife species and their habitats... are discussed at two levels..."

The DEIS and technical appendix state that the broad project vicinity will be discussed to address issues related to wide-ranging species, migratory species, and species with large home ranges. However, other than a general description of the area, there was no discussion of the impacts of the project on wide-ranging species, migratory species, and species with large home ranges and their habitats. The DEIS and technical appendix should include this analysis.

"The project area addressed in a more focused manner includes only the area within 0.25 mi. of the proposed transmission line ROW's."

A project area of 0.25 mile from the ROW is too small for the scale of home range sizes and dispersal capabilities of many wildlife species of concern (e.g., spotted owl, peregrine falcon, northern spotted owl, etc.). The DEIS and technical appendix should include a discussion of the fact that edge effects from the ROW will extend into the surrounding forest for at least 0.25 mi. This should be considered in mitigation for removal of late-successional habitat.

"Within the ROWs, the predominant vegetation type is early seral in mid to late coniferous forest."

The DEIS and technical appendix should describe what this means.

3.3.1 Wildlife Habitats Within the Project Area

"Coniferous forest - late... CRF... Late seral second- or third-growth coniferous forest. Reaching a mature stage but not considered late-successional habitat."

The DEIS and technical appendix should describe the difference between seral and successional. There is 50-80 year old coniferous forest along much of the ROW in the CRW, which could be defined as mid-seral, mid-successional, or mature.

3.3.2 Species to be Analyzed

"For the purpose of this document, species that are federally-listed as threatened or endangered, federal species of concern, and Washington State listed threatened, endangered, sensitive, or minor species with the potential to occur on the west side of the Cascade Mountains were selected for analysis."

The DEIS and technical appendix should address all species listed in the CRW HCP.

3.3.2.1 Forest Community Dependent Species

"An historic spotted owl sighting occurred on lands owned by the Wyserhoheuser Company. This single owl reported in 1993 was over 0.5 mi. from the proposed Alternative 3 ROW and, therefore, was not within the project area."

Spotted owls have designated home ranges in the northwest Cascade province of 1.5 miles from an activity center. The 0.5 mile threshold specified here is not appropriate. An unvalidated but reliable spotted owl sighting also occurred near Rattlesnake Lake in early 2001.

394-228 Section 2.1 of the Wildlife Technical Report (Appendix B) was revised to include a description of the field methodology and data collection.

394-229 Comment noted.

394-230 BPA does not agree that the project is inconsistent with the HCP. See Appendix U of the SDEIS and FEIS and Appendix AA.

394-231 Potential impacts to species with large home ranges are discussed in general terms in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B), with the greatest impact expected to be habitat fragmentation. This analysis was expanded in the section to focus on changes in habitat for these species.

394-232 Please see response to Comment 394-227.

Analysis of potential impacts from habitat fragmentation within the Cedar River Watershed was expanded in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B) to include an analysis on increased edge affect. Habitat loss is analyzed in Section 4.1.2, and is discussed by alternative.

394-233 This is a typographical error and the text has been revised.

394-234 As stated in Section 3.3.1 of the Wildlife Technical Report (Appendix B), these terms are defined in the Vegetation Technical Report (Appendix C), specifically Section 3.4.

394-235 Species that were not included in the analysis were those not expected to occur in the project vicinity, as described in Section 3.3.2 of the Wildlife Technical Report (Appendix B). Inclusion of species that are not expected to occur in the vicinity was deemed unnecessary.

394-236 The spotted owl sighting in the project vicinity was of a single bird and did not have the status of residential single (WDFW 2000) and, therefore, would not be considered a site center around which a home range territory would be established. The 0.5-mile figure was provided as a reference to the proximity of the historic sighting to the project area only. Additionally, habitat for spotted owls in the location of the sighting is no longer present.
Chapter 2 — Comments and Responses - DEIS

Data concerning an unvalidated report of a spotted owl near Rattlesnake Ridge was not available to the authors and, given that it is unvalidated, would not change the analysis. Although Rattlesnake Ridge could provide suitable nesting habitat for peregrines, they are not currently known to nest there (i.e., in the Cedar River Watershed HCP [City of Seattle 2000] and WDFW PHS data [2000]).

394-237 Section 3.3.2.1 of the Wildlife Technical Report (Appendix B) recognizes that the project area may contain suitable foraging and dispersal habitat for these species. According to the Cedar River Watershed HCP (City of Seattle 2000), nesting habitat for Goshawk may occur in the lower Cedar River Watershed, although potential nesting stands listed did not include the types found within the ROW. The HCP also identified pileated woodpecker and Vaux’s swift nesting habitat as occurring primarily in the upper watershed. The discussion of impacts was revised to include loss of recruitment habitat for forest dependent species.

394-238 The discussion of impacts was revised to include loss of recruitment habitat for forest dependent species.

394-239 See response to Comment 394-238.

394-240 The discussion of impacts was revised to include loss of recruitment habitat for forest dependent species. This would include marbled murrelets and Johnson’s hairstreak. The lower Cedar River Watershed (the project vicinity as defined in Section 3.3 of the Wildlife Technical Report) is not likely to provide habitat for lynx in the future because of the low elevation of the area and the known association of lynx with high elevation subalpine fir/spruce forests (Ruediger, et al. 2000). Future potential development of suitable habitat for gray wolf and grizzly bear is also questionable given the amount of ongoing human activity in and around the watershed.

394-241 A discussion about peregrine falcons was added to Section 3.3.2, Species to be Analyzed, of the Wildlife Technical Report (Appendix B). The Cedar River Watershed HCP (City of Seattle 2000) does not identify potentially suitable habitat within the lower Cedar River Watershed. However, because Rattlesnake Ledge is within the described project vicinity and could...
4.1.1 Alternative Transmission Line Impacts

...assuming that a 150 ft ROW is cleared...

This assumption is inconsistent with information provided in Sections 1.1.1.2 and 1.1.1.5. This analysis also fails to consider impacts associated with clearing new (temporary and permanent) roads and staging areas, as well as short- and long-term impacts of the 50 ft temporary construction easement previously mentioned by BPA (but not mentioned in the DEIS). SPU believes Table 5 significantly underestimates habitat impacts.

The DEIS, its technical appendix, and associated permitting documents need to present a complete, accurate, and consistent description of the proposed action.

4.1.1.1 Impacts

The DEIS and technical appendix should include a discussion of the impact of exposure to electric and magnetic fields (EMF) and the risk of decreased immune response for limited-mobility species, especially amphibians.

"Disturbance of Wildlife - Noise from blasting would... result in a low-level impact."

Blasting could result in moderate level impact if blasting is done during breeding season near a nest or den site. The DEIS and technical appendix need to discuss the impacts of blasting and other construction activity (and resulting noise and dust).

"Habitat Fragmentation—Under all of the alternatives, the amount of habitat fragmentation within the project vicinity would increase, resulting in a moderate-level impact. Fragmentation would lead to an increased amount of edge habitat in the area."

Habitat fragmentation is included here, when it should be a subset of habitat loss. Additional forest fragmentation under the preferred alternative would be small; however, habitat loss would be significant.

4.1.1.2 Mitigation Common to all Alternatives

The DEIS and technical appendix should consider all species included in the CRW HCP and should commit to compensatory mitigation designed to offset habitat loss for these species.

Most impacts were described in Section 4.1.1.1 as moderate or high, yet the mitigation proposals are primarily minimizations of impact. This is not adequate mitigation for the moderate/high impacts of permanent loss of habitat, permanent habitat fragmentation, mortality, and disturbance. The DEIS and technical appendix should acknowledge this and commit to mitigation actions that include compensatory mitigation, such as creation and protection of equivalent habitat of greater area than that lost due to construction of the proposed action. This needs to be habitat that would not already have occurred and/or been protected.

The fact that high quality low elevation late successional (LS) habitat will be created in CRW under HCP, and that the ROW will permanently fragment this large block of habitat needs to be addressed by the DEIS and technical appendix. Mitigation such as leaving corridors of trees maintained at a specified height through the ROW should be addressed.

Impacts on Threatened, Endangered and other Sensitive Species

Proposed mitigation would appear to be ineffective for mitigating impacts to species associated with forested and wetland/riparian habitats. Anticipated impacts will only benefit early seral-associated species.

Appendix B SPU Comments.doc

potentially be used by peregrine falcons for nesting, the Wildlife Technical Report was revised.

394-242 Because the project is located at low elevation, it does not meet the definitions given for golden eagle habitat and so golden eagle was not included in the analysis in Section 3.3.2 of the Wildlife Technical Report (Appendix B).

394-243 The discussion about impacts was revised to include loss of recruitment habitat for late successional forest dependent species.

394-244 Elevations for Cascades frog occurrences were not included in the Cedar River Watershed HCP (City of Seattle 2000), therefore this information was not available to the author. Section 3.3.2.3 of the Wildlife Technical Report (Appendix B) was revised to show that Cascades frogs occur at these elevations in the Cedar River Watershed.

394-245 The 150-foot clearing was based on information available when the report was first prepared in late 2000. Section 4.1.2 of the Wildlife Technical Report (Appendix B) has now been revised to reflect currently available data on clearing.

394-246 Information about the electromagnetic effects of transmission lines on limited-mobility species, such as amphibians is not readily available, and the detailed discussion that would be required to address this issue would be outside of the scope of this EIS, therefore BPA will not be undertaking such a study during the environmental review.

394-247 The "low level" impact was derived from the expectation that blasting would be infrequent and that disturbance from blasting would be of short duration. This analysis was expanded in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B).

394-248 Habitat loss is discussed in Section 4.1.2 of the Wildlife Technical Report (Appendix B), and is discussed at the species level by alternative. Habitat loss was added to the list of major issues and also discussed at the broader scale, in Section 4.1.1 of the Wildlife Technical Report.
The DEIS and technical appendix fail to include creating and leaving stands of acceptable height in closed zones of forested riparian and wetland areas. The DEIS and technical appendix should commit to ensuring all pertinent plans will meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

Minimizing forest vegetation clearing is not an adequate mitigation for forest habitat conversion to early successional habitat. The DEIS and technical appendix should acknowledge and commit to a compensation mitigation that effectively offsets habitat conversion.

Commercial (or ecological) thinning will also need to be conducted. The DEIS needs to include specifics on how this would be accomplished. For example, will BPA pay for thinning on adjacent lands? How many acres? Located where?

Reviewers of the DEIS and this technical appendix need targets for coarse woody debris density (including diameter and decay class) to effectively evaluate the efficacy of this proposal. The species for which this will provide mitigation need to be included in the DEIS and technical appendix.

**Habitat Fragmentation**

Clearing only as much vegetation as necessary does not compensate for the habitat fragmentation created by construction of new ROW, roads, and substations—especially considering the major fragmentation the ROW will create in the lower elevation late successional forest in CRW in the future. The DEIS and technical appendix should acknowledge this and commit to appropriate compansatory mitigation.

Leaving coarse woody debris is unlikely to address connectivity issues for most species. Even for those species that use coarse woody debris, the microclimatic differences between a closed canopy forest environment and an open environment may prevent use. The DEIS needs to add specifics as to exactly which species will be helped by this proposal.

Leaving some areas intact will be inadequate to mitigate for the fragmentation the proposed action will create.

Specific compensatory mitigation to offset this fragmentation need to be added to the DEIS and technical appendix.

**Bird Collision or Electrocution**

"...guidelines described in ...1981 report..."

The guidelines BPA will use need to be described in the DEIS in sufficient detail for reviewers to evaluate their effectiveness. Also, make current techniques than from 1981 need to be reviewed and used to hazard-proof the lines from collision and electrocution, especially by raptors. A complete discussion of this issue needs to be included in the DEIS and technical appendix so reviewers can evaluate whether the methods will be effective.

A discussion of the possibility of placing perches in safe locations and barriers to perches in unsafe location on the towers should be included in the DEIS and technical appendix.

A complete discussion of proposed methods to minimize bird collision with ground cables should be included in the DEIS and technical appendix.

A monitoring program to evaluate the effectiveness and longevity of the techniques to minimize/avoid both electrocution and collision should be included in the DEIS and technical appendix, with adaptive management provisions to change the procedures in case of a pre-determined level of mortality.

Section 4.1.1.2 of the Wildlife Technical Report (Appendix B) was revised to include information about species that would benefit from leaving course woody debris in the project area.

Section of 4.1.1.2 of the Wildlife Technical Report (Appendix B) was revised to reflect more current recommendations and describes techniques that are available.
Chapter 2 — Comments and Responses - DEIS

The details about these mitigation measures will be included in the Mitigation Action Plan to be subsequently developed for this project.

Section 4.1.1.2 of the Wildlife Technical Report (Appendix B) was revised to include information about methods to minimize bird collisions.

394-260 See response to Comment 394-227. As stated in the Mitigation Measures, Section 4.1.1.2, a distance of 2,600 feet will be the standard for bald eagle nests. The bald eagle nest surveys will be conducted via aerial survey methods using a helicopter to fly above and to the side of potential bald eagle nesting habitat and visually searching for nests. These surveys will be conducted by a qualified biologist and the method has been approved by the WDFW and USFWS.

394-261 The Wildlife Technical Report, Appendix B and Section 4.7.2.10 of the SDEIS have been revised to add mitigation measures to avoid impacting raptor nests.

394-262 The project vicinity is described in Section 3.3, paragraph 1 of the Wildlife Technical Report (Appendix B).

394-263 The finding of a low level impact was based on the definitions given in Section 4.0 of the Wildlife Technical Report (Appendix B), reduction of a habitat type that is very common in the project vicinity. Within the defined project area (0.25 mile either side of the proposed center line), forest removal under Alternative 1 would represent 5 percent of the habitat that is available. In the lower Cedar River Watershed, the HCP identifies 12,255 acres of second growth forest, of which 120 acres of forest clearing would represent 0.98 percent of the habitat that is available.

394-264 See response to Comment 340-002. Section 4.1.2.1 of the Wildlife Technical Report (Appendix B) was revised so that spanning riparian reserves was no longer termed mitigation. The details about mitigation measures will be included in the Mitigation Action Plan to be developed for this project.

394-265 Comment noted.
Section 4.1.3 of the Wildlife Technical Report was revised to address currently available data about construction of access roads. The details about these mitigation measures will be included in the Mitigation Action Plan to be developed for this project. BPA is proposing to add approximately 1.4 miles of new roads within the CRW, and abandon approximately 0.6 mile of existing roads. The net total of new access roads would be about 0.8 mile, encompassing an area of approximately 2 acres.

No roads would be built in wetlands. Some new roads would be built in buffers.

Section 4.1.5 of the Wildlife Technical Report (Appendix B) was revised so that it does not appear that road removal by others is being considered mitigation for the project. Road closures by the City of Seattle were included in this discussion on the basis of the definition of cumulative impacts, which is to include reasonably foreseeable actions in the project area.

BPA acknowledges that the transmission project was not specifically contemplated by the HCP. The HCP was undertaken by the city to include activities carried out or authorized by the City of Seattle, and not for BPA. The HCP did recognize, however, that new rights-of-way may need to be given. See, for example, Chapter 4.2-73.
Chapter 2 — Comments and Responses - DEIS

Kangley-Echo Lake Transmission Line Project DEIS
Appendix C – Final Vegetation Technical Report

Comments from Seattle Public Utilities
September 4, 2001

DEIS Appendix Citations in italics; SPU comments in normal font.

1.2.3 Removal of Forest within the Cedar River Watershed

"The HCP for the CRW promotes strict limitation of logging and other forest conversion within the watershed."

The proposed action is not a “covered activity” under the Cedar River Watershed (CRW) Habitat Conservation Plan (HCP). The DEIS and technical appendix should clearly disclose the proposed action is not a “covered activity” and provide an evaluation of this circumstance.

1.3.1 Uniformity of Vegetation Communities Between Alternatives

"Because most of the project area is second-growth forest that has been actively managed since around 1920, the existing forest stands are more or less uniform, with only slight variation in age and size classes between stands."

Though forests in the project area have been harvested in the past, existing forest communities provide a high diversity of habitats for forest-dwelling species. More importantly, the CRW HCP provides long-term protection status to forests in the CRW. Thus, these forests will continue to age and provide increasingly unique, low elevation conifer forest habitats in the rapidly developing Puget Sound region. The DEIS and technical appendix should acknowledge the unique long-term forest protection status provided by the HCP. BPA’s environmental analysis should be conducted recognizing the increasing regional biodiversity value of the forest it proposes to permanently clearcut.

2.1 Data Sources and Study Methods

"Washington Department of Natural Resources (WDFNR) Natural Heritage Program (NHP) lists of threatened, endangered, and other special-status plant species."

Though this database is an important resource, it relies on contributed information and should only be used as a crude guide to species distributions.

"It was also assumed that vegetation in an additional 75 ft zone on either side of the cleared area would be partially cleared."

This is inconsistent with the statement in Appendix B and information provided in Section 1.1.1.5 of this report that indicate 58 to 60 ft would be partially cleared. The DEIS, its technical appendices, and associated permitting documents need to present a complete and consistent description of the proposed action. Such inconsistencies make this DEIS difficult to review and evaluate. In any case, if this approach applies to Alternative 1, as the text suggests, does this mean that both sides of the 300 ft total ROW will be treated in this way, resulting in a 450 ft wide managed ROW? The DEIS and technical appendices should be explicit about this.

This analysis also appears to be confused in its discussion of the impacts of clearing roads and staging areas, as well as short- and long-term impacts of the 50 ft temporary
Chapter 2 — Comments and Responses - DEIS

394-277 Comment noted.

394-278 The plant associations given in the report are correct. TSHE/POMU, TSHE/TITR and other Tsuga heterophylla associations are frequently dominated by Douglas fir (Pseudotsuga menziesii). Plant associations are based on regeneration and climax communities, not on current dominance. True Douglas fir plant associations in the Pacific Northwest are much drier than the Cedar River Watershed sites. A true PSME (Douglas fir) plant association in the west Cascade low forests is extremely uncommon, and is not found within the project area.

394-279 Comment noted.

394-280 A “0.5-mile [wide] corridor centered on the ROW” and an area “within 0.25 miles [extending from each side the centerline] of the ROW” are descriptions about an equivalent area.

394-281 The definitions of “seral” and specific class labels are detailed within the text. While the terms used may not fall within standard forestry practice, that does not preclude the use of the words. The definition and explanation of the terms’ use provide a clear understanding of the intended meaning.

394-277 Comment noted.

394-278 The plant associations given in the report are correct. TSHE/POMU, TSHE/TITR and other Tsuga heterophylla associations are frequently dominated by Douglas fir (Pseudotsuga menziesii). Plant associations are based on regeneration and climax communities, not on current dominance. True Douglas fir plant associations in the Pacific Northwest are much drier than the Cedar River Watershed sites. A true PSME (Douglas fir) plant association in the west Cascade low forests is extremely uncommon, and is not found within the project area.

394-279 Comment noted.

394-280 A “0.5-mile [wide] corridor centered on the ROW” and an area “within 0.25 miles [extending from each side the centerline] of the ROW” are descriptions about an equivalent area.

394-281 The definitions of “seral” and specific class labels are detailed within the text. While the terms used may not fall within standard forestry practice, that does not preclude the use of the words. The definition and explanation of the terms’ use provide a clear understanding of the intended meaning.
With regard to the first point, commercial logging in the Cedar River Watershed HCP is now strictly limited; however, the age distribution of trees within the project area still reflects logging practices in the recent past. The characterization of the present-day stands is based on past practice, with no implication or inference for future management practices.

The reviewer agrees with your comment and the age-class mapping of the referenced area was reevaluated.

A revision is not required because Survey and Manage requirements apply to USDA/U.S. Forest Service and USDI/Bureau of Land Management lands only (see Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl, USDA/USFS and USDI, BLM, April 1994).

See response to Comment 394-193.

The reviewer agrees with your comment and reevaluated data collected for Table 3 to make the acreage totals in that table consistent with acreage totals elsewhere in the document.
This number is not consistent throughout the DEIS. In 4.1.3.1 of this technical appendix the width is 45 ft; 50 ft was widely referenced in the DEIS. The environmental analysis used in the DEIS and its technical appendices needs to be based on complete and consistent description of the proposed action.

"In some cases, forested stands, even within the maintained ROW, would not require clearing."

The DEIS and technical appendix should specify where these cases occur in the CRW, especially relative to the Cedar River.

This section also fails to mention that an acre or less of wetland habitat will be permanently converted due to filling, as is described in the Final Wetland Technical Report.

4.1.1.2 Mitigation

The DEIS and technical appendix make no commitment to mitigate for the loss of forest habitat, or other vegetated habitat. While the feasibility of meaningfully mitigating for the loss of forest habitat is debatable, BPA should commit to mitigating the permanent loss of the 150 to 200 acres of long-term forest it proposes to clearcut.

"Develop and implement aggressive vegetation management programs to limit colonization by non-native species and eradicate noxious weeds within the transmission line ROW."

The DEIS and technical appendix should describe methods for maintaining native plants and managing noxious weed species without the use of herbicides (which are not allowed in the CRW) so reviewers can evaluate their potential efficacy. Statements indicating "an aggressive vegetation management program" will be developed and implemented and not be able to be reviewed by the DEIS. The DEIS and technical appendix should describe the noxious weed management program (without herbicides) that will be implemented. A monitoring program (including adaptive management) needs to be part of that program.

Also, this statement implies BPA implements active and effective noxious weed management programs. In fact, however, the BPA ROW in (and outside of) the CRW is a significant avenue of dispersal and location of infestation for noxious weeds. The DEIS and technical appendix should recognize and explain this existing management approach, and they describe exactly how BPA proposes to manage their existing and proposed ROWs for noxious weeds in the future. If BPA intends to neglect active and effective management of noxious weeds in its ROW, as it does now, then the DEIS and technical appendix need to disclose this information.

"Use only certified weed-free straw..."

Weed-free straw will typically have been treated with herbicides. The DEIS and technical appendix need to address this situation, including the specific herbicides and their quantities that would be introduced to the CRW. The DEIS and technical appendix need to evaluate such contamination and the associated risks to water quality as part of this environmental analysis. Also, SPU is aware that certified weed-free straw is difficult to obtain locally. The DEIS and technical appendix should describe exactly what "certification" means in this case, who certifies that straw, and under what conditions that straw will need to have been grown to be certified.

4.1.3.1 Alternative 1 Mitigation

BPA proposes to permanently convert 118 ac of forest to early successional habitat. This forest would otherwise have been managed to achieve late successional characteristics in CRW. The DEIS and technical appendix should commit to compensatory mitigation for such conversion.
Consistently throughout the DEIS and its technical appendices, there is no acknowledgement that the CRW HCP effectively protects forests in the CRW in protection status and that forest management activities in the CRW are for restoration purposes. The DEIS and technical appendices should acknowledge the unique long-term forest protection status provided by the HCP. BPA’s environmental analysis for this project should be conducted recognizing the increasing regional biodiversity value of the forest it proposes to permanently clearcut.

4.1.3.6 Access Roads

“For the purposes of assessing new access road impacts, a 20-ft road cross section was assumed. Existing access roads are generally 24 ft across, and the actual new access road width would be 16 ft.”

This information is not consistent within the DEIS. In Chapter 2 (2.1.1.5), new roads outside of the ROW would require a 50 ft easement, which includes 16-22 ft of road surface and 10 ft of drainage ditches on either side. The environmental analysis in the DEIS and its technical appendices should be based on consistent dimensions of the project features. The DEIS and technical appendices should commit to compensatory mitigation for permanently converting forest and other vegetated habitats to impervious road surfaces. The DEIS and technical appendix should also evaluate the impacts of constructing mitigation (such as stormwater ponds) for water quality that will likely be required by the National Marine Fisheries Service for constructing 1 to 2 miles of new impervious surface in basins tributary to waters that support threatened species such as Chinook and coho salmon. Also, in this section, the DEIS and technical appendix should specifically consider BMPs for preventing erosion and protecting water quality. This section also fails to discuss or account for temporary roads and staging areas.

4.1.3.7 Cumulative Impacts

Cumulative impacts are incompletely evaluated. The DEIS and technical appendix should present a complete evaluation of cumulative impacts. Commitments to compensatory mitigation should be included in that evaluation.

4.2.2.1 Impacts

“Any such spills or leaks could kill or injure vegetation in the immediate vicinity of the spill.”

To protect the municipal water supply, SPU has “no-tolerance” objectives for spills or leaks of hazardous materials in the CRW. The DEIS and technical appendix should indicate how all spills will be prevented in the CRW.

4.2.2.2 Operation and Maintenance Mitigation

“Mitigation ... would follow policies and procedures adopted by BPA...”

These policies and procedures should be summarized. It is not reasonable to expect reviewers to obtain and review the EIS referenced here, especially considering the short duration of the public comment period.

4.2.2.3 Access Roads Impacts

Impacts of potential spills of hazardous materials were considered to be low to adjacent vegetation. However, any spill of a toxic substance in CRW should be considered a high impact because of the risks to water quality. To protect the municipal water supply, SPU has “no-tolerance” objectives for spills or leaks of hazardous materials in the CRW. The DEIS and technical appendix should indicate how all spills will be prevented in the CRW.

Comment noted.

Road information has been updated in the SDEIS. See Sections 2.1.1.5 and 4.4.2.1 of the SDEIS. See response to Comment 340-002.

See response to Comment 340-002.

See response to Comment 340-139.

See response to Comment 340-193.

See response to Comment 340-139.
5.6.1 Cedar River Watershed Habitat Conservation Plan

"The CRW HCP (City of Seattle 1999, 2000) was prepared by SPU to establish a comprehensive plan for long-term management of the CRW. The HCP includes numerous provisions intended to maintain the quality of fish habitat and the health of fish populations in the CRW. Many of these provisions apply to management procedures such as fish hatchery operation or manipulation of instream flows and thus are not directly relevant to this analysis. Other provisions address the effects on fish and their habitat that can result from forest removal and forest road construction and maintenance."

With regard to forest resources, the proposed action is inconsistent with the CRW HCP. The DEIS and technical appendix should disclose that the proposed action is not consistent with the CRW HCP.

5.6.4 Washington Department of Natural Resources Forest Practices Rules

"The WDNR Forest Practices Rules (WAC 222) describe the types of forest practices allowed under the State of Washington Forest Practices Act (RCW 76.09). They divide forest practices into four classes, based on potential impact to public resources, and outline the processes for permitting of each class."

The DEIS and technical appendix should describe riparian buffer requirements as contained in the Forest Practice Rules.

6.0 Individuals and Agencies Contacted

This section is redundant with Section 2.2. of this technical appendix.

394-299 Please see response to Comment 394-230.

394-300 You are correct in identifying that this information was not provided in the Vegetation Technical Report (Appendix C). However, we do not feel it is necessary to collect or present the information because it would not substantively contribute to the impact analysis, or the identification of potential significant impacts as required under the National Environmental Policy Act.

394-301 Comment noted.
Kangle-Echo Lake Transmission Line Project DEIS
APPENDIX D Final Wetlands Technical Report

Comments from Seattle Public Utilities
September 4, 2001

DEIS Appendix Citations in italics; comments in normal font.

1.1.1.9 Site Restoration and Clean-up

"Disturbed areas would be reseeded with grass or an appropriate seed mixture to prevent erosion. The seed mixture would include native plant species and would be free of noxious weeds."

The DEIS needs to be more specific regarding "restoration." Restoration is more than just reseeding with an "appropriate" seed mixture. The DEIS and technical appendix should commit to restoring the native plant communities disturbed by the construction and operations. The plantings and seed mixtures should include only native plants.

1.3 Major Conclusions

"Potential fill and excavation impacts from the construction of towers and roads would be avoided by strategically locating towers and roads outside of wetland areas where possible and by spanning wetlands."

The DEIS should provide more detailed description of these project features. Impacts to wetlands can not be evaluated until location of towers and roads are specified. Given this lack of detail and considering other constraints on tower locations (e.g., staggered location with existing towers, stream crossings, topographic constraints, spacing), it appears that placement of towers in wetlands is probable. However, as evidenced by information presented in the project's biological assessment (BA), BPA has identified locations for towers and new roads and so should be able (in the DEIS and its technical appendix) to estimate such impacts. The DEIS and the technical appendix need to present a complete and accurate environmental analysis, which includes the disclosure of such known project characteristics. The DEIS should discuss these fill impacts and the compensatory mitigation BPA proposes.

2.0 Study Scope and Methodology
2.1 Data Sources and Study Methods

"A map of potential wetland locations was created by superimposing the transmission alternatives over the wetlands location data provided by the aforementioned data sources. This map was used to aid the field survey of wetlands within the ROWs. The wetland reconnaissance survey focused on field-verifying selected areas of the wetland map that may be impacted. The approximate wetland boundaries were then field-mapped on the orthophotos provided by BPA. Due to the size of the wetlands and their readily apparent signature on the aerial photographs, the boundaries were sketched on 1:24,000-scale aerial photographs and subsequently digitized...

This methodology fails to mention what criteria were used to identify and delineate wetlands. Presumably, Section 404 jurisdictional wetlands are the subject of interest, but this is not clear. Additionally, the remote sensing approach to wetland identification and the scale at which they were mapped (1:24,000) indicates this exercise resulted in crude approximations of wetland boundaries, not jurisdictional wetland delineations. Also, an important source of wetland information, the SCS soil survey, was not listed as one of the data sources. In contrast, SPU observed flags delineating more precise wetland boundaries in the proposed corridors, but these flags are not mentioned in the methodology and the delineated boundaries do not conform to the project's needs.

See response to Comment 394-147.

394-303 A detailed description of potential impacts to wetlands associated with Alternative 1 is provided in Section 4.9.2 of the Supplemental Draft EIS. Following the release of the draft EIS, BPA conducted a wetland delineation of the wetlands within the proposed right-of-way and substation expansion area. Although a total of 35.63 acres of wetlands and 20,277 linear feet of streams were delineated in the project area, no permanent fill material would be placed within waters of the United States, including wetlands, during construction of the proposed project.

See also response to Comment 340-002.

394-304 and 305 Additional information regarding methods used to identify wetlands has been added to the Wetlands Technical Report (Appendix D) in Section 2.1, Data Sources and Study Methods. For the purposes of preparing the initial Wetland Technical Appendix, no waters of the United States were "delineated;" subsequently no jurisdictional wetland boundaries were established for the purposes of the DEIS. Wetland biologists located wetlands, including waters of the United States within the 500-foot survey corridor as regulated by the U.S. Army Corps of Engineers (Section 404), the Washington State Department of Ecology, and King County. Methods used for identifying and locating waters of the U.S. are listed in Section 2.1, Data Sources and Study Methods, of the Wetland Technical Report (Appendix D).

Wetland and stream boundary flags observed by SPU were established in April 2001 for the purposes of guiding the placement of tower and access road locations, and to minimize the potential for wetland and stream impacts due to road and tower construction. The wetland and stream boundaries flagged in April 2001 occurred after the drafting of the Wetlands Technical Report (Appendix D) in late 2000. These boundaries were a reconnaissance of approximate jurisdictional wetland and stream boundaries, using the 1997 Washington State Wetlands Identification and Delineation Manual, the 1987 U.S. Army Corps of Engineers Wetlands Delineation Manual, and King County’s Environmentally Sensitive Areas Ordinance (King County Code, Chapter 21A.24). Official wetland boundaries...
were not "delineated" during this reconnaissance. See response to Comment 394-303.

The 1:24,000-scale orthophotos were used as an aid for the creation of a base map of approximate wetland locations. This field map was then used in the field by wetland biologists to guide the reconnaissance of approximate wetlands locations. The map was then altered to reflect wetland boundaries as observed in the field. The orthophotos were not used to determine the vegetation community composition of wetlands; this was determined through a ground reconnaissance.

394-306 Brief descriptions about wetland community types and buffer habitats have added the information to the Wetlands Technical Report (revised Appendix D), Section 3.3, Study Area. See also response to Comment 394-303.

394-307 King County Environmentally Sensitive Areas (Chapter 21A.06.1415 A.1.) states that Class 1 wetlands are those "which have present species listed by the federal or state government as endangered or threatened or outstanding actual habitat for those species." Concerning fisheries, the Landsburg Diversion Dam on the Cedar River currently presents a passage barrier to all anadromous fish species including bull trout (Coastal/Puget Sound DPS [Threatened]), chinook salmon (Puget Sound ESU [Threatened]), and coho salmon (Puget Sound/Strait of Georgia ESU [Candidate]). (Please refer to the Final Biological Assessment for the Kangley-Echo Lake Transmission Line Project 2001 for more information). Thus, no wetlands within the Cedar River Watershed and within the Alternative 1 construction corridor meet provision 21A.06.1415 A.1 as presumed by your comment. We understand that a fish ladder at the dam is being constructed and these species may be present in the future. Wetlands located within the Raging River Watershed may provide riparian habitat for threatened anadromous fish species.

394-306 The standard underlying this conclusion is not stated. Species diversity is low relative to what standard? SPU observations of the wetlands in and near the ROW in the CRW indicate there is considerable diversity in these wetland areas. These wetlands also provide significant water quality and quantity functions to Rock Creek. Wetlands in the riparian area along the Cedar River are not identified in Figure 3 or in the report. The DEIS and its technical appendix present such scant site-specific information for the individual wetlands that accurate review and evaluation of BPA's conclusions is not possible. Also, the map scale is too small to verify boundaries. The DEIS and its technical appendix should contain sufficient site-specific information and specific boundary information such that an accurate and pertinent environmental analysis is possible.
Publication 93-74. While this information will be used for the impacts analysis and compensatory mitigation planning, we do not feel it is necessary to collect or present the additional ratings information at this time because it would not substantively contribute to the impact analysis, or the identification of potential significant impacts as required under the National Environmental Policy Act. However, additional information concerning potential impacts to wetlands from the construction of the transmission line corridor has been provided in Section 4.1, Construction Impacts, of the Wetlands Technical Report (revised Appendix D). (Please also see response to Comment 394-303.)

394-308 Comment noted.

394-309 You are correct in identifying that this information was not provided in the Wetlands Technical Report (Appendix D). However, we do not feel it is necessary to collect or present the information because it would not substantively contribute to the impact analysis, or the identification of potential significant impacts as required under the National Environmental Policy Act. See response to Comment 394-303.

394-310 Please see response to Comment 394-303.

394-311 You are correct in identifying that specific tower sites were not provided in the Wetlands Technical Report for Alternatives 2-4B (revised Appendix D). However, we do not feel it is necessary to present the information because it would not substantively contribute to the impact analysis, or the identification of potential significant impacts as required under the National Environmental Policy Act. See response to Comment 394-303. A detailed description of potential impacts to wetlands associated with Alternative 1 (the Proposed Action) is provided in Section 4.1, Construction Impacts, of the Wetlands Technical Report (revised Appendix D). This approximation of wetland impacts was made using the wetlands reconnaissance information and BPA’s current roads and tower siting plan (Figure 5 in the Wetland Technical Report).

394-312 Please see response to Comment 394-303.
• Ensure noxious weed infestations do not become a problem in wetlands by washing all construction vehicles and conducting a weed inventory one year after construction to verify weeds have not been introduced.

How will BPA respond if weeds are introduced? There is no weed management plan or commitment in the DEIS. Herbicides are not allowed in the CRW, which makes weed management in the CRW particularly challenging. Considering that BPA’s existing ROW is a major pre-ent-day corridor for weed dispersal and location of infestations in the CRW, SPU is obviously concerned that new or expanded weed infestations will go unchecked—as is the situation with current weed infestations in the BPA ROW.

4.1.1.3 Cumulative Impacts

“Filling or adverse modification of wetlands... This could be offset through mitigation and restoration of degraded wetlands within the affected watersheds.”

Because there are no unacceptably degraded or filled wetlands, there are essentially no significant opportunities for wetland creation, restoration, or enhancement in the subbasins of the CRW.

4.1.3 Alternative Transmission Line Impacts
4.1.3.1 Alternative 1
Impact—

“The 150-ft. wide cleared ROW would impact a total of 25 ac. of wetlands (Table 2). Wetlands surveyed within the Alternative 1 ROW consisted primarily of palustrine scrub-shrub and palustrine forested types. The majority of wetlands were low-gradient, depressed wetlands. Major streams and rivers associated with wetlands within the Alternative 1 ROW include the Rating River, Rock Creek, and Cedar River.

Clearing would cause a moderate-level impact to forested wetlands and their buffers. Wildlife habitat, flood flow and flood storage, and water quality functions could be degraded. Scrub-shrub and open water wetlands would experience moderate; low, or no impact assuming the wetlands could be avoided or spanned and that soils, hydrology, and vegetation were maintained.”

There is no site-specific information regarding wetland impacts in this section or those for the other alternatives, thus this impact evaluation is inadequate. Using definitions presented in the introduction to Section 4, clearing of forested wetlands would constitute a high—not a moderate—impact (impairing the ecological integrity of a wetland). These comments apply to the description of impacts for all alternatives. The DEIS and technical appendix should have a meaningful evaluation of potential impacts that is based on sufficient real information.

Mitigation—Mitigation measures specific to the wetland resources along Alternative 1 would include: “Minimize road construction and strategically site towers to avoid wetlands 1-3 and 1-4 to minimize impacts to wetlands within the headwaters of Rock Creek.”

Wetlands 1-1 and 1-2 are also in Rock Creek headwaters and impacts to these wetlands would need to be compensatorily mitigated. Potential clearing in riparian wetlands along the Cedar River would be a significant impact, but these wetlands were not identified. However, in two paragraphs above this section this technical appendix states: “Major streams and rivers associated with wetlands within the Alternative 1 ROW include the Cedar River.” The DEIS and its technical appendices need to present a complete and consistent description of the proposed action. Also, this section lacks mention of compensatory mitigation. The DEIS and technical appendix should contain a discussion of compensatory mitigation to which BPA would commit.

4.2 Operation and Maintenance Impacts
4.2.1 Impacts Common to All Action Alternatives

4.2.1.1 Impacts:

"Moderate-level wetland impacts would also occur where the forest cover was removed and permanently maintained as scrub-shrub or emergent vegetation."

This statement conflicts with previous statements. Conversion of forested to scrub-shrub or emergent wetlands constitutes a high wetland impact, according to definitions presented at beginning of Section 4.0.

Mitigation

As King County requires of other public utilities, such as Puget Sound Energy, BPA should commit to compensatorily mitigating every tree removed from wetland and riparian habitats during operation and maintenance activities.

5.1.3 Section 404

"This project, with mitigation measures as stated, would meet the standards outlined by the CWA."

This is an incorrect statement. Without compensatory mitigation "mitigation measures as stated" would not meet the standards currently stated by the Army Corps of Engineers, or by King County, in mitigating for unavoidable wetland impacts. However, due to a lack of site-specific information and the subsequent inadequate impact analysis no firm conclusions can be obtained regarding where or how much wetland would be filled or otherwise impacted by any alternative. The DEIS and technical appendix should contain sufficient information about potentially impacted wetlands such that a meaningful impact analysis can be conducted, at which point these documents can then realistically evaluate the required compensatory mitigation and the project's ability to comply with federal, state, and local wetland regulations.

5.2 Other Standards and Guidelines

5.2.1 Cedar River Watershed Habitat Conservation Plan

"Specifically, the HCP allows timber harvest and road construction within wetlands and wetland buffers only in limited circumstances. For activities in wetlands and their buffers, the City of Seattle would consult with the state and federal agencies regarding measures to minimize and mitigate the impacts."

These statements are wrong. The HCP does not allow timber harvest or road construction in wetlands. The City of Seattle would not be responsible for mitigating impacts to wetlands and their buffers due to construction of BPA's project, nor for any consultation or financial obligation necessary thereto.

394-321 See response to Comment 394-303.

394-322 Please see response to Comment 340-002.

394-323 Your comment regarding mitigation is noted and will be addressed in the appropriate detail in the Mitigation Action Plan to be prepared for this project, and in association with permitting discussions with the appropriate federal, state, and local regulatory agencies. Please see responses to Comments 340-002 and 394-303.

394-324 A revision is not required because though the HCP (April 2000) has committed to not harvest timber within aquatic and riparian ecosystem components, this does not prevent the City from conducting operations and activities associated with watershed management. The restriction alluded to by your comment only applies to the commitment not to harvest timber for "commercial purposes." (Cedar River Watershed HCP, April 2000: pages 4.2 6–7 and 4.2 45–46). BPA did not intend to imply that the City of Seattle would be responsible for any impacts created as a result of the proposed project.
September 4, 2001

Communications
Bonneville Power Administration – KC-7
P.O. Box 12999
Portland, OR 97212

Re: Kangley – Echo Lake Transmission Line Project
KEC – 4

Dear Sir/Madam:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the proposed Kangley-Echo Lake Transmission Line Project. The comments that are enclosed focus on whether this proposed project is consistent with King County’s Comprehensive Land Use Policies and zoning and related regulations affecting development within environmentally sensitive areas.

King County has developed its Comprehensive Plan land use policies pursuant to Article 11, Section 11 of the Washington State Constitution and the Washington State Growth Management Act (GMA), R.C.W. 36.70A. The King County Comprehensive Plan is the principle planning document used by King County for the orderly physical development of the county. Policies set forth in the County’s Comprehensive Plan are implemented through County land use regulations including, but not limited to, the King County Zoning Code, KCC Title 21A (including limitations upon development within environmentally sensitive areas); Surface Water Management Code, KCC Title 9 (including provisions for the protection of surface and groundwater); Building and Construction Standards Code, KCC Title 16 (including general clearing and grading standards) and Shoreline Management Code, KCC Title 25 (including restrictions upon development within designated shorelines). Each of these land use regulations was likewise adopted pursuant to authority of Article 11, Section of the Washington State Constitution and the Washington State Growth Management Act.

The proposed transmission corridor crosses two general zone classifications within unincorporated King County. These are the Forest and Rural Residential Zones. Utility facilities are permitted uses within these zone classifications but only to the extent that
these facilities comply with all applicable provisions of the zoning code, including the
development standards for environmentally sensitive areas. The DEIS does not evaluate
whether this project complies with these regulations but concludes on page 5-15 that by
complying with the Endangered Species Act, Section 404 of the Clean Water Act,
Coastal Zone Management Act, et. al., the project will comply with the substantive intent
of these regulations. As noted in Section 5.11.2 of the DEIS, BPA will be providing
information to the Department of Development and Environmental Services for later
review to determine consistency with the County’s Shoreline Master Program. This
review covers a very small portion of the project route and there is no similar evaluation
of how these other federal statutes meet or exceed the other applicable local regulations.
In addition, the DEIS does not include the level of detailed technical analyses or design
detail to determine this project’s compliance with applicable King County Policies or
adopted zoning or development regulations. For these reasons and others that are
discussed in more detail in the attached comments, we do not agree with the DEIS
conclusion relative to whether the proposed Kanaskeet-Echo Lake Transmission Project
complies with applicable County policies or codes.

Thank you again for the opportunity to comment.

Sincerely,

Randy M. Sandin, Supervisor
Site Development Services Section
Wetlands, Streams, Wildlife, and Shorelines

1.0 Wetlands/Streams and Rivers

1.1 Wetlands
According to the DEIS, a total 10 wetlands, totaling 242 acre, were identified within the 500-ft transmission line study corridor under the proposed alternative. Most wetlands were low-gradient, depressional forested wetlands. Major streams and rivers associated with wetlands within the ROWS include the Raging River, Rock Creek, and Cedar River.

According to the Draft Environmental Impact Statement (DEIS), establishment of the cleared ROW would impact a total of 16 acres of wetland (please note that the wetland Appendix identified 25 acres of impact, under the proposed alternative-please clarify). The majority of wetlands that may be affected are associated with forested habitats that would be permanently altered, by the removal of trees, with construction of the transmission line. Impacts would include clearing shrubs, trees, and herbaceous vegetation from wetlands and wetland buffers. Direct and indirect impacts that could occur within or outside of the cleared ROW include vegetation alteration, water quality degradation, sedimentation, introduction of invasive species, wildlife impacts, and changes in wetland hydrology. Permanent impacts on wetlands, buffers, and their functions and values may occur if associated with road access or widening for tower construction. New access roads would be sited to avoid wetland impacts where possible, however, road construction and use could carry sediment into wetlands, affecting water quality and biological productivity. Expansion of the substation is expected to impact less than 1/10 acre of wetland. Operation and maintenance of the ROW (vegetation removal) would include periodic impacts on wetlands and their buffers.

The following Comprehensive Plan policies apply to the siting of facilities in and around wetlands:

- **E-130** King County shall use as minimum standards, the Washington State Wetlands Identification and Delineation Manual, 1997 or its successor which is adopted by the King County Council and is the scientifically accepted replacement methodology based on better technical criteria and field indicators.

Wetlands are valuable natural resources in King County. They include shallow or deep marshes, bogs, ponds, wet meadows, forested and shrub communities and other lands supporting a prevalence of vegetation adapted to saturated soils. Many of the larger wetlands in King County are mapped in the County's Sensitive Areas Map Folio, and their vegetation, hydrology and wildlife are briefly described in the King County Wetlands Inventory.

**395-001** At the time the wetland technical study report was prepared, the amount of wetlands was estimated to be 25 acres within the proposed right-of-way. Further refinement of the amount of wetland impacts was made for the DEIS which stated 16 acres of wetland impact. Additional refinement of the level of wetland impact contained in the SDEIS is 14 acres. For more information please see the revised Appendix D.

**395-002** BPA recognizes the value that wetlands contribute to the environment, and agrees with King County that these areas are productive biological systems, providing habitat for fish and wildlife. BPA also recognizes that King County allows alteration of wetlands for utility development (King County Comprehensive Plan Policy E-139), as included in the comments provided by King County, that all wetland functions are evaluated, the least harmful and reasonable alternatives are pursued, affected significant functions are appropriately mitigated and mitigation sites are provided with monitoring. BPA is committed to complying with this King County Comprehensive Plan policy, as well as other applicable King County policies.

BPA has selected Alternative 1 as its Preferred Alternative. It parallels an existing high voltage transmission line and takes advantage of the existing clearing that has already taken place, the existing access road system, avoids a separate crossing of the Cedar River downstream of the existing crossing, and also avoids paralleling the Cedar River as Alternatives 4A and 3 would do. Furthermore, BPA has sited its substation expansion, transmission towers and access roads in uplands to avoid filling any wetlands.

BPA proposes to provide compensatory mitigation to satisfy King County regulations to mitigate for the 14 acres of forested wetlands that would be converted to scrub/shrub wetlands within the proposed transmission line right-of-way. See response to Comment 340-002.

395-001 395-002
and fishing. Wetlands also store flood waters and control runoff, thereby reducing flooding, downstream erosion and other damage. Further, wetlands protect water quality by trapping sediments and absorbing pollutants. They discharge ground water, making it available to plants and animals. Wetlands store peak flows and discharge to streams in dry periods, thus enabling fish and other riparian animal populations to survive. These wetland functions need consideration from a watershed perspective.

E. 132 King County’s overall goal for the protection of wetlands is no net loss of wetland functions within each drainage basin. Acquisition, enhancement, regulations, and incentive programs shall be used independently or in combination with one another to protect and enhance wetland functions.

E. 133 Development adjacent to wetlands shall be sited such that wetland functions are protected, an adequate buffer around the wetlands is provided, and significant adverse impacts to wetlands are prevented.

The functions and values of a wetland will change as land use surrounding the wetland changes. Fragmentation of habitat is considered the greatest threat to native biodiversity. Protecting native species biodiversity depends upon maintaining biological linkages and preventing fragmentation of wetland habitats. Small wetlands strategically located between other wetlands may provide important biological links between other, higher quality wetlands. Wetlands adjacent to habitat networks also are especially critical to wildlife functions and should receive special consideration in planning land use.

E. 134 Areas of native vegetation that connect wetland systems should be protected. Whenever effective, incentive programs such as buffer averaging, density credit transfers, or appropriate non-regulatory mechanisms shall be used.

E. 135 The unique hydrologic cycles, soil and water chemistry, and vegetation communities of bogs and fens shall be protected by the use of incentives, acquisition, Best Management Practices, and implementation of the King County Surface Water Design Manual to control and/or treat stormwater within the wetland watershed.

E. 138 Enhancement or restoration of degraded wetlands may be allowed to maintain or improve wetland functions provided that all wetland functions are evaluated in a wetland management plan, and adequate monitoring, code enforcement and evaluation is provided and assured by responsible parties. Restoration or enhancement must result in a net improvement to the functions of the wetland system. Technical assistance to small property owners should be considered.

E. 139 Alterations to wetlands may be allowed to:
   a. Accomplish a public agency or utility development;
   b. Provide necessary utility, stormwater, wetland, and road crossings; or
   c. Avoid a denial of all reasonable use of the property, provided all wetland functions are evaluated, the least harmful and reasonable alternatives are pursued, affected significant functions are adequately mitigated, and mitigation sites are provided with monitoring.

395-003 BPA understands that King County’s goal is “no net loss of wetlands.” BPA will work with King County to develop acceptable mitigation that meets both agencies’ needs.

BPA would use best management practices when constructing its facilities so that wetland functions are protected, buffers are protected to the extent practicable and significant adverse impacts to wetlands are prevented.

395-004 BPA understands that the King County Code provides for the alteration to wetlands to accomplish a public agency or utility development such as the proposed project, provided that all wetland functions are evaluated, the least harmful and reasonable alternatives are pursued, the affected significant functions are appropriately mitigated and mitigation sites are provided with monitoring.

BPA has prepared a wetland report that it has submitted to the King County Department of Development and Environmental Services in compliance with King County requirements, and also intends to provide compensatory mitigation to mitigate for the alteration of forested wetlands to scrub/shrub wetlands that would be necessary to construct the project.

Please see the revised Appendix D and the Wetland Delineation Report (sent to the County under separate cover).

395-005 BPA understands that when adverse impacts cannot be avoided, such as hand clearing of tall-growing vegetation in forested wetlands in the proposed transmission line right-of-way, compensatory mitigation may be allowed. See response to Comments 395-003 and 395-002.

395-006 BPA understands that King County zoning guidelines prohibit development from occurring within wetlands except where the minimum requirements are satisfied, and when there are no
When adverse impacts cannot be avoided, compensatory mitigation may be allowed. This means the replacement of project-induced losses of wetland functions and values will be permitted through wetland creation, restoration or enhancement.

E-141 Mitigation sites should replace or augment the functions to be lost as a result of the project proposal. Wetland mitigation proposals should be approved if they would result in improved overall wetland functions within a drainage basin. All wetland functions should be considered. Mitigation sites should be located strategically to alleviate habitat fragmentation, and avoid impacts to and prevent loss of farmable land within Agricultural Production Districts.

E-142 Mitigation projects should contribute to an existing wetland system or restore an area that was historically a wetland. The goal for these mitigation projects is no net loss of wetland functions per drainage basin.

E-143 Land used for wetland mitigation should be preserved in perpetuity. Monitoring and maintenance in conformance with King County standards should be provided by the project proponent until the success of the site is established.

The foregoing Comprehensive Plan provisions for evaluating proposed uses within wetlands are implemented by pertinent zoning code provisions paraphrased below. King County zoning guidelines prohibit development from occurring within wetland except where these minimum requirements area satisfied.

KCC 21A.24.320 Wetland Development standards defined.

KCC 21A.24.330 (B), (E), and (N)
(B) Special study required (see KCC 21A.24.100, 110, and 120)

(E)- Utilities may be allowed in wetland buffers if no practical alternative location is available and the utility corridor meets any additional requirements set forth in administrative rules.

(N)- Wetland road crossings

KCC 21A.24.130 Mitigation required: mitigation, maintenance, monitoring, and contingency.

KCC 21A.06.750 Mitigation defined. In descending order of preference, avoidance, minimization, rectification, reduction or elimination over time, compensation by replacing, enhancement, etc., and monitoring.

KCC 21A.24.340 (C) Replacement is required when a wetland or buffer is altered. Restoration of wetland shall be met by replacement.

BPA intends to satisfy the minimum standards as identified in King County’s comments to the DBS. To wit:

KCC 21A.24.320 Wetlands — Development Standards. BPA recognizes that all wetlands within King County are protected by buffers from 25 feet to 100 feet, and that the buffer widths are dependent on the classification of their associated wetland.

BPA also understands that buffer widths can be increased by King County when necessary to protect wetlands.

KCC 21A.24.330 (B) — BPA understands that King County allows alterations to wetlands and wetland buffers pursuant to K.C.C 21A.24.075 or if the proposed development will (a) protect, restore or enhance the wildlife habitat, natural drainage or other valuable functions of the wetland resulting in a net improvement to the functions of the wetland system; (b) develop a plan for its design, implementation, maintenance and monitoring prepared by a civil engineer and a qualified biologist; (c) perform the restoration or enhancement under the direction of a qualified biologist; and (d) will otherwise be consistent with the purposes of this chapter. BPA also understands that to establish baseline conditions, detailed studies “may be required,” such special studies, should they be required, shall include specific recommendations for mitigation which may be required as a condition of any development proposal (approval); and that these recommendations (if made) may include specific design and construction techniques.

In complying with the King County Code, BPA has prepared a wetland delineation report that identifies the direct and indirect impacts to the sensitive areas, and how they can be reduced. Additionally, BPA agrees to provide compensatory mitigation to offset the unavoidable impacts to the sensitive areas as a result of the proposed project.

While BPA has successfully cited all of its proposed facilities in uplands, some buffer areas would be affected. BPA
KCC 21A.24.340 (d) Enhancement may be allowed, but the wetland biologic and or hydrologic functions shall be improved.

KCC 21A.24.340(F) Off site mitigation allowed if within the same sub-basin, and greater hydrologic and biologic functions are achieved.

KCC 21A.24.070 - Exceptions to the wetlands standards are allowed if no practical alternative exists with less impact on the sensitive area and the proposal minimizes impacts on sensitive areas.

1.2 Streams/Rivers

The DEIS stated that the preferred transmission line alternative would cross nine fish-bearing streams and an unknown number of non-fish-bearing streams. Impacts on stream resources from the proposed action would include the clearing of 12 acres within 100 feet of potentially fish-bearing streams and 33 acres within 300 feet of potentially fish bearing streams. Approximately 2,900 feet of stream would be within the cleared ROW. Clearing within 100 feet of the stream could reduce riparian shading and bank reinforcement by roots, and increase fine litter contributions to the stream. Clearing within 300 feet of the stream could affect LWD recruitment to the stream and stream microclimate. It is also possible that during construction, surface water runoff containing sediment, fuel spills, herbicide runoff and other contaminants could impact streams.

During the construction of the transmission line, the DEIS identifies that the BPA may need to install some culverts to provide or upgrade stream crossings for access roads. Improper culvert installation may impact stream hydrology, increase sediment delivery to streams, increase peak flows, and/or create a fish passage barrier. Road construction and road use could cause sediment delivery to streams.

Although specific locations have not been determined yet, it is stated that the BPA would need to blast bedrock to install some tower footings. Detonating explosives in or adjacent to fish habitat could cause disturbance, injury, or death to fish and destruction or alteration of their habitat.

Operation and maintenance activities in of the ROW (vegetation removal) would include periodic impacts on streams and riparian areas. It is stated that the BPA has prepared a programmatic EIS for its vegetation management program associated with transmission lines, roads, and related facilities.

Comprehensive Plan policies apply to the siting of facilities in and around streams are identified below and in the Comprehensive Plan policies identified Under Fish and Wildlife and Shoreline sections in this letter.

Our use and modification of water resources and the surrounding terrestrial environment affects the hydrologic cycle functions and can cause unintended detrimental impacts such as flooding, erosion, degradation of water quality, loss of fish and wildlife habitat, understands that this section of the King County Code allows for utilities such as transmission lines to be located in wetland buffer areas "if no practical alternative location is available and the utility corridor meets the additional requirements set forth in the administrative rules." The rules state that utilities may be allowed if: (1) King County determines that no practical alternative location is available, and (2) the utility corridor meets any additional requirements set forth in the administrative rules including, but not limited to, requirements for installation, replacement of vegetation and maintenance.

BPA has undertaken an environmental review of the Proposed Action and several alternatives, including the No Action Alternative, under the National Environmental Policy Act of 1969, as amended. BPA has reviewed a range of alternatives that included alternatives that circumvented the Cedar River Municipal Watershed as well as those that crossed the Watershed and non-transmission alternatives. Alternative 1 was selected as the proposed action since it would create the least impacts to the human environment, which includes both the social environment as well as the natural environment. It avoided a second separate crossing of the Cedar River, which is protected under the Washington State Shoreline Management Act; would avoid clearing riparian habitat along the Cedar River; was the least likely to affect cultural resources; would require the least amount of clearing in that it would be located immediately adjacent to BPA’s existing 500-kV transmission line, and would also require the least amount of new access/spur roads. Additionally, the alternative was the one that the King County Comprehensive Plan (ET-203) suggests should be looked at first when attempting to site additional utility lines, and that is in existing utility corridors. The Proposed Action was the shortest line under review, and therefore would have the least line losses. It also is the least costly to construct, including material, land and mitigation costs.

Two alternatives, Alternatives 3 and C, would likely impact fewer wetlands than the Proposed Action. Implementation of these alternatives, however, would create many other impacts to other environmental resources. Both alternatives would require more clearing and more access roads and have a higher risk of impacting cultural resources and scenic quality. Alternative 3
would require a separate right-of-way through the Watershed and a separate crossing of the Cedar River at a point where the river would have shorter banks, requiring riparian vegetation to be cleared. Alternative C would impact a large number of residences outside of the Watershed and wells on private lands. These impacts seriously handicap these alternatives when compared to the Proposed Action.

Since BPA is prepared to meet any additional requirements set forth in administrative rules including requirements for installation, replacement of vegetation and maintenance, so long as these requirements would allow BPA to meet NESC (National Electric Safety Code) requirements and its own maintenance standards for safe operation and maintenance of the line, BPA believes that it complies with the King County Code.

BPA understands that Section KCC 21A.24.330 (N) of the King County Code allows constructing roads in wetlands as long as certain conditions are met.

Since BPA has sited all of its facilities in uplands, no roads would be constructed in wetlands.

All jurisdictional wetlands would be avoided as a result of BPA's proposal to construct the transmission line using a helicopter instead of a boom as much as possible. Doing so eliminates the need to construct 16-foot wide access roads to reach the proposed tower sites and the need to fill wetland areas.

BPA has submitted a wetlands report to King County that addressed the impacts that its facilities would have on the storage capacities of the wetlands, if any, and the degree that the proposed project would impact the hydrology of these sensitive areas as well. The agency agrees to mitigate the effects of these impacts on these sensitive areas, as required by the King County Code.

BPA understands that (as determined by King County) mitigation, maintenance and monitoring measures shall be in place to protect sensitive areas and (their) buffers from alterations occurring on the development proposal site.

and loss of archeological and traditional cultural resources that depend upon but do not damage natural resources. In order to minimize adverse impacts on the water resources of King County and ensure our continued ability to receive the benefits they provide we need to promote responsible land and water resource planning and use.

E. 116 King County shall use incentives, regulations and programs to manage its water resources (Puget Sound, rivers, streams, lakes, freshwater and marine wetlands and ground water) and to protect and enhance their multiple beneficial uses including fish and wildlife habitat, flood and erosion control, water quality control and sediment transport, water supply, energy production, transportation, recreational opportunities and scenic beauty. Use of water resources for one purpose should, to the fullest extent practicable, preserve opportunities for other uses.

E. 117 Development shall support continued ecological and hydrologic functioning of water resources and should not have a significant adverse impact on water quality or water quantity, or sediment transport and should maintain base flows, natural water level fluctuations, ground water recharge in Critical Aquifer Recharge Areas and fish and wildlife habitat.

E. 126 Stormwater runoff shall be managed through a variety of methods, with the goal of limiting impacts to aquatic resources, protecting and enhancing the viability of agricultural lands and promoting groundwater recharge. Methods of stormwater management shall include temporary erosion and sediment control, flow control facilities, water quality facilities as required by the Surface Water Design Manual, and Best Management Practices as described in the Stormwater Pollution Control Manual. Runoff caused by development shall be managed to prevent adverse impacts to water resources and farmable lands. Regulations shall be developed for lands outside of the Urban Areas that favor non-structural stormwater control measures when feasible including: vegetation retention and management; seasonal clearing limits; limits on impervious surface; and limits on soil disturbance.

E. 128 River and stream channels, stream outlets, headwater areas, and riparian corridors should be preserved, protected and enhanced for their hydraulic, hydrologic, ecological and aesthetic functions, including their functions in providing woody debris sources to salmonid-bearing streams.

The foregoing King County Comprehensive Plan stream policies are implemented by the zoning code provisions paraphrased below. King county zoning precludes development from occurring within rivers, streams and associated buffers unless these minimum requirements are satisfied.

KCC 2A.24.370: (A), (D), (G), and (J)
(A)-Special study required (see KCC 21A.24.100; 110; and 120.

(D)-Utilities allowed in stream buffers if no practical alternatives exist and provisions of KCC 21A.24.220 are met.
BPA will be complying with EPA’s National Pollutant Discharge Elimination System in developing a storm water pollution permit and filing the permit with EPA prior to the onset of construction activities. BPA also will be initiating water turbidity monitoring before, during and following its construction activities to ensure that no adverse impacts would be created to sensitive areas and their buffers, including Seattle Public Utilities drinking water.

King County requires that mitigation be offered in the following order of preference: Avoidance, minimization, rectification, reduction or elimination over time, compensation by replacing, enhancement, etc., and monitoring.

BPA has successfully avoided the need to fill any wetlands. However, some forested wetlands within the proposed right-of-way would need to be cleared of tall-growing vegetation. BPA would minimize this impact by removing that vegetation that would be a hazard to the safe construction, operation or maintenance of the line. Additionally, BPA would work with King County and anticipates that it can provide the appropriate level of compensatory mitigation to satisfy King County requirements.

Section KCC 21A.24.340 of the King County Code states that restoration shall be required when a wetland or its buffer is altered in violation of law or without any specific permission or approval by King County. BPA understands this section of the King County Code, and does not anticipate any activities that would be found to be a violation of law, or that would be found to be out of compliance with King County regulations.

Section KCC 21A.24.340 of the King County Code states that replacement shall be required when a buffer is altered pursuant to an approved development proposal or a wetland is used for a regional flow facility or other approved use. Requirements for the restoration of wetlands may be met by replacement wetlands.

BPA intends to avoid all wetland and stream buffers where it can (avoidance) and minimize any disturbance where it cannot (minimization). Where impacts cannot be avoided, BPA will work with the County to develop acceptable mitigation that meets both agencies’ needs.
Although these mitigation measures do identify measures to minimize impacts on stream and wetland resources, they are not comprehensive and do not identify specific steps that will be taken to avoid, reduce, or mitigate impacts on sensitive areas. As per King County zoning codes KCC 21A.06.750 and the Public Rules 21A-24.031, the proposed project must demonstrate all impacts on streams and associated buffers are avoided or reduced through mitigation. The following mitigation actions are listed in descending order of preference: 1) avoiding the impact by not taking a certain action, 2) minimizing the impact by limiting the degree or magnitude of the action by using appropriate technology or by taking affirmative steps to avoid or reduce the impact, 3) rectifying the impact by repairing, rehabilitating, or restoring the affected sensitive area or buffer, 4) reducing or eliminating the impact by time preservation or maintenance operations during the life of the development proposal, 5) compensating for the impact by replacing, enhancing, or providing substitute sensitive areas and environments, and 6) monitoring the impact and taking appropriate corrective measures. Mitigation should include site specific analysis of each sensitive area that would be affected by the proposed project. Specific project siting alternatives should then be developed to avoid or minimize impacts on sensitive areas (specifically, avoiding all impacts on Class 1 and 2 wetlands and streams). This should include identifying all sensitive areas where impacts could be avoided or reduced through alternative siting methods such as using existing toplography to span sensitive areas that would alleviate the need to remove existing vegetation. The analysis should also include identifying locations along the proposed ROW where the proposed utility corridor or roads and other associated facilities could be shifted to avoid impacting sensitive areas. A sensitive area clearing plan shall also be prepared as part of the design of the project to minimize vegetation impacts on wetlands, streams, and associated buffers. The plan should identify and evaluate specific sensitive areas that could not be avoided through the siting alternatives evaluation, and determine the permissible height of existing vegetation that could remain at these locations.

As stated above, enhancement, restoration, or creation will be required for all unavoidable wetland, stream, and buffer impacts. The DEIS did not identify sufficient mitigation measures to rectify sensitive area impacts by repairing, rehabilitating or restoring the affected sensitive areas. The mitigation should include compensating for the impacts by creating substitute sensitive areas or enhancing sensitive areas. This will include mitigation for all temporary construction-related sensitive area, and permanent sensitive area impacts, such as modifying forested wetlands to other vegetation types, will require replacement of the functions of those sensitive areas through enhancement, restoration, or creation of altered sensitive area resources. Monitoring must also be completed and remedial actions should be identified to assure enhancement, restoration, or creation mitigation measures are successful. Mitigation sites should be on (and that is owned either by the BPA, King County, or other ownership acceptable to King County), and shall be permanently protected from future development or alteration.

The following bulleted items identify additional wetland and stream zoning code non-consistency issues that should be addressed within the final EIS.

BPA understands Section KCC 21A.24.340 (D) of the King County Code. Enhancement may be allowed, but the wetland biologic and or hydrologic functions shall be improved.

KCC 21A.24340 (F) — Replacement or enhancement off site may be allowed if the applicant demonstrates to the satisfaction of King County that the off-site location is in the same drainage subbasin as the affected wetland and that greater biologic and hydrologic functions would be achieved. BPA understands this section of the King County Code, and intends to provide compensatory mitigation.

KCC 21A.24.070 — Exceptions to the wetland standards are allowed if no practical alternative exists with less impact on the sensitive area and the proposal minimizes impacts on sensitive areas.

BPA understands this section of the King County Code. As mentioned above, BPA believes there is no practical alternative to the Proposed Action with fewer environmental impacts, and the Proposed Action is designed to minimize impacts to the sensitive areas that could not be avoided.

BPA did identify these impacts in the DEIS and also identified mitigation measures that would reduce these impacts. Please see Section 4.6.2.11 of the DEIS and Section 4.6.2.10 of the SDEIS.

Please see response to Comments 394-084, 394-188 and 394-132.

Potential blasting impacts are detailed in Section 4.1.1.1 of the Fisheries Technical Report (Appendix A). That discussion also states that no in-water blasting would occur, and that blasting within 400 feet of fish-bearing streams would not occur when sensitive life history stages of fish are present in the blasting area.

Comment noted. BPA understands that King County precludes development from occurring within rivers, streams and associated buffer areas unless minimum requirements are satisfied. BPA has sited its proposed facilities to avoid all of these sensitive areas, and agrees to provide compensatory mitigation to offset impacts where they could not be avoided.
395-022 All wetland sites within or outside of the proposed ROW that may be impacted by project activities would need to be delineated using methodology outlined in Ecology’s State of Washington Wetland Identification and Delineation Manual (1997).

395-023 All wetlands would need to be classified per 21A.06.1415 (A-C).

395-024 Per the KCC 21A.24.320, all class 1 wetlands shall have a 100-foot buffer, class 2 wetlands shall have 50-foot buffers, and class 3 shall have 25-foot buffers. Buildings and other structures shall be setback 15 feet from the wetland buffer (21A.24.200).

395-025 Sensitive area buffers are mandated for the purpose of protecting wetlands. Buffers of native vegetation help wetlands to maintain both hydrological and biological functions and values. These include storm water conveyance and food chain support, as well as flood prevention and salmon production. In order for buffers to perform these duties, they must remain in an undisturbed condition as a “setback area” in which native plants are allowed to grow. Non-native species are not allowed to be introduced into this area (KCC 21A.24.330).

395-026 Utilities and/or removal of vegetation for a proposed utility corridor may be allowed within established wetland buffers only if the development would protect, restore, or enhance the wildlife habitat, natural drainage or other valuable functions of the wetland resulting in a net improvement to the functions of the wetland system (21A.24.330 E).

395-027 The filling of non-isolated wetlands for construction of structures is not permitted under King County code. Alteration of isolated wetlands (21A.06.1410) may be permitted under some circumstances (21A.24.330 K).

395-028 Alteration to wetlands and wetland buffers from road crossings must be mitigated (21A.24.330 (A.2) and N). Additionally, crossings must not change the overall wetland hydrology, must minimize wetland impacts, and must be constructed during summer low water periods. Alterations of wetlands shall be replaced or enhanced on the site or within the existing drainage basin using the following formulas: Class 1 and 2 wetlands on a 2:1 basis and class 3 wetlands on a 1:1 basis with equivalent or greater biologic functions including, but not limited to, habitat functions and with equivalent hydrologic functions including, but not limited to, storage capacity (21A.24.340 C, D, and E). Replacement or enhancement off the

395-012 Chapter 4 and Appendices A, C, and D of the SDEIS describe the potential effects and mitigation for the Proposed Action regarding water quality, fish habitat, and wildlife habitat.

See response to Comment 394-044 for a reference to response to comments with additional information on impacts to water quality, fisheries, and wetlands.


395-013 The BPA, as specified under the EPA rules pertaining to stormwater discharges into surface water bodies (40 CFR 122–124), shall obtain an National Pollutant Discharge Elimination System (NPDES) permit for construction activities, including clearing, grading, and excavation, that disturbs one or more acres of land. Under Section 402 of the Clean Water Act, federal facilities (or projects) are subject to these permitting requirements; administration of this program has been delegated to the state, however, for federal projects, EPA administers this program. BPA, as a federal agency, will obtain a general NPDES permit from EPA Region 10. BPA will prepare a project specific Storm Water Pollution Prevention (SWPP) Plan. This plan helps ensure that erosion control measures would be implemented and maintained during construction. It also addresses best management practices for stabilization, stormwater management, and other controls. Additionally, the SWPP plan contains a site-specific Spill Prevention and Control (SPC) Plan that covers the project scope of work (including equipment, materials, and activities).

395-014 Comment noted. See response to Comment 395-011.

395-015, -016 and -017 KCC 21A.24.360 Streams: Development Standards — BPA recognizes that King County has adopted development standards for sites near streams, and that the streams have buffers depending on how they are classified. Class 1 streams have 100-foot buffers; Class 2 streams containing salmonids also have 100-foot buffers; Class 2 streams (without salmonids) have 50-foot buffers, and Class 3 streams have 25-
site may be allowed if the applicant demonstrates that the off-site location is in the same drainage sub-basin as the original wetland and that greater biologic and hydrologic functions will be achieved.

- The use of herbicides in wetlands and buffers will not permitted (KCC 21A.24.320 D).

- Site specific analysis of all proposed streams to be crossed would need to be performed to identify and evaluate streams for the presence of fish (KCC 21A.24.100; 110; and 120) and classify the streams. As noted within the DEIS Fisheries Appendix, the DEIS relied upon remote methods to identify potential fish-bearing streams.

- Per the KCC21A.24.360, Class 1 streams and Class 2 stream used by salmonids shall have 100-foot buffers. Non-fish bearing Class 2 streams shall have a 50-foot buffer and Class 3 streams (ephemeral) shall have a 25-foot buffer. Alteration, such as vegetation clearing, is typically not permitted within stream buffers.

- Sensitive area buffers are mandated for the purpose of protecting streams and rivers. Buffers must remain in an undisturbed condition as a "setback area" in which native plants are allowed to grow: non-native species are not allowed to be introduced into this area (KCC21A.24.330).

-Utilities may be allowed in stream buffers if no practical alternative is available and the utility corridor meets any additional requirements set forth in administrative rules including, but not limited to, requirements for installation, replacement of vegetation and maintenance (21A.24.330 E).

- Crossings of streams and encroachment on the otherwise required stream buffer may be allowed if all crossings use bridges or other construction techniques which do not disturb the stream bed or bank, except that bottomless culverts or other appropriate methods demonstrated to provide fisheries protection may be used for Class 2 or 3 streams if the applicant demonstrates that such methods and their implementation will pose no harm to the stream or inhibit migration of fish (21A.24.370 G). All crossings must be constructed during the summer low flow and be timed to avoid stream disturbance during periods when use is critical to salmonids. Crossings can not occur over salmonid spawning areas unless King County determines that no other possible crossing site exists. Bridge piers or abutments are not placed within the FEMA floodway or the ordinary high water mark. Crossings do not diminish the flood-carrying capacity of the stream.

foot buffers. BPA also understands that King County can increase buffer widths when necessary to protect streams.

KCC A.24.370 Streams: Permitted Alterations — (A) Alterations may only be permitted if based on a special study see KCC 21A.24.100; 110; and 120.

BPA has sited its proposed transmission facilities to avoid sensitive areas like streams and wetlands and their associated buffer areas. While all streams would be spanned, tall-growing vegetation would likely need to be removed in buffer areas to comply with the National Electric Safety Code.

KCC 2A.24.370 D — This section of the King County Code allows utilities to be located within stream buffers if:

1. No practical alternative exists; and

2. The utility corridor meets any additional requirements set forth in the administrative rules including, but not limited to, requirements for installation, replacement of vegetation and maintenance.

BPA is undertaking this environmental review to determine the best alternative to meet the purpose and need of the proposed project. The Proposed Action was selected as the preferred alternative because it meets the project's purpose and need, creates the least environmental impact, is technically superior to the other alternatives and has the least cost. The Proposed Action would parallel an existing transmission line, therefore taking advantage of an existing access road system, minimize the amount of clearing that would be required (because of the adjacent transmission line right-of-way), require the least amount of new conductor, and avoid a second separate crossing of the Cedar River.

With respect to meeting the additional requirements set forth in the administrative rules, BPA could not comment without knowing what these additional "requirements" would be. In building, operating and maintaining its high voltage system, BPA must conform to the National Electric Safety Code to construct, operate and maintain its facilities in a safe and reliable manner.
2.0 Fish and Wildlife

A number of wildlife species, including invertebrates, were identified as potentially occurring within the project area. Species that are federally listed as threatened or endangered; federal species of concern; and Washington State-listed threatened, endangered, sensitive or monitor species with the potential to occur on the west-side of the Cascade Mountains were selected for the BPAs analysis. Species were sorted by their primary habitat associations, defined as forest communities, aquatic communities, riparian communities, early seral communities, and special or unique habitats.

Two wildlife habitat corridors designated as wildlife Network in the King County Comprehensive Plan occur within the project area. One of the wildlife corridors follows the Cedar River and another traverses the project area to the north of the river. Two wildlife corridors converge west of Rattlesnake Lake. Both corridors would be crossed by the project alternatives.

Impacts on wildlife species associated with the preferred alternative include physical loss of habitat, or disturbance of wildlife from the construction activities or ongoing facility use and maintenance. Temporary construction impacts would be associated with noise and human presence.

The proposed action could potentially impact three federally listed salmon species, the Chinook salmon, bull trout, and Coho salmon. Bull trout and Chinook salmon have not been recorded to use streams in the project area of any of the proposed alternative, however, all stream accessible to anadromous fish in the project area are regarded by the USFWS and NMFS as having potential to support Chinook salmon an bull trout. Chinook salmon have been recorded in the Raging River less than one mile downstream of the Segment D crossing, and their apparent absence in the project area may only be due to inadequate surveying. The Cedar River contains suitable Chinook salmon spawning habitat and such use is expected to occur after the Landsburg Dam fish ladder is completed. Reduced LWD recruitment potential and impacts on stream thermal regime were identified to be the primary issues of concern.

The following Comprehensive Plan policies and those identified under streams/rivers, Wetlands, and the Shoreline section of this letter apply to the siting of facilities in sensitive fish and wildlife species:

It is King County’s goal to conserve fish and wildlife resources in the County and to maintain countywide biodiversity. This goal may be achieved through implementation of several broad policy directions that form an integrated vision for the future. Each of the pieces is necessary for the whole to be successful. The policy objectives are to 1) identify...

KCC 2A.24.370 G — Stream crossings may be allowed and may encroach on the otherwise required stream buffer if:

1. All crossings use bridges or other construction techniques which do not disturb the stream bed or bank, except that bottomless culverts or other appropriate methods to provide fisheries protection may be used for class 2 or 3 streams if the applicant demonstrates that such methods and their implementation will pose no harm to the stream or inhibit migration of fish;

2. All crossings are constructed during the summer low flow and are timed to avoid stream disturbance during periods when use is critical to salmonids;

3. Crossings do not occur over salmonids spawning areas unless King County determines that no other possible crossing site exists;

4. Bridge piers or abutments are not placed within FEMA floodway or the ordinary high water mark;

5. Crossings do not diminish the flood-carrying capacity of the stream;

6. Underground utility crossings are laterally drilled and located at a depth of four feet below the maximum depth of scour for the base flood predicted by a civil engineer licensed by the State of Washington; and

7. Crossings are minimized and serve multiple purposes and properties whenever possible.

BPA understands these conditions. No new stream crossings are proposed. BPA would use its existing access/spur road system to cross any streams associated with the proposed project.

KCC 2A.24.370 J — A stream channel may be stabilized if: (1) Movement of the stream channel threatens existing residential or commercial structures, public facilities or improvements, unique natural resources or the only existing access to property; and (2) the stabilization is done in compliance with the requirements of the King County Code 21A.24.230 through 21A.24.270 and administrative rules promulgated pursuant to this chapter.
and protect critical fish and wildlife habitat conservation areas, 2) link those critical habitat areas and other protected lands through a network system, and 3) integrate fish and wildlife habitat and conservation goals into new and existing developments. Conservation of biodiversity is necessary if wildlife benefits currently enjoyed by residents of the County are to be enjoyed by future generations.

E- 165 The County shall strive to maintain the existing diversity of species and habitats in the County. The County should maximize wildlife diversity in the Rural Area.

E- 166 Fish and wildlife should be maintained through conservation and enhancement of terrestrial, air, and aquatic habitats.

E- 167 Habitats for species which have been identified as endangered, threatened, or sensitive by the state or federal government shall not be reduced and should be preserved. In the Rural Area and Natural Resource Lands, habitats for candidate species identified by the county, as well as species identified as endangered, threatened, or sensitive by the state or federal government shall not be reduced and should be preserved.

The Growth Management Act requires jurisdictions to designate Fish and Wildlife Habitat Conservation Areas for protection. The Washington Administrative Code (WAC) sets out guidelines that jurisdictions must consider when designating these areas. As set forth in the WAC guidelines, Fish and Wildlife Habitat Conservation Areas include:

a) Areas with which endangered, threatened, and sensitive species have a primary association;
b) Habitats and species of local importance;
c) Commercial and recreational shellfish areas;
d) Kelp and eel grass beds, herring and smelt spawning areas;
e) Naturally occurring ponds under 20 acres and their submerged aquatic beds that provide fish or wildlife habitat;
f) Waters of the state;
g) Lakes, ponds, streams, and rivers planted with game fish by a governmental or tribal entity; or
h) State natural area preserves and natural resource conservation areas.

It is important to note that for some species, mere presence is not considered significant. Significant habitats, for some species, are those areas that may be limited during some time of the year or stage of the species life cycle. King County has reviewed these guidelines and has developed policies E-168 through E-172 that address the various species included in the WAC guidelines. These policies recognize the tiered listing of these species and their habitats as defined by the United States Fish and Wildlife Service and the Washington State Department of Fish and Wildlife. These policies also recognize the need to regularly review the information developed on species and habitats and amend the tiered listing as appropriate.

E- 168 King County shall designate and protect, through measures such as regulations,

Comment noted. BPA does not anticipate the need to stabilize any stream channels associated with the Proposed Action.

KCC 21A.24.130 — As determined by King County, mitigation, maintenance and monitoring shall be in place to protect sensitive areas and buffers from alterations occurring on the development site.

BPA has identified the environmental impact of the proposed project along with a list of mitigation measures that are designed to eliminate, or at least minimize, the resulting environmental impacts. BPA proposes to undertake monitoring activities to ensure that any impacts are minimized.

With respect to maintenance activities, BPA would maintain the proposed transmission line and related facilities to ensure safe and reliable transmission of high voltage electric power over the life of the facility, and also to comply with the easement BPA would have with the underlying landowners.

KCC 21A.06.750 — Mitigation defined.

KCC 21A.24.380 (D) — Replacement or enhancement is required when a stream or buffer is altered. Replacement or enhancement shall result in no net loss of stream functions and result in no impact to streams.

BPA anticipates no alteration to streams as a result of the proposed project, however, stream buffers would be affected. Approximately 14 acres of wetland buffers and stream buffers would be affected by the Proposed Action (see revised Appendix D).

KCC21A.24.380 (F) — Mitigation shall be on site and in-kind unless on site mitigation is not possible, mitigation occurs within the same subbasin and greater biologic and hydrologic functions are achieved.

BPA understands this King County ordinance and will work with the County to develop acceptable mitigation that meets both agencies’ needs.
 Exceptions to the stream standards are allowed if no practical alternative exists with less impact on the sensitive area and the proposal minimizes impacts on sensitive areas.

BPA understands this exception to the stream standard, adopted by King County Code.

Comments noted. At the time the DEIS was released, BPA had not yet designed the proposed project. BPA routinely uses the environmental process to design its facilities. If BPA were to complete the design of its facilities prior to initiating the environmental review, the affected/interested publics could not provide meaningful and timely input into BPA’s decision-making process. Therefore, the design of a project typically parallels the environmental process, with the environmental review out front.

BPA has now delineated all of the sensitive areas within the proposed right-of-way and has sited all of its facilities (substation expansion, tower sites and access/spur roads) on uplands. No wetlands would be filled as a result of the project. To do so, BPA would implement extraordinary measures to construct the project, including requiring the contractor to construct most towers with a helicopter instead of a truck mounted boom. Doing so would reduce the road width normally needed. Additionally, BPA would be using a new footing design (micropiles) to reduce the disturbance area at each tower site. See Section 2.1.1.1 of the SDEIS.

BPA disagrees with the County’s evaluation of its proposed project being inconsistent with its land use plans and zoning ordinance. In designing its projects, BPA tries to be consistent with all federal, state and local plans and programs to the extent practicable, while still meeting the National Electric Safety Code requirements, and its own right-of-way maintenance criteria for safe construction, operation and maintenance of its facilities. While BPA is not an “applicant” here, since it is a federal agency and Congress has not waived federal supremacy, it tries to meet or exceed state and local plans and programs to the extent practicable.
See response to Comment 395-006.

Having proposed extraordinary measures to avoid sensitive areas and mitigate potential impacts, BPA believes that the proposed project is consistent with the King County’s land use plans and zoning regulations to the maximum extent practicable.

Construction specifications would be developed before construction that would show sensitive areas and clearing required.

395-021 Comment noted. BPA agrees to provide the appropriate level of compensatory mitigation for all unavoidable impacts to sensitive areas, as provided by the King County Code.

395-022 through -028 BPA has prepared a wetland report (see revised Appendix D) and a Wetlands Delineation Report (sent under separate cover). These reports identify the location of the sensitive areas, the measures BPA has taken to avoid the sensitive areas to the extent that it can, and what measures would be taken to reduce impacts to the maximum extent practicable.

395-029 Herbicides would not be used anywhere on the Cedar River Watershed. Outside the Watershed, it is unlikely herbicides would be used in wetlands and wetland buffers.

395-030 through -034 Please see responses to Comments 394-022, 395-009, -014, -015, -016, and -017.

395-035 See response to Comment 395-029.

395-036 Potential impacts to these corridors are discussed in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B).

395-037 This source of disturbance is included in construction activities and is described in Section 4.1 of the Wildlife Technical Report (Appendix B).

395-038 Impacts to these species are analyzed in the Fisheries Technical Report (revised Appendix A) and Wildlife Technical Report (Appendix B).
The foregoing King County Comprehensive Plan stream and shoreline policies are implemented by the zoning code provisions paraphrased below and as outlined within the Wetland and Streams/Rivers Sections of this letter. King county zoning precludes development from occurring within wildlife corridors unless these minimum requirements are satisfied.


(A) The wildlife corridor shall be meet the following conditions:

1. Forms on contiguous tract that enters and exits the property at the points the designated wildlife habitat network crosses the property boundary.
2. Maintains a width, wherever possible of 300 feet. The network width shall not be less than 150 feet wide at any point.
3. Be contiguous with and may include sensitive area tracts and their buffers, and where feasible, the corridor shall connect isolated sensitive areas or habitat and connect with wildlife habitat corridors, open space tracts or wooded areas on adjacent properties.

The Washington Administrative Code (WAC) 197-11 includes the State Environmental Policy Act (SEPA) regulations. WAC 197-11-660 states that local government shall base mitigation measures on policies, plans, rules or regulations formally designated by the appropriate legislative body. King County’s Comprehensive Plan is substantive authority under the SEPA rules. The policies to protect wildlife habitat are found in Section VI, A and B, of the Natural Environment chapter. To protect this habitat, King County must adequately condition development permits.

In order to implement Policy E-175, a draft set of Wildlife Study Guidelines was prepared in August 1993. Wildlife studies prepared by consultants and submitted with permit applications are expected to follow these Guidelines.

Under the King County Wildlife Study Guidelines, projects that are greater than 5 acres located within the rural area and having no special wildlife criteria present, at a minimum, will require a habitat survey. If areas contain special wildlife criteria, additional studies may be required. Special wildlife criteria in rural developments include the presence of threatened or endangered species, site location within a wildlife management area (WMA), or the presence of priority habitats and/or species.

Specific surveys may include a habitat survey, wildlife survey, and threatened or endangered species report for the proposal, as described in the 1993 “Wildlife Study
395-040 Appendix B and Section 4.9 of the SDEIS have been expanded to provide additional information on impacts to wildlife. BPA has been in formal consultation with the U.S. Fish and Wildlife Service and has completed informal consultation with NOAA Fisheries (see Appendix U).

to avoid or reduce impacting these species (e.g. seasonal construction restrictions, ROW siting modification or facility siting modification, etc.). King County typically relies on management recommendations outlined in the Washington Department of Fish and Wildlife Management Recommendations for Washington’s Priority Habitats and Species and other internal documents to identify mitigation for sensitive species.

Per King County land use plans and zoning regulations, wildlife corridor networks must maintain a width, wherever possible of 300 feet. The network width shall not be less than 150 feet wide at any point. Clearing of the two wildlife corridors would therefore not be consistent with King County land use plans and zoning regulations. The proposed project would need to demonstrate that the wildlife corridors would be maintained in their existing conditions. The project should evaluate the use of alternative ROW siting or transmission line sparing techniques to avoid impacting existing wildlife corridors. If it is found that the wildlife corridors cannot be maintained at their existing locations, an analysis should be performed to determine if alternative and appropriate habitat corridors could be established in the immediate vicinity. The corridors would need to meet the design standards in KCC 21A.14.270.

As stated within Appendix A, Final Fisheries Technical Report, of the DEIS, the impact assessment for the analysis relied upon remote methods to identify potential fish-bearing streams. As identified in Section 1.3 of this letter under Wetlands and Streams/Rivers, to be consistent with King County land use plans and zoning regulations, site specific stream analyses will need to be performed to accurately identify and classify all streams that occur within the identified ROW. For streams that may be directly affected by ROW crossing, a Level I stream survey should be conducted. The survey must include two reaches equal to 20 times the average stream width both up and downstream of the crossing. For all Class 1 and 2 stream crossings that would require work within the OHWM (roads, culverts, other facilities), a Level II analysis may need to be completed. This would include 1) a list of all fish, including their life histories, that are known to inhabit the stream, 2) spanner counts for all anadromous salmonids that use the particular stream where the crossing occurs (WDF format), 3) redd surveys for all anadromous salmonids that use the streams, 4) electrofish the crossing sites during April and May to determine juvenile rearing use.

Mitigation, including an alternative evaluation (see Wetlands and Streams/Rivers) would need to be identified for potentially impacted streams and rivers.

Shorelines

King County’s Shoreline Management Master Program (Title 25 of the King County Code) is a functional plan developed in compliance with the Washington State Shoreline Management Act of 1971. The Master Program protects streams with a mean annual flow of 20 cubic feet or more per second, lakes that are 20 acres or more in size, the marine shoreline of Puget Sound and wetlands associated with these systems.

E- 124 Development within designated Shoreline Environments shall preserve the resources
and ecology of the water and shorelines, avoid natural hazards, promote visual and physical access to the water, protect ESA listed species and their critical habitat, and preserve archeological, traditional cultural resources, shellfish resources, and navigation rights. Protection of critical areas shall take priority over visual values and physical access.

- Utility construction should be encouraged to locate where water quality will be maintained or improved.
- Utility corridors should be encouraged to consolidate or share rights of way.
- Public access should be encouraged.
- Utility routes should be designed to minimize visual impact from the water and upland areas.
- Utility facilities and rights of way should be selected to preserve the natural landscape and minimize conflicts with present and future land uses.
- Utility facilities and rights of way should be selected to preserve the natural landscape and minimize conflicts with present and future land uses.
- Utility facilities should be located to not require extensive shoreline protection or to restrict water flow, circulation or navigation.

The shoreline policies and Comprehensive Plan policies referenced above are both implemented through code provisions paraphrased below.

**KCC 25.04.030 Scope.** (A) and (C).

(A) No development shall be undertaken by any person on the shorelines of the state unless such development is consistent with the provisions of this title and the goals, policies and objectives of the master program.

(C) Development proposed on property adjacent to water bodies or wetlands under the jurisdiction of the Shoreline Management Act shall be evaluated in terms of the goals, policies and objectives of the master program. (Ord. 3688 § 103, 1978).

**KCC 25.04.050 Relationship to other King County programs.** A. When provisions of this chapter conflict with the sensitive areas code, K.C.C. Chapter 21A.54, that which provides more protection to the sensitive area shall apply.

**KCC 25.20.310 Utilities.** Utility facilities may be permitted in the rural environment subject to the utilities requirements (Section 25.16.160) of the urban environment and the general requirements (Section 25.20.030) of this chapter. (Ord. 3688 § 511, 1978).

**25.20.030 General requirements.** (A), (C), (D), (E), (F), and (G)

(A) Nonwater related and residential development shall not be permitted waterward of the ordinary high water mark.
(C) All development shall be required to comply with K.C.C. chapter 9.04 to control runoff and to provide adequate surface water and erosion and sediment control during the construction period.

D. Development shall maintain the first fifty feet of property abutting a natural environment as required open space.

E. Parking facilities except parking facilities associated with detached single-family and agricultural development shall retain existing vegetation or be planted in conformance with the landscape standards enumerated in the general requirements (K.C.C. 25.16.030) of the urban environment.

F. Water quality treatment in compliance with K.C.C. chapter 9.04 shall be required where stormwater runoff would materially degrade or add to the pollution of recipient waters or adjacent properties.

G. The regulations of this chapter have been categorized in a number of sections; regardless of the categorization of the various regulations, all development must comply with all applicable regulations.

25.20.140 Excavation, dredging and filling. (A) Excavation, dredging and filling may be permitted in the rural environment subject to the provisions of K.C.C. 25.16.190.

25.24.030 General requirements (A), (C), (D), and (G).

(A) No water related, water related and residential development shall not be permitted seaward of the ordinary high water mark.

(C) All development shall be required to comply with K.C.C. chapter 9.04 to control runoff and to provide adequate surface water and erosion and sediment control during the construction period.

(D) Development shall maintain the first fifty feet of property abutting a natural environment.

(G) The regulations of this chapter have been categorized in a number of sections; regardless of the categorization of the various regulations, all development must comply with all applicable regulations.

25.24.140 Excavation, dredging and filling.

A. Excavation below the OHWM is allowed in the conservancy environment only to mitigate public safety concerns and fisheries impacts.

C. Excavation or dredging of marshes, swamps or bogs shall not be permitted.

25.16.160 Utilities. Utility facilities may be permitted in the urban environment subject provided that:

A. Utility and transmission facilities shall:
   1. Avoid disturbance of unique and fragile areas;
2. Avoid disturbance of wildlife spawning, nesting and rearing areas;
3. Overhead utility facilities shall not be permitted in public parks, monuments, scenic recreation or historic areas.

B. Utility distribution and transmission facilities shall be designed so as to:
   1. Minimize visual impact;
   2. Harmonize with or enhance the surroundings;
   3. Not create a need for shoreline protection;
   4. Utilize to the greatest extent possible natural screening.

C. The construction and maintenance of utility facilities shall be done in such a way so as to:
   1. Maximize the preservation of natural beauty and the conservation of resources;
   2. Minimize scarring of the landscape;
   3. Minimize siltation and erosion;
   4. Protect trees, shrubs, grasses, natural features and topsoil from drainage;
   5. Avoid disruption of critical aquatic and wildlife stages.

D. Rehabilitation of areas disturbed by the construction and/or maintenance of utility facilities shall:
   1. Be accomplished as rapidly as possible to minimize soil erosion and to maintain plant and wildlife habitats;
   2. Utilize plantings compatible with the native vegetation.
   3. Solid waste transfer stations shall not be permitted within the shorelines of the state.

“Shorelines of the State” which appear to be associated with the preferred alternative include the Cedar River, Raging River, and other streams with flows of more than 20 cfs, and their associated wetlands. Since the proposed alternative appears to cross several shorelines of the state and constitutes a substantial development, a shoreline substantial development permit from King County would be required. Therefore, to be consistent with King County Comp Plan policies and zoning regulations, the BPA would need to submit information that demonstrates the project is consistent with the King County Shoreline Master Program as outlined above.
September 10, 2001

Lou Driessen, Project Manager  
Bonneville Power Administration  
PO Box 2621  
Portland, Oregon 97208

Dear Mr. Driessen:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Kangley-Echo Lake Transmission Line Project. Ample and reliable electrical power service is of course necessary for our region; however, locating and constructing new transmission lines inevitably creates substantial impacts. For this reason, the EIS must clearly demonstrate why a new transmission line corridor is necessary to ensure system reliability and, if so, include thorough analysis of potential impacts and adequate mitigation for those identified impacts.

The foothills of the Cascades are a high value forest resource. The Cedar River Watershed encompasses a unique lowland forest that will be protected in perpetuity, thanks to the City of Seattle’s vision and commitment. Together, the Cedar River Watershed and the Raging River valley form a critical ecological connection between the Cascade Mountains, Tiger Mountain State Forest, Taylor Mountain and Rattlesnake Ridge, providing a crucial wildlife corridor between the foothills and the higher elevation forests of the Cascades. King County has been making tough choices to ensure compliance with the Endangered Species Act, and has been implementing a variety of programs to maintain the forest land base for its economic and habitat values. The City of Seattle is working to implement their Habitat Conservation Plan for the Cedar River Watershed. A new transmission line through the forest lands of the Raging River valley and the Cedar River Watershed will affect these efforts, and we anticipate that as a public agency, BPA will seek to work cooperatively with us and with the City of Seattle to make sure our efforts are not diminished.

National Environmental Policy Act regulations require that an EIS discuss possible conflicts between the proposed action and local land use plans and policies. The 2000 King County Comprehensive Plan includes policies encouraging energy conservation and calling for the use of existing transmission corridors first.
2-101

409-002 and -003 Please see response to Comment 349-001 for more information about conservation. Please see the response to Comment 340-003. A new alternative discussing potential non-transmission alternatives was added to the SDEIS to fully disclose current non-transmission options. Additional information about the purpose and need for the project have been added to Chapter 1 of the SDEIS. Alternative actions that were considered but dropped, including double-circuiting in the existing right-of-way through the Cedar River Watershed, are described in Section 2.3 of the SDEIS.

409-004 See response to Comment 340-002.

409-005 See response to Comment 340-002.

The EIS should include a more in-depth analysis of how the proposal complies with these policies. Specifically, the EIS should include an explanation of the electrical transmission system serving the King County area, and an analysis that shows the current situation, how conservation could alleviate future needs and other improvements BPA is considering in the future. The analysis should demonstrate why an increase in service is necessary.

Further, it appears possible to double service by rebuilding the existing transmission towers within the current corridor to accommodate two sets of circuits, but the DEIS omits this alternative as too difficult in the short term. A broader analysis of the regional system should be included in the EIS to demonstrate whether or not the system has sufficient flexibility to allow for this alternative, which best meets policy F-310, above. Constructing a new transmission line adjacent to the existing corridor as proposed is less disruptive than the other alternatives and therefore preferred, but should only be considered if rebuilding in the existing corridor is clearly demonstrated to be unworkable.

The 2000 King County Comprehensive Plan also includes a body of policies addressing protection of forest resources and environmental features that have not been considered in the DEIS. Transmission lines have had substantial impacts on forests, related wildlife, streams and wetlands. The proposal would result in further loss and fragmentation of active forest land and wildlife habitat, and the impacts of construction and operation could adversely affect compliance with the Endangered Species Act and diminish efforts to recover salmon and other listed species. The proposal also brings added risks to protecting water quality in a watershed that supplies drinking water for much of the county. These impacts are significantly downplayed in the DEIS, and the proposed mitigation measures are inadequate to offset the impacts.

If use of the existing corridor proves to be unworkable, the proposal will be a substantial project consisting of nine miles of new 300kV transmission line, with a cleared swath at least 150 feet wide through mature forest and crossing rivers, streams and wetlands. It also includes construction of at least a mile and a half of new road, three staging areas of undetermined size and location, plus a three-acre expansion of an existing substation. None of the loss, the project is described as affecting only “…relatively small areas…,” and resulting in “…only a low impact.” The DEIS also fails to discuss the cumulative impacts of transmission lines criss-crossing the forests of this region, rating the impact of forest loss as low.
As a partner in the region, we expect an earnest analysis of the impacts of the proposal on forest resources, habitat and water resources, and look forward to working with BPA to identify appropriate mitigation. The most reasonable mitigation for any permanent damage or loss of forest land and habitat is replacement. Within King County, any lost wetland habitat must be replaced at a 2:1 ratio. King County has worked to assemble blocks of forest land in the vicinity of the project; there are several parcels adjacent to King County’s assembled lands and the City’s Watershed, as well as parcels in the upper Rock Creek valley and along the Green River that would be excellent candidates for forest land and habitat replacement for land lost through the project.

Further, the Raging and Cedar River riparian areas provide especially important habitat for terrestrial species. As the forest in the Cedar River Watershed grows, this area could provide significant habitat for spotted owls and marbled murrelets, and murrelets may be using the upper Watershed today. Transmission lines crossing the Raging and Cedar Rivers should be high enough to allow coniferous forests to grow to maturity in the riparian zone of the river and adjacent slopes.

At this time, the EIS inadequately addresses the need to construct a parallel transmission line, the full range of impacts of the preferred alternative, conflicts with King County policy and the appropriate mitigations for the full range of impacts. We look forward to working with you to resolve these deficiencies, and to help you select replacement lands for lost forest resources and habitat. For assistance, please contact Lori Grant, King County Office of Regional Policy and Planning, at 206-296-3458.

Sincerely,

King County Executive

cc: Pam Bissonnette, Director, Department of Natural Resources
    Stephanie Warden, Director, Office of Regional Policy and Planning
    ATTN: Lori Grant, Office of Regional Policy and Planning
October 5, 2001

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

Dear Mr. Driessen:

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.

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, Battlecreek 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.

Sincerely,

[Signatures]
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.
• 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 Flager, Seattle Public Utilities, Watershed Management Division
    Lori Gram, Executive Office
    Pam Bissonnette, Director, Department of Natural Resources
    Benj Wadsworth, Forestry Program Analyst
Tribes
BPA has sited the transmission towers to avoid sensitive natural areas such as streams, wetlands and riparian areas adjacent to streams and wetlands. After selecting these tower sites and the proposed access/spur road locations, BPA gave the Cultural Committee the opportunity to suggest that BPA move any of its facilities, with the exception of angle structures, either ahead on line or back on line, if any cultural materials could neither be harvested or relocated.

If BPA were to decide to build the project, it would inform the Culture Committee as soon as the decision is made, so that the Committee could either harvest or relocate these resources with the permission of the landowners. As mentioned to the Committee in recent correspondence, in many BPA rights-of-way, tribal members routinely harvest berries, roots, and medicinal plants under the transmission lines annually. BPA would work with the Muckleshoot Tribe as with other tribes to identify and take extra caution with vegetation management practices to avoid contaminating gathering sites.

Prior to deregulation of the electric utility industry, utilities could plan new resources such as new generation, 10 or more years out in the future. Since deregulation, new generation and additional loads can be added over a 5-10 year time frame. So, while in the past long-range planning studies were done over a longer period of time, often 20 years in the future, current planning requirements have changed the time frame considered long term.

The existing line through the CRW was built over 30 years ago. BPA's conservative estimate is that a new line and additional lines added to the infrastructure would serve loads for at least another 30 years. Please also see responses to Comments 382-004 and 382-005 and Appendix H (available on request).

It is true that the presence of any existing utility facility would be a logical choice for the siting of future proposals. BPA has no plans for additional lines at this time.
of the existing ROW’s with taller transmission lines of greater capacity, or other additional construction simply because the infrastructure already exists. Such long term and cumulative effects must be considered in this document, especially considering public benefits of the ecological commitments Seattle has made for the Watershed.

Within a mid- to long range (10-25) years horizon please develop your discussion of the Canadian Entitlement, how BPA intends to address it, and how this project will provide a long-term solution.

ROW Clearing and Maintenance (Sections 2.1.1.4 and 2.1.5 pages 2-5, 2-11)

The ROW clearing and maintenance plans should be developed and disclosed in this document in order to evaluate adverse effects and mitigation of effects.

Access Roads (Section 2.1.15 page 2-7)

The EIS states that “access road locations have not been defined”. Access routes and required stream crossings should be identified in this document in order to evaluate potential adverse effects and mitigation of effects.

Summary of Impacts Table 2-2 page 2-19

This table should be modified to reflect the information reflected in MIT’s comments, especially as regards Tribal usage of the Watershed and its resources, including the Land Use, Wildlife, Visual Resources, Cultural Resources, Health and Safety, etc.

Land Use: Section 3.4.9 page 3-12:

The City of Seattle and SPU acknowledge treaty rights and support traditional cultural activities of local Tribes in the Watershed, and are presently working to cooperatively identify and enhance such special uses. The statements in this Section should also acknowledge the Watershed as a special resource area utilized by tribal members, as is acknowledged in Section 3-13 on page 3-65. Other similarly affected sections include Visual Resources (3.11); Socio-economics (3.12) and Noise, Public Health, and Safety (3.14).

Visual Resources: Section 3.11:

Tribal members have used the area known as the Cedar River Watershed for generations specifically for its rich resources that provide sustenance. The land was also used for religious and spiritual purposes as it continues to be today. The document overlooks the fact that there is use within the Watershed boundaries beyond recreation. Evaluation of visual resources, through the view of a Tribal member wishing to practice a sacred tradition, was not considered.

Section 3.8 and 4.7 Wildlife:

More information has been added about the Canadian Entitlement. Please see Appendix I.

Additional information about clearing and maintenance has been included in the SDEIS.

Additional information about access roads and stream crossings has been included in the SDEIS.

BPA has prepared Table 2-3 “Summary of Impacts from Alternatives,” by taking the information presented in Section (Chapter) 4 “Environmental Consequences” of the SDEIS and attempting to quantify the level of impact for each resource area as low, moderate, high, or no impacts.

Comment noted.

We concur that there is use within the Cedar River Municipal Watershed beyond recreation. The DEIS stated that the Cedar River Municipal Watershed is managed as an ecological reserve (Page 3-3). The document also states that the primary use of the watershed (CRMW) is to provide a reliable, high-quality supply of (drinking) water to the region. In addition to supplying drinking water, the CRMW is also managed for generation of electric power, for education purposes, and also for recreation i.e., swimming at Rattlesnake Lake.

Although the document did not evaluate the visual impact of a tribal member practicing a sacred tradition within the CRMW, the proposed line would be located immediately adjacent to the existing Raver-Echo Lake 500-kV Transmission Line; therefore, the proposed line would add only slight incremental visual impacts. If the impact of a transmission line would interfere with the aforementioned sacred tradition, then we would assume that such tradition would be practiced elsewhere in the CRMW where no line currently exists.

Comment noted. However, BPA disagrees with the premise that existing and proposed rights-of-way would negatively impact
The Proposed Alternative, as well as the three other alternatives considered, have the potential to negatively impact deer and elk herds of importance to the Tribe. Specifically, the disruption of the existing ROW and creation of a new one could decrease the amount of forage available. As is mentioned in the document, there is a high potential for introduction of non-native species through ROW ground disturbance, which are toxic to deer and elk. The ROW maintenance schedule should be included within the document, and specific proposed methods of clearing unwanted vegetation should be discussed in the document.

The Muckleshoot Tribe has offered comments relating to potential mitigation which are mentioned within the EIS. We are concerned, however, of the lack of commitment to actually implement these measures, specifically planting of forbs and grasses as ungulate habitat within the ROW after construction. We request that BPA assist in funding the already ongoing deer and elk studies within the Watershed monitor those areas that are proposed to be cleared. Clarification and specificity regarding development and implementation of aggressive vegetation management programs on page 4-47 is needed. Noxious weed controls have already been defined within the "BPA Transmission System Vegetation Management Program". An explanation as to whether the proposed program will follow existing recommendations, or whether a new management program is required. If new programs are offered, they should be disclosed in order to evaluate impacts.

Finally, we would like BPA to commit to minimize disturbance to deer and elk within the area by preventing construction during fawning and calving periods.

Section 3.9 and 4.8 Vegetation:

In the “Final Vegetation Technical Report” located within the Appendices, operation and maintenance impacts for all the alternatives are considered to be low despite the concern over colonization from non-native or noxious plant species. The report argues that the stated low-level impact is warranted because invasion could be mitigated. This is contrary to what we have experienced regarding invasive species, including shrub broom. It is very difficult to eradicate these species without the use of chemical sprays, which are prohibited within the Watershed boundaries. The commitment to mitigation may not be feasible without chemicals. The report also states the cumulative effects of the project would include "loss of forested area within CRW, additional road construction, and increased colonization of non-native plants" (Tech Report pg. 36), and that "the project has a potentially high impact for spreading noxious weeds" (4-64).

Invasion of noxious weeds has been identified within the document, but we feel that adequate measures to prevent and a plan to deal with introduction of these species have not been seriously considered in sufficient detail. As we have stated in previous meetings with BPA, we are very concerned about the possibility of the ROW becoming invaded with these species and prohibiting the growth of forage for animals and plants that are native to Muckleshoot people.

The proposed removal of riparian vegetation to construct the corridor at stream crossings could potentially destroy medicines and plants important to the Tribe. This has not been evaluated. (See Section 4.7,2.6 page 4-47). We are requesting consultation on location of stream crossings and an opportunity to identify and possibly remove plants before construction or

deer and elk herds in the area. With the removal of the over story in the forested environment and the establishment of low-growing vegetation within the cleared right-of-way, more feed would be made available for ungulates such as deer and elk, instead of less. Deer and elk need both feed and cover to survive and be healthy.

If BPA decides to build the project this year, construction would not begin until after the Record of Decision, now scheduled for August 2003. It is our understanding that the calving and fawning period for deer and elk normally begins in March and typically ends in late spring, around the middle of June. Most, if not all, of the calving and fawning will have already taken place prior to the onset of construction activities.

Any trees removed from the forested wetlands would be cut by hand-held equipment (chain saws) and portions of this vegetation would be left in the wetland areas for use as wildlife habitat or removed by helicopter. No mechanical clearing
vegetation removal begins. Assistance with salvage and potential enhancement of other suitable sites if required should be discussed as appropriate mitigation.

The Stable Tree Criteria is mentioned within the document, but not specifically and stated that it will be worked on more at a later time. The survey and number of trees that will be removed in all areas should have been defined within the document. Impacts on the availability of cover for deer and elk, as well as the stability of the trees left standing should have been addressed.

A suggested source of mitigation from the Muckleshoot Cultural Resources Program would be to cultivate and maintain huckleberry patches adjacent to the existing ROW and test the chosen alternative if it is decided to move forward with this project. Many of the plants that traditionally supported native people’s of the area, including huckleberries, were destroyed or do not exist within the Watershed because of past land use practices.

Sections 3.13 and 4.12 Cultural Resources:

The discussion on cultural resources is severely lacking in substance. The DEIS acknowledges that BPA is subject to Section 106 of the National Historic Preservation Act (NHPA) for this federal undertaking. (Section 5.4, page 5-5). Under the NHPA, the agency is responsible to identify archaeological, historic and traditional cultural resources that may be directly or indirectly adversely affected by a project, and determine appropriate strategies for mitigating adverse effects. Where the Muckleshoot Tribe has traditional use and interests within the area of potential effects for an undertaking, it must be consulted throughout the Section 106 process. The DEIS acknowledges that the project is an undertaking subject to NHPA, that cultural resources including traditional cultural properties (TCP’s) have a high probability of being present and affected, and that surveys are required. However, it does not discuss the area of potential effect (APE) for the undertaking, which is an important step necessary to determine the proper scope of surveys. Audio, visual, and direct effects of ground disturbance including access roads, staging areas, borrow pits, are all factors to be taken into account when defining the APE.

The DEIS states that there is a high probability of encountering prehistoric and historic cultural resources within the project area (4-96), but the proposed action states that there is a low impact on cultural resources and contains the least number of culturally sensitive areas and no cultural resource sites within the ROW. (4-96). This document was printed before most cultural resources surveys or appropriate studies, including any TCP studies involving Tribal informants, were designed or undertaken or results made available for any of the project alternatives. The statement is made, however, that the impact to cultural resources will be low for the proposed action, based upon archival research. This is not sufficient “reasonable effort” to evidence NHPA compliance or support this conclusion. The studies must be undertaken prior to making any determination of presence, significance, eligibility, or appropriate mitigation strategies.

It is troubling that BPA is willing to make this statement well before surveys or TCP studies were completed considering that the proposed action is to effect 152 acres directly within the ROW, and over half older stands that may support cultural resources and culturally modified...
405-019 BPA will be pleased to enter into a Memorandum of Agreement (MOA) regarding National Historic Preservation Act (NHPA) compliance, if continued analysis and consultation determines that the project would affect one or more National Register of Historic Places properties and avoidance or mitigation is needed. BPA looks forward to receiving any information the Muckleshoot Tribe may have on traditional cultural properties or uses of the project area.

405-020 The Proposed Action calls for construction of nine miles of transmission line and the expansion of Echo Lake Substation by approximately three acres for the purpose of constructing a new bay to accommodate the additional transmission line. BPA regrets this oversight if it was not mentioned during the scoping meeting with representatives of the Muckleshoot and Snoqualmie tribes. With respect to surveying these areas for cultural resources, BPA cultural resource contractor, HRA Inc., surveyed the substation expansion area at the time the line was surveyed during summer 2001. Although the proposed substation expansion area was surveyed, no survey was undertaken for any staging areas because they were unknown at the time. Any area where ground disturbing activities would take place would be surveyed for cultural resources before construction.

405-021 Once BPA has a timber cruise, we would be willing to share that information with the tribe.

405-022 Comment noted. BPA received many requests for more information as a result of the review of the draft EIS and decided to publish a SDEIS to respond to the comments.
Groups and Individuals
338-001  Comment noted.

339-001  Additional information has been added to the SDEIS to address this comment. Please see Chapter 1. The purpose of the project is to meet the level of reliability that will reasonably insure that all customers in the region have electrical power available when it is needed.

Greg Meeks
360-886-7334

339-001  Lou Driessen called Greg Meeks on 7/9/01. He does not want the project. He is against growth and thinks this project would promote growth. He also does not want this project to affect wildlife, including E&M field impacts. He knows that this project would only benefit California and was not concerned about local needs for they have not had a black/brown out. He was all in favor of the No Action Alternative.
Chapter 2 — Comments and Responses - DEIS

340-001 Our reference to the “human environment” includes both the social environment as well as the natural environment, and our EIS looks at impacts to both. We do not put one above the other, but analyze all impacts in our environmental documents. With respect to what we mean by the project purpose “Maintain environmental quality,” we mean that it is our intention to build, operate and maintain the proposed transmission facilities in an environmentally-responsible manner, should BPA make a decision to build the project.

340-002 Your comment regarding mitigation is noted and will be addressed in the appropriate detail in the Mitigation Action Plan to be subsequently prepared for this project, and in association with permitting discussions with the King County Department of Development and Environmental Services.

BPA has purchased 350 acres in the Raging River Basin immediately adjacent to the Cedar River Watershed. One hundred ten acres would be turned over to the city of Seattle with the remaining acreage sold with a conservation easement or deed restriction such that no commercial or residential construction could take place. BPA may also purchase or fund the purchase of other properties that could be used for compensatory mitigation. Portions that will not be turned over to the city of Seattle would be sold with a conservation easement or deed restriction such that no commercial or residential construction could take place. These properties would more than offset any impacts the project may cause to the Cedar River Watershed and its HCP and impacts to wetlands inside and outside the watershed.

In addition to this compensatory mitigation measure, BPA has designed mitigation measures into the proposed project. It has avoided impacts to jurisdictional wetlands by avoiding filling any wetlands, using a small footprint for tower footings to minimize ground disturbance, planting low-growing vegetation in forested wetlands that would be changed to shrub-scrub wetlands and planting low-growing vegetation on other disturbed ground to rehabilitate it, requiring helicopter/sky crane construction be used to minimize new road construction, and using existing access roads to the extent possible.
With respect to the proposed conversion of forested wetlands to scrub/shrub wetlands, BPA would only use hand clearing techniques to remove tall-growing woody vegetation, and either leave all vegetation taken in the wetland areas or would remove vegetation by use of helicopter/sky crane. Additionally, BPA would provide the appropriate level of compensatory mitigation as recommended by King County for altering these wetlands.

340-003 See Section 2.3.8 of the SDEIS.

340-004 Danger trees would be identified using a combination of information – topography, location and swing of the conductor, wind direction, lean, evidence of high water table, past tree failures, overall health of the tree, etc. See Section 2.1.1.4 of the SDEIS.

340-005 The proposed line would not cross the north face of the Taylor Mountain, and would not be visible to travelers on I-90. The line would terminate at Echo Lake Substation, more that a mile south of I-90.

340-006 Please see the response to Comment 340-002.
Mr. Gene Lynard (KECN-4)  
Project Environmental Lead  
Bonneville Power Administration  
Post Office Box 3621  
Portland, OR  97208

Dear Mr. Lynard:

Re: Kangley – Echo Lake Transmission Line Project  
Specifically impact on the Gray Wolf, Black Bear, Cougar

Thank you for the copy of the Kangley – Echo Lake Transmission Line Project environmental impact study. I found the information quite enlightening and very thorough and informative.

However, as late as July 4, 2001, I have personally observed a Gray Wolf not more than 200 yards east of the present transmission lines where they cross Kerrston Road – whereas you report indicated ‘No known to occur in the CRW’ and ‘Not expected to occur in the project area’. I would have to tell you that where I saw the wolf was pretty damn close to your project area.

Further, I did not see any listing of the Black Bear or Cougar, which also do occur within all the areas listed for your project. What information has been established for these two species?

Aside from these three species of animals I was very pleased with the extensive work done by Bonneville Power Administration, et al.

Cordially,

Philip L. Howard

Cc: Bonneville Power Administration file
The route suggested was field reviewed on two occasions. The route is not level and would require additional acquisition from private owners, and more new construction.

To:  comment@bpa.gov

Re: Online EIS Chapter 2.1.1.5 Access Roads

We would like to suggest that any access road leading to the South (Kangley) end of the project be placed in accordance with Figure 23, page 79, DEIS Kangley Site, Sand and Gravel Operation Proposed Rezone, May 1997, King County Department of Planning and Community Development.

(Riverwood Land Co /Stoneway Concrete, Inc.)

To wit: In Section 27, Township 22N, Range 7E, WM: S/2 of NE/4 of SE/4 the new Tower Access Roads are shown to extend from 336th Ave SE (private road) NE along the Grand Coulee - Raver No. 1 & 2 line to a point 100' from our property line (description below), then running North along that 100' setback line to the Tacoma - Grand Coulee Line easement. Using this route, access to the Number 1 tower of the Kangley - Echo Lake Line could be achieved by extending that road Easterly along the North side of our property directly to the new tower and easement, thereby negating crossing our pastures with a new road and achieving the installation of the roads called for in the aforementioned DEIS. This new road would be level from 336th Ave SE to the new tower.

We will be unable to attend the August 1, 2001 Public Meeting at the Maple Valley Community Center, but will be happy to discuss this proposal, on site, with your planners after Aug 7, 2001.

Thank you,

Richard J. and Patricia L. Stoelz
20516 336th Ave, SE
P. O. Box 135
Ravenna, WA 98051
SE/4 of NE/4 of SE/4, Sec 27, TWP 22 N, R 7 E, WM
(360) 886-2713
dtoelz@juno.com
Lou Driessen, Project Manager, Bonneville Power Administration

Mr. Driessen,

The BPA is proposing construction of 9 miles of new 500 kV power transmission line to be known as Kangley-Echo Lake Transmission Project in King County. The powerline would cut through both the Raging River watershed and the Cedar River watershed (a primary source of Seattle's drinking water) and is currently protected from logging.

If constructed, this line would involve clear-cutting a swath from 150' to 275' wide through the forest plus construction of 1.5 miles of new roads and three construction staging areas of undisclosed size.

We believe the BPA should be held responsible for full mitigation for this project by replacing the habitat, including forest and wetlands, damaged or degraded by this project with equivalent habitat type and quality in the vicinity. Mitigation of damaged or degraded habitat is standard practice in other industries and the BPA should not be exempt.

Please require that the BPA fully mitigate the environmental impact of this project.

Gail and Geary Vaden
344-001 Please see the response to Comment 340-002.

---Original Message---
From: Michael A. and Donna L. Brathovde [mailto:mbrath@concentric.net]
Sent: Wednesday, August 2, 2001 3:11 PM
To: Division, Land
Cc: Murray, Senator Patty Murray, Cantwell, Senator Maria, Dunn, Jennifer, Schell, Seattle Mayor Paul Schell;
Sinc, Ron, Flagg, Suzanne
Subject: BPA Kangley-Echo Lake Mitigation

Michael A. and Donna L. Brathovde
29069 SE Kent-Kangley Road
P. O. Box 8
Ravensdale, Washington 98051
Phone: (425) 432-3237

Leu Driessen, Project Manager
Bonneville Power Administration
P. O. Box 3621
Portland, OR 97208

Dear Sir:

The Bonneville Power Administration (BPA) is proposing construction of nine miles of new 500 kV power transmission line to be known as the Kangley-Echo Lake Transmission Project in King County, Washington. This powerline would cut through both the Raging River watershed and the Cedar River Watershed (a primary source of the City of Seattle’s drinking water and currently protected from logging).

If constructed, this line would involve clear-cutting a swath from 150’ to 275’ wide through the forest plus construction of 1.5 miles of new roads and three construction staging areas of undisclosed size.

We do not oppose the construction of the line but we do believe that the BPA should be held responsible for full mitigation for the environmental impact of this project by replacing the habitat, including forest and wetlands, damaged or degraded by the project with equivalent habitat type and quality in the vicinity. Mitigation of damaged or degraded habitats is standard practice in other industries and the BPA should not be exempt.

Please, require that the BPA fully mitigate the environmental impacts of this project.

Sincerely,
Michael and Donna Brathovde

cc: Senator Patty Murray
    Senator Maria Cantwell
    Representative Jennifer Dunn
    Seattle Mayor Paul Schell
    King County Executive Ron Sims
    Suzanet Flagg, Cedar River Watershed Manager
2-124

Chapter 2 — Comments and Responses - DEIS

345-001 Please see the response to Comment 340-002.

346-001 Comment noted.

346-002 Please see response to Comment 340-003.

346-003 Comment noted. We understand that the City of Seattle has acquired most of the land above Landsburg Dam within the Cedar River Watershed to protect water quality and wildlife. We also understand that the City of Seattle has "negotiated a conservation plan with the secretaries of the Interior and Commerce to minimize and mitigate any impact to endangered species while conducting otherwise lawful activities." HCP's are a long-term plan authorized under Section 10 of the Endangered Species Act (16 U.S.C. 1539). (HCP, Page 1.1-3).

As a federal agency, BPA is not subject to Section 10 of the ESA, but is subject to Section 7. BPA has initiated formal consultation with the U.S. Fish and Wildlife Service (FWS) and has concluded informal consultation with the National Marine Fisheries Service (NMFS).

346-004 BPA tries to first avoid environmentally sensitive areas, such as wetlands, in siting its transmission facilities. Where it cannot, these areas are spanned. Where they cannot be spanned, the
impact is minimized. For the Proposed Action, BPA finds that no wetlands would need to be filled; however, approximately 14 acres of wetlands would be altered from forested wetlands to scrub/shrub wetlands.

The proposed project would change some forestland to managed grass/forb/shrub habitat, and change some forested wetlands to scrub/shrub wetlands. BPA would provide compensatory mitigation for these impacts as described in Response to Comment 340-002 above; however, such wetland mitigation would be determined by King County regulations and not the Washington State Department of Ecology. Since no wetlands would be filled as a part of the proposed action, no permit would be sought from either the Army Corps of Engineers or the Department of Ecology.
Dear Sir/Madam:

I have just learned that BPA intends to build nine miles of a new 500-kV transmission line through the Cedar and Raging River watersheds in King County, Washington. This would include 1.5 miles of new road construction and a clearcut a swath from 150' to 285' wide through the forest, including Seattle’s watershed, which is now protected from logging.

A Draft EIS on the transmission line is apparently available for comment.

347-001 Please see the response to Comment 340-003.

347-002 Please see the response to Comment 340-002.

347-003 Please see response to Comments 411-006 and 394-090.

BPA needs to consider adding circuits to the towers in the existing corridor or explain why that is not possible.

If a new and separate line is necessary, then any forest or wetlands that are damaged by it must be mitigated, i.e., replaced.

A new EIS should be written which includes information needed to reach an informed decision, a substantive cumulative effects analysis and additional alternatives (including conservation).

Sincerely,

James L. Chapman
23321 75th Ave. W
Edmonds, WA 98026
Kuehn, Ginny - KC-7

From:  Dresden, Lauren C - TNF -3
Sent:  Friday, August 24, 2001 12:48 PM
To:  Kuehn, Ginny - KC-7
Subject: FW. Transmission Project in King County

Kangley - Echo Lake
-----Original Message-----
From: Nuki@drag@aol.com [mailto:Nuki@drag@aol.com]
Sent: Saturday, August 11, 2001 9:29 AM
To: lodiressen@bpa.gov
Subject: Transmission Project in King County

Dear Lou,

The Bonneville Power Administration (BPA) is proposing construction of nine miles of new 500 kV power transmission line to be known as the Kangley-Echo Lake Transmission Project in King County, Washington. This powerline would cut through both the Raging River watershed and the Cedar River Watershed (a primary source of the City of Seattle’s drinking water and currently protected from logging).

If constructed, this line would involve clear-cutting a swath from 150’ to 270’ wide through the forest plus construction of 1.5 miles of new roads and three construction staging areas of undisclosed size.

We believe that the BPA should be held responsible for full mitigation for this project by replacing the habitat, including forest and wetlands, damaged or degraded by this project with equivalent habitat type and quality in the vicinity. Mitigation of damaged or degraded habitat is standard practice in other industries and the BPA should not be exempt.

Please, require that the BPA fully mitigate the environmental impacts of this project.

Sincerely,

Dave & Karin Ambur
Chapter 2 — Comments and Responses - DEIS

2-128

Conservation was studied as an alternative to the transmission line. BPA is actively involved in conservation programs as noted in the EIS, but BPA plans the transmission system on the basis of the loads supplied by its customers. BPA's customers (Seattle City Light, Snohomish County PUD, Puget Sound Energy, etc.) encourage conservation and have a closer relationship to end users of electricity. At the same time, local utilities have requested transmission service from BPA sufficient to serve their expected load. BPA is obliged to maintain and construct a system that can meet those contracted needs. Conservation cannot provide the level of reliability and capacity needed. See Section 2.2.9 and Appendix J of the SDEIS.

Please see Section 2.3.8 of the SDEIS.

The Draft EIS does not adequately consider the very serious environmental effects from this project. The project would require 1.5 miles of new road construction through the Cedar River Watershed and the Raging River Watershed. New roads are very likely to cause soil erosion and resulting damage to water quality and fisheries resources. Additional roads also cause fragmentation and have severe impacts on wildlife in these watersheds. Although the DEIS Summary seems to infer that the roads right of way would only require clearing for about 75 feet, in fact, cutting of trees can be as far as 200 feet from the power line (DEIS pages 2-5). Further, the roads would impact several wetlands. In light of the enormous amounts of money that the City of Seattle and many state and federal agencies are spending to protect

349-002

Further, in the event that additional transmission lines are required, we believe that BPA should take a much harder look at placing additional lines on the existing towers. BPA asserts that new transmission lines are required because of the possibility of damage to the existing towers. However, in our judgment, that possibility is negligible. Certainly the cost of reinforcing and strengthening the existing towers in various ways would be substantially less than the cost of the proposed project.

349-003
BPA has prepared a programmatic EIS for its vegetation management program associated with transmission lines, roads, and related facilities. The EIS identifies appropriate measures to protect the environment while minimizing danger tree risks and maintaining the ROW within safe, reliable conditions. These guidelines provide for protecting water resources by using herbicide buffer zones. BPA would comply with the standards and guidelines established in this EIS and the Record of Decision for vegetation management (BPA 2000). See Appendix K of the SDEIS for more information. See also response to Comment 394-193. BPA would discuss the use of herbicides with individual landowners. Herbicides would not be used in the Raging River Watershed if landowners object.

As a further critical mitigation factor, the BPA should commit itself not to use herbicides in the Raging River Watershed, which contains important salmon runs.

We look forward to seeing these concerns addressed in the final EIS.

Sincerely,

The Mountaineers

Edward M. Henderson, Jr.
President

EMH/kle
350-001 Please see the response to Comment 340-003.

350-002 Please see the response to Comment 340-002.

350-003 Comment noted. Please see response to Comments 411-006, 349-001, and 394-090.

-----Original Message-----
From: Phil Sheffer [mailto:shefferp@home.com]
Sent: Tuesday, September 04, 2001 11:34 AM
To: lkdressen@bpa.gov
Subject: New Power lines

Dear Sir,

I am writing to express my concern about plans to build new power lines in the Cedar and Raging River Watersheds. These areas are protected for many reasons and water quality is just one of them. There are crucial wildlife habitats within these areas that must not be disturbed. The public has spoken on this issue in the past and our opinions have not changed. I urge you to add circuits to the existing towers rather than cutting down portions of the protected forests to build new towers. The construction of additional road is a big step backwards in our work to restore the watershed to its optimum ecological efficiency. If there are forests and wetlands that are destroyed, disturbed or damaged, they must be replaced. I would also ask for a new EIS that includes a substantive cumulative effects analysis and additional alternatives (including conservation). Thank you for your time, I hope to hear of a more ecologically sensitive alternative plan.

Sincerely,

Philip Sheffer
3033 NE 90TH St
Seattle, WA 98115
shefferp@home.com

-----Original Message-----
From: Kuehn, Ginny -KC-T
Sent: Wednesday, August 29, 2001 1:30 PM
To: Kuehn, Ginny -KC-T
Cc: Driesen, Lauren C - TMR-3
Subject: FW: Please don't run power lines through watersheds!

It said nothing other than the heading.

Lou

-----Original Message-----
From: Clark Nicholson [mailto:clark@windows.microsoft.com]
Sent: Tuesday, August 28, 2001 3:09 PM
To: lkdressen@bpa.gov; comment@bpa.gov
Subject: Please don't run power lines through watersheds!
Dear Mr. Diessel:

I received some alarming news this morning. I understand the Bonneville Power Administration is proposing to clearcut a large swath of low elevation forest in the Cedar River Watershed, which provides water for the City of Seattle, which is protected forest, and which is home to several streams and creeks in which several threatened stocks of salmon live.

I cannot be more clear: There is absolutely no reason to be building new power lines in this watershed. There are existing towers to which lines can be added. The loss of lowland forest in the State of Washington has been enormous, and the threat of extinction for several species of salmon, as well as some birds and mammals, is very real.

I strongly suggest you rethink this idea. Just because we now have a President who wholeheartedly supports the elimination of environmental regulations and concerns does not make it right. The City of Seattle has protected this watershed for a number of reasons. The citizens of King County support this protection. And as a reminder, the President I speak of was not elected by the majority of voters. He does not have a mandate to ignore the will of the majority of citizens.

If the BPA is doing this because of what some are calling an "energy crisis", then it has been sold down the river, or indeed, it is selling the citizens of this state and BPA's own customers down the river.

The "energy crisis" so often invoked by Bush and Cheney is simply a fabrication to cover the fraud perpetrated upon the energy users of this country by the suppliers of electricity, all in the name of deregulation.

Again, let me state this clearly: You must not clearcut in our watershed.

I intend to express my concerns to my congressional delegation as well.

Sincerely yours,

Richard F. Champion
2281 10th Ave. S., #204
Downs, Washington 98198
206-769-5097
Comment noted. If BPA makes a decision to build the proposed project, it would do so in an environmentally-responsible manner. BPA would obtain all applicable environmental permits from the appropriate land management agencies and other federal agencies, such as the USFWS, before initiating construction activities.

-----Original Message-----
From: Cole Thompson [mailto:wct25@yahoo.com]
Sent: Tuesday, August 28, 2001 4:39 PM
To: lccdriessen@bpa.gov
Subject: power line development

Hello--

Just a quick note. Don't cut down any trees in our watersheds damn it!! I understand the need to create new power lines in a rapidly developing region— but for salmon's sake, figure out a solution to cutting wide swaths through our forests. I am an avid hiker, and those cuts are saddening and I believe unnecessary—so figure an alternative, you have the technology and the budget. Seattle enjoys a solid source of freshwater, why take away from this vital resource.

Sincerely,
A Concerned citizen, Seattle Resident energy user, and lover of the roadless wilds.
Please see the response to Comment 340-003.

Please see the response to Comment 340-002. BPA has purchased lands adjacent to the Cedar River Watershed as compensatory mitigation for the forestland that would be taken out of production within the Cedar River Watershed. These lands could also be used as mitigation for the wetlands that would be impacted as a result of the proposed project.

Please see responses to Comments 349-001 and 350-003.

-----Original Message-----
From: Dorothy Sager (mailto:dotsager@hotmail.com)
Sent: Tuesday, August 28, 2001 7:07 PM
To: linelessen@bpa.gov; concmit@bpa.gov
Subject:

Attention: Mr. Lou Driessen, Project Manager

I understand providing power to Northwest users is important. I am opposed to cutting any forest to do so. I want you to focus on adding additional circuits to towers in the existing corridor instead of clearing more forest.

Whatever the outcome of this project, I expect that any forest or wetlands that are damaged will be replaced. This is also a citizens request for a new SIS with needed information, a substantive cumulative effects analysis and additional alternatives (including conservation).

Submit comments to [before Sept. 4]

Dorothy Sager
I recently was informed that you are planning to put new transmission lines through the Cedar and Raging River watersheds, the same watersheds that supply Seattle with our drinking water. As I understand it, this area is protected from logging, and rightfully so. Not only would this compromise our water source, it would also place a large scar in our precious forest land. Haven’t we seen enough clear-cutting from Weyerhauser? I do not approve of this course of action from my public utility. Please put additional lines on existing towers. Please don’t destroy our forests.

Justin Birk
Green Lake
The Final Cedar River Watershed Habitat Conservation Plan for the Issuance of Permit to Allow Incidental Take of Threatened and Endangered Species (HCP), does not "disallow logging of this type in the Watershed," as the commenter states. On the contrary, the HCP states "Removal of trees, down or standing, will be allowed along the existing or new rights-of-way, including roads, to protect public safety and facilities and to allow access. Trees removed for such reasons may be sold by the City, as long as any net revenues are used to offset costs of the HCP or watershed management."

Comment noted. Please see the response to Comment 340-003.

Comment noted. Please see responses to Comments 349-001 and 350-003.

---Original Message---
From: Erica Kay [mailto:b2838@com.org]
Sent: Tuesday, August 28, 2000 8:07 PM
Cc: ldrissenden@ba.gov/comment@ba.gov
Subject: Comments regarding proposed logging in Cedar River Watershed to make way for power lines

Dear Lou Drissenden, Project Manager,

It has come to my attention that a plan by the BPA to expand power lines would require logging and road building in the Cedar River Watershed (as well as nearby forests). (Fraid not!)

My basic comment is simple. This violates the HCP for this area which disallow any logging of this type in the watershed. As I understand the HCP to which the city of Seattle is accountable, this cannot even be considered in this protected area. As a citizen of Seattle, I demand that this project drop this idea immediately and consider legally (and ecologically) viable alternatives. No logging is legal in this watershed and the goals of the HCP are to remove roads not build new ones.

Although I don't fully understand the repercussions of adding additional circuits to the existing towers in that corridor, I suspect I could support that alternative, assuming any forest or wetland damage is minimized and mitigated.

A new EIS that looks at additional alternatives and examines cumulative effects is needed.

Erica Kay
PO Box 22103
Seattle WA 98145
b2838@com.org
357-001 Please see the response to Comment 340-003.

357-002 As described in Section 3.4 of the Vegetation Technical Report (Appendix C) of the EIS, the proposed transmission line ROW does not pass through old growth forest.

357-003 Comment noted. Please see response to Comments 411-006, 349-001, and 394-090.

357-004 Analysis of potential impacts from habitat fragmentation within the Cedar River Watershed was expanded in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B). No old-growth forest habitat would be affected.

357-005 Comment noted. BPA has purchased land to be used as compensatory mitigation, to partially mitigate for the forestlands and wetlands that would be impacted by the proposed project. See response to Comment 340-002.

358-001 Please see the response to Comment 340-003.

358-001 I do not want Bonneville Power to destroy the city's protected water shed with power lines. Destroying a natural resource like water sheds is an unsustainable prospect for human interest. Bonneville should use current cut paths from other power lines rather than clear new ones.

-David A
359-001  Please see the response to Comment 340-003.

359-002  Comment noted.

360-001  Please see the response to Comment 340-003.

360-002  See response to Comment 357-004.

360-003  The Proposed Action would not require cutting any old growth on the Cedar River Watershed, or anywhere within the project area.

360-004  Comment noted.  See response to Comment 357-003.

-----Original Message-----
From: Colwell, David G  [mailto:david.g.colwell@boeing.com]
Sent: Wednesday, August 29, 2001 7:15 AM
To: "lori@wdfw.wa.gov", "comment@wpa.gov"
Subject: Raging Cedar Powerline

Dear Mr. Driessen,

I oppose the proposed Raging Cedar Powerline because I am a resident of the Cedar River watershed and don't want my watersheds trashed by road building and tree cutting. Why cannot additional powerlines be hung on existing towers? You would not propose a construction of a new powerline though Mt. Rainier National Park. Why do you propose construction in Seattle's protected watershed? It is clear from the DEIS that the GPA does not regard the loss of lowland forest as significant, but lowland forest is already disappearing fast enough. We don't need to loose more.

David G. Colwell
Boeing SSC Facilities Services - Strategic Planning
*206-964-7557 (phone)
*206-797-4059 (fax)
*206-964-5858 (mail)
*David.G.Colwell@boeing.com (email)

-----Original Message-----
From: Paul Ballard  [mailto:pballard@h2p.net]
Sent: Wednesday, August 29, 2001 8:26 AM
To: lori@wdfw.wa.gov; comment@wpa.gov
Subject: Bonneville Power Plan to Clearcut in the Cedar River Watershed!

Lou Driessen, Project Manager

Regarding the Bonneville Power Administration (BPA) plan to build nine miles of new 560 kilovolt line through the Cedar and Raging River watersheds. I support, instead, adding additional circuits to towers in the existing corridor. If there is any cutting, I insist that any forest or wetlands that are damaged be replaced. There are apparently discrepancies, including the amount of forest to be cut especially around old growth. I would ask for a new EIS with needed information, a substantive cumulative effects analysis and additional alternatives. This should of course include conservation.

Sincerely,

Paul Ballard
416 NW 92nd
Seattle, WA 98117
206 782 0824
Kuehn, Ginny - KC-7

From: Dressart, Laurens C - TMP-3
Sent: Wednesday, August 29, 2001 3:29 PM
To: Kuehn, Ginny - KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW NINE MILES OF NEW TRANSMISSION LINES

-----Original Message-----
From: Stacey Glenewinkel [mailto:STACEY@worldshare.net]
Sent: Wednesday, August 29, 2001 11:07 AM
To: kriessen@bpa.gov
Subject: NINE MILES OF NEW TRANSMISSION LINES

361-001 I am deeply disturbed about your plans to build nine miles of new 500 kilovolt line through the Cedar and Raging River watersheds and your 1.5 miles of new road construction. Why do you think it's ok to clearcut a swath from 150' to 235' wide through the forest, including Seattle's watershed, which is currently protected from logging?? This plan would destroy forests recently protected by the City of Seattle and Protect Our Watershed Alliance. Why have you dismissed alternatives that would modify existing powerlines, eliminating the forest destruction? There are important salmon fisheries in Raging River and the City of Seattle is working to re-establish salmon in Cedar River.

361-002 BPA feels the loss of forest is not large or important. Apparently you don't understand the importance of these low elevation forests, the rapid loss of forest in the county, and the landmark decision by Seattle to preserve its watershed forests. Would BPA propose a powerline through Mt. Rainier National Park? Then why through our protected watershed?

361-003 BPA needs to put any new lines on the existing towers. In any alternative, BPA must fully mitigate for any impacts of their projects. And that means REPLACING any forests that they cut.

361-004 Please add additional circuits to towers in the existing corridor. I INSIST that any forest or wetlands that are damaged be replaced. I also ask for a new EIS with needed information, a substantive cumulative effects analysis and additional alternatives (including conservation).

Be responsible!!

Stacey Glenewinkel

361-001 Please see the response to Comment 340-003.

361-002 Comment noted.

361-003 Please see the response to Comment 340-002.

361-004 Please see responses to Comments 349-001, 350-003, and 357-005.
Chapter 2 — Comments and Responses - DEIS

362-001 Comment noted.

362-002 Please see response to Comment 394-090 for additional information on cumulative effects analysis.

August 30, 2001

I am writing in regard to the Draft Environmental Impact Statement (DEIS) on the Rock Island Powerline, also known as the Haugley-Echo Lake Transmission Line Project. I strongly oppose the cutting any forest areas, especially in the protected Cedar River Watershed, and destruction of any wetlands in the construction process. Any and all wetlands and forests impacted must be mitigated.

Long term and cumulative impacts from the project must be evaluated, including impacts to amphibian populations and state sensitive plant and animal species. Species like Tall Bugbane, Clematis, and native Bigleaf Maple are state sensitive species that are only found in lowland old growth and late successional forests. This species is likely extinct in King County and has few known populations in Washington State. Lowland old growth and late successional forests are becoming rare, and must be protected from all possible developments and disturbance. Many species that are not listed are endangered and still threatened by habitat fragmentation.

Alternative proposals must be evaluated in a new EIS, including options to modify existing towers or corridors to handle new power needs.

Thank you.
Richard Ellison, Save Seattle’s Trees!  
1938 40th Ave E  
Seattle, WA 98102

362-003 Please see the response to Comment 340-003.
Hallujah!!!

I happened to hear there is going to be some logging on the Cedar River Watershed - and I am delighted... Especially if it is old-growth.

Congratulations on your stewardship of a renewable natural resource.

Please continue to manage the forests, which certainly includes logging, and clearcutting is fine. Without it and the full sunlight to which it gives rise, Douglas-fir will not regenerate and as you know, we'll end up with a lesser species, such as hemlock.

Please, do not cave in to the vocal folks who think preservation is proper management.

We need the timber / lumber. We need the related jobs in the beleaguered timber industry. The forest needs the logging to harvest the trees that otherwise are destined to fall down and rot. The understory needs the removal of the fuel that encourages catastrophic fire, and we need some roads for access for management and fire protection.

Regards,

Paul R. Waggoner
13002 SE 52nd Pl
Bellevue, WA, 98006
425 / 644-1221
pwages@truth.com
Kuehn, Ginny - KC-7
From: Driessen, Laurens C - TNP-3
Sent: Wednesday, August 29, 2001 4:34 PM
To: Kuehn, Ginny - KC-7
Cc: Lynam, Gene P - KEC-4
Subject: FW: Comment, Kangley - Echo Lake

---Original Message---
From: Zarah Kushner [mailto:zkushner@quorum-irb.com]
Sent: Wednesday, August 29, 2001 4:02 PM
To: lcchesson@bpa.gov; comment@bpa.gov
Subject: Comment

Dear Mr. Driessen, Project Manager,

I am recently heard about your plans to build nine miles of new 500 kilovolt line through the Cedar and Raging River watersheds and your 1.5 miles of new road construction. I think it is reprehensible to clearcut a space from 150' to 255' wide through the forest, in Seattle's watershed, which is currently protected from logging, yes? This plan would destroy forests recently protected by the City of Seattle and Protect Our Watershed Alliance, a most progressive decision. Why have you dismissed alternatives that would modify existing powerlines, eliminating the forest destruction? There are important salmon fisheries in Raging River and the City of Seattle is working to re-establish salmon in Cedar River. BPA feels the loss of forest is not large or important. Apparently you don't understand the importance of these low elevation forests, the rapid loss of forest in the county, and the landmark decision by Seattle to preserve its watershed forests. Would BPA propose a powerline through Mt. Rainier National Park? Then why through our protected watershed? BPA needs to any new lines on the existing towers. In any alternative, BPA must fully mitigate for any impacts of their projects. And that means REPLACING any forests that they cut. Please add additional circuits to towers in the existing corridor. INSIST that any forest or wetlands that are damaged be replaced. I also ask for a new DEIS with needed information, a substantive cumulative analysis and additional alternatives (including conservation). Be responsible!

Thank you for listening. I hope that my words find ears that are more focused on the environmental consequences of actions to be carried out by a company than turning a profit.

Zarah Kushner, Concerned citizen against the plans that have been set into motion by BPA.

Zarah Kushner
Associate Project Manager
Quorum Review IRB
zkushner@quorum-irb.com
http://www.quorum-irb.com
(V) 206-448-4082
(F) 206-448-4193
365-001  Please see the response to Comment 340-003.

365-002  Comment noted.  Please see response to Comment 340-002.

365-003  Comment noted.  BPA is siting the needed facilities to minimize the impacts on the environment, while meeting the project’s purposes and need.

Dear BPA,

I have been a citizen of Washington State for my entire life (going on 30 years now) and I have been living in Seattle for the last five years. I’ve been to many of the other states in our great union, but none compare to the vast beauty of our state, Washington.

I am writing to urge you to reconsider your stance on adding additional equipment to the Cedar and Rising River watersheds. As I’ve said in many others, feel that adding additional circuits to the towers already standing would be more environmentally friendly than to tear up a large portion of the watersheds to add new equipment.

In addition, I encourage you to be sure to thoroughly replace any wetlands or forests that have beened or may be damaged by BPA.

I understand that you must satisfy the needs of many here in Washington State, but I ask that you please take into account our environment as well. As the population of our state grows, we need to take steps to ensure that protected (and non-protected) portions of our forests and wetlands don’t suffer the consequences.

Thank you for listening.

Sincerely,

Jade Day
Seattle, Washington
Increasing the number of routes and building additional lines would increase the environmental impacts.

Please see response to Comment 394-034 and Section 2.1.1.4 of the SDEIS.

Please see response to Comment 349-001.

--- Original Message ---
From: Paul Hess (mailto:phess@environmental.com)
Sent: Wednesday, August 29, 2001 6:36 PM
To: 'Dressen, Laurens C - TNP-3'
Subject: RE: Raging Cedar Powerline project

Lou -

So what if you shared the magnitude transmitted over several different routes? Say you shared it on three routes - if you lost one, you would only lose 1/3 of the added power that this new project will be carrying. That wouldn't be so bad, would it?

Since I think some of the proposed cut areas are in very old growth forest, won't you have to cut a wider swath than the normal 75' ROW, to account for the larger trees in close proximity? That will not be good. How wide with the cut be at it's maximum?

What if you combined conservation with the above sharing on current lines, have you realistically looked at that? I can't imagine that the pricing on that combination would be more than this entirely new project.

Looking forward to your reply. Thanks,

Paul
Dear Mr. Diessel,  

I recently learned of the intention of the Bonneville Power Administration to build a new 500 kilovolt line through the Cedar and Raging River watersheds that are protected by the City of Seattle and Protect Our Watershed Alliance. Wetlands and salmon fisheries that the City of Seattle is trying to re-establish in the Cedar River would be impacted by this action. Your intention to clearcut through nine miles of forests in order to complete this project is unacceptable and shows no regard for the work that has been done to preserve these areas and their ecosystems.

You must find alternatives, particularly modifying the existing power structures to accommodate additional capacity instead of destroying valuable forests and compromising the Seattle watershed. In spite of the opinion of the BPA that the destruction of this patch of forest is inconsequential, there are many of us who strongly disagree.

I am greatly appalled that your plan is being seriously considered, and I strongly urge you to add additional circuits to the towers in the existing corridor. You should be held accountable for any decision that adversely affects the forest, wetlands and salmon, as well as the Seattle watershed. These issues are of extreme importance to many people who are responsible stewards of the environment. It is imperative that a new EIS with crucial and needed information including a cumulative effects analysis and additional alternatives (including conservation), be investigated and proposed.

Please act responsibly and with regard for the land, the trees, the salmon and most certainly the people of Seattle!

Barbara Glanckirk
BPA understands that the City of Seattle has recently adopted a HCP in compliance with the Endangered Species Act. BPA expects to minimize any impacts to the environment in constructing, operating and maintaining the facilities over the life of the project. Please see response to Comment 340-002.

Please see the response to Comment 340-003.

Comment noted. Should BPA make a decision to build the project, it would do so in an environmentally-responsible manner. BPA understands the sensitivity of the Cedar River Watershed and adjoining lands, and intends to do what it can to protect and preserve the municipal watershed and not cause any harm, should a decision be made to site the facilities through the Watershed.

Although the Cedar River Watershed is owned by the Seattle Public Utilities, it is located in unincorporated King County. The environmental regulations that govern the environmentally sensitive areas, such as wetlands, within the Watershed are the King County Sensitive Areas Ordinance, and state and federal regulations. BPA intends to comply with all applicable federal, state and local environmental laws and regulations to the extent practicable.

1. Modify the existing power lines to accommodate the new ones.
2. New power lines are in a wetland area and are protected by the City of Seattle.
370-001  Please see responses to Comment Letter 361.

---Original Message---

From: Arthur Mink<br>Subject: Cedar River power line

Dear Mr. Griessen,

We understand that BPA plans to clear cut a swath from 150' to 285' wide through Seattle's watershed, which is currently protected from logging. This plan would destroy forests recently protected by the City of Seattle and Protect Our Watershed Alliance. BPA apparently has dismissed alternatives that would modify existing power lines, eliminating the forest destruction.

BPA apparently does not understand the importance of these low elevation forests, the rapid loss of forest in the county, and the landscape decision by Seattle to preserve its watershed forests.

Would BPA propose a power line through Mt. Rainier National Park? Then why through our protected watershed?

We support adding additional circuits to towers in the existing corridor.

We insist that any forest or wetlands that are damaged be replaced.

We want a new EIS with needed information, a substantive cumulative effects analysis and additional alternatives (including conservation).

Sincerely,

Arthur R. Mink
Lynn Mink
163 Power Ave.
Seattle, WA 98122-6545
371-001 Please see the response to Comment 340-003.

371-002 Comment noted. BPA intends to minimize the impacts to the environment, should a decision be made to build the project. Please see response to Comment 357-003.

371-003 Comment noted.

--- Original Message ---
From: Lisa Brenner
Date: Monday, September 03, 2001 12:45 PM
To: Cedar & Raging River Watersheds

I am writing as a former citizen of Seattle (I currently live in Arlington) to say that it is heartbreaking that once again something is being proposed that will cause unneeded damage to the amazing country of the Pacific Northwest. I want to support the idea of adding circuits to existing towers in the existing corridor. I want to insist that all damage to forest and wetland be repaired. I want to ask that a new EIS be filed.

We cannot ever estimate the damage actions like the proposed one will do. We can estimate what we can STOP from happening. Please take preventative actions NOW.

Thank you.
Lisa Brenner
Izocherstraat 38
1074 IG Amsterdam

--- Original Message ---
From: Lisa Brenner
Date: Monday, September 03, 2001 9:10 PM
To: Kuehn, Ginny, KC-7
Cc: Lynard, Gene P., KC-4
Subject: FW: <no subject>, Kangley - Echo Lake

To Lou Orijessen, Project Manager
Bonneville Power Administration

Dear Mr. Orijessen:

I have just learned--with alarm--that Bonneville Power Administration has plans to cut old-growth forest, to clearcut a new corridor within the Cedar River Watershed for its new Kangley-Echo Lake Transmission Line Project. This would impact several wetlands and important salmon fisheries.

In Raging River, as well as the work being done by the city of Seattle to re-establish salmon in the Cedar River.

I am writing to urge the BPA to stop this planning immediately. Instead, the BPA could improve the existing corridor by adding additional circuits to the towers already there. If any forest or wetlands outside the existing corridor are to be damaged, they should be replaced. But before any action by the BPA, a new Environmental Impact Statement is needed. This should include all necessary information that presents alternatives including conservation, and that prevents a substantial cumulative effects analysis.

Please respect the importance to all of us of preserving low elevation forests, particularly Seattle's watershed forests.

Sincerely,
Lisa Brenner
2020 - 23rd Avenue E.
Seattle, WA 98112
Comment noted.

BPA designs its facilities to have an economic life of approximately 50 years. It does not make hasty decisions in siting transmission facilities. As a federal agency, BPA is subject to the National Environmental Policy Act (NEPA) of 1969, as amended. NEPA requires that BPA undertake an environmental impact statement on all major federal actions prior to making its decisions.

Over the last three years, BPA has made a concerted effort to work with the potentially-affected public and involved government agencies to find alternatives for the proposed power line and related facilities, including undertaking this environmental impact statement. BPA is committed to complying with the letter and the intent of NEPA in identifying all of the environmental impacts the proposal would cause, in advance of the decision-maker making an informed decision. If a decision is made to build a transmission line, then those impacts would be minimized to the maximum extent practicable. See response to Comment 340-002.
Dear Mr. Dreissen,

I am writing to ask that you reconsider the new powerline corridor you are planning that will cut through the Cedar Mtns-Raging River watershed. This would cause significant and adverse environmental impacts to fragile and valuable and PROTECTED forests and wetlands. I urge you to consider adding additional circuits to the towers in the already existing corridor. I don’t believe your EIS provides enough information about the cumulative effects of this new corridor, nor does it propose any viable alternatives. I think there should be a new EIS which provides this information. As a citizen at Washington state, I care deeply about our environment and saving the salmon and old growth forest. We all need to try really hard to think in the long term about how to save these resources. I appreciate your consideration of this matter.

Thanks
Megan Kelso
citizen member of Pacific Crest Biodiversity Project

Dear Mr. Dreissen,

I am deeply concerned about the clearcut that the Bonneville Power Administration proposes to make within protected wetlands. Instead, why not improve the existing corridor? Bonneville could add additional circuits to the towers in the present corridor instead of clearcutting for a new one. In any case, before permitting BPA to act, demand a new Environmental Impact Statement that includes all necessary information (the present one is insufficient), that presents alternatives including conservation, and that provides a substantial cumulative effects analysis. Finally, BPA should be made responsible for replacing any forest or wetlands that are damaged in the course of this new work.

Sincerely,
Judy Lightfoot, PhD
BPA has proposed siting the transmission facilities (towers and access/spur roads) to avoid sensitive areas such as wetlands, and their buffer areas. Where these sensitive areas could not be avoided, we have attempted to minimize their impact. No wetlands would be filled, but about 14 acres of non-jurisdictional wetlands would be converted from forested wetlands to scrub/shrub wetlands.

Additionally, BPA intends to purchase or fund the purchase of additional land that could be used for compensatory mitigation to mitigate for the damage done to sensitive areas, should BPA make a decision to build the project. See response to Comment 340-002. BPA intends to comply with all federal, state and local regulations with respect to the proposed project, and minimize impacts to wetlands.

BPA has concluded consultation with the National Marine Fisheries Service under Section 7 of the Endangered Species Act. We have prepared a biological assessment (BA) and have concluded that the Proposed Action would not result in destruction or adverse modification of designated critical habitat. We asked NMFS for their concurrence in this finding, and received their concurrence in early February 2002. Please see Appendix U.

Please see responses to Comments 340-002, 349-001 and 357-003.
378-001 Comment noted. BPA has selected its Proposed Action based on a number of factors, including electrical performance, cost, and level of impact to the human and the natural environment. Table 2-3 of the SDEIS compares the impacts among alternatives. The Proposed Action is less likely to impact cultural resources, would have the least line losses, and is one of the most economical of the alternatives analyzed in the SDEIS.

BPA has agreed to a long list of mitigation measures to diminish the impact of the Proposed Action in the Watershed. Double-circuiting the crossing of the Cedar River will avoid clearing vegetation along the riverbanks. Constructing the towers with helicopters and using new tower footing designs called micropiles would reduce the amount of ground disturbance. The purchase or funding of land adjacent to the watershed for natural resource protection will more than offset the small amount of disturbance that is expected to result from the construction. Locating the Proposed Action adjacent to an existing line would take advantage of the existing access road system and would also minimize the amount of clearing of vegetation that would be necessary. See also response to Comment 340-002.

378-002 Please see response to Comment 349-001.

378-003 BPA anticipates no short-term or long-term impact to the municipal water supply as a result of the Proposed Action. If a decision is made to build the project, BPA would prepare and implement a storm water pollution prevention plan, under the National Pollutant Discharge Elimination System (NPDES), a program regulated by the Environmental Protection Agency. In complying with the NPDES requirements, no sediments in measurable quantities would be allowed to enter surface water. As a federal agency, BPA is required to comply with the Clean Water Act, and the National Drinking Water Act and BPA intends to do so. BPA is aware of the sensitivity of the area, particularly in the Cedar River Municipal Watershed, where drinking water is collected for 1.3 million people in the Seattle metropolitan area. BPA currently has an existing transmission line that crosses the Cedar River Municipal Watershed, and BPA knows of no problems the City of Seattle currently has with this existing line.
The Draft EIS does not adequately consider the very serious environmental effects from this project. The project would require 1.5 miles of new road construction through the Cedar River Watershed and the Raging River Watershed. New roads are very likely to cause soil erosion and resulting damage to water quality and fisheries resources. Additional roads also cause fragmentation and have severe impacts on wildlife in these watersheds. Although the DEIS Summary seems to infer that the road rights-of-way would only require clearing for about 75 feet, in fact, cutting of trees can be as far as 200 feet from the power line (DEIS pages 2-5).

Further, the roads would impact several wetlands. In light of the enormous amounts of money that the City of Seattle and many state and federal agencies are spending to protect wetlands and salmon habitat, this additional road construction is unnecessary. This is especially crucial when one considers the high likelihood that during a project of this scale, there will undoubtedly be fuel spills, oil leaks and other accidents but very serious incidents that will have a major effect. As a further critical factor, the BPA should commit itself not to use herbicides in the Raging River Watershed, which contains important salmon runs.

Furthermore, the DEIS does not adequately consider BPA's duty to mitigate if the project proceeds with the Preferred Alternative. Lowland forests are a critical ecological element in the Western Cascades. The Cedar River Watershed contains an unusually large block of old growth. It also contains second growth that now has the possibility of maturing into old growth as a result of the Cedar River HCP. This project, with a right of way up to 200 feet from the power line, would cause serious fragmentation through this forest ecosystem. Mitigation should include replacement habitat, including forests and wetlands, which should be in close proximity to the area that is disturbed. To the extent that local areas are not used for mitigation, the area of mitigation should be increased as the mitigation moves in distance. If mitigation is employed, the BPA should look at several close by areas in Green River, Raging River, near Selleck, and upper Rock Creek Valley.

Further mitigation should include but not be limited to the height of any transmission lines crossing the Cedar and Raging Rivers should be high enough to allow late successional forest to grow to 200' tall in the riparian zone of the river, and adjacent slopes. Given the topography on either side of the river, that should be feasible. The height of the towers should be increased if necessary.

Roads outside of cleared powerline right of way should be eliminated. Helicopters and/or trails to access those sites should be used instead. Any roads constructed should be offset by eliminating roads elsewhere in the watershed. No staging area should be allowed inside the watershed.

Furthermore, the DEIS fails to address cumulative impacts of this and other similar projects. Particularly when one looks at this in conjunction with existing transmission lines affecting forests and wildlife corridors becomes more than a little significant. In fact, this project degrades wildlife corridors in this critical ecological connection to Tiger Mt. and Rattlesnake Ridge.

Whereas the current project will significantly affect the watershed, another route through the watershed would be far worse. Thus, I would strongly object to this course of action.

I believe there are long ways to go to adequately study the impacts of this project and the solutions to these and other serious problems. The Draft EIS lacks important site specific information on the location of towers, roads, and staging areas. It's analysis of streams and fisheries is inadequate. The cumulative affect analysis is essentially non-existent. The DEIS fails to consider a full range of alternatives. A supplemental Draft EIS should be produced and a broader public involvement process implemented.

I look forward to commenting on an improved supplemental DEIS which addresses these and other concerns that the current DEIS fails to address or addresses inadequately.

Sincerely,

Harry Romberg

378-006 Please see response to Comment 340-003.

378-007 Comment noted. BPA feels that we have adequately addressed the impacts of the project. Regarding potential soil erosion, BPA would comply with the Clean Water Act and the NPDES requirements in designing and implementing a storm water pollutant prevention plan. Erosion control devices would be left in place until the area has become at least 70 percent stabilized. They then may be removed or remain in place for a longer period. When removed, a Notice of Termination will be filed with EPA.

Please see response to Comment 357-004 addressing habitat fragmentation.

With respect to the clearing impacts, the commenter is correct, danger trees could be taken as far or farther than 200 feet from the powerline, depending on their height, condition, and relationship to the line. See response to Comment 340-004.

378-008 BPA proposes to double circuit (at a cost of over $2 million) the proposed line with the existing line at the crossing of the Cedar River. This would avoid the need to clear additional riparian vegetation along the banks of the river. The crossing at the Raging River would use tower heights that would minimize clearing in riparian habitat as much as possible.

378-009 BPA is only proposing to build access/spur roads outside of the proposed right-of-way to avoid wetlands. Trails are not sufficient
surfaces for the equipment used to build and maintain the line. Helicopters would be used to construct the project, but BPA needs access to its tower sites at all times to operate and maintain the transmission system. Regarding eliminating roads elsewhere in the Watershed, BPA has no control over existing roads on private land. To access its transmission system, BPA prefers to acquire rights on existing access roads and only builds its own roads where there are no existing roads or access to those roads has been denied.

378-010 BPA feels that it has done an adequate job addressing cumulative impacts of past, present and any reasonable foreseeable future projects in the area in the SDEIS. BPA disagrees that critical wildlife corridors would be affected between Tiger Mountain and Rattlesnake Ridge.

378-011 Comment noted. BPA agrees that of the alternatives under consideration the Proposed Action is the preferable route.

378-012 and -013 Comment noted. A SDEIS was produced and distributed with updated information on cumulative impacts, fisheries, streams, mitigation measures, and site-specific information.
Chapter 2 — Comments and Responses - DEIS

Kuehn, Ginny -KC-7

From: Peter Roth [peterroth@yahoo.com]
Sent: Sunday, September 02, 2001 4:25 PM
To: lcrichtsen@bpa.gov, commnet@bpa.gov
Subject: Raging Cedar Powerline/Kangley-Echo Lake Transmission Line Project comment

To Lou Driessen:

I would like to comment on Raging Cedar Powerline/Kangley-Echo Lake Transmission Line Project proposal.

While I support the addition of circuits to towers in the existing corridor, I must insist that any forest or wetlands that are damaged be adequately replaced. This requires a comprehensive Environmental Impact Statement (EIS) with a substantive analysis of all cumulative effects of any changes to the ecosystem. Included in this EIS should be alternatives that require no environmental destruction. These non-destructive alternatives are the most important part of the EIS because they would require the least amount of effort and resources to implement.

Thank you for taking the time to read my input.

Sincerely,
Peter Roth
7415 - 5th Ave NE #208
Seattle WA 98115-5770

---

Kuehn, Ginny -KC-7

From: kthomast@qwest.com
Sent: Sunday, September 02, 2001 8:02 AM
To: lcrichtsen@bpa.gov, commnet@bpa.gov
Subject: Proposed Powerline in Cedar and Raging River watersheds

Bonneville Power Administration,

I am writing to voice my opposition to the proposed nine miles of new powerline which the BPA is considering building in the Cedar and Raging River watersheds. These areas should not be subject to the road-building and clear-cutting which the installation of new powerlines would entail.

Any new lines should be placed on already existing towers, to minimize damage to the forests in the watersheds. Any damage done to forests or wetlands by the installation of new powerlines should be replaced.

Our watersheds and forests require protection now and in the future. Please do not build new powerlines.

Sincerely,
Karen P. Thomas
4435 First Avenue NW
Seattle, Washington 98107

---

379-001 Please see response to Comments 349-001, 340-003, and 409-002.

380-001 Please see the response to Comment 340-003.
Dear Mr. Dreissen,

I am deeply concerned about the clearcut that the Bonneville Power Administration proposes to make within the Cedar River Watershed. Instead, why not improve the existing corridor? Bonneville could add additional circuits to the tower in the present corridor instead of clearcutting for a new corridor. In any case, before permitting BPA to act, demand a new Environmental Impact Statement that includes all necessary information (the present one is insufficient), that presents alternatives including conservation, and that provides a substantial cumulative effects analysis.

Finally, BPA should be made responsible for replacing any forest or wetlands that are damaged in the course of this new work.

Sincerely,

Robert R. Weeks

381-001 Please see the response to Comment 340-003.

381-002 Please see responses to Comments 340-002, 350-003, and 357-003.
382-001 Comment noted.

382-002 Comment noted.

382-003 Please see responses to Comments 394-003, 378-012, and 378-001.

382-004 The description of the purpose and need for this project is greatly expanded in Chapter 1 of the SDEIS. A summary of the transmission planning studies (Appendix H) is available upon request.

382-005 BPA performed a regional system analysis that supported the subject project. These analyses are conducted through computer simulation studies. A summary of these studies is available upon request (Appendix H).

BPA is considering other improvements in the area. See Section 1.7 of the SDEIS.

382-006 Comment noted. Cost estimates for all the alternatives in the SDEIS were updated to include mitigation cost estimates. BPA is committed to providing the appropriate level of mitigation as required by King County’s Environmentally Sensitive Areas Ordinance, Chapter 21A.24 of the King County Code. Although BPA as a federal government agency is not required to meet these procedural requirements, it strives to meet or exceed local development regulations’ substantive requirements wherever possible. As a result, BPA is working with King County as well as Seattle Public Utilities and the U.S. Fish and Wildlife Service in developing a reasonable mitigation package that is acceptable to all of these agencies’ needs. Please also see response to Comment 340-002.

382-007 Please see response to Comment 394-090.
The DEIS and SDEIS contained a cumulative impact analysis that looked at the cumulative impacts of existing facilities when added to the proposed project and any reasonable foreseeable future actions. BPA does not know whether a line between Echo Lake Substation and Monroe Substation is needed. BPA’s system planners are constantly studying the system, and only propose improvements to the system as they are needed. System planners have not determined that such a line is needed, and therefore, it would not be considered to be reasonable foreseeable at the present time.

The 50-foot road easement is a BPA standard for acquisition of a road to be constructed along a 500-kV transmission line. The typical cross section of a 16-foot wide road with ditches is 36-foot maximum with additional as may be required for cuts and fills or curve widening. Typically, a 16-foot wide road on the type of terrain in the project area would not require more than 26 feet.

BPA will specify helicopter/sky crane tower erection within the Cedar River Watershed to minimize impacts in the area. Helicopter tower erection would also be used outside the Watershed in those areas where access might impact wetlands. Roads would still be necessary to allow access to most of the tower sites that could be reached from uplands, for both construction and maintenance activities. However, no wetlands would be filled to reach tower sites.

Comment noted. BPA has purchased or will fund the purchase of land to offset those forestlands and wetlands that would be lost due to the Proposed Action. See response to Comment 340-002.

Please see response to Comment 394-034 and Section 2.1.1.4 of the SDES.

A SDEIS has been provided with more in-depth analysis of a variety of issues raised during the comment period for the Draft EIS.

When siting its transmission facilities, BPA avoids sensitive areas such as wetlands where it can. Where it cannot, these sensitive
areas are spanned, and where they cannot be spanned, BPA minimizes its impact to the extent that it can. BPA has determined that the Proposed Action would convert approximately 14 acres of forested wetlands to scrub-shrub wetlands. No wetlands would be filled. BPA is looking for ways to mitigate for the wetland impacts; however, it proposes to use part or all of the 352-acre parcel recently purchased from the Trust for Public Land to mitigate for the conversion of forested habitat to non-forest uses, as well as to mitigate for a portion of wetland impacts associated with the Proposed Action. See also response to Comment 340-002 for information about compensatory mitigation.

Comment noted. BPA is aware that the City of Seattle intends to reestablish some species of salmon in the Cedar River, above Landsburg Dam, and that the Raging River has coho and chinook salmon. While additional road construction, clearing activities and potential spills could adversely impact these fish species, BPA would put in place mitigation measures to minimize any impacts. Additionally, BPA has written a biological assessment (BA) on the Proposed Action that has concluded that the Proposed Action may affect, but is not likely to adversely affect the chinook salmon (listed as threatened in the Puget Sound area) and their designated habitat, and that it may impact, but is not likely to adversely impact, the coho salmon (listed as a candidate species, under the Endangered Species Act).

In January 2002, NMFS issued a letter to BPA concurring with its effect determination of "may affect, but not likely to adversely affect" for Puget Sound chinook and their designated critical habitat; therefore, BPA has concluded informal consultation on these actions in accordance with 50 CFR 402.14(b)(1). See Appendix U.

Section 4.1.1.1 of the Wildlife Technical Report (Appendix B) was amended to include a discussion of potential collisions with power lines by marbled murrelets potentially flying up river corridors. Section 3.3.2 was revised to include marbled murrelets as a species to be analyzed.

Section 3.3.2.1 of the Wildlife Technical Report was revised to reflect the level of potential future habitat loss in the lower

The DEIS states several times that the clearing would be 150' wide, but table 2.1 (DEIS p2-6) says 375'. If no extra clearing is done between towers (that is 75', assuming as close as possible), then 375' would be cut on the other side, thus, total clearing is 262' wide. Additional "danger tree" could be felled (p. 5.3). This could increase to up to 476' slope distance through mature and old-growth forests. At only 150' wide, 9 miles of clearing equals more than 160 acres, but it is apparent that clearing could easily exceed 300 acres, much of it late-successional forest. This is a significant impact on forest, which only increases if we assume blowdown in adjacent forest due to this clearing. In addition, there would be 3 acres of clearing for substation expansion. BPA is considering reduced clearing within the Cedar River watershed, but provides no specifics. This is crucial information and should be in a supplemental Draft EIS, rather than in the Final EIS.

Impacts on Wetlands
Ten wetlands with 242 acres are located within 500' study corridor (DEIS p3-47). While not all may be directly impacted by clearing and construction, all will be seriously affected. Mitigation measures should address all these. The first approach is avoidance. If an area can't be avoided, then replacement areas must be acquired and protected.

Important Fisheries in Raging & Cedar Rivers
The City of Seattle is working to re-establish salmon in Cedar River. The Raging River has coho and chinook salmon. Additional road construction, clearing, and potential spills will all adversely affect these species.

Impact on behavior of wildlife
Marbled murrelets may be using the upper watershed. This species tends to fly along the river corridors. Thus, any towers or lines that cross the river would present a hazard from both collision and electrocution. This is a significant impact, and one that bears on BPA's obligations under the ESA. As the forest approaches late-successional character, spotted owls will increase their use in this area. BPA's line will eliminate potential habitat and make it more difficult for owls to reach habitat to the west. Again, BPA's action may not be consistent with the ESA.

Fragmentation of habitat is a major concern, and one not adequately treated in the DEIS. This creates barriers to wildlife movements due to inappropriate habitat conditions and/or increased predation success. In some cases makes good habitat unusable. It is imperative that the upper and lower Cedar River forests be connected by the best possible habitat. Similarly, the connection to Tietg Mtn. and other forests in the vicinity is needed. BPA's powerlines are one of the most significant obstacles to achieving goals.

Corridor management needs revision
The management of other vegetation in the ROW corridor (DEIS p2-5) is excessive and needs to be revised. Less clearing and more allowance for shrubs and woody vegetation should be included. This may require more frequent attention, to allow maximum height of vegetation, while maintaining safety clearances. Wherever topography is favorable, taller trees should be allowed to grow. In certain areas, this could be combined with installing taller towers, thus increasing line height, to provide considerable forest cover.

Seattle City Light's management within the Rose Lake NRA has begun to incorporate some of these approaches. In special areas, such as the Cedar River watershed, special actions are necessary. While this might require more frequent corridor management, that is part of the price for traversing these special areas.
The new clearing and construction will allow incursions of noxious weeds. The current ROW has weeds, so the regional plan referenced in the DEIS is not adequate to control them. Additional clearing will engender additional weeds. A commitment to a control plan with proven effectiveness, even if it is all manual, must be a part of any powerline corridor.

We are pleased with your commitment to not use any herbicides in the Cedar River Watershed. (p S-5). However, it appears that it will be used in the Raging River watershed. The salmon in this river need the highest quality water and the powerline cross the river and continues for several miles in the watershed.

**Alternatives**

**Range of alternatives is inadequate**

The alternatives did not represent a full range, as numerous possibilities were rejected without further study. NEPA requires that reasonable alternatives be considered which include those alternatives that can meet the objectives, as defined by the purpose and need statement, of the proposal. For the stated goal, there is a much larger range of reasonable alternatives.

The DEIS does not provide sufficient analysis of alternatives outside of the Cedar River Watershed to support their elimination without detailed evaluation. The DEIS notes impacts to “developed land and people living in the area.” While it is clear there would be impacts, there is no analysis of the type, amount or significance. BPA cannot simply dismiss an alternative just because it would have impacts. All of the alternatives through the watershed also have impacts, and yet they were not dropped from consideration. Lacking stated criteria and evaluation, there is no justification for dropping certain alternatives and narrowly limiting the range of alternatives considered in the DEIS.

The DEIS must evaluate the full range of reasonable alternatives. The DEIS also needs to present a detailed cost justification for the proposed action to ensure that agency funds are being spent prudently. This should include full consideration of anticipated future projects, as well as considering mitigation measures that could avoid or reduce impacts of the proposed action. Furthermore, NEPA requires that federal agencies consider alternatives that can accomplish the objectives of the proposal, but at a lower environmental cost.

**Alternatives not considered**

Adding a circuit to the existing towers, or replacement towers should still be considered. The risk of loss of a tower is very low, especially given the limited access, so the risk of losing two circuits at the same time is low. At your public meeting, a BPA staff person said it would require a six-month outage to replace the existing towers and line with a double circuit. What length of time can you have this line out of service? Did you analyze using existing towers within the Cedar River Watershed, and separate towers outside? With accelerated construction activities and careful scheduling could the outage period be reduced to levels that would not significantly affect system loads? Again, there was no information in the DEIS on these questions.

**Alternatives of rebuilding other lines and adding equipment at substations to increase voltage were briefly mentioned and dismissed (p2-18). Information on these options should have been expanded and compared to the proposed action.**

We agree that no additional powerlines from Stampede Pass to Echo Lake should be built, but rebuilding an existing line was dismissed with little discussion except the cost would be higher. There is no assessment of whether BPA would in the future propose an additional circuit or increase of voltage on this line. Would rebuilding a 100kV double circuit now be more cost effective in the long run? Will BPA want to build another powerline in the Echo Lake-Raver corridor? If so, why doesn’t the agency Cedar River Watershed and discuss the potential impacts of creating dispersal barriers for this species. Although spotted owls may use habitat in the lower Cedar River Watershed in the future, it is not guaranteed.

The analysis of potential impacts from habitat fragmentation within the Cedar River Watershed was expanded in Section 4.1.1.1 of the Wildlife Technical Report.

**382-016** For safe and uninterrupted operation of the transmission line, vegetation within the ROW is not allowed to grow above a certain height. Restrictions vary, however, depending on the terrain, the type of vegetation, and growth rates. It is BPA’s intent to protect and maintain, as much as practicable, vegetation in the ROW that will not interfere with the safe and reliable operation of the line. In some places, towers are sited so that trees in canyons and along rivers can be maintained. In addition, long-term vegetation management on the ROWs includes the promotion of low-growing plant communities on the ROWs to “out compete” trees and tall-growing brush.

**382-017** BPA contracted for a noxious weed survey in July 2001. Six noxious weed species were found within the Proposed Action area, with three being so common that King County and the Noxious Weed Program recognizes that control or eradication is not economically feasible. Most of the noxious weeds were found on the more disturbed sites outside the Cedar River Watershed. During construction, BPA will follow the recommendations in that report regarding preventative measures such as educating the construction contractor to identify and avoid infested areas, washing vehicles and equipment prior to entry and upon moving to another location, using certified weed-free materials brought onto the project area, and reseeding disturbed areas. Following construction, BPA will follow standards and guidelines set forth for noxious weeds as defined in the FES and Record of Decision for BPA Transmission System Vegetation Management Program (BPA 2000). The Vegetation Management ROD can be found on the Internet at [www.efw.bpa.gov/cgi-bin/PSA/NEPA/SUMMARIES/VegetationManagement_EIS0285](http://www.efw.bpa.gov/cgi-bin/PSA/NEPA/SUMMARIES/VegetationManagement_EIS0285). See also Appendix K of the SDEIS. BPA and SPU are drafting an agreement that addresses
vegetation management of target species, including weeds, within the CRW.

382-018 In response to comments received about the range of alternatives analyzed in the DEIS, BPA analyzed five additional alternatives in the SDEIS that would avoid construction in the Cedar River Watershed.

382-019 Please see the responses to Comments 340-003 and 382-018.

BPA stated that the line could not be taken out of service long enough to be rebuilt. This is one of the main lines BPA relies on to carry power for the Seattle area when the existing Raver-Echo Lake line is forced out of service. Without the Covington-Maple Valley line, load in the Seattle area and/or Treaty return for Canada may have to be curtailed for the time period the line is out to be rebuilt. BPA has reevaluated and as a result included Alternative A, which uses the Covington-Maple Valley line corridor in the SDEIS.

The existing Raver-Echo Lake line (formerly the Raver-Monroe line) was built in the early 1970s. This line has been sufficient for system load purposes for the last 30 years. The addition of the second line will more than triple the power carrying capability of the two lines because each line will be more effective in backing up the loss of the other line and should therefore provide another 30 to 50 years of load serving capability.

382-020 See response to Comment 382-018.

382-021 Please see response to Comment 349-001.

382-022 Please see response to Comment 382-012.

382-023 BPA has no information on where the staging area(s) would be located at this time. The selection of staging areas would be at the discretion of the contractor and would be approved by the landowner. No staging areas would be in the Cedar River Watershed.

382-024 Erosion impacts and riparian clearing are assessed in Section 4.1 of the Fisheries Technical Report (Appendix A). Site-specific stream data are in Appendix A of the Fisheries
Several key aspects of the proposed transmission line are not described in sufficient detail to support an evaluation of impacts. We understand that BPA completed a Final Biological Assessment for this project during the public comment period for the DEIS. This indicates that sufficient details was available for the DEIS. The fact that specific, known design information for the proposed action was omitted from the DEIS indicates BPA has violated NEPA by failing to fully disclose environmental impacts. Please provide us with a copy of the biological assessment, and include it in a supplemental DEIS.

Failure to adequately describe the project compounds the vagueness of proposed mitigation measures, making it impossible to evaluate the effectiveness of mitigation. The net result is a level of uncertainty of the proposal’s impacts that renders the DEIS useless to reviewers and decision-makers.

The impacts of the project are potentially greatest for the Cedar River Watershed, especially considering the area is the region’s major drinking water supply, and the land is being managed under a complex Habitat Conservation Plan (HCP). However, BPA’s proposed actions and their impacts are described so minimally that it is not possible for the public to evaluate the project’s impacts. Once again, the DEIS does not fully disclose environmental impacts.

Site specific information on clearing requirements in the watershed (p.2-6) and access roads (p.2-7) is lacking, although at one point the DEIS describes removal of trees on the Cedar River as a “high” impact (p.4-36). BPA attempts to avoid the requirement with an explanation that the information will be available for the Final EIS. This information is critical to evaluating project impacts and mitigation measures and therefore should be provided as part of the DEIS. Also, the DEIS does not describe tower locations, which could have substantial impacts. This does not provide the public with an opportunity to review the proposal. Again, a supplemental DEIS is needed.

Lack of consistency with federal, state, and local regulations

NEPA regulations require that an EIS discuss how the proposed action is consistent with federal, state, and local land use plans and policies. Has this been done, and if so how has BPA reconcile any conflicts. Two examples in the subject project are King County’s sensitive areas and Shoreline Management provisions.

We cannot find where BPA coordinated with federal agencies on Endangered Species Act prior to releasing the DEIS. Perhaps this is one reason that the DEIS fails to fully assess impacts on endangered and threatened species such as Chinook salmon and coho salmon, and fails to address impacts on marbled murrelets. BPA has an obligation under the Endangered Species Act and Northwest Power Act to protect, mitigate, and enhance salmon runs where affected by its actions. However, BPA’s proposed action has adverse impacts on federally listed salmon and their habitats that are not adequately mitigated.

This project will directly affect the Cedar River Habitat Conservation Plan, under the Endangered Species Act. BPA indicates that USFWS will have to “decide if the transmission line facilities require any change to the existing Habitat Conservation Plan.” The DEIS does not discuss the proposed action’s impacts on the HCP, but the DEIS fisheries technical report suggests construction of the proposed action would violate provisions of the HCP. Comments made by the City in its HCP would be substantially diminished by the BPA project, reducing the conservation value of the City’s HCP. The City should not need to modify the HCP as a consequence of BPA’s activities. If BPA requests such changes, it must provide mitigation for any impacts that reduce the conservation value of the City’s HCP, at a minimum, compensates for that reduction in value.

Mitigation

The DEIS lacks mitigation for unavoidable impacts

The DEIS suggests “mitigation measures”, these are actually standard practices (sometimes called best management practices or BMPs) and not really project mitigation measures. They do not offset, reverse, or rectify the impacts of constructing the proposed project. Thus, BPA’s suggestion that “maintaining environmental quality” (S-2) is one of the purposes in developing this project, is but an empty statement. For example, although the DEIS states that impacts on ESA-based species of fish are “high,” BPA fails to commit to any mitigation that would offset those impacts.

Technical Report. Data do not indicate that detailed analysis of Type 4 and 5 streams would substantively alter the findings of the analysis. The effects of the Proposed Action on such streams would be approximately the same as the effects on Type 3 fish-bearing streams, and those effects are detailed in Section 4.0 of the Fisheries Technical Report.

Please see response to Comments 378-005 and 382-012.

BPA agrees that the proposed project has potentially significant impacts. That is why we immediately proceeded to produce an EIS rather than an Environmental Assessment. However, we intend to mitigate any potentially significant impacts to a level below significance because we believe doing so is in the public interest. We disagree that it is improper to use relative terms such as “low, medium or high” to discuss the nature of the impacts. We believe making these assessments helps the public and decision-maker to be better informed concerning the nature of the various impacts upon the environment.

BPA hired a team of consultants to assist the agency develop technical study reports that the agency used to write the DBS and the SDEIS. Subsequently, BPA needed to survey the Proposed Action before the tower sites could be located and access/spur roads identified to reach these facilities. Following the survey, BPA identified where the wetlands were, and sited the proposed towers to avoid these sensitive areas. While it is true that our biological assessment contained the proposed tower site and access/spur road locations and was written a short time after the DBS, this information was not available at the time the DEIS was written. Additional information is in the SDEIS.

Chapter 2 of the SDEIS describes the alternatives considered to meet the need, and summarizes how the environmental consequences differ among alternatives. More detailed information is presented in Chapters 4, Affected Environment, and Chapter 4 Environmental Consequences.

Chapter 4, Environmental Consequences, identifies the impacts of the Proposed Action and alternatives.
382-035 We understand that BPA has not mitigated for habitat losses of their powerlines in the past. But this must change. Unless and until BPA makes a binding commitment to replace lost, damaged and fragmented habitat, we must oppose construction of this line.

382-036 BPA cannot externalize the costs of this project, as it has done with previous lines. The loss of the forest is more than just a loss of timber revenue. It is a permanent loss of habitat that is rapidly disappearing—especially in the foothills of the Cascades in King County. The cost of such replacement must be included in the cost, then compared to other alternatives. The sale of timber by the underlying landowner does not mitigate the long term impacts of logging. Past practice of ignoring the loss of forest permanently is no longer defensible.

382-037 The mitigation measures presented in the EIS are wholly inadequate for a project of this nature. All construction alternatives should include the following.

- BPA should replace all habitat damaged within the project area with equivalent habitat type and quality in the vicinity, or if unavailable, increase acreage in ratio to lesser quality, plus a premium for fragmentation.

- The height of transmission lines at Cedar and Raging River crossings should be high enough to allow late successional forest to grow to 200’ tall in the riparian zone of the river and to mature heights on the slopes above the river bottom. Given the topography on either side of the river, that should be feasible. BPA should increase the height of the towers in that vicinity if necessary. We are disappointed that this issue was not addressed in the DEIS. We had brought it up during scoping and public meetings at that time.

- Eliminate roads outside of cleared powerline right of way. Use helicopter and/or trails to access these sites. Any roads constructed should be offset by eliminating an equal or greater amount of road in the affected watersheds, over and above what is planned by the land owner.

- Minimize tree cutting outside of 150’ corridor; best option should be to only log them, then, if necessary, removing those trees deemed likely to topple into the lines within a short period of time, rather than wholesale clearcutting.

- Apply measures to prevent any and all toxic materials and sediment from entering surface or subsurface waters in the Cedar River Watershed.

382-038 Conclusion

The Draft EIS is inadequate, and should be redone to display a full range of alternatives, demonstrate need, include relevant information, adequately assess the impacts and incorporate adequate mitigation, describe required coordination with other governmental entities, and incorporate and describe all costs of the project. The project fails to meet the requirements of NEPA and the ESA. We urge BPA to withdraw its proposal and only reissue a Draft EIS when has a proposed action that is legally and environmentally acceptable.

382-039 Thank you for this opportunity to comment on the DEIS. Please keep us apprised of any actions related to this proposal.

Sincerely,

Charles C. Raines
Director, Cascade Checkerboard Project

c: Senator Patty Murray
Senator Maria Cantwell
King County Executive Ron Sims
Mayor Paul Schell

382-031 Section 5.10 of the SDEIS addresses the Coastal Zone Management Act. The information shows that BPA is to the extent practicable, consistent with all federal, state and local government plans and programs, including the City of Seattle’s recently adopted Habitat Conservation Plan (HCP).

With respect to the King County Environmentally Sensitive Areas Ordinance, Chapter 21A.24 of the King County Code, BPA is consistent to the extent that it can be. The proposed power line and access/spur roads were sited to avoid impacting sensitive areas. All are located on uplands. Where sensitive areas could not be avoided, i.e., conversion of forested wetlands to scrub/shrub wetlands within the proposed right-of-way, the impact would be minimized by undertaking hand clearing, and either leaving the vegetation removed within the right-of-way as wildlife habitat, or removing it by sky crane or helicopter to avoid ground disturbance to the wetlands, and avoid fuel loading within the right-of-way. Additionally, BPA would be providing compensatory mitigation as required by the King County Code to mitigate for altering these wetlands. With respect to the Shoreline Management provisions of the King County Code, BPA's proposed project would not be considered to be directly affecting the coastal zone. Although the proposed transmission line would cross two Class 1 Streams, the Cedar and Raging rivers, which are governed by the Shoreline Management Act, no ground disturbing activities would be undertaken within 200 feet of these waterbodies.

382-032 Please see Section 5.2 of the SDEIS for a complete description of consultation with the U.S. Fish and Wildlife Service and NOAA Fisheries on threatened and endangered species. See also response to Comments 377-001, 382-014, 394-010, 394-088, 400-001, and 411-013.

382-033 The DEIS (Pages 5-16) stated that the HCP covers only actions by the City of Seattle, and that activities undertaken by other agencies are not addressed by the HCP, and therefore, require separate reviews by FWS and NMFS. Furthermore, the DEIS stated that BPA is consulting with both FWS and NMFS to ensure compliance with the Endangered Species Act.
It is unlikely that the City of Seattle will be required to modify its HCP as a result of BPA’s project.

While BPA is not requesting any changes to the HCP, BPA has purchased or will fund the purchase of land to provide compensatory mitigation to replace spotted owl habitat as well as to compensate for the conversion of forested wetlands to scrub/shrub as a result of project. See response to Comment 340-002.

While we recognize that the proposed project crosses the City of Seattle’s CRW, we do not believe it will seriously interfere with the purpose or objectives of the HCP that Seattle Public Utilities recently adopted. While admittedly the project will have some adverse impacts, the proposed alternatives represent the least-damaging routes that could be identified. For example, impact to wetlands and cultural resources were avoided to the maximum extent practical. Additionally, BPA intends to mitigate for any adverse impacts resulting from project implementation in a manner consistent with the HCP purposes, and which will, in effect, keep the HCP whole.

382-034 Please see response to Comment 340-002.

382-035 Please see response to Comment 340-002.

382-036 Please see response to Comment 340-002.

382-037 BPA would be altering habitat on the CRW from a forested habitat to a non-forested habitat over the 5 mile right-of-way within the CRW. BPA has purchased land to offer as compensatory mitigation for the forested habitat that would be converted to a non-forest use. Please see response to Comment 340-002.

382-038 The 135-ft tall tower referred to in the EIS is an average based on past experience with 500-kV towers. The actual height of the towers would be determined during the design phase of the project. The towers flanking the Raging River will be sized to minimize clearing in riparian habitat. BPA is using double-circuit towers on the Cedar River crossing to eliminate clearing near the river.
BPA would be building access/spur roads outside of the cleared right-of-way only to avoid sensitive areas such as wetlands and their buffer areas. With regard to eliminating the need to access tower sites, BPA cannot do so. BPA needs access to each tower site to construct, operate and maintain the transmission system in a safe and reliable manner. BPA will specify that helicopter construction techniques be used for this project if BPA decides to build the transmission line.

BPA has no authority to eliminate roads in the Cedar River Watershed. Seattle Public Utilities owns all roads within its property boundaries. BPA holds easement rights across some of these roads.

382-040 Please see response to Comment 340-004. Topping is not a recommended alternative to tree removal and should only be used if there are no other alternatives.

382-041 Comment noted. As a result of this and another comment, BPA has requested that the tower steel manufacture not dip the tower steel in a solution of sodium dichromate prior to shipment. Sodium dichromate is commonly used on tower steel following the galvanizing process to prevent white rust from forming on the tower steel during shipment. This material is water soluble, and would add a short-term pollutant to the Watershed. BPA thanks the commenter for the comment.

382-042 In response to comments, the SDEIS includes more information about these topics. BPA has initiated formal consultation with the USFWS and has concluded informal consultation with NMFS.
Communications

Attn: Mr. Leo Orriessen, Project Manager
Bonneville Power Administration - KE-7
PO Box 12999
Portland, Oregon 97299

Dear Mr. Orriessen,

I am writing with regard to the Bonneville Power Administration’s interest in building new powerlines in the Cedar and Raging River watersheds.

I appreciate the importance of providing electricity to customers, and I admire BPA’s ability to do so at a low cost. I am concerned, however, with BPA’s proposal to install nine miles of 500 kilovolt lines with a necessity of clearing away between one hundred fifty to two hundred eighty-five feet width of trees. I am also concerned about the plans BPA has to build one and a half miles of new roads in order to accomplish this task.

Mr. Orriessen, I am sure that you care about the ecosystem and that you love the outdoors as much as the next person. I gather that you comprehend the importance of low elevation forests, the rapid loss of forests in King County, and Seattle’s decision to preserve its watershed forests.

Sir, I am against building new 500 kilovolt
Mr. Lew Priesten
August 29, 2008

I am opposed to construction of any roads in them. One of the reasons for my position is, has to do with Seattle's attempts to reestablish salmon in Cedar River.

Mr. Priesten, I do however support BPA adding additional circuits to towers in the existing corridor, if safe and if it can be done for a reasonable cost and without threat to BPA's workers.

Furthermore, I believe it to be of the utmost importance that any and all forests and wetlands that have been damaged by BPA be repaired through replacement. I also respectfully request a new Environmental Impact Statement with nothing less than all needed information, a substantive cumulative effects analysis, as well as additional alternatives.

This letter states my position. Mr. Priesten, I know BPA has a lot of pressure to produce but I think it can get the job done without harming our beautiful watersheds.

Tom Huddsay
Tom@principia.edu
Lou Driessen, Project Manager
Communications
Bonneville Power Administration - KC -7
Post Office Box 12999
Portland, OR 97212

Dear Project Manager:

This is to ask that the Bonneville Power Administration build any new power lines through the Cedar and Raging River watersheds on already existing towers.

The current plan—to clearcut a swath of forest (currently protected from logging) within the watershed and to construct new road—would have severe, extensive impacts throughout both watersheds. Wetlands, salmon grounds and fisheries, and forest habitat—all of which are at risk—would be impacted by such a plan.

From my work in wetlands, I’ve found that mitigation does not recreate damaged or destroyed wetlands or forest. It may on paper, but the reality in every case is that the ecosystem never again works as it did before. This is true even for relatively small projects such as the BPA’s proposed new 500 kilovolt line. A new Environmental Impact Statement (DEIS) is needed, with information and analysis of cumulative effects along with additional alternatives for the proposal to build within the Cedar River watershed.

I think it’s vitally important to respect the sanctity of a protected watershed.

Sincerely,

[Signature]

Lynn Pruzan
Dear BPA Project Manager,

Please enter this letter into the public record with regards to the DEIS for the Kaneset-Echo Lake Transmission Line Project.

I'd like to add my voice to those who are calling for the following:

1. Any new lines should be placed on existing towers.
2. In any alternative, the BPA must fully mitigate for any impacts of its projects.
3. Replace and forest you cut on wetlands you destroy.
4. A new EIS should be developed that fully considers the cumulative effect of the project and is relevant.

Best, [Signature]

[Address]

385-001 Please see the response to Comment 340-003.

385-002 BPA would not be filling any wetlands. See response to Comment 340-002.

385-003 Please see responses to Comments 350-003 and 357-003.
386-001 Please see the response to Comment 340-003.

386-002 Please see response to Comments 340-002 and 357-003.

Lou Driessen, Project Manager
Communications
Bonneville Power Administration - KC - 7
Post Office Box 12999
Portland, OR 97212
August 31, 2001

Dear Project Manager:

Please, build any new power lines through the Cedar and Raging River watersheds on already existing towers.

Also, please offer a new Environmental Impact Statement that supplies a substantive cumulative effects analysis of the proposal to build in the Cedar River Watershed, along with additional alternatives. The current plan— to clearcut a swath of forest (currently protected from logging) within the watershed and to construct new road— would have severe, extensive impacts throughout both the Raging River and the Cedar River watersheds. Wetlands, salmon grounds and fisheries, and forest habitat—all of which are at risk— would be impacted by such a plan.

Sincerely,

Ceci Cordova
To the attention of: Lou Driessen, Project Manager  
C/o Communications  
Bonneville Power Administration - KC -7  
Post Office Box 12999  
Portland, OR 97212

Dear Project Manager:

Please, build any new power lines through the Cedar and Raging River watersheds on already existing towers.

Also, please offer a new Environmental Impact Statement that supplies a substantive cumulative effects analysis of the proposal to build in the Cedar River Watershed, along with additional alternatives. The current plan—to clearcut a swath of forest (currently protected from logging) within the watershed and to construct new road—would have severe, extensive impacts throughout both the Raging River and the Cedar River watersheds. Wetlands, salmon grounds and fisheries, and forest habitat—all of which are at risk—would be impacted by such a plan.

Sincerely,

ALICE WIREN  
and  
HAL WIREN
Dear Lou Daniels,

We, the residents of Seattle, worked hard to have the Cedar River and the Raging River watersheds protected from tree cutting and from road building and to have past damage restored so we can be assured of a safe water supply.

You already have a right of way through these watersheds that you can use for your expansion or you can use alternate routes outside of the watersheds.

I strongly oppose the proposed powerline that will further destroy our watersheds, on which there has been no offer of replacement forest and wetlands, and for which impact analysis and alternatives have not been prepared.

Sincerely

Tabitha Kiesel
109 Nw 76
Seattle Wa 98117

388-001 Please see the response to Comment 340-003.

388-002 See response to Comment 340-002. The SDBS identified the impacts of the Proposed Action and the impacts of the alternatives to the Proposed Action, including the No Action Alternative. The Administrator of BPA will use the SDBS and the Final EIS to make a decision on the Proposed Action.
Telephone comment by Ginny Kuehn
9/4/01

Doug Lawrence
3232 Conkling Place W.
Seattle, WA 98119
(206) 283-4350

I object strongly to the idea that this power line would go through Seattle's watershed, which has just gone through extensive public process to keep the city river watershed undisturbed and clean. The idea that old growth forests and the watershed maybe cut down for this power line is absolutely appalling and I am hoping that when you come up with the final scope of the EIS that it will include routes that avoid construction and maintenance in Seattle's watershed, not just Seattle's watershed. Seattle supplies water too much of the regions from this watershed. So I am absolutely adamant that you need to find routes that go outside the watershed and that don't cut down old growth forests.

Thank you.

-----Original Message-----
From: Jones T. Michel (mailto:jts@coachmail.com)
Sent: Tuesday, September 04, 2001 3:34 AM
To: dlawrence@em.gov
Subject: Cedar River Watershed

Lou,

It has come to my attention that the BPA is considering cutting a new 9 mile swath of the cedar river watershed to run new power lines. I am very opposed to this proposal. Currently, lines already exist, and running additional lines along the already existing corridor would be considerably less invasive than removing trees from one very important watershed to further near this unique wildlife habitat.

Please do not cut any more in the Cedar River Watershed.

Best Regards,

James T. Michel
2010 26th Ave W
Seattle, WA 98199
To Lou Driessen, Project Manager:

Greetings,

I am writing to ask that the BPA not put any new lines on the existing towers, I understand that the BPA wants to build 9 miles of new 500 kilovolt line through the Cedar and Raging River watersheds. This would include 1.5 miles of new road construction. This plan would destroy forests recently protected by the City of Seattle.

Cutting of trees could be as far as 200' from the powerline, especially if it is old growth forest...not the 75' as is implied in the summary.

Would BPA build a powerline through Mt. Rainier National Park? Then why does it propose to through our watersheds?

I support adding additional circuits to towers in the existing corridor; I support having a new EIS with needed information on any decision.

In any alternative chosen, BPA must fully mitigate the impacts of the projects. That means replacing any forests that are cut.

Sincerely,

Jill McDowall
6743 Palatine Ave N
Seattle, WA 98103
393-001  Please see the response to Comment Letter 361.

-----Original Message-----
From: Donald Potter (mailto:potter.q@q.org)
Sent: Tuesday, September 04, 2001 4:18 PM
To: ledriessen@ep.gov
Subject: Raging Cedar (Kangley-Echo Lake Transmission) Line

Dear Mr. Driessen,

I have been aware of the proposed Raging Cedar Powerline proposal for several months now, and am distressed that it would cause a number of environmental problems.

First, it destroys forests, including Seattle's watershed, which is now protected from logging. The loss of a forest is more than just a loss of timber revenue, but is a permanent loss of habitat, which is rapidly becoming scarce in this highly populated portion of the state.

Second, no mitigation of replaced forest is included in the proposal, and should be.

Third, the area encompasses a unique lowland forest, including old growth forest. Such projects fragment the forest and connectivity is vital for the survival and migration of species, both flora and fauna.

Please, do the following:
--add additional circuits to towers in the existing corridor
--replace any forests or wetlands that are damaged
--reconsider the new EIS with substantive cumulative effects analysis and additional alternatives, including conservation.

Thank you,

Respectfully yours,

Donald E. Potter, MD
3823 14th Ave NE
Bellevue, WA 98005-1473
w=mailto: potter.q@q.org
Dear Sir,

September 4, 2001

I am writing to voice my strong opposition to your proposed Raging Cedar Powerline Project.

I worked hard with the Pacific Crest Biodiversity Project (where I serve on the Board of Directors) and the Protect Our Watershed Alliance to move the City of Seattle to protect the watershed and the forests and fisheries it holds, and to create the HCP to which the City is accountable. This proposed powerline would violate the HCP, which disallows any logging of the type required by this project in our watershed. This project should not even be considered in this protected area. No logging is legal in our watershed and the goals of the HCP are to remove roads not to cut new ones.

I demand that BPA drop this proposal immediately and consider legal (and ecologically sound) alternatives, such as adding additional circuits to towers in existing corridors. I request a new EIS with information including a substantive cumulative analysis and the addition of conservation alternatives.

Please keep me informed about the proposed project. Thank you.

Sincerely,

Chris Vondracek
4742 35th Avenue S.
Seattle, WA 98118
email: sp649@scn.org
397-001  BPA is proposing to construct a new 500-kV line immediately adjacent to the existing 500-kV line from near the tap point to the Echo Lake Substation. Paralleling the existing 500-kV line would take advantage of the existing access road system already in place, and also the clearing that has taken place for the existing line. The reason that the second line could not be located within the same 150-foot wide right-of-way is that it would violate BPA design standards. Right-of-way widths are established to ensure safe, reliable operation of the lines. The existing 500-kV line is located in the center of the 150-foot-wide right-of-way. The proposed line also would be located in the center of a 150-foot-wide right-of-way; therefore if the line were built the two lines would be 150 feet apart. This is the minimum distance that the two lines could be operated safely and reliably. Section 2.3.8 of the SDEIS examines use of double-circuit towers. Also see responses to Comments 426-002 and 1459-009.

A non-transmission alternative that included conservation has been fully analyzed in the SDEIS. See Section 2.2.9 and Appendix J of the SDEIS.
399-001 Please see responses to Comment Letter 361.

399-002 Please see SDEIS for more information about cumulative impacts.

LOU DRIESSSEN, PROJECT MANAGER
COMMUNICATIONS
BONNEVILLE POWER ADMINISTRATION - KC - 7
POST OFFICE BOX 12999
PORTLAND, OR 97212

DEAR PROJECT MANAGER:

PLEASE BUILD ANY NEW POWER LINES THROUGH THE CEDAR AND
RAGING RIVER WATERSHEDS ON ALREADY EXISTING TOWERS.

ALSO, PLEASE OFFER A NEW ENVIRONMENTAL IMPACT STATEMENT THAT
SUPPLIES A SUBSTANTIVE, CUMULATIVE EFFECTS ANALYSIS OF THE PROPOSAL TO
BUILD IN THE CEDAR RIVER WATERSHED, ALONG WITH ADDITIONAL
ALTERNATIVES. THE CURRENT PLAN—TO CLEARCUT A SWATH OF FOREST
(CURRENTLY PROTECTED FROM LOGGING) WITHIN THE WATERSHED AND TO
CONSTRUCT NEW ROAD—WOULD HAVE SEVERE, EXTENSIVE IMPACTS
THROUGHOUT BOTH THE RAGING RIVER AND THE CEDAR RIVER WATERSHEDS,
WETLANDS, SALMON GROUNDS AND FISHERIES, AND FOREST HABITAT—ALL OF
WHICH ARE AT RISK—WOULD BE IMPACTED BY SUCH A PLAN.

SINCERELY,

CARL PRUZAN
MARIAN PRUZAN
BPA agrees that the Cedar River Watershed is a very valuable water source and wildlife resource, and that any intrusions into the area should not occur lightly, or without good cause. The DEIS and SDEIS was sent to both USFWS and NMFS, who were invited to comment on the proposed transmission line. We have initiated formal consultation with USFWS and have concluded informal consultation with NMFS. See Appendix U.

The HCP is a plan that SPU had to prepare to build the Landsburg fish ladder and return chinook salmon to the upper Cedar River. It is a plan that was entered into between the landowner, Seattle Public Utilities, two state agencies, Washington State Department of Ecology and the State Department of Health, and the two federal agencies that have responsibilities under the Endangered species Act, the Fish and Wildlife Service and the National Marine Fisheries Service. As a federal agency, BPA does not prepare habitat conservation plans (HCPs), but instead is coordinating with these federal agencies under Section 7 consultation.

While SPU’s HCP is not applicable to BPA’s activities, BPA is subject to the Coastal Zone Management Act, which requires federal agencies to be consistent, to the extent practicable, with all applicable local, state and federal plans and programs in exercising its mission as the federal power marketing agency in the Northwest.

BPA contacted NMFS and USFWS earlier on in the project to request their participation as “cooperating agencies” under the National Environmental Policy Act of 1969, as amended. Both agencies declined. Subsequently, in early summer 2001, BPA prepared a biological assessment that identified what impacts, if any, would be created for listed and candidate species, as a result of the proposed project. BPA subsequently prepared an addendum to the BA, submitting additional information requested by FWS after receiving a letter from them stating that it could not concur in BPA’s finding of no affect on the northern spotted owl, and requested that BPA enter into formal consultation with the agency. NMFS subsequently concluded that since the Proposed Action incorporates avoidance and minimization measures into the project, the agency can expect the effects of the action “to be discountable or insignificant.”

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

August 30, 2001

RE: Kangley - Echo Lake Transmission Project

Dear Mr. Driessen:

The Pacific Crest Biodiversity Project, a nonprofit organization with approximately 2,000 members, is dedicated to the protection and restoration of forest ecosystems in the Pacific Northwest. We played a key role in facilitating public involvement in the development of the Cedar River Habitat Conservation Plan and advocated an end to the commercial timber sale program within the watershed.

Just over two years ago, in a unanimous and historic vote, the Seattle City Council voted to end commercial logging in the Cedar River Watershed. The vote was a conclusion to a remarkable public process in which more than a thousand people turned out to hearings and hundreds submitted comments. When the process began, the city was not planning to consider an alternative with no commercial logging. In the end, overwhelming public support for making 100% of the watershed an ecological reserve and a willingness of customers to pay an additional $4 per average household per year led to the about-face. The city also expanded its goals for road decommissioning based on public input.

Especially within this context, proposals to cut trees or build roads in the watershed for anything but water quality or ecological integrity must be taken very seriously. It’s as if the agency were proposing to cut a swath through an important park or wildlife refuge. We don’t see how such a project could be consistent with Seattle’s HCP for the watershed and are disappointed not to see a thorough discussion of this issue in the Draft EIS. We feel that the public should have the opportunity to see what the National Marine Fisheries Service and US Fish and Wildlife have to say about conflicts or consistency with the HCP before the project reaches the Final EIS stage.

About conservation: this was given minimal treatment in the DEIS. We do not feel BPA have given the public adequate information about the potential for conservation to
Therefore, NMFS concurred with BPA’s effect determination of “may affect, but not likely to adversely affect” for the Puget Sound Chinook and their designated critical habitat. BPA has, therefore, concluded informal consultation with NMFS.

BPA has entered into formal consultation with the FWS. BPA will conclude this formal consultation with the agency prior to initiating any construction activities.

Please see response to Comment 409-002.

Please see the response to Comment 340-003.

See response to Comment 340-002.

With respect to the road issue, BPA would be building about 1-1/2 miles of new road within the Cedar River Municipal Watershed to build, operate and maintain the line. About half a mile of road in the CRW that crosses wetlands would be removed from service. Although BPA would be acquiring the rights to build these roads, it would have no authority to abandon any existing roads within the Cedar River Watershed, outside of those that it presently uses to operate and maintain the existing Raver-Echo Lake 500-kV line located there.

Please see response to Comment 357-003.
The existing Raver-Echo Lake 500-kV Transmission Line is located on a 150-foot-wide right-of-way, the same width as the proposed right-of-way.

-----Original Message-----
From: Judy Lightfoot [mailto:jlightfoot@hotmail.com]
Sent: Monday, September 10, 2001 11:03 AM
To: ldrissen@bpa.gov
Subject: RE: Mr. Dreissen's reply

Thank you for this explanation. How wide is the existing clearcut? How wide will the widened clearcut be?

Thank you for your attention and time--
Judy Lightfoot, PhD
1326 NE 63rd St
Seattle, WA 98115
206/322-2269
http://www.homestead.com/judy_lightfoot

>From: "Dreissen, Laurence C - TNP-3" <ldrissen@bpa.gov>
>To: "Judy Lightfoot" <jlightfoot@hotmail.com>
>Subject: RE: Mr. Dreissen's reply
>Date: Mon, 10 Sep 2001 17:51:49 -0700

> The preferred plan is to parallel immediately next to the existing line thereby reducing the amount of clearing needed as stated in the Draft EIS.
> We cannot put the new line in the existing R/W without doing any clearing.
> There is just not enough room. The only way to put the new line in the existing clearing is to remove the existing line and replace it with towers
> that would support the existing line and the new line such that both circuits would be on the same structure. That would be unacceptable from a reliability standpoint. So the preferred option is doing what you are suggesting, utilizing the existing right of way to the extent possible and minimizing clearing. In addition, we normally take any tree outside of the right of way that could potentially fall into the new line. In this case
> through the watershed, we are planning to take only those trees that are unhealthy and leaning heavily towards the line and are most likely to fall
> down in a heavy wind. All healthy trees would be allowed to remain. I think we have a preferred option that takes into account all the aspects
> and
> concerns while meeting the needs of the project and minimizing the environmental impacts to the watershed, other natural environments and people impacts. Hope this helps.
> Take care
> lou
The proposed project would begin at the tap point at the southern end of the project and terminate at Echo Lake Substation, about a mile and a half south of I-90. The proposed line would not be located on the north face of Taylor Mountain; therefore, it would not be visible to travelers on I-90.

Please see the response to Comment 340-003. BPA will encourage low-growing vegetation in the right-of-way. BPA is proposing to use a "stable tree" criteria for identification of danger trees that would allow more trees to be left near the right-of-way. See Section 2.1.1.4 of the SDEIS.

Please see response to Comment 340-002.
In response to this and similar comments from government agencies, BPA is proposing to provide compensatory mitigation to offset impacts as a result of the Proposed Action. Please see response to Comment 340-002.

Please see response to Comment 340-004.

Comment noted.

In response to this and similar comments from government agencies, BPA is proposing to provide compensatory mitigation to offset impacts as a result of the Proposed Action. Please see response to Comment 340-002.

Please see response to Comment 340-004.

Comment noted.

Thus, the Greenway Trust is concerned that the DES for the Kangley-Echo Lake power line expansion makes no mention of mitigation for the permanent loss of forestland that the project proposes. We estimate the minimum, permanent loss of forest cover to be 150' (proposed corridor width) x 9 miles (proposed length) = 1440 acres. In an era of salmon listings, new measures being taken to protect native vegetative cover and heightened sensitivity to the importance of forests for wildlife habitat, water quality and quantity, recreation, scenic values, air quality and carbon sequestration, and more, BPA should permanently replace the 164 acres of forest lost to clearing and development with a minimum of 164 forested acres elsewhere. Since the impacts of the proposed project are within the Greenway corridor, we believe that BPA should provide replacement forestlands within the corridor. This should be factored into the project costs and could be accomplished via a conservation easement or fee acquisition. The Trillium parcel, now held by the Trust for Public Land until public funding becomes available, offers an immediate mitigation opportunity if BPA wishes to participate in its public purchase.

Other proposals for development in this region have required compensating mitigation for loss of forestland and habitat. Most notably, King County has a “4:1 program” which requires a developer to donate 4 acres to public ownership for every one acre rezoned into a higher urban zoning status. The City of Issaquah has utilized an “Urban Village” designation to cluster proposed developments while permanently protecting 75% of each site as public forestland. The Cedar River Watershed implemented a new Habitat Conservation Plan to protect and restore its old-growth forest characteristics. These, and other programs have set a precedent that BPA should follow when planning for any new power line corridor in this region.

BPA’s proposed approach to “danger trees” is another issue of concern. Cutting any tree within range of the powerline that MIGHT have a future impact is not acceptable. Just as the Cedar River Watershed is not allowing this approach across their land, BPA should take a similar approach along the entire 9-mile length and use the “stable tree” approach everywhere. We also believe mitigation should be provided for any tree that is cut outside of the 150’ proposed BPA ROW.

A great deal of effort and public investment has gone into creating the Mountains to Sound Greenway corridor and permanently protecting its scenic forested character. It should be the policy of BPA to minimize and mitigate any negative impacts its projects may bring to this corridor. Thank you for the opportunity to comment.

Yours truly,

James R. Ellis
President
403-001 With respect to the comment that the commenter strongly disapproves of the proposal to construct the power line through the Cedar and Raging River watersheds, this comment is noted.

BPA is also concerned about the impacts of the proposed project on both the natural and human environment including impacts on fish and wildlife. Our SDBS identified the impacts of the Proposed Action, and alternatives on the fisheries and wildlife resources (see Sections 4.6 and 4.7 of the SDBS), and has also identified mitigation measures that would eliminate or at least minimize impacts identified.

We do not expect that any pollutants would enter surface waters as a result of the proposed project. BPA will comply with the National Pollutant Discharge Elimination System, and develop a storm water pollution prevention plan, prior to the onset of any construction activities. BPA will construct erosion control devices to prevent any sediment from entering surface waters, as required by the Clean Water Act, and the general permit issued by the state of Washington, Department of Ecology. To ensure that no pollutants enter ground water, BPA will leave the erosion control measures in place until the site is 70 percent stabilized, as required by the permit. Additionally, all disturbed areas would be reseeded following the completion of construction activities to reduce erosion.

403-002 Please see the response to Comment 340-003.
404-001 See response to Comment 349-001.

404-002 The Proposed Action would be next to an existing corridor.

404-003 See response to Comment 357-003.

404-004 See response to Comment 340-002.

404-005 Comments noted. BPA does its best to notify all those who would either be affected by or interested in the Proposed Action. It does so early on after the system planners have identified a need. The comment period was extended from August 15th to September 4th, 2001. BPA tries to address all comments received even those submitted after the “official” review period has ended, to the extent possible.

Dear BPA,

Seattle celebrated the protection of the Cedar River watershed, which I thought would be protected for 50 years. Now, I find that BPA is undermining this protection with a proposed powerline. I want this to stop.

1. This powerline is not necessary. BPA has not done all it can and should to conserve energy. Energy conservation was not pursued wholeheartedly during the 90s until the California energy crunch, and building powerlines through vital watersheds is not the answer to catching up.

2. I don’t believe all alternatives to such a powerline have been exhausted such as lines through corridors already cut.

3. Your environmental impacts were not adequately assessed. I would like a full environmental impact statement done that looks at the watershed and its areas with the affects of all factors represented over time. This assessment should include alternatives.

4. You have not even attempted adequate mitigation for the proposed dam. If in the future such a line goes through the forest, wetlands, riparian corridors, etc. should be bought from private landowners in at least a 2 for 1 exchange as the public is compensated for its loss. This is necessary and part so BPA has the full cost of such a project as part of its cost/benefit analysis. If included, I believe that the current costs outweigh the benefits of the project as proposed and BPA will instead up the ante on conservation and alternative transmission measures.

So, do not build the line at this time.

Sincerely,

Shelly Baur

P.S.: Sorry I missed the official public comment period, but I do not feel BPA adequately advertised its intentions to the public, knowing how outraged we would be if it were well known. In future, I would like to see BPA advertise this more.
406-001  Comment noted.  BPA has purchased a 352-acre parcel formerly owned by the Trust for Public Land. This parcel is located immediately adjacent to and north of the Cedar River Municipal Watershed. The proposed power line would bisect the parcel. See also the response to Comment 340-002.

DEAR MR. DRIESEN,

PLEASE CONSIDER ENCOURAGING BPA TO PURCHASE AND PRESERVE AN EQUIVALENT AMOUNT OF LOW ELEVATION FORESTLAND THAT WOULD REPLACE THE LOSS OF HABITAT IN CEDAR RIVER FOREST. 4 OUT OF 5 SALMON AGREE... IT'S THE RIGHT THING TO DO!

THANK YOU,
BPA!

SINCERELY,

[Signature]

RIONNA  SILL
2422 WESTLAKE
SEATTLE, WA  98119

LOU DRIESEN
BANFIELD POWER ADMINISTRATION
P.O. BOX 3421
PORTLAND, OR  97208-3421

TWP-3
Mr. Lou Driessen
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Dear Mr. Driessen:

I thought that we locals had secured our watershed against any further logging. The sentiment against the Seattle Water Department's plan to keep rates down by continuing logging in the watershed ultimately prevailed. I assumed that was the end of it. Now it appears that the BPA wants to cut a wide swath through the watershed for a new power line. I am sure there are other routes for such a line. I hope you find such an alternative. I am opposed to the current BPA proposal.

Sincerely,

Christian Melgard

Christian Melgard
September 10, 2001

Mr. Lou Driessen  
Bonneville Power Administration  
P.O. Box 3621  
Portland, WA 97208-2621

Dear Mr. Driessen:

I am writing you to express my concern about BPA's intention to build a new power line in eastern King County. I am afraid it will destroy hundreds of acres of protected forest in the City of Seattle's Cedar River watershed. I understand that it will cross the salmon bearing Raging River and the future salmon bearing Cedar River. I also understand BPA intends to build new roads and expand the Echo Lake substation.

Mr. Driessen, I do not feel the Bonneville Power Administration has fully investigated the potential environmental damage this project will cause. Perhaps your Environmental Impact Study has not gone far enough. Do you fully understand the importance of the Cedar River forest? Or the cumulative effects of power lines which destroy and fragment OUR forests?

The construction of new power lines should require the replacement of damaged habitat. BPA should be required to acquire and preserve an equivalent amount of forestland elsewhere, perhaps some that is at risk of being developed commercially. I feel that BPA should bear the full REAL cost of building these power lines and not ignore the loss of important habitat for forest animals.

Please take our comments into consideration as you formulate BPA's strategy for expanding power service thru OUR forests.

Very truly yours,

[Signature]

David N. James
410-001, -002, and -003 Comments noted.

To My Elected Officials,

Please do not allow the Bonneville Power Administration to cut into our Cedar River Watershed. Their plan to clearcut a 9-mile strip of forest would adversely impact the ecosystem and our drinking water -- all for a powerline. This is unacceptable, especially since BPA has not even provided any other viable options.

You already know the importance of this watershed. The Cedar River Watershed's fragile ecosystem is currently protected under an MCP. This area was threatened a few years ago by another logging proposal. To everyone's relief, the ecosystem was left intact. Please do not allow logging to go through this time!

We must protect what is left, for us, for future generations, and for the health of the planet. Please do the right thing and oppose BPA's destructive plan.

Thank you.

Lisa Ramirez
Seattle, WA
Comment noted. Though BPA’s Proposed Action would cross through the Cedar River Municipal Watershed, BPA does not believe that this line is a threat to the Watershed. BPA is undertaking extraordinary measures to ensure that it does not threaten the watershed, including providing compensatory mitigation to replace that forest habitat that would be converted to non-forest habitat following project implementation. See response to Comment 340-002.

414-001 Please see the response to Comment 340-003.
415-001 Comment noted.

--- Original Message ---
From: Hilary B. Bramwell [mailto:hillary@u.washington.edu]
Sent: Thursday, October 18, 2001 9:31 AM
To: feerrainbodl@bpa.gov; comment@bpa.gov
Subject: Cedar river watershed

Hi. My name is Hilary Bramwell, and I am a resident of Seattle. I am very concerned with the future health of the Cedar river watershed. I am writing to say that I absolutely am against the BPA’s plan to build through the watershed area. Please realize that individuals 11.3 million of us! will be directly affected. I’m sorry, but the purity of the water we have available to put in our bodies is more important than selling power to Canada. If you DON’T think it is, then you have some whacked-out priorities in my opinion. If you go through with the plan, I’m going to have to see the federal government a bill for my bottled water costs. I know they won’t pay it, but why? I’m really pissed off, and want to make people realize the implications of building transmission lines through the watershed area.

Please consider the human element here, as well as the environmental one. What BPA is planning just isn’t right or fair. Thanks for listening.

Sincerely, Hilary Bramwell
416-001 and -002  Please see new information included in the SDBS and the response to Comment 382-018.

-----Original Message-----
From: Michael Shank (mailto:michael@pcbp.org)
Sent: Tuesday, October 16, 2001 3:09 PM
To: "gplpwards@bpa.gov"
Subject: Regarding the Cedar River Watershed

Greetings, Dave:

My name is Michael Shank and I'm serving as the Membership Coordinator for the Pacific Creek Biodiversity Project. The Biodiversity Project is a coalition of environmental organizations that protect the Cedar River Watershed from commercial logging three years ago.

I have a few questions that have gone unanswered by Lou Eriksson and I thought you might be able to answer them.

We (along with 500 and the Seattle City Council) have asked that the BPA pursue other viable options outside the Cedar River Watershed and your reasons are short and lack full articulation. Your first reason/excuse given in why you cannot enter Maple Valley is that you cannot turn the power off long enough to replace the lines. Is it not true that you could replace half of the time one year and the rest of the lines the following year? The second reason/excuse you give for not using Maple Valley is that two vacant lines are needed for other purposes. Could you explain those other needs? BPA is supposed to do such things in the DEIS and you haven't. I'd appreciate it if you would.

Thank you for your time.

Sincerely,

Michael Shank
Membership Coordinator

Protecting and restoring forest ecosystems in the Pacific Northwest

Pacific Creek Biodiversity Project
4649 Sunnydale Avenue North 4221
Seattle, WA 98103

Phone: 206.565.3734 ext. 11
Fax: 206.545.4498
Email: michael@pcbp.org
Web: http://www.protectandrestore.org
Kuehn, Ginny - KC-7

From: Drisessen, Lauren C - TNP-3
Sent: Thursday, October 18, 2001 5:15 PM
To: Kuehn, Ginny - KC-7
Cc: Lynard, Gena P - KEC-4
Subject: FW: clear cut

-----Original Message-----
From: Murr Shawan (mailto:smurr@earthlink.net)
Sent: Monday, October 08, 2001 1:19 PM
To: lbrain@bpa.gov
Subject: clear cut

As a resident, I strongly oppose Bonneville Power's plan to clear cut through Cedar River watershed.

Kuehn, Ginny - KC-7

From: Drisessen, Lauren C - TNP-3
Sent: Thursday, October 18, 2001 5:16 PM
To: Kuehn, Ginny - KC-7
Cc: Lynard, Gena P - KEC-4
Subject: FW: Kangley - Echo Lake

-----Original Message-----
From: Erwin Galan (mailto:galanerwin@hotmail.com)
Sent: Monday, October 08, 2001 1:06 PM
To: lbrain@bpa.gov
Cc: galanerwin@hotmail.com
Subject:

It is of the utmost importance that the Cedar River Watershed be completely protected against any intrusion whatsoever. Educate the public regarding how we can cut our consumption. This would eliminate the need of building this transmission line. This is realistic - think of how many business leave their lights and computers on after hours. Look around.
419-001 Comment noted.

420-001 Please see the response to Comment 340-003.

420-002 See response to Comment 340-002.

420-003 See response to Comment 357-003.
The Cedar River Municipal Watershed HCP does not disallow logging, only commercial logging. BPA is in the business of transmitting electricity. Clearing of rights-of-way to safely construct, operate and maintain high voltage transmission lines is incidental to the delivery of electric power. Furthermore, the City’s HCP is between the City of Seattle and the other signatories of the HCP, NMFS and the USFWS. BPA has concluded informal consultation with NMFS and has initiated formal consultation with the USFWS to meet the requirements of the Endangered Species Act of 1972.

BPA is proposing an insurance package to ensure protection of the CRW.
422-001 Please see response to Comment 382-018.

422-002 Yes. Seattle Public Utilities has stated that should BPA's project cause a violation of the water quality as a result of the Proposed Action, then BPA should be responsible to construct a water filtration plant for the City of Seattle. See also response to Comment 420-002.

422-003 You may call Phil Park (604) 293-5857 of BC Hydro.

423-001 Please see the responses to Comments 339-001 and 340-003.

Kangley-Echo Lake Transmission Line Project

Telephone comment by Ginny Kuehn
10/31/01

Margo T. Fetz
1901 7th Avenue West
Seattle, WA 98119
206-284-5870

Add a line to the old towers instead of building new ones.
Dear Sir,

As one of Seattle's citizens who worked hard to ensure the protection of the Cedar River watershed, I am writing you now applying you to reconsider the plan to site a new line through the Cedar River. Perhaps you could add an additional conduit to existing tunnels. We are doing our utmost to conserve electricity here in Seattle and frankly feel more justifiable that a new line is absolutely necessary.

Please provide urgent creativity at solving this dilemma which could affect the region's drinking water for generations to come.

Thank you,

Anna J. Shirley

3520 NE 92nd St

Seattle, WA 98115
Kuehn, Ginny -KC-7
From: Driessen, Lauren O - TNP-TRP-3
Sent: Wednesday, November 14, 2001 2:18 PM
To: Kuehn, Ginny -KC-7
Cc: Lynn P. Gine - KCE-4
Subject: FW: Raging-Cedar Powerline, Kangley - Echo Lake

425-001

425-002

----Original Message----
From: Darrell Weiss [mailto:dweiss@ mindspring.com]
Sent: Tuesday, November 13, 2001 9:49 AM
To: lottreesen@epa.gov
Subject: Raging-Cedar Powerline

Dear Mr. Driessen:

I am extremely concerned about the impacts threatening the Cedar River Watershed as a result of access and construction of the proposed powerline. The risks and impacts are far too great, and are unacceptable. Just because there are few or no private landholders in the Cedar River Watershed to raise a fuss about the proposed raging- cedar powerline construction does not mean this is not extremely valuable "property."

THIS LAND IS PRECIOUS AND CONSIDERABLY MORE FRAGILE THAN PRIVATELY-OWNED PROPERTIES ALREADY "HARASSED" AS ALTERNATIVES FOR THIS POWERLINK.

It appears the selected BPA alternative for a new powerline is based strictly on cost. Cost cannot continue to be the number one priority for such decisions or future generations will find themselves with a wasted environment that was exploited at every opportunity in the name of economic gain.

WE SHOULD BE PROUD OF THIS LAND AND DO ALL WE CAN TO PROTECT IT, RATHER THAN FIND WAYS TO CAPITALIZE ON IT. Such is the trend, and it must not continue.

If our power rates need to increase because we have exceeded our capacity, then the costs must be borne by those who demand it. We cannot continue to skirt the issue of rising costs resulting from our lifestyle choices.

It is time to do the right thing -- to make the correct choice for siting this powerline (if it is, indeed, essential). I believe you know in your heart what the "correct choice of action" is. Please reconsider your alternatives and take action that does not exploit the Cedar River Watershed.

Thank you,

Darrell Weiss
755 N 204th
Shoreline, WA 98133
206-542-0687

dweiss@ mindspring.com

425-001 Comment noted.

425-002 Please see response to Comment 382-018.
2.198

Chapter 2 — Comments and Responses - DEIS

426-001 BPA would guard against any sediment from reaching surface waters within the Cedar River Municipal Watershed. BPA would undertake erosion control measures to ensure against siltation of surface waters, and therefore, BPA does not anticipate that any pollutants would affect the water quality of the Cedar River Municipal Watershed.

426-002 While NERC reliability criteria does not allow both of these lines (existing Raver-Echo Lake line and the proposed Kangley-Echo Lake line) to be strung from a single set of towers, siting the transmission lines adjacent to each other is permitted. Outage of two adjacent lines is much less likely than outages of both lines on a double-circuit tower. See also Section 2.3.8 of the SDEIS and the responses to Comment 1459-009. See public meeting Comment 20 for a description of NERC's BPA transmission lines are designed to handle high winds and ice loading, so any single weather related event would unlikely result in the loss of both lines. BPA has looked at the expected common mode outage rate of two 500-kV lines on adjacent towers in this region and has found that exposure to be acceptable.

BPA is concerned about security and takes precautions throughout the transmission system.

Communications
Bonnie Miller
P.O. Box 12999
Portland, OR 97212

RE: New transmission lines to Seattle

Dear Sir/Madam:

I have recently become aware of the plan that you are developing to construct a second transmission line to the Seattle area. I am shocked to learn that you prefer a second transmission route that parallels the current transmission route. I have two major concerns with this possibility:

• The Cedar River Watershed supplies hundreds of thousands of men, women, and children in the Seattle area and the water must be safe and pure. Cutting a wide swath exposes our drinking water to the run-off of the silt and debris in this proposed area. We finally stopped logging in the area. This benefits our water supply by the action of rain and trees to keep our water safe.

• The proximity of the proposed second route so close to the current route exposes both routes to the very same climatic conditions that may knock out our power. It would seem logical to select an alternate route to avoid this potential devastating interruption of our power. In light of our fears of terrorist activities, it is also important to have a second route a considerable distance from the first route.

I look forward to your response to these concerns.

Sincerely,

Bonnie E. Miller

CC: Seattle City Council
November 19, 2001

Glen Lynam (TIEC-6)
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon
97208

Dear Mr. Lynam:

Re: Kangley - Echo Lake Transmission Line Project

Powerex is responsible for marketing BC Hydro surplus energy, scheduling power deliveries and marketing surplus Canadian Entitlement to the Pacific Northwest Interconnection (PNW) and the U.S. In these capacities, Powerex makes extensive use of the Bonneville Power transmission system and its interconnections with Canada. To support the trading activities, Powerex maintains involvement in northwest and Western Interconnection planning activities for transmission system reinforcement. We would like to take this opportunity to comment on the need for the Kangley - Echo Lake Transmission Line Project.

The following comments are based on our own experience with transmission restrictions and regional planning forums:

The Kangley - Echo Lake Transmission Line Project is one of many transmission projects needed for regional and Western Interconnection security. Over the past few years, power transfers between the Northwest U.S. and Canada have frequently been restricted due to inadequate transmission in the Seattle area. In extreme conditions, we understand this can threaten security of supply to the Seattle area.

Transmission owners in the Seattle area, including BPA, Project Sound Energy, and Seattle City Light, have undertaken many upgrades of the 230 and 115 kV transmission system in the area over the past few years to relieve transmission constraints in the area and between the PNW and B.C.

These owners have reported that the opportunities for further upgrades of the 230 and 115 kV to address restrictions are limited and that reinforcement of the 500 kV transmission system is needed. Information presented in public regional planning meetings on alternatives considered by the affected entities has shown the Kangley - Echo Lake line to be a key reinforcement for the area.

Planning studies have identified that the Kangley - Echo Lake Transmission Line Project is required mainly to maintain adequate transmission capacity for supply to the Seattle/Tacoma area and relieve transmission capacity restrictions for the return of the Canadian Entitlement, as compared to importing power from Canada. The Columbia River Treaty provides for return of the Canadian Entitlement to Canada on a firm basis.

BC Hydro has invested in upgrades to maintain and enhance the transfer capability between B.C. and the PNW. Also, Powerex has participated in the costs of right of way maintenance for lines in the Seattle area to help maintain transfer capabilities.

While Powerex cannot comment on the specific routing or other aspects of the proposed line, Powerex believes that there is an urgent need to upgrade transmission capacity in the area to support Seattle area load growth and to provide for return of increasing Canadian Entitlement capacity in April 2003.

Sincerely,

Phil Park, P.Eng.
Manager, Transmission Access

Direct Line: 604.891.5020
Fax Line: 604.895.7012
Email: phil.park@powerex.com

Powerex
PO Box 3621
Portland, OR 97208

Powerex Corp.
1401 University Street
Vancouver, BC V6C 3C7
Tel: 604.895.3600
Fax: 604.895.7012
www.powerex.com
November 2001

Attention Lou Diessen, Project Manager
Bonneville Power Administration - KC-7
PO Box 12599
Portland, Oregon 97212

Mr. Diessen,

I am deeply disturbed about your plans to build nine miles of new 500-kilovolt line through the Cedar and Raging River watersheds and your 1.5 miles of new road construction. Your preferred alternative states a plan to permanently clear-cut a swath from 150' to 285' wide through the forest, including Seattle's watershed, which is currently protected from logging. This plan would destroy forests recently protected by the City of Seattle and Protect Our Watershed Alliance. There are important salmon fisheries in Raging River and the City of Seattle is working to re-establish salmon in Cedar River. It was a landmark decision by Seattle to preserve its watershed forests.

Would BPA propose a powerline through Mt. Rainier National Park? Then why through our protected watershed? Please thoroughly address your reasons for dismissing the other alternatives in your final EIS as your draft didn't adequately explain the reason they were thrown out.

Most of all, please realize that your plan is a temporary fix. In the next 10 years, we will be at the same load capacity that we are at now. What then? More logging in our watershed? What we need are stronger conservation programs. It is an unrealistic view that we have unlimited amounts of resources here in the Pacific Northwest. We have met a load capacity because the population has grown so significantly in the last 10 years. It's time we start conserving what we have and making it enough instead of simply saying we'll go find more. Especially when the only offered solution is one that could potentially contaminate the drinking water supply for over 800,000 Seattle residents who said they were willing to pay several dollars extra each year to protect our watershed.

If in the end you decide that conservation won't work and we need a new line, add additional circuits to towers in the existing corridor. I realize the potential for large scale failure, but I also realize the possibility is rare that this would happen. I INSIST that any forest or wetlands that are damaged be replaced. I also ask for a new EIS with needed information, a substantive cumulative effects analysis and additional alternatives especially including conservation.

Thank you,

Salome Uphued

6530 316th St.
Federal Way, WA 98023
Hello,

I am writing to voice my opinion on the Kangley-Echo Lake Transmission Project. Clearcutting in the Cedar River Watershed to construct a powerline highway through this beautiful natural area is not a good solution to the issue faced by the Bonneville Power Administration. The Cedar River Watershed should be preserved as is.

Matthew C. Lorincz
mlorincz@fthrc.org

429-001 Comment noted.
Another email on the Kangley-Echo Lake EIS. Thanks.

-----Original Message-----
From: Darrel Weiss [mailto:dweiss@kundspring.com]
Sent: Monday, December 10, 2001 8:26 PM
To: Gene Lymard (E-mail); Laurence Driessen (E-mail); Tom Fossky (E-mail); Vickie VanZandt (E-mail) 
Cc: Ron Sims (E-mail); Gary Locke (E-mail); Heidi Wills (E-mail); Jim Canpot (E-mail); Judy Nicoastro (E-mail); Margaret Fosker (E-mail); Rick Liska (E-mail); Peter Steinbrueck (E-mail); Richard Conlin (E-mail)
Subject: Proposed Raging-Cedar Powerline

Dear Bonneville Power Official (Mr. Lymard, Mr. Driessen, Mr. Fosky, Mr. VanZandt):

You know how people are always saying “not in my backyard”? I would like to remind you that this is not the case for myself and many others who are very concerned that a new powerline is proposed to be built in the Habitat-Conservation-Plan-protected Cedar River watershed. It is not our backyard -- it the Seattle area’s primary drinking water supply -- and it is a place that really should not be considered for a construction project of this magnitude.

I’m surprised that you lot the not-in-my-backyard-property-owners (those whose properties fall into your category of “routes considered but eliminated”) score you off.

The watershed is not the only alternative. It is not the best alternative. It is the riskiest alternative. It is the most damaging alternative and therefore, most certainly, the most costly alternative.

The City of Seattle’s drinking water watershed should not be for sale.

I believe it was a mistake to quickly rule out alternatives outside the watershed because “hundreds of rural-residential properties” would object to a powerline in their backyard.

I am copying this message to my elected officials, urging their support in siting the powerline outside the watershed. If the project moves forward within the watershed, I urge them to assure that significant mitigation compensation be assessed the BPA. I also urge them to make sure the BPA takes every precaution to assure that the watershed is not damaged or compromised in any way.

The safeguards necessary to comply with the 50-year RCP protecting the watershed have not been adequately addressed. They need to be addressed in considerable detail. The impacts also must be adequately mitigated.

Please -- do not trample on the watershed! Pursue another, less threatening route.

Darrel Weiss
715 S 204th
Shoreline, WA 98177-3112
206-542-0687
431-001 Comment noted.

431-002 See response to Comment 349-001.

431-003 Additional information on the alternatives has been included in the SDEIS.

431-004 Please see response to Comment 382-006.

432-001 Comment noted.

432-002 If another line is needed across the Cascade Mountains, it would likely be needed north of Seattle in the Monroe area. BPA has identified that another cross-mountain 500-kV line would be necessary after about 2010, but has not done a more extensive siting evaluation.
Public Meeting
1. What clearance criteria do you use over trees?
2. You should be able to figure how tall towers need to be to have adequate clearance (and) be able to keep trees in right-of-way.
3. EIS needs more detail describing where trees can be left in gorges — maybe just cutting on banks. Because in these areas, there may be adequate clearance.

1 and 2. BPA typically removes all tall-growing vegetation within the ROW during the construction process. This precludes problems during the stringing process (stringing involves connecting the conductor from tower to tower and trees left in the ROW can interfere with that process) and makes returning for vegetation maintenance unnecessary for a number of years. Tall-growing species will either resprout or seed in during that first 3–5 year period and some of those species can grow 10 feet or more per year. In certain locations, where topography is such that BPA can retain tall-growing vegetation (such as over canyons or deep ravines), the minimum clearance over these trees varies depending on the voltage of the line. In this case, where a 500-kV transmission line is proposed to be built, a minimum distance of is 20 feet plus the specific vegetative species’ growth factor to the line needs to be maintained to prevent flashover.

3. The trees within the Proposed Action area are upwards to 200 feet tall. To allow trees to remain in the ROW, the towers would need to be about 350 feet high or higher, considering sag, insulators, minimum clearance to the trees, etc. Discounting the fact that these taller towers would be much more expensive to build and maintain, there are a number of reasons why taller towers are not a good idea:

- For reliability, towers of the new line must not be able to fall into the adjacent line. So the taller the structure, the farther it must be away from the existing line. For 350 foot towers, the new line must be about 350 feet away from the existing line. In addition to a large increase in costs, many more new access roads would need to be constructed. Some of these roads would need to go through sensitive areas.
- This height of towers would require a much larger “foot print” — 80 to 100 foot square — to withstand the weight of the steel. A larger “foot print” would require much more land to be disturbed and cleared around the bases, which would cause higher impacts on the environment.
- Taller towers would create a visual eyesore on the landscape since they would be approximately 150 feet above the forest canopy.
- Any transmission tower over 200 feet in height has to go through FAA registration. The FAA may require lights on the
4 BPA doesn't allow trees to grow to height within clearance limits. (Probably more economical to keep cleared.) EIS should address maintaining vegetation to clearance limit — say come in and top once a year. Weigh environmental impacts to cost. Or have taller towers to allow vegetation to grow taller.

5 I suggest you excerpt some items out of Vegetation Management EIS into this EIS, since many people don't have time to go through numerous documents.

6 Going through watershed is a special situation that calls for special measures; you can't use standard practices.

7 BPA's estimate of 1.5 miles of new access roads: Is that based on general assumptions or actual field review?

8 Are there conditions that you would use helicopters to install towers rather than driving to sites?

Leaving trees in the ROW can cause problems with stringing the conductor. During stringing, the conductor is connected from tower to tower. Trees interfere with this process and have caused bodily harm to workers.

4 BPA is responsible for providing low-cost electricity to the Pacific Northwest. To keep those costs low, BPA needs to find the most economically efficient and environmentally acceptable method to keep its transmission lines safe and reliable. To allow trees to grow in the ROW and continually top them would be very costly and would involve bringing in equipment to do that job since climbing smaller trees is not safe. Bringing in this specialized equipment would not only cause a safety hazard (especially if trees are maintained near the minimum clearance requirements), but would probably require additional roads to get the equipment to the trees. Bringing in additional equipment also increases the risk of accidental fuel/oil spills and the introduction of noxious weeds. Controlling vegetation in its earliest stages is the most economically efficient and environmentally acceptable way to maintain the safe and reliable operation of our transmission lines.

5 Please see Appendix K in the SDEIS for a summary of BPA's Vegetation Management EIS.

6 BPA is aware of the unique protection that the Cedar River Watershed requires and agrees with your comment. For example, during surveying of the preferred alternative, special surveying techniques were used to avoid cutting any trees over 2 inches in diameter. If BPA decides to build a transmission line, special care will be taken to protect this resource.

7 The road estimate was made prior to a field review using aerial photomaps and a general working knowledge of the local terrain. An updated estimate based on a field review is included in the SDEIS.

8 Helicopters have been used in situations where access conditions make it difficult to drive large equipment, such as towers. If lights are required, a separate powerline of lesser voltage would have to be built to power those lights.
9  Purpose of the project is not substantiated in the Draft EIS.
10  There are no studies (power-flow) in the document to substantiate the need statement.
11  Can we provide the power-flow studies for review? WSCC cases.
12  Why isn't there a public meeting being held in Seattle?
13  The project hardly affects the people of Maple Valley and affects the people of Seattle much more.
14  Do we send power out of the state?
15  Agree with preferred alternative since it is the least disruption to the watershed itself. The routes avoiding the watershed are twice as long and have greater impact to residences. (Ravensdale)
16  Why doesn't the DEIS address the actual clearing anticipated? It is much too general.

9  Additional information has been added to the SDEIS to address this comment. Please see Chapter 1.
10  Please request a copy of SDEIS Appendix H, Summary of Transmission Planning Studies for more information.
11  See response to Comment 10.
12  BPA did hold public meetings in Seattle to get scoping comments for the SDEIS and to gather comments after release of the SDEIS.
13  Comment noted.
14  Yes, BPA does send power out of the state. BPA also imports power from other states and British Columbia when power is needed in the Pacific Northwest.
15  Comment noted.
16  Please see response to Comment 394-034.
A new corridor is needed because the line on the existing corridor (Raver-Echo Lake No. 1 500-kV line) cannot be removed from service for the length of time (approximately 7 or 8 months) it would take to rebuild it to a double-circuit line. The system without the existing line (Raver-Echo Lake No. 1 500-kV line) will not be able to serve expected load, the return of the US-Canada Treaty power and withstand another line outage (required to meet national reliability criteria) without a high probability of uncontrolled loss of load or a system collapse in the Puget Sound Area. Also, rebuilding the existing line to a double-circuit line essentially provides no additional capacity to serve the Puget Sound load. This is because BPA must plan for an outage of the double-circuit line as required by the North American Electric Reliability Council (NERC). This in essence will not allow BPA to make use of the new line on the double-circuit towers, therefore making the investment worthless.

Seven to 8 months. Due to NERC rules, BPA cannot build this project on double-circuit towers.

BPA must maintain a safe electrical clearance between adjacent lines and to the edge of the right-of-way. The new line cannot be built on the existing right-of-way and maintain both a safe electrical distance to the existing line and edge of right-of-way. BPA also wants to make sure one tower cannot fall into the adjacent line.

NERC, or the North American Electric Reliability Council, was established in 1968 to promote bulk electric system reliability and security. Among other responsibilities, it establishes operating and planning standards to ensure electric system reliability. NERC is composed of ten Regional Councils including the Western Electricity Coordination Council (WECC). WECC members include 97 electric utilities, 17 affiliate members, and nine State Commission representatives. (See www.wecc.biz and www.nerc.com.) BPA and other utilities follow NERC and WECC criteria to ensure reliable electric service. The Reliability Council operates under a system of voluntary compliance. In addition, BPA and most members of WECC have agreed to mandatory compliance with certain criteria and standards.

BPA is studying impacts to wetlands and natural habitat for endangered species within the Cedar River Watershed. The Preferred Alternative (Alternative 1) minimizes additional rights-
Reducing or minimizing impacts is not adequate mitigation.

DEIS ignores cumulative effects of building the line through the forest and watershed.

You need to replace right-of-way acreage taken out of forest production. Low elevation forests are disappearing. Just because you haven’t replaced acreage in the past, that’s not a good enough reason not to start now.

Will we see, in the near future, retrofitting old double-circuit to single-circuit with greater separation between lines? That would be a huge impact.

As reliability standards change over time, so do mitigation requirements (replace areas permanently lost).

If you remove 150 acres of mature forest, you should replace with same, or multiplier of 150 acres for immature forestland.

Mitigation measures cited do prevent, reverse, and rectify impacts during or from construction. There are impacts that are not reversible such as permanent loss of timber and access road construction. BPA is studying the possibility of replacement as an additional mitigation measure. Please see response to Comment 340-002.

Please see response to Comment 394-090.

See responses to comments 21 and 22.

BPA has no program to rebuild/replace existing double-circuit 500-kV towers to two single-circuit towers for reliability purposes to meet new reliability guidelines. Nevertheless, under NERC reliability guidelines, BPA is required to plan for outage of a double-circuit tower, whether that facility is new or existing. If the guidelines cannot be met, then some action is required, which could include reconfiguration, remedial action schemes or building additional lines.

When there is a need for new projects, some will be double circuit and some will be single circuit lines. When BPA sites these lines there may be a need for separation from other lines. BPA has a long history of replacing old single and double-circuit low capacity lines with very high capacity single or double-circuit 500-kV lines and thereby minimizing the environmental impact. BPA has installed two of these high
28 There are some of us who want to pay for quality and full mitigation.

29 You have eliminated alternatives outside of watershed, without providing a full analysis in the DBS, thereby limiting your alternatives. The DBS doesn't provide the relative impact of the off-watershed routes, it just simply states that a number of people didn't want this (Ravensdale) route.

29 Please see response to Comment 382-018.

30 Why were the alternatives for Rocky Reach-Maple Valley (rebuilt double-circuit, or new parallel line) dismissed?

31 What about the option of building new generation facilities?

31 New generation facilities are presently being proposed and constructed all across the Northwest. However, due to the deregulation of the power industry, which allows non-utilities to construct power plants, BPA has no control over where or when these plants are built. This makes transmission planning extremely difficult because a transmission line cannot be built as fast as a generation plant and the transmission system can only be planned about 4 or 5 years into the future. Completed generation plants are incorporated in the planning studies.

26 See responses to Comments 21 and 22.

27 See responses to Comments 21 and 22.

28 Comment noted.

29 Please see response to Comment 382-018.

30 These two alternatives are fully analyzed in the SDBS.
32 Shouldn't the system be evaluated on efficiency rather than economics in regard to delivering power?

33 What about Echo Lake to Monroe? Do you have the same situation as for this project? (This is another example of cumulative affects.)

34 What was the purpose of alternatives 5a, 4b and 2?

32 The transmission system must be planned on a least cost basis, which incorporates efficiency. Transmission design is a very careful tradeoff between cost, needs and capacity.

33 The purpose and need for the Monroe-Echo Lake 500-kV line would be to ensure reliable service to Puget Sound Area loads and to integrate potential new generation projects. Need depends in part on the decision of generation developers. BPA is examining alternatives, including approaches that do not require transmission construction. A decision on the need has not been made.

34 No Alternative 5a was considered.

The purpose of Alternative 2 is to avoid taking two residences located next to the south end of the Proposed Action. The purpose of Alternative 3 was to meet the WECC's reliability criteria, which recommended a minimum of 2000 feet separation between transmission line rights-of-way with at least one common terminal. Separation provides increased system reliability.

Alternatives 4A and 4B avoided the two residences located next to the southern portion of Alternative 1, the Proposed Action, and also avoided a separate crossing of the Cedar River. Both of these alternatives provided for crossing the Cedar River immediately adjacent to where BPA's existing line crosses the Cedar River. Additional alternatives were added in the SDBS.
35 Please see response to Comment 382-038.

36 The minimum ground clearance for a BPA 500-kV line is 35 feet.

37 Please see response to Comment 382-018.

38 As stated in the Federal Highway Administration’s Brochure, “Your Rights and Benefits as a Displaced Person, Under the Federal Relocation Assistance Program,” government programs designed to benefit the public as a whole often result in acquisition of private property, and sometimes in the displacement of people from their residences, businesses or farms. As a means of providing uniform and equitable treatment for those persons displaced, your government passed the “Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970,” and the “Uniform Relocation Act Amendments of 1987.”

Any individual, family, business or farm displaced by a federal or federally-assisted program shall be offered relocation assistance services for the purpose of locating a suitable replacement property. Relocation services are provided by qualified personnel employed by the Agency. It is their goal and desire to be of service to you, and assist in any way possible to help you successfully relocate.


35 You cross both Cedar and Raging rivers, plus several tributaries. (Raging river has salmon, Cedar River will have salmon.) You need to look to see how tall towers need to be to keep full riparian habitat intact along river crossings. EIS only lists 135-ft. tall towers.

36 What is minimum clearance for the 500-kV line?

37 I’m assuming the route alternatives are not going to change (east or west) of routes identified.

38 How am I going to be treated by BPA since your new line will take out my house and barn?
39 Will the appraiser be looking at damages outside the right-of-way?

40 When you put in the new line, you will devalue my house located on the west side of the line.

41 Who will decide the final alternative?

42 Can we use superconducting conductors?

43 Are there any plans for future expansion east or west of the project area?

44 Where BPA removed lines (230-kV) on the Columbia-Covington right-of-way, would BPA ever build new lines in this right-of-way? When?

45 Could BPA's public involvement office publish in newspaper a yearly statement that BPA's rights-of-way are not public rights-of-way?

39 BPA usually only purchases the land rights that it needs. If BPA intends to acquire only a portion of the property, the Agency must state the amount to be paid for the part to be acquired. In addition, an amount will be stated separately for damages, if any, to the portion of the property you will keep. If the Agency determines that the remainder property will have little or no value or use to you, the Agency will consider this remainder to be an uneconomic remnant and will offer to purchase it. You will have the option of accepting the offer for purchase of the uneconomic remnant or of keeping the property.

40 See SDEIS Section 4.11.2.5, Community Values and Concerns, Property Value Impact.

41 Following the completion of the environmental review, the BPA Administrator will make a decision on the proposed project. The Administrator will choose the Proposed Action or one of the alternatives. BPA is expected to make a decision on the project 30 days after the release of this Final EIS.

42 No, the use of superconducting conductors is technologically infeasible at this time.

43 No, there are no plans to expand east or west of the project area.

44 This right-of-way is very valuable to BPA for future use. This statement is simply made because new rights-of-way are so difficult to acquire given the expansion of population and human activities outside of major urban areas. BPA does not have a date for this use.

45 Unfortunately, publishing ads or legal notices in all the newspapers of the Northwest would be expensive and whether the people who trespass on private property would read the notices and follow their direction is questionable. Illegal use of property is a continuing concern for BPA and property owners. Our maintenance staff would be happy to discuss your particular concern at your convenience.
46 Yes, there have been gates that BPA has stopped maintaining due to the high cost of maintenance. However, we work very hard with landowners to maintain the gates. Currently we are installing stronger gates in these areas to try and keep vandals out.

47 The new line would be connected to an existing line.

48 In most cases the new towers will not be placed directly opposite of the existing towers but will be offset ahead or back-on-line. The distance of offset varies, but it would be about 50 feet.

49 Comment noted.

50 Comment noted.

51 Comment noted with respect to your first point. Paralleling an existing transmission line in a wooded area does minimize the clearing that would be required because no danger trees would exist, and therefore have to be removed, on the west side of the right-of-way, since there is an existing transmission located there. Additionally, BPA would take advantage of the existing access/spur road system (to the maximum extent possible) so as to minimize the number of new roads that would be needed to serve the new line.

With respect to the second point, it is typically true that the fewer number of property owners, the less chance that any property would need to be condemned to site the line.

52 The need for additional projects in the future would depend on load growth.

53 This is not a question that can be answered with any certainty. The entire Western US electric system is interconnected. It is possible that if you are a Seattle City Light customer for example, the power Seattle City Light is buying could be coming from a power generator in El Paso, Texas or from the Centralia Coal Generating plant or any one of 1,000 other generators throughout the west. Only if the Puget Sound area were isolated from the rest of the system would it be apparent that generators in the area are serving the load.
54 How does BPA use growth-rate study information collected by boring trees?

55 The DEIS is unclear about how much area is actually being cleared of trees, 150 ft. vs. up to 400 ft.

56 Vegetation will rapidly invade areas cleared of timber. How will BPA manage the right-of-way?

57 What information do you have on wildlife kills related to transmission lines (raptors)?

58 Does BPA keep records of bird kill found along right-of-way?

59 Since groundwire can have a detrimental impact on migratory birds, can you do without ground wire on this project? (Note: overhead ground wire can be marked.)

60 I recognize the need for power, but the preferred alternative is much less traumatic than an alternative like the Ravensdale route.

61 Any way to underground the line?

62 This project affects the folks in Seattle more than it does those in Maple Valley, so why are you holding the meeting in Maple Valley instead of Seattle?

54 The information gathered from boring the trees gives us an idea of the age and the growth rate of the trees and an indication of site potential. When a new ROW is cleared, trees that previously grew within the protection of a group of trees (with relatively little exposure to wind) are now exposed making them vulnerable to wind throw. This vulnerability persists for about 3 to 5 years after clearing until the trees become used to their new environment and become more “wind firm.” Because of this, BPA uses the growth information to add in a margin of safety of about 5 years to the calculations of safe heights.

55 See response to Comment 16.

56 BPA has prepared a programmatic EIS for its vegetation management program associated with transmission lines, roads, and related facilities. The EIS identifies appropriate measures to protect the environment while minimizing danger tree risks and maintaining the ROW within safe, reliable conditions. These guidelines provide for protecting water resources by using herbicide buffer zones. BPA would comply with the standards and guidelines established in this EIS and the Record of Decision for vegetation management (BPA 2000). See SDEIS Appendix K for more information.

57 BPA does not have any information about wildlife kills related to transmission lines. None have been found on the existing ROW.

58 BPA does not keep records of birds killed along the ROW.

59 We cannot do without overhead groundwire on this line. In the past, where a migratory bird path has been identified, BPA has installed bird flight diverters.

60 Comment noted.

61 Undergrounding the line was considered but eliminated because of cost. See Section 2.3.1.

62 We held the meeting at the Maple Valley Community Center in Maple Valley since that facility was the closest suitable meeting place to the proposed project. Meetings were held in Seattle for scoping of the SDEIS and to receive comments on the SDEIS.
## Chapter 2 Response to Comment Topics

<table>
<thead>
<tr>
<th>TOPIC</th>
<th>COMMENT NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td>sockeye, coho, chinook fisheries</td>
<td></td>
</tr>
<tr>
<td>BC Hydro</td>
<td>422-003</td>
</tr>
<tr>
<td>bird collisions</td>
<td>394-066, 394-096, 394-100, 394-101, 394-259, 382-015, PM #57, PM #58, PM #59</td>
</tr>
<tr>
<td>bull trout</td>
<td>394-089, 394-178, 394-184, 394-200, 394-307</td>
</tr>
<tr>
<td>burning, slash treatment</td>
<td>394-129, 394-214</td>
</tr>
<tr>
<td>Canadian Treaty</td>
<td>394-002, 382-019, PM #17</td>
</tr>
<tr>
<td>CRW watershed</td>
<td></td>
</tr>
<tr>
<td>Coastal Zone Management Act</td>
<td>394-008, 395-045, 382-031, 400-001</td>
</tr>
<tr>
<td>coating on towers, zinc, sodium dichromate</td>
<td>394-175, 382-041</td>
</tr>
<tr>
<td>Columbia-Covington line</td>
<td>PM #44</td>
</tr>
<tr>
<td>comment period</td>
<td>404-005</td>
</tr>
<tr>
<td>Topic</td>
<td>References</td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
</tr>
<tr>
<td>construction equipment</td>
<td>394-025, 394-139, 394-141, 378-009, 382-017, PM #4, PM #8, 405-014</td>
</tr>
<tr>
<td>consultation with tribes</td>
<td>411-018, 394-016, 394-111, 405-001, 405-018, 405-019, 405-020, 378-003</td>
</tr>
<tr>
<td>costs</td>
<td>411-009, 411-012, 394-032, 394-042, 394-213, 395-006, 356-001, 382-006, PM #4, PM #32, PM #61</td>
</tr>
<tr>
<td>cross-Cascade, cross-mountain line</td>
<td>432-002, PM #25</td>
</tr>
<tr>
<td>cultural resources</td>
<td>411-018, 394-016, 394-017, 394-111, 394-124, 395-006, 405-001, 405-017, 405-018, 405-019, 405-020, 378-001, 382-033</td>
</tr>
<tr>
<td>culverts</td>
<td>394-022, 394-084, 394-188, 395-015</td>
</tr>
<tr>
<td>danger tree</td>
<td>394-034, 394-156, 394-177, 394-212, 394-222, 394-275, 378-005, 405-012, 349-005, 350-005</td>
</tr>
<tr>
<td>deer and elk</td>
<td>394-120, 405-010, 405-012, 341-002</td>
</tr>
<tr>
<td>double circuit on same towers</td>
<td>426-002, PM #17, PM #18, PM #25</td>
</tr>
<tr>
<td>easements, right-of-way</td>
<td>382-008, PM #33</td>
</tr>
<tr>
<td>Echo Lake-Monroe line</td>
<td>349-001, 397-001</td>
</tr>
<tr>
<td>energy conservation</td>
<td>411-005, 382-006, 382-026, 403-001, PM #4, 405-007, 340-001, 353-002, 368-001, 368-003, 371-002, 378-001</td>
</tr>
<tr>
<td>environmental quality</td>
<td>394-237, 394-238, 394-240, 394-243, 394-250</td>
</tr>
<tr>
<td>Forest Practices Act</td>
<td>390-003, 394-059, 394-210, 394-281</td>
</tr>
<tr>
<td>future projection</td>
<td>405-002, 405-003, PM #31, PM #43, PM #44, PM #52, PM #53</td>
</tr>
<tr>
<td>generation</td>
<td>405-002, PM #31, PM #33</td>
</tr>
<tr>
<td>gray wolf</td>
<td>341-001</td>
</tr>
<tr>
<td>groundwater contamination</td>
<td>394-050, 394-139, 403-001</td>
</tr>
<tr>
<td>Topic</td>
<td>Pages</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>-------------------------------------------------</td>
</tr>
<tr>
<td>hazardous spills, SWPPP</td>
<td>411-019, 394-026, 394-132, 395-013, 382-014, PM #4, 403-001, 378-003, 378-005</td>
</tr>
<tr>
<td>helicopter construction, sky crane</td>
<td>394-033, 394-135, 394-214, 405-014, 340-002, 378-001, 378-009, 382-009, 382-031, 382-039, PM #8</td>
</tr>
<tr>
<td>herbicide use</td>
<td>394-075, 394-291, 395-029, 349-005, PM #56</td>
</tr>
<tr>
<td>insurance policy for watershed</td>
<td>421-001</td>
</tr>
<tr>
<td>King County code</td>
<td>394-125, 394-304, 394-307, all responses to letter 395, 340-002, 341-002, 346-004, 369-002, 382-006, 382-031</td>
</tr>
<tr>
<td>lamprey</td>
<td>394-093, 394-206</td>
</tr>
<tr>
<td>land use impacts</td>
<td>395-018</td>
</tr>
<tr>
<td>landscape analysis of impacts</td>
<td>394-227</td>
</tr>
<tr>
<td>mail list</td>
<td>394-020</td>
</tr>
<tr>
<td>marbled murrelet</td>
<td>394-066, 394-088, 394-123, 394-227, 394-240, 382-015</td>
</tr>
<tr>
<td>merchantable timber</td>
<td>394-213, 394-216, 394-230, 394-254, 394-324, 411-002, 405-021</td>
</tr>
<tr>
<td>micropile, footings</td>
<td>394-141, 394-217, 394-221, 395-018</td>
</tr>
<tr>
<td>NEPA process</td>
<td>394-010, 394-013, 394-014, 394-091, 374-003, 400-001</td>
</tr>
<tr>
<td>noise</td>
<td>394-120, 394-123, 394-144, 395-042</td>
</tr>
<tr>
<td>non-transmission alternative</td>
<td>394-043, 395-006, 409-002, 411-006, 405-002, 397-001, 349-001, PM #31</td>
</tr>
<tr>
<td>northern spotted owl</td>
<td>398-001, 002, 003; 411-013, 014, 015; 394-010, 394-227, 394-236, 382-015, 400-001</td>
</tr>
<tr>
<td>Comment/Issue</td>
<td>References</td>
</tr>
<tr>
<td>---------------</td>
<td>------------</td>
</tr>
<tr>
<td>noxious weeds</td>
<td>394-108, 394-112, 394-291, 382-017, PM #4, 405-012, 378-003</td>
</tr>
<tr>
<td>old growth</td>
<td>357-002, 357-004, 360-003</td>
</tr>
<tr>
<td>purpose and need</td>
<td>411-002, 411-010, 394-002, 394-003, 394-031, 394-148, 395-015, 409-002, 339-001, 340-001, 382-004, 382-005, 382-019, PM #25, PM #34</td>
</tr>
<tr>
<td>Raging River</td>
<td>394-022, 394-088, 394-100, 394-101, 394-178, 394-307, 395-045, 382-038, 403-001, 349-005, 378-008, 382-014</td>
</tr>
<tr>
<td>relocation and compensation</td>
<td>PM #38, PM #39, PM #40</td>
</tr>
<tr>
<td>Rock Creek</td>
<td>394-022, 394-180, 394-200</td>
</tr>
<tr>
<td>Seattle</td>
<td>411-002, 394-002, 394-026, 394-031, 394-270, 394-271, 394-324, 340-002, 346-003, 368-001, 378-003, 382-014, 382-019, 382-033, 382-039, 421-001, 422-002, PM #12, PM #53, PM #62. See also responses to comments on the HCP and CRW.</td>
</tr>
<tr>
<td>seed mix</td>
<td>394-147, 405-012, 382-017</td>
</tr>
<tr>
<td>sending power out of state</td>
<td>PM #14</td>
</tr>
<tr>
<td>significance of impacts</td>
<td>394-011, 394-227, 382-026, 400-001</td>
</tr>
<tr>
<td>socioeconomic impacts</td>
<td>340-001, 405-018, 411-005</td>
</tr>
<tr>
<td>soil erosion, landslide</td>
<td>394-026, 394-072, 394-180, 378-005</td>
</tr>
<tr>
<td>staging areas</td>
<td>394-038, 394-041, 394-047, 394-139, 394-276, 382-023, 405-017, 405-020</td>
</tr>
<tr>
<td>super conducting conductors</td>
<td>PM #42</td>
</tr>
<tr>
<td>survey and manage requirements</td>
<td>394-284</td>
</tr>
<tr>
<td>system reliability</td>
<td>390-003, 426-002, PM #3, PM #17 through #20, PM #25, PM #34, 405-015, 339-001, 349-001</td>
</tr>
<tr>
<td>Taylor Mountain</td>
<td>340-005, 402-001</td>
</tr>
<tr>
<td>trespassing on rights-of-way</td>
<td>PM #45</td>
</tr>
<tr>
<td>vandalism</td>
<td>PM #46</td>
</tr>
<tr>
<td>vegetation description</td>
<td>394-278, 394-281, 394-283, 405-001</td>
</tr>
<tr>
<td>------------------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>visual resources</td>
<td>340-005, 402-001, PM #3</td>
</tr>
<tr>
<td>water purification plant</td>
<td>422-002</td>
</tr>
<tr>
<td>wells</td>
<td>395-006</td>
</tr>
<tr>
<td>wildlife</td>
<td>Note: PM = public meeting comment #</td>
</tr>
</tbody>
</table>
Chapter 3 — Comments and Responses - SDEIS

In this Chapter comments from:

- Federal Agencies
- State Agencies
- Local Agencies
- Tribes
- Groups and Individuals
- Public Meetings

BPA completed a supplemental draft environmental impact statement (SDEIS) for the proposed Kangley-Echo Lake Transmission Line Project. The SDEIS was released to the public for a 45-day review and comment period that ended on March 1, 2003. Five public meetings were held at various locations in King County during the week of February 3-6 to gather public comments on the SDEIS.

This chapter contains the written comments from letters, e-mails, and comment sheets received during the comment period for the SDEIS and BPA’s responses to those comments. It also contains the comments from the public meetings and telephone calls received during the comment period. Chapter 2 contains the written and oral comments received during the comment period for the DEIS and BPA’s responses to those comments.

Letters and comment sheets were given numbers in the order they were received. Separate issues in each letter were given separate codes. For example, letter 394 might have issues 394-001, 394-002, and 394-003 identified within its text. Comments from the public meeting were also numbered. BPA prepared responses to each of these individual comments.

The chapter is organized in the following sequence: comments from federal agencies are followed by comments from state agencies (page 3-7), local agencies (page 3-11), tribes (page 3-31), then groups and individuals (page 3-43). Comments from the public meetings are at the end of the chapter (page 3-163). Because we have organized comments this way and often reference responses to other comments, please use the numerical list on the back of this page for reference. See also the reference page in Chapter 2. A listing of related comments by issue is at the end of the chapter on page 3-343.
<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Begins on Page</th>
<th>Comment Number</th>
<th>Begins on Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1389</td>
<td>3-45</td>
<td>1461</td>
<td>3-96</td>
</tr>
<tr>
<td>1390</td>
<td>3-45</td>
<td>1462</td>
<td>3-97</td>
</tr>
<tr>
<td>1391</td>
<td>3-46</td>
<td>1463</td>
<td>3-98</td>
</tr>
<tr>
<td>1392</td>
<td>3-46</td>
<td>1465</td>
<td>3-99</td>
</tr>
<tr>
<td>1393</td>
<td>3-47</td>
<td>1466</td>
<td>3-100</td>
</tr>
<tr>
<td>1394</td>
<td>3-48</td>
<td>1467</td>
<td>3-101</td>
</tr>
<tr>
<td>1395</td>
<td>3-49</td>
<td>1468</td>
<td>3-102</td>
</tr>
<tr>
<td>1396</td>
<td>3-50</td>
<td>1469</td>
<td>3-103</td>
</tr>
<tr>
<td>1397</td>
<td>3-9</td>
<td>1470</td>
<td>3-104</td>
</tr>
<tr>
<td>1398</td>
<td>3-51</td>
<td>1471</td>
<td>3-105</td>
</tr>
<tr>
<td>1399</td>
<td>3-52</td>
<td>1472</td>
<td>3-105</td>
</tr>
<tr>
<td>1400</td>
<td>3-53</td>
<td>1473</td>
<td>3-105</td>
</tr>
<tr>
<td>1401</td>
<td>3-54</td>
<td>1474</td>
<td>3-106</td>
</tr>
<tr>
<td>1402</td>
<td>3-55</td>
<td>1475</td>
<td>3-107</td>
</tr>
<tr>
<td>1403</td>
<td>3-56</td>
<td>1476</td>
<td>3-108</td>
</tr>
<tr>
<td>1404</td>
<td>3-57</td>
<td>1477</td>
<td>3-109</td>
</tr>
<tr>
<td>1405</td>
<td>3-58</td>
<td>1478</td>
<td>3-110</td>
</tr>
<tr>
<td>1406</td>
<td>3-59</td>
<td>1479</td>
<td>3-111</td>
</tr>
<tr>
<td>1407</td>
<td>3-60</td>
<td>1480</td>
<td>3-5</td>
</tr>
<tr>
<td>1408</td>
<td>3-60</td>
<td>1481</td>
<td>3-112</td>
</tr>
<tr>
<td>1409</td>
<td>3-60</td>
<td>1482</td>
<td>3-114</td>
</tr>
<tr>
<td>1410</td>
<td>3-61</td>
<td>1483</td>
<td>3-115</td>
</tr>
<tr>
<td>1411</td>
<td>3-62</td>
<td>1484</td>
<td>3-116</td>
</tr>
<tr>
<td>1412</td>
<td>3-63</td>
<td>1485</td>
<td>3-117</td>
</tr>
<tr>
<td>1413</td>
<td>3-64</td>
<td>1486</td>
<td>3-118</td>
</tr>
<tr>
<td>1414</td>
<td>3-65</td>
<td>1487</td>
<td>3-12</td>
</tr>
<tr>
<td>1415</td>
<td>3-66</td>
<td>1488</td>
<td>3-119</td>
</tr>
<tr>
<td>1416</td>
<td>3-67</td>
<td>1489</td>
<td>3-15</td>
</tr>
<tr>
<td>1417</td>
<td>3-68</td>
<td>1490</td>
<td>3-19</td>
</tr>
<tr>
<td>1418</td>
<td>3-68</td>
<td>1491</td>
<td>3-120</td>
</tr>
<tr>
<td>1419</td>
<td>3-68</td>
<td>1492</td>
<td>3-21</td>
</tr>
<tr>
<td>1420</td>
<td>3-165</td>
<td>1493</td>
<td>3-124</td>
</tr>
<tr>
<td>1421</td>
<td>3-184</td>
<td>1494</td>
<td>3-125</td>
</tr>
<tr>
<td>1422</td>
<td>3-238</td>
<td>1495</td>
<td>3-126</td>
</tr>
<tr>
<td>1423</td>
<td>3-69</td>
<td>1496</td>
<td>3-127</td>
</tr>
<tr>
<td>1424</td>
<td>3-70</td>
<td>1497</td>
<td>3-128</td>
</tr>
<tr>
<td>1425</td>
<td>3-71</td>
<td>1498</td>
<td>3-129</td>
</tr>
<tr>
<td>1426</td>
<td>3-72</td>
<td>1499</td>
<td>3-130</td>
</tr>
<tr>
<td>1427</td>
<td>3-73</td>
<td>1500</td>
<td>3-131</td>
</tr>
<tr>
<td>1428</td>
<td>3-74</td>
<td>1501</td>
<td>3-132</td>
</tr>
<tr>
<td>1429</td>
<td>3-246</td>
<td>1502</td>
<td>3-133</td>
</tr>
<tr>
<td>1430</td>
<td>3-301</td>
<td>1503</td>
<td>3-134</td>
</tr>
<tr>
<td>1431</td>
<td>3-74</td>
<td>1504</td>
<td>3-135</td>
</tr>
<tr>
<td>1432</td>
<td>3-74</td>
<td>1505</td>
<td>3-136</td>
</tr>
<tr>
<td>1433</td>
<td>3-75</td>
<td>1506</td>
<td>3-138</td>
</tr>
<tr>
<td>1434</td>
<td>3-33</td>
<td>1507</td>
<td>3-140</td>
</tr>
<tr>
<td>1435</td>
<td>3-76</td>
<td>1508</td>
<td>3-141</td>
</tr>
<tr>
<td>1436</td>
<td>3-77</td>
<td>1509</td>
<td>3-142</td>
</tr>
<tr>
<td>1437</td>
<td>3-78</td>
<td>1510</td>
<td>3-143</td>
</tr>
<tr>
<td>1438</td>
<td>3-79</td>
<td>1511</td>
<td>3-144</td>
</tr>
<tr>
<td>1439</td>
<td>3-80</td>
<td>1512</td>
<td>3-145</td>
</tr>
<tr>
<td>1440</td>
<td>3-81</td>
<td>1513</td>
<td>3-146</td>
</tr>
<tr>
<td>1441</td>
<td>3-82</td>
<td>1514</td>
<td>3-6</td>
</tr>
<tr>
<td>1442</td>
<td>3-83</td>
<td>1515</td>
<td>3-27</td>
</tr>
<tr>
<td>1443</td>
<td>3-84</td>
<td>1516</td>
<td>3-29</td>
</tr>
<tr>
<td>1444</td>
<td>3-85</td>
<td>1517</td>
<td>3-147</td>
</tr>
<tr>
<td>1445</td>
<td>3-86</td>
<td>1518</td>
<td>3-148</td>
</tr>
<tr>
<td>1446</td>
<td>3-10</td>
<td>1519</td>
<td>3-149</td>
</tr>
<tr>
<td>1447</td>
<td>3-13</td>
<td>1520</td>
<td>3-150</td>
</tr>
<tr>
<td>1448</td>
<td>3-87</td>
<td>1521</td>
<td>3-151</td>
</tr>
<tr>
<td>1449</td>
<td>3-88</td>
<td>1522</td>
<td>3-152</td>
</tr>
<tr>
<td>1450</td>
<td>3-89</td>
<td>1523</td>
<td>3-153</td>
</tr>
<tr>
<td>1451</td>
<td>3-90</td>
<td>1524</td>
<td>3-154</td>
</tr>
<tr>
<td>1452</td>
<td>3-91</td>
<td>1525</td>
<td>3-155</td>
</tr>
<tr>
<td>1453</td>
<td>3-91</td>
<td>1526</td>
<td>3-156</td>
</tr>
<tr>
<td>1454</td>
<td>3-92</td>
<td>1527</td>
<td>3-157</td>
</tr>
<tr>
<td>1455</td>
<td>3-92</td>
<td>1528</td>
<td>3-158</td>
</tr>
<tr>
<td>1458</td>
<td>3-93</td>
<td>1529</td>
<td>3-159</td>
</tr>
<tr>
<td>1459</td>
<td>3-94</td>
<td>1530</td>
<td>3-160</td>
</tr>
<tr>
<td>1460</td>
<td>3-95</td>
<td></td>
<td>3-162</td>
</tr>
</tbody>
</table>

(Comments on the SDEIS begin with BPA log #1389; earlier letters were for scoping, or comments on the DEIS)
Federal Agencies
Lou Driessen  
Project Manager  
DOE-Bonneville Power Administration  
P.O. Box 491  
Vancouver, WA 98666-0491

Re: Kangley-Echo Lake Transmission Line Project

Dear Mr. Driessen:

On July 8, 2002, the USDA Forest Service (USFS) entered into an Interagency Agreement (No. 02-IA-11067103002) as a cooperating agency with the Bonneville Power Administration (BPA) in the development of the Supplemental Draft Environmental Impact Statement (SDEIS) for the Kangley-Echo Lake Transmission Line Project.

As stated in the agreement, the USFS is to review environmental documentation and provide feedback to ensure that these documents could support decisions that may be required by the USFS. This includes environmental review and coordination with BPA on transmission line alternatives that cross National Forest System lands on the Mt. Baker-Snoqualmie and Wenatchee National Forests. In addition, the agreement specifies that the USFS, as a cooperating agency, will provide guidance on potential issues and analysis needs to sufficiently address current USFS requirements and processes.

In reviewing the SDEIS that was recently released, I note that BPA is recommending Alternative 1, which parallels an existing BPA transmission line through the Cedar River Municipal Watershed, as the preferred alternative for this project. This alternative does not cross National Forest System land and, therefore, would not require any action on the part of the USFS.

However, the analysis has not been performed at the same level of intensity for the alternatives proposed across National Forest System land. I understand you are aware that if one of the alternatives across National Forest System land (Alternative B or D) were selected as the preferred alternative for this project, the SDEIS would be inadequate to support the necessary decisions that would be required by the USFS. Additional field surveys, analysis, and consultation would be necessary to adequately display and disclose the impacts that would likely occur on National Forest System land. If this situation were to occur, further project delay would be inevitable in order to accommodate the required steps.

I look forward to a continuing cooperative relationship regarding this project and other BPA projects that may involve National Forest System lands. If public comment on the SDEIS suggests a possible change in the preferred alternative, please notify the USFS project contact, Floyd Ruigakki, at the earliest possible time. Thank you.

Sincerely,

/S/ SONNY J. O'NEAL  
SONNY J. O'NEAL  
Forest Supervisor

1480-001 Comment noted.

1480-002 Comment noted.

1480-003 BPA is aware of the additional work necessary if an alternative on National Forest land is chosen and the time it would take to complete this work.

1480-004 Thank you for your cooperation.
United States Department of the Interior
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 356
Portland, Oregon 97232-2036

February 28, 2003

Lou Driessen, Project Manager
Bonneville Power Administration
Communications – KC – 7
P.O. Box 12999
Portland, Oregon 97212

Dear Mr. Driessen:

The Department of the Interior has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the Kangley-Echo Lake Transmission Line Project, King County, Washington. The Department does not have any comments to offer.

We appreciate the opportunity to comment.

Sincerely,

Preston A. Sleeper
Regional Environmental Officer

1514-001 Comment noted.
State Agencies
1397-001 A list was developed from the sign-in sheets and any one who requested to be added to the mail list was, along with people/persons who signed in, but were not found on previous lists.
February 7, 2003

Bonneville Power Administration
Public Affairs Office – KC - 7
PO Box 12599
Portland, OR 97212

Re: Kangesley-Echo Lake Transmission Project – SDEIS

Dear Public Affairs Office:

We would like to take this opportunity to thank the Bonneville Power Administration (BPA) for all of its hard work and efforts in completing the Supplemental Draft Environmental Impact Statement (SDEIS) for the Kangesley-Echo Lake Transmission Project. BPA’s willingness to consider all of the comments submitted for this document is to be commended.

We continue to support BPA’s preferred alternative for construction of this important transmission line as the most reasoned and balanced solution. The SDEIS clearly shows that the preferred alternative is both the most cost-effective and the most environmentally sound option.

We also applaud BPA’s consideration of new and environmentally friendly technologies such as micro-pylons and the use of helicopters in the construction plan for the transmission line.

Thank you again for your hard work and dedication to the community.

Sincerely,

Dino Rossi
State Senator
5th Legislative District

Cheryl Pilag
State Representative
5th Legislative District

Glen Anderson
State Representative
5th Legislative District

David W. Jones
King County Councilmember
Council District 12

cc: The Honorable Jennifer Dunn, U.S. Congress
    Greater Maple Valley Area Council

1446-001 Comment noted.

1446-002 and -003 Comments noted.
Local Agencies
Chapter 3 — Comments and Responses - SDEIS

1447-001 Comments noted.

1447-002 The City of Kent groundwater supply area has been addressed in the SDEIS. Additional information has been provided in Shannon and Wilson Inc.'s letter to BPA dated January 16, 2003. See Appendix Y.

1447-003 See response to Comment 1447-002.

1447-004 and -005 See response to Comment 1447-002.

1447-006, -007, and -008 Comment noted. Documented anadromous fish use of Rock Creek, a tributary to the Cedar River at river mile 18, includes Chinook salmon, Coho salmon, and sockeye salmon per the Washington Department of Fisheries - A catalog of Washington stream and salmon utilization, Volume 1, Puget Sound (1975), and fish use information available at StreamNet (<http://www.streamnet.org>) accessed March 2003. Sockeye are considered to be present only within the main stem of the Cedar River.
removal of vegetation around the streams, potentially impacting the anadromous fish populations, altering the large wetland found on the City of Kent property and potentially altering localized hydrology. The City of Kent is currently developing a Habitat Conservation Plan for the Clark Springs facility under the provisions of the Endangered Species Act. The HCP will include an evaluation of land use impacts on the stream system, anadromous fish populations and their habitats.

Less than a mile east of Clark Springs property, the Landsburg Mine is present (Sec 24 and Sec 25, T 22 N, R 6 E, WM). The mined section, Rogers Coal Seam, was mined to a depth up to 760 feet. Subsidence of the overburden left a trench roughly 60-100 feet wide, 20-60 feet deep, and approximately 3/4 mile long. This trench was subsequently used in the late 1950s to early 1980s for disposal of industrial wastes, and construction and land clearing debris. Drums and liquids from tanker trucks were disposed in the northern portion of the trench. The Landsburg Mine site is currently under an Agreed Order with the Department of Ecology to clean up the former mine site. The mine is relevant as Alternative C is located adjacent to the former mine. We are concerned about the impacts any high voltage power lines may have on the various contaminants dumped in the Landsburg mine and the potential effects on groundwater quality.

The City of Kent strongly favors Alternative C as proposed by the Bonneville Power Administration, and we do not favor the alternatives that would create some potential impacts to the City of Kent property, the municipal water supply, or the natural resources found within the City's watersheds.

We look forward to working with you to manage our regional natural resources.

Sincerely,

Don Wickstrom, P.E.
Public Works Director

c: Mr. Kelly Peterson, Wellhead Protection Engineer
Mr. William Wolfoski, Environmental Engineering Manager
Mr. Brad Lake, Water Superintendent
Mr. Patrick Fitzpatrick, Deputy City Attorney
Mr. Tom Brohart, City Attorney
Mr. Judy Nelson, Covington Water District
Mr. Gene Lyson, Bonneville Power Administration
Ms. Cindy Cutter, Bonneville Power Administration
File

BPA would site its transmission facilities (towers and access roads) to minimize sensitive resources such as streams and wetlands. BPA avoids these resources where it can, spans them where it can’t avoid them, and mitigates if it can’t span them. Impacts to the fishery resource are expected to be low to moderate, the same as with the Proposed Action, and the impact to wetlands are expected to be moderate with 17 acres of wetlands affected. The impact to groundwater is expected to be moderate to high. The wells under the City of Kent’s wellhead protection program are considered highly susceptible to groundwater contamination.

The location of the Landsburg Mine adjacent to Alternative C is discussed in the SDBS, Section 4.1.5.1 Settlement Hazard and its location shown on Sheet C-1 of Figure 5B of Appendix M. The transmission line ROW would be approximately 500 feet to the east of the mine trench that has been used as a disposal site. We have no evidence of harmful interactions between higher levels of electromagnetic radiation (EMR) on toxic wastes and groundwater quality.

Comments noted.
Section 21A.24.070 of the King County Code provides for an agency or utility to apply for an exception to the Sensitive Areas Ordinance, if the application of this chapter would prohibit a development proposal by a public agency and utility.

As a federal government agency, BPA is prevented from applying for a local government permit, including an exception to a local government code. Since Congress has not waived sovereign immunity with respect to local zoning ordinances, BPA is prevented from complying with the County's procedural requirements. Although we do not comply with the procedural provisions of local government code, we do comply with the substantive intent of local government law, and we feel we have done so in minimizing impacts to sensitive resources to the maximum extent possible.

BPA as a federal agency does not apply for county permits, but would meet the equivalent of county requirements where feasible. Due to the nature of a transmission line, it is not possible to not impact riparian areas along streams and rivers and wetlands and their buffers. In order to keep a transmission line reliable, tall-growing species of trees need to be cut within riparian and wetland areas. BPA is proposing to compensate by planting/seeding low-growing plant species back where taller trees would have been taken. In addition BPA would purchase, or fund the purchase of, other properties (just for the Kangley-Echo Lake Project Alternative 1). BPA's intention is to convey the land to the City of Seattle for long-term protection. If all or part of the property is found to be unsuitable for mitigation of habitat loss, BPA intends to sell those portions of the property considered unsuitable for this purpose. In this case, BPA would sell the property subject to a restriction prohibiting residential or commercial use. The prohibition of commercial use would not include timber growing and harvesting, which would continue to be an allowable use.

BPA understands that the King County Code recognizes that utility corridors must cross sensitive areas in order to provide...
services to King County residents, that crossing wetlands is not a permitted alteration, and that a utility/public agency must apply for a public agency/utility exception. Please see previous response.

As a federal government agency, BPA is required to prepare an environmental impact statement (EIS) under the National Environmental Policy Act before making a decision on any major federal action, such as adding a 500-kV transmission line to BPA’s main grid.

BPA has prepared a SDEIS, identifying the impacts of nine build alternatives, non-transmission alternatives and a No Action Alternative. As a part of this analysis, BPA identified how those impacts could be mitigated.

In addition to the best management practices, BPA proposes to offer 473 acres in compensatory mitigation to mitigate for the loss of approximately 90 acres of habitat for the northern spotted owl, and for alteration of 14 acres of forested wetlands to nonforested scrub/shrub wetlands within unincorporated King County. The 473 acres of compensatory mitigation would be located immediately north and immediately south of the Cedar River Municipal Watershed.

BPA has completed a wetland delineation report, dated March 28, 2002, which has been sent to you.

For a complete review of all streams proposed to be crossed under project Alternatives A, B, C (Options C-1 and C-2), and D (Options D-1 and D-2), please see Appendix N of the SDEIS. Revised Appendix A – Table A-1 of the Final Fisheries Technical Report (see Addition to Appendix A in the FEIS) contains this information for Alternatives 1-4. For a complete list of streams...
The BPA identified mitigation measures that would be utilized under any of the proposed action alternatives. These mitigation measures include, but are not limited to, use of special design elements and construction techniques, seasonal restrictions on construction, supervised erosion control practices, purchasing land as replacement habitat for habitat affected by the project, wetland mitigation including careful cutting and removal of only vegetation that are tall-growing species, reseeding where vegetation has been removed, and purchase of lands that contain wetlands, streams, and upland habitats.

Under the action alternative review, King County DDES noted that, with the exception of Alternatives B and D, similar impacts on wildlife identified under all alternatives, however, it was noted that overall, the least amount of vegetation disturbance would occur under the Preferred Alternative (Alternative 1). Additionally, under Alternative 1, a total of 14 acres of wetland would be impacted. Impacts to the 14 acres of wetland only include vegetation disturbance, and the primary impacts would include the conversion of forested wetlands to scrub/shrub and emergent wetlands. Fewer acres of impacts to wetlands were noted under some of the other action alternatives; however, as stated previously, overall, land area impacts under the other action alternatives were greater. With the exception of Alternatives B and D, impacts to fisheries and stream resources were identified as being similar under all the action alternatives. At this time, however, it is not clear exactly how many streams and of what type are proposed to be crossed under each of the alternatives.

It is understood that mitigation for environmental impacts will include minimization during project construction and operation, limited on-site mitigation, and that most impacts will be primarily mitigated off-site. It is also understood that the off-site mitigation options are still being finalized.

Overall, based on the provided alternative analysis, it appears that King County DDES could support the Preferred Alternative (Alternative 1). However, BPA has not supplied sufficient documentation to establish conditions and mitigation measures to insure the proposed project will mitigate impacts on streams, wetlands, and associated buffers, and fish and wildlife.

Under the selected alternative, the BPA will need to:

1) Accurately quantify impacts to streams, wetlands, and their buffers. To facilitate quantification of impacts, the BPA will need to delineate and classify wetlands (KCC 21A.06.1415) and streams (KCC 21A.06.1240) within 100-feet of the proposed right-of-way. Based on the classification of wetland and streams location, and buffer requirements, impacts to wetland, streams and their buffers would need to be quantified.

2) Mitigation will be required for alteration of wetlands, streams, and their buffers. The PAUE process does allow for some flexibility in mitigation; however, mitigation should be consistent with the following King County regulations:

to be crossed in association with the Preferred Alternative, please refer to Tables 3 and 5 within the Final Wetland Delineation Report, Kangley-Echo Lake Transmission Line Project (March 28, 2002).

1489-004 See response to Comment 1489-003.

1489-005 BPA has purchased 350 acres in the Raging River Basin and may purchase or fund the purchase of other properties that could be used for compensatory mitigation to mitigate for the unavoidable impacts to sensitive resources. These properties may achieve greater biologic and hydrologic conditions, as called for by KCC 21A.24.340, than would result without the project.

BPA anticipates no alteration to streams; however, stream buffers would be impacted, as allowed by King County Code.
Per KCC 21A.24.340, all alterations on wetlands shall be replaced or enhanced on the site or within the same drainage basin using the following formulas: Class 1 and 2 wetlands on a 2:1 basis and Class 3 Wetlands on a 1:1 basis with equivalent or greater biologic functions. Replacement or enhancement off the site may be allowed if the applicant demonstrates to the satisfaction of King County that off-site location is in the same drainage sub-basin as the original wetland and that greater biologic and hydrologic conditions will be achieved.

1489-005 Per 21A.24.380, replacement or enhancement shall be required when a stream or buffer is altered pursuant to an approved development proposal. There shall be no net loss of stream functions on the development proposal site, and no impact on stream functions shall occur from the approved alterations. Replacement or enhancement for approved stream alterations shall be accomplished in streams on the site unless the applicant demonstrates to the satisfaction of King County that: 1) enhancement or replacement on the site is not possible, 2) the off-site location is in the same drainage sub-basin as the original stream, and 3) greater biologic and hydrologic functions will be achieved.

1489-006 BPA understands King County requirements and would meet those requirements where feasible including monitoring.

3) Monitoring of the mitigation measures shall be required for five years following installation as specified on the approved plans, to evaluate whether or not the project performance standards have been met.

Should you need to discuss this information further, please feel free to call me at 206-296-7392.

Sincerely,

Bill Kerschke
Environmental Scientist III
Chapter 3 — Comments and Responses - SDEIS

February 28, 2003

Somerville Power Administration
Communications Office – KC-7
P.O. Box 12999
Portland, Oregon 97212
email: comments@bpa.gov

RE: Kangley-Echo Lake Transmission Line Project

1490-001
I am writing on behalf of the City of North Bend to comment on the Kangley-Echo Lake Transmission Line Project Supplemental Draft Environmental Impact Statement (SDEIS).

The City is in support of the SDEIS conclusion that Alternative 1, a new single circuit 500-kV transmission line routed through the Cedar River Municipal Watershed, would have the least environmental and fiscal impact. The City notes that Alternative 1 provides substantially increased environmental mitigation measures to protect the Cedar River Watershed at a significant cost to the BPA customers. If similar care were taken to protect the environment on any of the other alternatives evaluated in the SDEIS, the cost of those alternatives would be significantly higher. The potential increase in cost to mitigate routes other than Alternative 1, to the same mitigation standards proposed for Alternative 1, should be evaluated in the Supplemental Final Environmental Impact Statement.

1490-002
The City is not in support of Alternative B, rebuilding the Rocky Reach-Maple Valley-345 kV to Double Circuit 500-kV from East of Stampede Pass to the Echo Lake-Maple Valley lines. Alternative B would result in a replacement of the existing 150-foot tall towers with 180-foot tall towers. The change would create a significant increase in the visibility of the transmission line from the City of North Bend, adversely impact the Rattlesnake Mountain Scenic Area south of North Bend, and adversely impact the scenic value of the Mountains to Sound Greenway, for the length of the new line. Access routes required for reconstruction of this line could adversely impact the Forster Woods subdivision located south of Interstate 90 in North Bend.

1490-003
Similarly, the City is not in support of Alternative D, constructing a new Single-Circuit 500-kV line west of the Cedar River Watershed to the Echo Lake-Maple Valley lines. As proposed in the SDEIS, the new 500-kV line would be located adjacent to the existing 345 kV line, creating a significant increase in visual impacts to the City of North Bend.

1490-004

1490-001 and -002 Comment noted. Please see response to Comments 1420-001 and -002.

1490-003 Comment noted.

1490-004 and -005 Comment noted.
150-foot tall Rocky Reach-Maple Valley 345 kV running from east of Stampede Pass to the Echo Lake-Maple Valley line. Alternative B would result in clearing another 150-foot wide right of way and constructing a new set of 180-foot tall towers next to the existing 150-foot tall Rocky Reach-Maple Valley 345 kV towers. Alternative D would also create a significant increase in the visibility of the transmission line from the City of North Bend, adversely impact the Rattlesnake Mountain Scenic Area south of North Bend, and adversely impact the scenic value of the Mountains to Sound Greenway for the length of the new line. Access routes required for construction of the new line could adversely impact the Forster Woods subdivision located south of Interstate 90 in North Bend. Additionally, the 150-foot wide clearing required for Alternative D could adversely impact the streams, steep slopes and geologically unstable ground above the Forster Woods development. The City experienced significant flooding and sedimentation problems from the streams eroding the unstable ground on the north slope of Rattlesnake Ridge in 1996. The City strongly opposes any action that would adversely impact the stability of the hillsides and increase runoff and sedimentation in the streams on the North slope of Rattlesnake Ridge.

For the reasons outlined above the City is would favor implementation of Alternative A, a new single circuit 500-kV transmission line routed through the Cedar River Municipal Watershed, because it would have the least environmental and fiscal impact, based on the information contained in the SDEIS.

Thank you for the opportunity to comment.

Sincerely,

Laurence Stockton,
Community Services Director

Copy

Mayor
Council
City Attorney
City Administrator
March 1, 2003

Lou Drissen, Project Manager
Bonnieville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621


Sent via e-mail to: comment@bpa.gov

Dear Mr. Drissen:

Seattle Public Utilities (SPU) is responsible for providing drinking water to 1.3 million customers in urbanized areas of western King County and the southern portion of Snohomish County. SPU takes approximately two-thirds of this drinking water from the Cedar River. SPU owns the 90,546-acre Cedar River Municipal Watershed (CRW) and manages its land and aquatic resources for water supply, the protection and restoration of fish and wildlife habitat, and the protection of cultural resources. SPU’s companion utility, Seattle City Light, owns and operates a hydroelectric facility and associated transmission lines in the Watershed.

1492-001 This letter provides SPU’s comments on BPA’s Supplemental Draft EIS (SDEIS) for the Kangley-Echo Lake Transmission Project. SPU provided comments during the scoping for the Draft EIS (DEIS) in letters to BPA dated April 28, 2000, and October 2, 2000. SPU also provided comments during the comment period for the DEIS on September 4, 2001. SPU provided comments to BPA on the scoping of this SDEIS in a letter dated July 22, 2002. To the extent applicable, these comments are incorporated herein by this reference.

SPU has the following major points on the SDEIS. Additional details for these points and others are included below.

1492-002

- The purpose and need for this project should be clearly and completely described in the SDEIS.

See responses to Comment Letter 394.

1492-002 Please see Chapter 1 of the SDEIS.

1492-003 Please see Chapter 1 of the SDEIS. Please see responses to Comments 340-002, 1415-003, and 004.

1492-004 BPA has worked closely with the City of Seattle to develop construction measures and stormwater pollution controls to minimize water quality impacts from construction of the project. From the onset, BPA designed the project, including placement of roads and towers, to avoid all sensitive areas, to the maximum extent feasible. To address unavoidable impacts, BPA is in the process of acquiring and protecting compensatory mitigation properties adjacent to the CRW that will help reduce future impacts to the CRW from potential development. We also intend to implement new turbidity monitoring devices in the CRW to increase awareness of when the water supply system may need to temporarily shut down to protect City water customers due to turbidity. Finally, we are acquiring insurance coverage for unforeseen events (caused by BPA’s construction or operation and maintenance of the transmission line), which would trigger new environmental requirements. We believe we are taking extraordinary steps to address the concerns raised by the comment.

1492-005 Please see the mitigation listed for each of these resources in the SDEIS. Also please see responses to Comments 340-002, 1415-003, and 004.

1492-006 A Summary of Transmission Planning Studies is provided in Appendix H (available on request). BPA did a comprehensive evaluation of transmission infrastructure needs which is summarized in “BPA Infrastructure Projects, February, 2003,” available at http://www.bpa.gov/Corporate/KC/home/keeping/03kc/KC_Infrastructure.pdf. A variety of alternatives were identified to address the particular purpose and need, including reconfiguration of existing lines in the Puget Sound area. The alternatives are described in Chapter 2 of the SDEIS.
Chapter 3 — Comments and Responses - SDEIS

The primary beneficiaries are consumers in the Puget Sound Area and in British Columbia served by retail utilities that take service over the BPA transmission grid. This essentially represents all residential, commercial and industrial consumers in the area. For information on the Canadian Treaty, please see Section 1.2.2 of the SDEIS, Appendix I and response to Comments 1422-002-001, 1422-002-002 and 1421-031-001. Consumers in the Puget Sound Area directly benefit from the Treaty. We believe that Canada may “make profits in the lucrative short- and near-term markets” mostly in the spring and summer, not in the winter when this problem occurs.

The reference to this line was changed in the SDEIS for security reasons.

BPA has included in its planning any future potentials for any alternative. This Kangley-Echo Lake project cannot be included with any future alternative. In fact, in the early 1990s, BPA did a project that would have produced a new 500-kV line across the Cascade Mountains into the King County area and also the Kangley-Echo Lake project. Through the then environmental/NEPA process, BPA determined that the “Cross-Mountain” portion of the project and the Kangley-Echo Lake portion could be delayed by construction of a new substation, called Schultz, in the Ellensburg area, and through targeted conservation. Also it was determined that if another line is needed across the Cascade Mountains, then it would likely be needed north of Seattle in the Monroe area and not in the Echo Lake Substation area. BPA has tentatively determined that the next cross-Cascade line is needed in 2010, but that date could be substantially affected by the rate of load growth and new generation west of the Cascade Mountains. Therefore Alternative B and D likely will have no advantage to future projects and cannot combine economical resources. BPA has also acknowledged in the current Kangley-Echo Lake SDEIS that Alternatives A and C would use a vacant 500-kV circuit on their north end to get into Echo Lake Substation. BPA has plans to use this vacant circuit sometime in the near future as growth in King County continues. When the need arises to use these
the 50-year old 545 kV Rocky Reach-Maple Valley line over Snoqualmie Pass or building another 500 kV on the Maple Valley-Echo Lake Alternative A) with a new 500 kV line could alter the “preferability” among current project alternatives and present valuable opportunities for cost savings over the long term. Why are these future projects for these lines not being considered, for design and construction simultaneously with the needed 500 kV line? If the reason is that BPA’s planning horizon is “five to seven years” (SDEIS p. 1-4 (box)), then this would be inconsistent with BPA’s previous actions on other projects. That is, BPA has previously invested resources for the long-term without knowing the complete future picture (e.g. WPPS and Trojan). Such an investment (designing and constructing two projects in concert) would appear to offer cost advantages in this case, considering even conservative estimates of growth in Western Washington. The SDEIS should completely describe all short- and long-term planned system upgrades, reconstruction, and new construction for all transmission facilities in and near the project area, and describe why BPA has not investigated design solutions involving the reconstruction/upgrade/construction of two or more transmission lines in concert as project alternatives.

RISK ASSESSMENT FOR “FAIL SCENARIOS”

1492-009

The SDEIS should include an explanation of how risks to power lines are calculated and used to define system reliability standards and performance. This would provide a better context for BPA’s risk assessments for this project. For example, Watershed forests can be subject to extreme fire hazard, “microbursts” have historically leveled forests near the proposed project, and parts of the proposed line would be located on ancient landslide deposits. The SDEIS should be re-examined carefully, this implies a superficial, simplistic risk assessment approach that does not fully justify selection of the proposed action in terms of reliability. BPA should address these potential risk issues in the SDEIS.

ALTERNATIVES EVALUATED IN THE SDEIS

1492-011

SPU appreciates the SDEIS’s inclusion of alternative routes located outside the CRW. However, it is not clear why the four alternatives (besides the proposed action) that cross the Cedar River Watershed (CRW) are still being analyzed and considered in the SDEIS. These superficially similar alternatives are distracting and don’t bring any significant information to light. In addition, the SDEIS fails to provide detailed cost estimates for all alternatives while still using project costs to evaluate alternatives. The cost estimates associated with project alternatives are difficult to understand. The SDEIS needs to present a cogent and detailed description of cost estimates for all alternatives because BPA is using relative costs in the decision-making process for this project. It is difficult to assess if project costs are being “inflated.” For example, additional cost of mitigation for alternatives mixes standard sound design and construction BMPs with “mitigation.” The BMPs should be considered standard elements of design and construction, not additional mitigation costs: use of erosion specialists and monitor for erosion control, use of temporary mats to cross wetland vegetation, use of special surveying techniques to minimize vegetation disturbance; use of special clearing criteria; restricting ground-disturbing activities to the dry season (Alternative 1); minimizing wetland impacts; use of special care and design for crossing fish-bearing streams (Alternative A). But, when actual compensatory mitigation actions are described, then these are not included in the mitigation costs across the board for other alternatives [e.g. measures needed for the

1492-014

vacant circuits and either Alternative A or C is using this vacant circuit, then another transmission line would need to be constructed to replace the vacant circuit occupied by Alternative A or C. Other future projects are not in the same area and/or provide no benefits to this project, such as a possible future line from Echo Lake Substation to the north. BPA planned Kangley-Echo Lake as part of a broad examination of infrastructure needs, which is summarized in Infrastructure Keeping Current, February, 2003, available at http://www.bpa.gov/Corporate/KC/home/keeping/03kc/KC_Infrastructure.pdf.

See response to Comment 1492-006.

1492-009 and -010 The risks and criteria that BPA uses to plan the grid are summarized in Section 1.2.1 of the SDEIS and described in more detail in “Reliability Standards: meeting national and regional requirements for electric system reliability,” available at http://www.bpa.gov/Corporate/KC/home/keeping/03kc/KC_Reliability.pdf. BPA has over 30 years of experience with an existing transmission line in the CRW which has operated with acceptable reliability and without impact on the CRW.

1492-011 and -012 Comment noted. Please see response to Comments 1420-001 and -002.

1492-013 and -014 Please see response to Comments 1420-001 and -002.

1492-015 and -016 Please see response to Comments 1420-001 and -002. BPA would minimize and mitigate impacts to wetlands and other sensitive areas on any alternative. BPA would likely not purchase additional properties for impacts to sensitive areas outside the CRW.

1492-017 See response to Comment 382-026.

1492-018 The only alternative that has detailed engineering and engineering survey information available is the Proposed Action (Alternative 1). Due to the need to get the project energized as quickly as possible, BPA has taken the risk and
Gathered this information knowing that the Administrator could choose another alternative. If he chooses another transmission alternative, BPA would need another two or more years to energize this project. BPA understands that it is taking a financial risk investing in the preferred alternative beyond what BPA would normally do ahead of the Record of Decision. Other alternatives do not have this detailed information. For the other alternatives, BPA has used a worst-case scenario, such as more clearing than would actually be necessary, including clearing at sensitive areas such as wetlands and creek and river crossings.

BPA's proposed transmission line would expand the existing 150-foot wide right-of-way through the CRW to a 300-foot wide right-of-way. BPA did evaluate the impacts to vegetation (low to moderate), and for threatened, endangered or sensitive species (moderate).

BPA has consulted with the USFWS and NMFS. Letters from NMFS were included in the SDEIS (Appendix U) and state that NMFS agrees with BPA's determination of "may affect, but not likely to adversely affect" for Puget Sound chinook and their designated habitat.

Spills of fuel or hazardous materials in the CRW could impact groundwater that may eventually flow into the Cedar River. The potential for such spills would be greatest during construction. A spill response plan will be developed and incorporated into the SWPP Plan, as described in Section 4.3.3.2 of the SDEIS. See response to Comment 394-139.
large block of protected forest that is a key element in this north-south habitat connectivity. The Watershed comprises two-thirds of the Cedar River Basin, and includes the headwaters of the major river supplying Lake Washington. The Cedar River includes some of the most important salmon habitat in the Lake Washington Basin.

1492-024

The SDEIS should take into account the growing local and regional importance of the CRW as wildlife and fish habitat, a wildlife movement corridor, and a refuge from urban development and extractive land uses. This role is a significant social and biological value that needs to be taken into consideration in evaluating the potential impacts of this project.

1492-025

SPU recently completed its Habitat Conservation Plan for the Cedar River Watershed under the federal Endangered Species Act (ESA). On April 21, 2000, the City of Seattle along with the National Marine Fisheries Service (NMFS) and the U. S. Fish and Wildlife Service (USFWS) signed the Implementation Agreement for this HCP and received the associated incidental take permits under the ESA. The HCP and its implementing agreements represent the cutting edge, regionally and nationally, of applied ecosystem management principles and were the culmination of over six years of effort in building regional consensus on the future direction for the management of the terrestrial and aquatic resources of the Watershed.

1492-026

The intensive public review for this HCP revealed broad public support for protecting the habitats in the Watershed and not creating more large openings in the forest by commercially harvesting timber. In response to this, the City decided to discontinue commercial timber harvest over the next 50 years. BPA’s proposed route through the Watershed would result in making large clearings in this important forested area. The local and regional consequences of the proposed large-scale fragmentation and removal of older forests in this sensitive area should be thoroughly evaluated in the SDEIS.

1492-027

In its cover letter for the DEIS and SDEIS, SPU identified the need for BPA to address affects of the project on the HCP. SPU needs to be certain that the proposed project will not diminish the conservation value of the plan and that the City’s and its water supply customers will be fully protected.

1492-028

SPU believes that the proposed routes through the CRW could, unless adequately mitigated, have significant impacts on species protected under the Endangered Species Act, and on their habitat. Protected salmon species are expected to be present in the Alternative 1 through 4 project areas by the fall of 2005. These issues need to be carefully evaluated in the SDEIS, which should disclose and evaluate the extent to which the proposed routes through the CRW would affect the habitat of listed species. The SDEIS should also describe how BPA would protect the City from any possibility that the terms of the HCP will be violated.

1492-029

IMPACTS TO DRINKING WATER SUPPLY

Generally, the SDEIS downplays the regional significance and social function of the CRW as a municipal water supply. For example, Section 4.5 indicates that groundwater impacts for Alternative 1 would be low (despite the groundwater contributions to Cedar River flows upstream of Issaquah), while groundwater impacts for Alternative A would be high due to the City of Kent’s wellhead protection area. The SDEIS must explicitly address the potential impacts of the proposed action on drinking water and the City’s ability to provide that water to those who need it. Because the Cedar River source is unfettered, SPU is required to control the Watershed in accordance with a Department of Health (DOH)-approved control program. Any crossing of the Cedar River and its tributaries in this area of mature forest could pose significant risks to the drinking water supply during construction. Construction activities have the potential to cause high water turbidity events that could result in exceedance of federal drinking water standards and potentially result in the need for expensive water filtration that otherwise would not be needed or required. The SDEIS should disclose and evaluate these risks, and should describe how BPA will protect the City and its water supply customers from the associated potential harm. In addition, the SDEIS needs to present a more detailed discussion of federal and state drinking water quality regulations and constraints as they pertain to the CRW.

1492-030

1492-031

1492-032

1492-033

1492-034

1492-035

general, impacts to groundwater that provide a sole drinking water source (City of Kent wellhead protection area) will be greater than impacts to groundwater that eventually drains to a surface water source of drinking water (CRW) due to shorter travel times and less dilution. Construction site impacts would be local and temporary. Tower sites would be isolated and away from stream crossings. Mitigation measures described in the DEIS and SDEIS would be used to reduce the potential of turbid water events. Water quality regulations are discussed in Sections 3.5.3 and 3.5.4 of the SDEIS and in letters from Shannon and Wilson, Inc. to BPA dated January 16, 2003 (see Appendix Y).

1492-035

Please see response to Comment 1492-004. Impacts to drinking water regulations have been discussed in the SDEIS. As mentioned above, BPA is proposing to extraordinary steps to minimize construction impacts to the CRW by designing the project to avoid impacts, by undertaking various best management practices to minimize harm, and by purchasing mitigation to compensate for those impacts that cannot be avoided. The mitigation should leave the CRW with net environmental benefit. Moreover, BPA already has an existing 500-kV line that parallels the proposed line. The existence of the existing line offers convincing evidence that such a line is compatible with water quality. To our knowledge, no water quality problems have ever been attributed to the existing line. If there are some minimal impacts to water quality during construction, these impacts would only be temporary. The ROW should be stabilized (naturalized) in one or two growing seasons.

1492-036

Please see response to Comments 1420-001 and -002.

1492-037 and -038 BPA has prepared a SDEIS and has included Chapter 5, entitled “Consultation, Permit and Review Requirements.” Within Chapter 5, BPA has discussed consistency with federal, state and local environmental laws, and regulations. Additionally, BPA has published a letter from the Washington Department of Ecology (Appendix B of the SDEIS), stating that “Ecology agrees with your determination and assessment that the proposed action is consistent to the maximum extent practicable with the enforceable policies of Washington’s
Coastal Zone Management Program and will not result in any significant impacts to the State's coastal resources.” With respect to the King County Sensitive Areas Ordinance, Chapter 5 of the SDEIS states that BPA will comply with the substantive intent of the County zoning ordinance.

The cultural resources work conducted for the selected alternative is adequate to conclude that its potential for impacts on these resources is low. The study was exceptionally thorough, starting with background research and a sensitivity analysis that concluded that the routing had a relatively low potential for containing cultural resources. The fieldwork included more than 1,150 subsurface test probes and also involved the participation of the Muckleshoot Indian Tribe in the survey and in interviews about traditional use of the area. The methods and results of the cultural resources study are reported in a lengthy report that is confidential with respect to public distribution but has been reviewed by SPU, the State Office of Archaeology and Historic Preservation, and the Indian tribes. An additional survey will be conducted of newly-identified project features such as roads and staging areas. The report includes an Unanticipated Discovery Plan that provides specific procedures in the event that any artifacts or human remains are found.

We do not believe the new line would be visible from either State Route 18 or from I-90; however, the proposed transmission line would be visible to air traffic flying over or in the vicinity the Cedar River Municipal Watershed. Our SDEIS identified this impact and stated that the impact to visual resources would be low to moderate on views from cars or aircraft, and moderate to high on some Kangley area residents for whom the transmission line would be the dominant visual feature.

The transmission line would be designed to mitigate the visual impacts with darkened steel towers, nonspecular conductors and insulators that are non-reflective.
February 28, 2003

Bonneville Power Administration
KC-7, PO Box 12999
Portland, OR 97212

To Whom It May Concern:

King County Department of Natural Resources and Parks (KCDNR) is pleased to have the opportunity to comment on the supplemental draft Environmental Impact Statement (SDEIS) for the proposed Kangley-Echo Lake Transmission Line Project. As steward of King County’s environment and natural resources, this agency has concerns regarding the extent of analysis performed by the Bonneville Power Administration (BPA) on the impacts of this project on these resources and, in particular, on federally listed salmonids in King County, Washington.

1515-001 and -002 Comment noted.

1515-003, -004, -005, and -006 Comments noted.

1515-007 Comment noted.

1515-008 Comment noted.

1515-009 and -010 BPA has consulted with the NOAA and NOAA has stated that since the Proposed Action incorporates avoidance and minimization measures into the project design, the effects of the action can be expected to be discountable and insignificant. NOAA has concurred with our effect determination of “may affect, but not likely to adversely affect” for Puget Sound chinook and their designated habitat.

1515-011 See response to Comment 1485-007.
King County believes that the Final Supplemental Fisheries Report (Fisheries Report) of the SDEIS does not provide adequate analysis of the potential adverse impacts to chinook and coho populations resulting from each proposed alternative. In fact, the Major Conclusions section (section 1.3) of the report (page 7) states that "All action alternatives would have similar impacts to fish and their habitat." This is not accurate since such alternative proposes crossings at different river locations with different populations of fish and a variety of habitats. Before a final EIS is issued, specific impacts of each alternative should be prepared.

The Fisheries Report acknowledges that the clearing of riparian vegetation along the Raging River and other streams with threatened salmonids "could constitute a high impact" (page 39). Recognized impacts such as decreased large woody debris recruitment, decreased riparian shading, increased stream temperatures, and increased bank erosion may result in significant cumulative impacts to fish and their habitats. Yet, the report also states that these conclusions "cannot be confirmed until the extent of clearing needed in the affected areas is known" (page 39). This is important information and should be provided in order to make an informed selection of the alternatives. King County would like to see a more thorough analysis of impacts performed at each of the proposed alternative sites.

The Final Supplemental Vegetation Technical Report (Vegetation Report) does not provide an in-depth analysis of riparian clearing needed to accommodate the conductors, overhead ground wires, and insulators designed for each alternative. In order to make an informed decision regarding alternative selection and the impacts of each alternative on vegetation management, more information is needed. For example, if the minimum conductor-to-ground clearance for a 500-kV line is just over 20 feet, what is the allowable distance between vegetation and the conductors? Does the vegetation need to be removed completely even in the riparian areas?

In summary, King County Department of Natural Resources and Parks has a specific interest in protecting the Raging River. It is an important tributary to the Snoqualmie River and provides spawning and rearing habitat for threatened salmonids. The current suite of alternatives, in particular the preferred alternative, propose management actions that could have significant adverse impacts to the Raging River and its adjacent riparian area. The state of information and the depth of analysis provided in the SDEIS, the Fisheries Report, and the Vegetation Report do not adequately address these potential impacts. King County requests that BPA conduct a more thorough analysis on the impacts to the Raging River and its salmon populations and present the findings before an alternative is selected.

Thank you for the opportunity to comment on the SDEIS for the proposed Kangley-Echo Lake Transmission Line Project. If you have any questions about our comments, please call James Schroeder, Project Manager, in the Water and Land Resources Division with the King County Department of Natural Resources and Parks, at (206) 205-8309.

Sincerely,

Daryl Grigsby
Manager

cc:  Rick Kirkby, Manager, Water Resources Unit, King County Department of Natural Resources and Parks (KCDNR)
Kevin Owens, Manager, Regional Policy Unit, KCDNR
Harry Reinert, Special Projects Manager, King County Department of Developmental and Environmental Services (KCDDES)
Mark Sollitto, Transfer of Development Rights Program, KCDNR
Bill Korschuk, Senior Ecologist, Land Use Services Division, KCDDES
James Schroeder, Project Manager, Water and Land Resources Division, KCDNR

BPA believes that the analysis of specific impacts has been completed for each alternative, is accurate, and gives the decision maker enough information to make an informed decision.

The Raging River crossing is located across a very deep drainage and in some areas near the river, no vegetation would be cut because there is enough clearance between the line and the river. Some trees may be cut where they could pose a danger to safe operation of the line.

The minimum allowable clearance between conductor and vegetation is 20 feet plus the specific vegetative species' growth factor. In general, all tall-growing species would be cut to almost ground level except at specific sensitive areas such as riparian areas where any vegetation could be allowed to grow within the 20 feet plus growth factor to the conductor. So the actual height of the vegetation allowed at riparian areas depends on the actual height of the conductor at that site. Due to the special status of the Cedar River Watershed and its HCP, BPA is willing to work with Seattle to allow young, tall-growing tree species to remain longer before cutting to create a taller habitat without creating a hazard for the transmission line. If possible, no low-growing vegetation species will be cut near riparian areas during construction.

BPA believes that the analysis of specific impacts has been completed for each alternative, is accurate, and gives the decision maker enough information to make an informed decision. Because of the presence of endangered species in the area including chinook salmon in the Raging River, BPA prepared a biological assessment and entered into Section 7 consultation with NMFS in July 2001. This consultation was completed on January 28, 2002, with their finding that "Since the proposed action incorporates avoidance and minimization into the project, NMFS can expect the effects of the action to be discountable or insignificant. Therefore NMFS concurs with your effect determination of "may effect, but not likely to adversely affect" for Puget Sound Chinook and their designated habitat.

Please see response to Comments 1515-014 and -015.
Chapter 3 — Comments and Responses - SDEIS

1516-001 Comments noted.

1516-002 Comments noted.

1516-003 Comment noted.

1516-004 Comment noted.

1516-005 Comment noted.

Snohomish County

Bonneville Power Administration
Public Affairs 
P.O. Box 120059
Portland, Oregon 97212

SPA Representative:

Public Utility District No. 1 (District) has reviewed the Supplemental Draft Environmental Impact Statement Summary DOE/EIS-0317-01 and applicable appendices. The District comments will focus on the need for transmission reinforcements in the Puget Sound area and not on the specific corridor and facility alternatives proposed to implement the Northwest transmission system reinforcement.

The District actively participated in a number of Northwest transmission planning activities including the Bonneville Power Administration Infrastructure for Technical Review Committee ("ITRC"). This committee was formed to evaluate needs for significant transmission addition in the Northwest, including the Kachele-Rede Lake transmission line project. SPA evaluated numerous alternatives with electric industry representatives. The ITRC evaluated and scrutinized the projects to ensure that they would resolve existing system deficiencies as well as provide for future needs. The "Puget Sound Area Additions Project," also known as "GI Project," includes the Kachele-Rede Lake 500-kV line as well as the Snoqual 500/230-kV tie addition which will be located in Snohomish County. These projects carefully coordinated with other planned projects, including the second 500 kV line between Monroe – Red Lake known as the "I-5 Corridor G5 Project." The Northwest electric utilities have developed and supported these electric system plans to benefit the Puget Sound and Northwest.

Those projects, in conjunction with other planned projects, will increase the system load service capacity, level of service, and transfer capability in the Puget Sound area. Without these "GI" projects, SPA will not be able to meet its obligations under the Columbia River Treaty and Return of the Canadian Entitlement or the transmission load service obligations to Puget Sound area electric utilities. Significant transmission congestion and curtailments have already caused material economic impacts to the region. The region to date has capitalized on the use of reactive additions and Smart Grid Action Scheme ("RAS") to provide small incremental capacity additions to avoid major transmission expansions. However, 15 years of major growth in the Northwest with no substantial transmission expansion has severely burdened the existing transmission system. The District is in agreement with SPA and many other Northwest electric utilities, that it is time to expand the transmission system before the system is gridlocked and the economic and environmental ramifications of resolving the problems are insurmountable. Therefore, the District strongly supports the proposed projects; the District does not however, endorse or oppose any particular installation plan or location for the much-needed improvements.

Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Statement DOE/EIS-0317-01 and applicable appendices.

If you have any questions, please contact John Martinson, Principal Engineer, System Planning and Protection, at 425-782-4527.

Sincerely,

Ignacio Castro, Jr.
Manager, System Planning and Protection
Distribution Services Division
Snohomish County Public Utility No. 1
1602 7th Street, S.W.
Everett, Washington 98203-6264

3310 California Street • Everett, WA • 98201 • Mailing Address: P.O. Box 1107 • Everett, WA • 98206-1107
425-782-1000 • Toll-free in Western Washington at 1-877-782-1000 • www.sxpd.com
Tribes
BPA will do its best to minimize impacts to these resources.

As a federal agency, BPA is required to comply with the Endangered Species Act, therefore, surveys would be conducted for rare and endangered plant species if their habitat could be found in the area. No rare or endangered plant surveys were conducted for the proposed project, since the habitat where these species are found is not present. The only other plant surveys that were conducted as part of the proposed project was for undesirable plants, such as noxious weeds. BPA routinely conducts weed surveys before and after construction.

BPA has proposed extensive mitigation to protect water resources and fisheries.

BPA is working closely with representatives of the Snoqualmie and Muckleshoot tribes, both of whom are federally-recognized tribes. With respect to site visitations, BPA would be happy to take representatives of the Tulalip tribes to the site, and would do so, with the landowners permission.
Chapter 3 — Comments and Responses - SDEIS

Lou Dieksen, Project Manager
Department of Energy, Bonneville Power Administration
PO Box 491
Vancouver, Washington 98666-0491
by fax to 503-230-3283

RE: T-DT-002 Kangley-East Lake Transmission Line Project

Mr. Dieksen,

The Cultural Resources Program has previously requested that BPA correct certain misrepresentations and inaccuracies that were identified in the HRA Cultural Resources Technical Report which supplements this SDEIS. We also requested that BPA republish the HRA report as corrected. The Tribe has notified BPA that Section 106 compliance is not complete for this project until the Area of Potential Effect (APE), including access roads and staging areas, is fully identified and surveyed for historic and cultural resources. Section 106 compliance must be completed while there is time to relocate such roads and areas if necessary to avoid adverse impacts. Comments on these matters and Appendix X, the Monitoring and Unanticipated Discovery Plan, have been previously submitted to BPA by letters dated February 3 and 13, 2003

The Muckleshoot Tribe’s Wildlife Program has worked for years to combat the adverse and cumulative toxic effects of noxious weed infestations located on or near, and directly attributable to, BPA transmission line corridors. Adverse impacts are especially severe on the elk and deer herds which the Tribe manages in the Cedar, Green, and White River drainages. Mitigation for this problem and restoration of appropriate native forage plants to benefit the health of the herds, will require a detailed program with clear commitment to management targets, effective timing of treatment, and funding resources. This will be especially important where herbicides are not an option for use in the Cedar River Watershed (CRW). The SDEIS puts forward general proposals and guidelines, but does not present specific analyses or a scientific, and detailed vegetation management plan that could effectively mitigate this problem.

Comment noted.

The report, including the Appendix D, Unanticipated Discovery Plan, is being revised in light of your comments. BPA will continue to consult with the Muckleshoot Tribe as required for Section 106 compliance and will conduct additional assessment of the access roads and staging areas. Consultation will be ongoing through the construction of this project, if BPA decides to build Alternative 1.

Comment noted.

BPA will continue to work with SPU and the Muckleshoot Tribe to develop a specific plan that meets the needs of all parties interested in providing forage plants while protecting the safety of the transmission line, should BPA decide to build Alternative 1.

BPA does recognize the cultural importance of the CRMW to the tribe and provided for HRA to interview Muckleshoot tribal elders in coordination with tribal staff. HRA’s cultural resource survey was thorough. BPA conducted many meetings with tribal members to understand the Tribe’s concerns. See Appendix W. Meetings with the Tribe continue.

We also understand that future development within the CRMW is limited by the landowner, Seattle Public Utilities. Furthermore, we understand that currently three power line rights-of-way exist within the CRMW, two BPA rights-of-way and one Seattle Public Utilities right-of-way. The proposed project would be located adjacent to one of the existing BPA rights-of-way, thereby minimizing environmental impacts to the maximum extent possible.

With respect to the assertion that we have not analyzed the cumulative effects of the proposed project through the CRMW, we disagree. We have analyzed the cumulative effects of the proposed action for each resource area in the DEIS and the SDEIS. We have designed the proposed transmission line to avoid sensitive environmental resources where we could, span them where we could not avoid them, and offer compensatory
Throughout the SDEIS, and specifically in its discussions of treaty rights and trust responsibility, BPA does not take into account the unique cultural importance of the CRW for the Muckleshoot Tribe, or the implications of the unusual circumstances that will preserve the Watershed from most future development under Seattle Public Utility ownership. The cumulative impacts of the proposed second transmission line through this protected area, rather than through more developed routes, have not been addressed in the SDEIS, nor is the BPA’s trust responsibility to mitigate for such adverse and cumulative effects discussed. The disproportionate impacts on the Tribe are also a matter of Environmental Justice subject to the direction of Executive Order 12898.

In conclusion, BPA has a continuing duty to manage lands associated with this project over which it has authority, to assure that Tribal treaty rights are unimpaired. This duty includes the obligation to consult with and involve the Muckleshoot Tribe, and integrate BPA and Tribal co-management plans where decisions involve such issues as the harvest of trees, placement of wooden debris in streams, culvert installation and maintenance, availability of wood for fuel and cultural purposes, planting for eradication of noxious weeds and selection of species for replanting, and designation of areas for treatment, for mitigation or for habitat replacement.

Please contact me at (360) 802-2202, extension 1015 if you have any questions.

Sincerely,

Melissa Calvert
Director
Muckleshoot Wildlife and Cultural Resource Programs

mitigation to mitigate for impacts that could not be avoided. We believe we have met our trust responsibilities.

With respect to causing disproportionate impacts to tribal interest, as opposed to others, we also disagree. BPA has been meeting with the Muckleshoot Tribe on the proposed action for over three years. During this time, we have sought to find out if the proposed project would impact any traditional cultural properties (TCPs), and interviews with tribal elders were conducted. The information revealed that no TCPs would be affected. And to avoid impacts to other cultural resources such as plants or woody vegetation important to the Tribe that could neither be moved or harvested in advance of construction, we proposed to relocate the facilities (towers and access roads), as long as they would not be relocated from uplands to wetlands, and would not affect any angle points or the substation expansion area. Following the 45-day review period BPA gave the tribe to recommend relocating any of the proposed facilities, none were received.

Additionally, BPA’s cultural resource contractor, with assistance from the Muckleshoot and Snoqualmie tribes, undertook a cultural resource survey of the proposed right-of-way, digging more than 1,170 holes looking for cultural resources. Only two potential resources were found, one an artifact related to the logging industry (metal spike) and the other, a trench, were discovered. Neither were of any cultural significance.

BPA wishes to continue to meet with the Muckleshoot Tribe in an attempt to meet our Trust responsibilities; however, we disagree that constructing the line along the proposed alignment would violate the Executive Order on Environmental Justice. BPA feels that it has considered this Executive Order during the environmental review, and feels that none of the alternatives analyzed would violate the intent of the Executive Order.

As stated above, BPA has initiated consultation with the Muckleshoot Tribe on this project, and we remain committed to continue to meet and consult with the Tribe on matters that concern them. BPA is developing a ROW management plan which is environmentally sensitive, and will leave woody debris in streams to benefit fish and other wildlife, to the extent practical. It will also involve use of native plant seeds. However, the majority of the proposed ROW occurs within the CRW, owned and managed by SPU. SPU adopted an
### MIT Cultural Resources Program SDEIS Comments, incorporating all prior written comments including those submitted 9/8/2001; 2/3/03 and 2/12/03:

<table>
<thead>
<tr>
<th>SDEIS citation, Page</th>
<th>SDEIS text</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1487-020 (Section 2.1.1.7 page 2-12)</td>
<td>&quot;BPA would install 9 gates&quot;.</td>
<td>Access restrictions affect Tribal resources management and exercise of treaty rights. MIT requests access of those areas behind gates that are owned by BPA; and BPA cooperation in obtaining access to lands owned by other entities.</td>
</tr>
<tr>
<td>1487-021</td>
<td>Summary Section S.3.11 page 3-33 and Section 3.13 page 3-90 Cultural Resources</td>
<td>The probability for encountering prehistoric cultural resources along any of the alternatives varies by landform...and increases along the Cedar river and other water sources...There is also a high probability of encountering many historic-period cultural resources despite that fact that few recorded resources are in the immediate vicinity of the alternatives. Many such resources have been identified in archival sources and maps, although few have been formally inventoried or even verified on the ground by cultural resource professionals.</td>
</tr>
<tr>
<td>1487-022</td>
<td></td>
<td>This section does not accurately reflect the information contained in BPA's Cultural Resources Report regarding eligible and potentially eligible sites within the APE for the preferred project route. It also indicates that Section 106 compliance work was not initiated for any route except the proposed alternative.</td>
</tr>
<tr>
<td>1487-023</td>
<td></td>
<td>The APE for the proposed route must also include access roads (Sec 2.1.1.5 page 2-10) and staging area locations that have not been identified (Sec 2.1.1.8 page 2-13). Once these areas are identified, there should be surveyed, therefore Section 106 work is not completed for the preferred route.</td>
</tr>
<tr>
<td>1487-024 (Section 4.12 Cultural Resources page 4-162, 163)</td>
<td>&quot;In general the Proposed Action contains the least</td>
<td>It is not possible to generalize about the</td>
</tr>
<tr>
<td>1487-025</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1487-026</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1487-027</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

HCP for this watershed in April 2000, and any harvest of trees, and/or placement of wood, in streams or on the land, would be undertaken with the permission of the landowner.

1487-013, -014, -015, -016, and -017 No new fish culverts would need to be installed for the proposed project. However, BPA has agreed to correct problems associated with three existing culverts on its Raver-Echo Lake ROW, immediately adjacent to the proposed ROW. Prior to doing so, BPA would obtain the appropriate permits from the Army Corps of Engineers and will ensure that they meet the current Washington Department of Fish and Wildlife design criteria.

1487-018 and -019 Pursuant to tentative agreements reached with the U.S. Fish and Wildlife, through a biological consultation, and negotiations with the City of Seattle, BPA has agreed to purchase several tracts of land, to permanently protect those lands from development, and to allow them to be managed as wildlife habitat and for conservation purposes. See response to Comment 340-002.

1487-020 and -021 BPA is acquiring easement rights for access roads and the transmission line right-of-way, and does not have the authority to grant access to others. Anyone wanting to access private property must seek the permission of the underlying fee owner.

1487-022 and -023 HRA performed a thorough survey of the preferred route and located a logging feature and a trench feature, neither of which appears to be eligible for the National Register of Historic Places. The contractor has conducted further work at the trench feature, at the request of OAHP and the Muckleshoot Tribe. They found nothing significant. HRA preformed background research and viewed the routes of the other alternatives to provide a professional opinion of their sensitivity for containing cultural resources.

1487-024 and -025 BPA will conduct a cultural resource assessment of proposed access roads off the previously surveyed ROW and will also survey the proposed staging areas if the areas have not been previously disturbed.
It is possible to generalize about the relative probability of the alternative routes for containing areas sensitive for the existence of cultural resources. It is true that the preferred route contains two cultural resources. HRA recommends both as being ineligible for the National Register of Historic Places and has conducted further investigation at one of the sites as requested by OAHP and the Muckleshoot Tribe.

Comment on springs and other environmental features noted. BPA is not required to conduct detailed cultural resource surveys of all alternative routes.

Comment noted. Construction of the preferred alternative would not adversely affect the CRPT.

"A few cultural resources have been identified within a mile of the route in this northern portion, but none of the sites have been formally inventoried or identified on the ground by trained cultural resources staff."

Springs are also high probability indicators of water sources as are historic berry fields, bogs, and camas swales.

It appears that Section 106 requirements have not yet been completed for this area.

"None of the previously recorded cultural resources sites occur on or near (within 700 feet) of the Cedar River Pack Trail."

The cultural Resources Technical Report acknowledges that the Cedar River Pack Trail is...
The cultural resources assessment concluded that construction of the preferred alternative should not adversely affect the CRPT and that there were no other traditional cultural resources that would be affected.

Comment noted.

Construction of the preferred alternative is not expected to result in adverse effects to the CRPT.

It is unclear from the comment precisely what disproportionate impacts the writer is referring to. As stated above, the proposed alignment does not actually touch any land currently owned by the Muckleshoot Tribe. BPA also believes whatever Treaty rights the Tribe has now, before the proposed project would be implemented, will remain intact. As far as BPA can tell, the highest percentage of population of Native Americans (including all Native Americans, Eskimo and Aleut) that would be affected by any of the five alternatives is 1.07 percent (Alternatives B and D) of the affected population. Overall, as far as we can tell from the census data, the social and ethnic makeup of those persons most directly affected by the preferred alternative, those in greatest proximity to the project, are above-average income, non-minorities. In fact, the area has relatively few residences or businesses, and is more rural, or forested in nature than urbanized. The project is not located in an area inhabited by the underprivileged or minority populations. The project is not intended to benefit one segment of the population, or specific community, as a regional electrical distributor will benefit the general population of King County, the City of Seattle, and western Canada. As such, we believe the Tribe would share in the benefit of the project, as would the general population as a whole.

The cultural resources assessment stated that the proposed project would not adversely affect three previously identified resources located within the APE and proposed for listing in the National Register: the Cedar River Pack Trail; the Chicago, Milwaukee, St. Paul, and Pacific Railroad right-of-way; and the Cedar River Cultural Landscape District.
BPA agrees that as a federal agency, we have a general trust responsibility. As we have indicated in our negotiations with the Tribe, we want to continue to try to address concerns raised by the tribe, and will do so as long as those concerns are consistent with our other statutory duties and obligations.

The cultural resources assessment did not identify any cultural resources and use areas that would be adversely affected by the construction of the preferred alternative.

See response to Comment Letter 405.

Fawning and calving season for deer and elk occurs from March to June. If the decision is made to build Alternative 1, construction would begin in August, after the fawning and calving season has ended.

MIT Wildlife Program SDEIS Comments, also incorporating prior written comment submitted 9/4/2001:

<table>
<thead>
<tr>
<th>SDEIS citation, Page #</th>
<th>SDEIS text</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 2.1.1.7 page 2-12</td>
<td>“BPA would install 9 gates”.</td>
<td>See above comment for Cultural Resources</td>
</tr>
<tr>
<td>Pg. 4.8</td>
<td>Mitigation of construction impacts.</td>
<td>Impacts to calving and fawning annually should be considered and mitigated for by delaying or eliminating work during those times of the year that may cause the greatest harm.</td>
</tr>
</tbody>
</table>
1487-046 and -047 BPA will continue to work with SPU and the Muckleshoot Tribe to develop a specific plan that meets the needs of all parties interested in providing forage plants while protecting the safety of the transmission line, should BPA decide to build Alternative 1.

1487-048 and -049 BPA is interested in reviewing MIT’s study. BPA uses relevant information in developing vegetation management plans for BPA’s ROWs. The MIT’s suggestions for high quality deer and elk forage on BPA’s ROWs are important input to the vegetation management process and will be studied. BPA will work with relevant parties to determine the best vegetation management plans.

1487-050 See response to Comment 1485-009 and 1487-006.
<table>
<thead>
<tr>
<th>Comment</th>
<th>Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>1487-051</td>
<td>BPA should adopt and implement an aggressive vegetation management program to limit colonization by non-native species regardless of whether or not such a program is also being carried out by adjoining landowners. The disturbance caused by the transmission line ROW is often the agent that allows the invasive species into an area. We believe BPA should take responsibility to keep all ROW’s clear of noxious weeds.</td>
</tr>
<tr>
<td>1487-052</td>
<td>See response to Comment 1487-051.</td>
</tr>
<tr>
<td>1487-053 and -054</td>
<td>BPA has maps of fee-owned property and does take full responsibility for the control of noxious weeds on fee-owned property. However, as stated above under Comment 1487-051, if the surrounding landowners are not treating or trying to control the noxious weeds on their property, it may not be feasible or cost effective for BPA to do so. BPA would work with adjoining landowners where possible to gain control over noxious weeds in the area. BPA would like to work with the Muckleshoot Tribe to identify those areas that would result in the greatest benefit to treat.</td>
</tr>
<tr>
<td>1487-055 and -056</td>
<td>BPA is proposing to acquire land for compensatory mitigation for these impacts. See response to Comment 340-002.</td>
</tr>
<tr>
<td>1487-057</td>
<td>See revised Map 9.</td>
</tr>
<tr>
<td>1487-058</td>
<td>See response to Comment 1485-009 and 1487-006.</td>
</tr>
</tbody>
</table>
Groups and Individuals
1389-001 BPA apologizes for the disruption that this project has caused to landowners along the proposed route alternatives. Although the SDEIS identified the preferred route, route Alternatives A-D remain under consideration. The Record of Decision, which is expected in August 2003, will identify whether BPA has decided to proceed with the non-transmission alternative, no-action alternative, or identify which route has been selected for the construction alternative. We cannot provide advice to you regarding disclosure laws.

1389-001 and -002 Comment Noted.

1390-001 and -003 Construction noise is typically exempt from noise ordinances because they are temporary impacts, but BPA would try to keep noise to a minimum. Please see Sections 4.13 and 4.14 of the SDEIS. BPA would use best management practices to hold down dust and minimize air pollutants.

1390-005 Please see response to Comment 340-002.
3-46
Kuehn, Ginny - DM-7

From: Alan Bryant  

Sent: Monday, January 20, 2003 8:07 AM  

To: comments@psp.gov

Subject: Kangley-Echo Lake Transmission Line

My wife and I live in North Bend close to the watershed area and we would not want any harm to come to that pristine area, however it makes the most sense to add the additional power line there. We are in favor of your preferred route, Alternative 1.

Dr. and Mrs. Alan Bryant  

9536 42nd Way SE  

North Bend, WA.

1391-001 Comment noted.

1392-001 Comment noted.

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You ..."

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments:

Thank you for the latest notice. It appears that more studies have been done, and now from your limited acceptance of the project. I think you're making a wise decision, checking and the alterations and edit being done really preferred.

Thanks and regards, 

[Signature]

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name

Address

E-Mail Address

March 1, 2003

Renee Power Administration  
Public Affairs Office - KC  
PO Box 13999  
Portland, OR 97212
1393-001, -002, and -003 Please see response to Comments 1390-003 and -004.

1393-004 Comment noted.
Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1. Please have your environmental studies look at .

2. I need more information about .

3. I have these other comments: 
   Cut the lines through the watershed.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name: [Signature]
Address: [Address]
E-mail Address: [E-mail Address]

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1394-001 Comment noted.
1395-001  BPA will compensate landowners fair market value for the land rights needed for the Kangley-Echo Lake Transmission Line Project. We apologize for the disruption that this project has caused to other landowners impacted by the proposed project.
Kangley - Echo Lake Transmission Line Project

“I’d Like to Tell You . . .”

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments: I live in Waterwood est. and I have trees in my back yard. I do not want more in my back yard.

1396-001 Comment noted.
3-51

Chapter 3 — Comments and Responses - SDEIS

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments

   You mean the best route
   and that is all. Parallel
   existing DWR transmission lines
   through Water SHE

   Dan Pehrson 3131 3127 74 Way SE
   TRAVEN DATE 4/25/01

[] Please put me on your project mailing list. (You are already on the mailing list if you have received mailing notices.)

   Name
   Address
   E-Mail Address

   Please mail your comments by March 1, 2003 to:

   Bonneville Power Administration
   Public Affairs Office - KC
   P.O. Box 12999
   Portland, OR 97212

1398-001 Comment noted.
Kanglely - Echo Lake Transmission Line Project

"I'd Like to Tell You ..."

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments:

   We agree with your choice
   of Alternative 1. This is the
   most logical and safe choice.

Please put me on your project mailing list. (You are already on the mailing list if you have received mailed notices.)

Name: Eric / Judy Benton
Address: PO Box 614, Ravensdale, WA 98051

Please mail your comments by March 1, 2003.

Bonneville Power Administration
Public Affairs Office - RC
PO Box 12999
Portland, OR 97212

1399-001 Comment noted.
1400-001 Our understanding is that Seattle Public Utilities (SPU) is constructing a water purification plant, not a water filtration plant at Lake Youngs. The water purification plant involves using ultraviolet light to purify drinking water at this location. We understand that the plant has been designed to be compatible with a water filtration plant, should SPU ever add such a facility in the future.
Chapter 3 — Comments and Responses - SDEIS

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1. Please have your environmental studies look at

2. I need more information about

3. I have three other comments

   I am a lifetime member of the Serra Club and a Structural Engineer. Anybody that looked at the topo map would have seen the project has almost no impact on Cedar River water quality.

   I say go ahead and build the line using good construction practices to minimize any runoff during construction,

   Please put me on your project mailing list. (You are already on the mailing list if you have received mailed notice.)

   Name:  Robert Hahn
   Address:  4007 39th SW  Seattle, WA  98116

   Please mail your comments by March 1, 2003 to:

   Bonneville Power Administration
   Public Affairs Office - KC
   P.O. Box 12989
   Portland, OR  97212

1401-001 Comment noted.

1401-002 Comment noted.
Kangley - Echo Lake Transmission Line Project
"I'd Like to Tell You . . ."

1. Please have your environmental studies look at ________________________________

2. I need more information about ________________________________

3. I have these other comments: ________________________________

   [Handwritten note: From the door to the contracted route would destroy many homes and disrupt family]

☐ Please put me on your project mailing list. (You are already on the mailing list if you have received a mailed notice.)

Name ______________________________________
Address ____________________________________
E-Mail Address ________________________________

Please mail your comments by March 1, 2003 to:
Bonneville Power Administration
Public Affairs Office, RC-12
5131 NE 119th Place
Portland, OR 97220

1402-001 Comment noted.
For the protection of aquatic species, no in-water work is proposed for constructing the Raging River crossing. If in-water work is required, US Army Corps of Engineers-approved in-water work windows for the Raging River would be adhered to (no work from July 1st - September 15th) for the protection of salmonid species. Furthermore, the floodplain of the Raging River is about 180 feet below the surrounding plateau from which the conductor wire would be strung. This feature will enable the conductor to be strung without the removal or trimming of trees within the floodplain of the river, thus avoiding potential affects to the aquatic and terrestrial habitats that could occur if work was performed within the riparian area associated with the Raging River.
1404-001 Comment noted.

1404-002 The final decision will be made by BPA's Administrator in a Record of Decision. People on the project mailing list will be sent notice of the decision.

1404-003, -004, -005, and -006 Comment noted.
1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments: We agree with Alternative 1.
   Thank you.

☐ Please put me on your project mailing list. (You are already on the mailing list if you have received mailed notice.)

Name: Sara Dawson & Darrel Nash
Address: 26673 220 Pl SE Maple Valley WA 98038
E-Mail Address: 

Please mail your comments by March 1, 2005 to:

Bonneville Power Administration
Public Affairs Office - NW
P.O. Box 12999
Portland, OR 97212

1405-001 Comment noted.
1406-001 Comment noted.
The mail list for landowners along the proposed route alternatives reflects thousands of parcels, so it was not practical to include parcel maps to indicate where individual properties are located relative to the proposed routes. The corridor for Alternative C running north and south was identified as a swath approximately 250 feet wide, although only a corridor 150 feet wide would be needed if this route were to be selected. BPA could not be more specific regarding this alignment since a site-specific route had not been surveyed. Landowners have called into BPA requesting that their specific properties be identified relative to the proposed routes, and BPA has provided site-specific maps to these landowners and will continue to do so as requests come in.

Your property lies south of the east-west portion of Alternative C and appears not to be directly affected.

As principal of Grace Lake Elementary in the area possibly affected by the addition of power lines, I wish to express my deepest concern regarding the impact on our children and families. Withstanding the unknown physical have this project may have on us, I am also concerned about the height of the power standards. My understanding is that they could double or triple in height. I have visions of an earthquake toppling these standards and then falling onto our school grounds. We are directly next to the current power standards.

Please reconsider the placement of any additional power lines/poles in an area not adjacent to our school.

Thank you,

Linda Wagner, Principal
Grace Lake Elementary
28700 151st Place S.E.
Kent, WA 98032
(253) 373-7661

In response to your January 14, 2003 letter, my comment pertains to the adequacy of your route information. The map scale is so small that it is not possible to precisely determine the route i.e. you are only illustrating wide corridors. Without the exact location within the corridor, it is difficult to evaluate the impact on residents, wetlands, etc.

Alaa Cornel
29370 168th Ave. SE
Kirk, WA 98032
Alaa@nsco.com
1410-001, -002, and -003 Please see response to Comment 340-002.
Chapter 3 — Comments and Responses - SDEIS

1411-001 Renewable generation such as wind and solar were not considered for this study because their resource characteristics are a poor match for BPA's needs to defer this project. Wind energy was excluded because the Puget Sound Area is not home to a commercial-grade wind resource. Solar was excluded because the critical hours occur during the winter months when solar radiation is scarce, and many of the target hours occur during the evening. Please see Appendix J, Section 5.3.6.

Comment noted.
1412-001 BPA has sent you maps indicating that your property lies over a mile east of Alternative C.

---Original Message---
From: Jane Michaelson [mailto:jbmichaelson@msn.com]
Sent: Monday, January 27, 2003 8:41 PM
To: Kuehn, Ginny - DM-7

Subject: FW: Kangley-Echo Lake Transmission Line

Mr. Kuehn -

My husband and I recently moved from Colorado to the Hobart area. We have recently been told that a decision has been made on where this new transmission line is to be constructed. Is there a map indicating the route on your website? If so, can you please attach it and e-mail me back. We live on 296th Ave. SE, backing to King County/Taylor Mountain Park, at the end of SE 204th Ave.

Thank you, Jean and Paul Michaelson

jbmichaelson@msn.com

---Original Message---
From: Linnard, Gene P - KE-C-4
Sent: Tuesday, January 28, 2003 4:45 PM
To: Kuehn, Ginny - DM-7

Subject: FW: Kangley-Echo Lake Transmission Line

I received this email message yesterday, and have responded to it. Please log this in as a comment. Thanks.
3. I have these other comments. We are still in your B
    Act 1 - your site watershed is
    has the [confidential name]
    4 Cost
    not detrimental to human health or
    adverse to property values.

1413-001, -002, and -003 Comment noted.
1414-001 Comment noted.
1414-002 Comment noted.

From: RONKATR@cs.com
Sent: Thursday, January 30, 2003 6:08 AM
To: comment@epa.gov

Subject: SDEIS for Kanges-Echo Lake Transmission Line

We will not be able to attend the public meetings you will have regarding the SDEIS for Kanges-Echo Lake Transmission Line. We wanted to support your decision to build the power the next to the existing one inside the Cedar River Watershed, instead of the neighborhoods of Maple Valley.

Thank you.

Ron and Kathy Ryan
29531 SE 237th St
Maple Valley, WA 98038
425-432-2673
I am writing to make known my extreme concern about the proposed powerline to be constructed. Such a move should not happen until conservation and other electrical systems have been fully explored.

If a powerline is to be constructed, then BPA must mitigate any new or expanded corridor by acquiring and protecting nearby forestland including:

- 400 acres along Raging River near Highway 10, and
- 600 acres near the Cedar River (Section 25, owned by Plum Creek Timber Co., and subdivided for development)

This mitigation MUST be done with BPA funds, not with Land and Water Conservation Fund or Forest Legacy money, as BPA has suggested.

On any powerlines constructed I believe that BPA should raise the height of the lines and minimize width of any corridors over the Raging & Cedar Rivers to protect riparian forests.

There should be NO NEW ROADS! If towers are to be installed, it should happen with helicopters.

A continual program for removal of non-native plants growing in the newly deforested areas must be implemented.

Thank you

Alyson Schier
4715 108th Avenue SE
Bellevue, WA 98004
425-224-0196

Please see response to Comment 349-001.

Please see responses to Comments 340-002 and 1489-001 regarding BPA's easements on property transferred to the City of Seattle and others.

BPA would use its own funds to purchase additional properties. BPA would likely be purchasing more than is needed for mitigation. Agencies interested in those remaining parcels with conservation easements or deed restrictions could use any of their own funds including Land and Water Conservation Funds or Forest Legacy money.

Because the Cedar River is a drinking water source and has potential fish habitat, our Preferred Alternative crosses the Cedar River using double-circuit towers on the existing ROW, thus minimizing clearing across the Cedar River. The double-circuit towers will cost $2 million. BPA looked at this possibility at the Raging River crossing. Because the Raging River is not a drinking water source we determined that the cost was too high for the benefit. We will mitigate and will consider topping trees, if feasible, instead of complete removal across the Raging River.

BPA is proposing constructing the line with helicopters. However, there is work that needs to be done that requires access roads. Most of the roads that would be used are existing roads, with only new spur roads needed to the new tower sites. BPA does need access to each tower for maintenance also.

Please see response to Comment 382-017.
BPA Communications
DM-7 P.O. Box 12999
Portland, Or. 97212

Attention:

Please build the proposed
Kingfisher Lake transmission line
next to the existing one inside the
Cedar River Watershed. Any alternative
routes would be a departure to
green/clean coal farms.

Thanking you,
Walter Miller

Copy sent to:
State Representative
52nd Legislative District
Cheryl毓

1416-001 Comment noted.
Chapter 3 — Comments and Responses - SDEIS

Chapter 3 — Comments and Responses - SDEIS

1417-001

This property is located along Alternatives B and D. Although the SDEIS identified the preferred route, Alternatives A-D remain under consideration. The Record of Decision, which is expected in August 2003, will identify whether BPA has decided to proceed with the non-transmission alternative, no-action alternative, or identify which route has been selected for the construction alternative.

1418-001

BPA's analyzed several alternatives inside and outside of the Cedar River Municipal Watershed. Alternative A would rebuild BPA's existing Covington to Maple Valley 230-kV transmission line to a double-circuit 500-kilovolt (kV) line. The new towers would be about 175-ft. tall. The new 500-kV line would be constructed on existing right-of-way. Each end of the new line would be connected to existing unused 500-kV circuits such that the new line would be connected to the Raver and Echo Lake Substations. The northern vacant circuit would need to be connected to Echo Lake Substation with a short line on BPA property. BPA preferred transmission route is Alternative 1, which would construct a new single-circuit 500-kV transmission line across the Cedar River Municipal Watershed. The project map is posted on the Transmission Business Line Web site, www.transmission.bpa.gov/projects. If you need a more detailed map, BPA can send one to you in the mail.
I am very concerned about the proposed Kangley/Echo Lake Transmission Line also known as the Raging Cedar Powerline for the impacts this project will cause on the Cedar and Raging Cedar valleys. These are my concerns:

1) Is this project necessary? BPA states that the new line is needed to accommodate electrical growth and reliability concerns in the Puget Sound area. As for growth, I request that BPA pursue an aggressive conservation campaign before building a new powerline. Puget Sound residents, more than just about any other in the country, understand the need for conserving energy, and will do it if educated and asked to. And as for reliability concerns, I ask BPA to pursue electrical system changes to the best of its ability and the existing system's capability.

2) If BPA does build a new corridor or expand an existing one, it's imperative that it mitigates for the environmental impacts. BPA should acquire and protect nearby forestland including 600 acres along the Raging River near Highway 18, and 600 acres near the Cedar River that is Section 25, owned by Plum Creek Timber Co, and currently subdivided for development. In order to pay for necessary mitigation, BPA needs to use its own funds, and not those of the Land and Water Conservation Fund or Forest Legacy money. If BPA decides that it can't afford mitigation, then it shouldn't proceed with the project.

3) If BPA does build a new line, I request the following: raise line height and minimize the corridor width over the Raging and Cedar Rivers to protect riparian forests; do not build any new roads, and install towers with helicopters; and replace invasive plant species such as Scotch broom and blackberry with native vegetation in rights of way.

4) As for where to build the line, I request that BPA doesn't build it in the Cedar River Watershed. This 90,000-acre watershed provides low elevation forest habitat for wildlife, something that is being gobbled up by ever-increasing development in the greater Seattle area. The watershed has been logged in the past, but the City of Seattle has taken progressive steps to rectify the past damage by prohibiting further logging, thereby ensuring a continued and reliable source of clean drinking water. I don't see how clearing a swath of mature forests, erecting electrical towers and stringing power cables will do anything to preserve wildlife habitat and clean water.

Thank you

Sincerely, Chris Gulick

Chris Gulick
pg08@nwlink.com

1423-001 Comment noted.

1423-002 The project is necessary in order to reliably meet electric demands in the Puget Sound Area during extreme cold weather. BPA has supported conservation programs in the region for many years. Nevertheless, it is clear that conserving enough power to delay the project is not possible. See Section 2.2.9 and Appendix J of the SDEIS. See also response to Comment 1421-032-003. Further comments noted.

1423-003 and -004 Please see responses for Comments 1415-003, -004 and -005.

1423-005, -006, -007, and -008 BPA would use the existing right-of-way for the existing 500-kV line by using double-circuit structures to cross the Cedar River, such that no clearing needs to take place within the Cedar River canyon. BPA would use care to minimize clearing at the Raging River crossing. To raise structures would impose a reliability hazard for BPA because the new line could potentially fall into the existing line. The current design would prevent that. Also taller structures may present a hazard to flying aircraft and may require special paint and lights. BPA will concentrate on clearing techniques and encouraging low-growing vegetation along the Raging River and associated creeks. BPA is studying how best to take care of noxious weeds such as Scotch broom. BPA has programs in place to take care of Scotch broom with machine cutting and herbicides. Chemicals cannot be used in the Cedar River Watershed, so BPA would use other means to try to control these invasive plants. BPA is working with the city, county and tribes to determine the seed mixtures to use to meet their needs. Some new roads would be needed so that some existing roads that currently go through wetlands can be removed. Short spur roads will be needed for access to individual tower sites.

1423-009, -010, and -011 Comment noted.
This is my 3rd time attending such a hearing. I was hoping we would not have to get into a seemingly indefinite battle, but here we are.

1424-001
This is about a pristine forest, the Cedar River Watershed, which serves the City of Seattle and surrounding areas, and which is one of only a few in the entire United States that is so clean it needs no filtration system other than what nature has provided.

1424-002
This is also about whether it is indicated in the provided documentation by the BPA or not, about an energy debacle brought about by deregulation and the subsequent opportunistic energy fraud perpetrated by Enron and other companies. We were told there was a shortage (which was manufactured), and that therefore we need to upgrade our power grid.

1424-003
We are still being told this. I have not forgotten about Enron and the way they scammed the entire Western United States. Evidently others have forgotten. I hope you haven’t.

1424-004
Because of this ongoing perpetuated threat of having our lights, our heat, and our dialysis machines suddenly turned off, we are supposed to throw our entire concept of environmental stewardship out the door. We are supposed to be concerned now about energy shortages and “national security” more than we are about clean water.

1424-005
If polluted water, the loss of entire species of Salmon and other fish, the loss of habitat for numerous other species, further degradation of a fast disappearing forest, and the insult to the people that hunted and fished there before we came is not a threat to our national identity, and our national pride, then what is it? A simple inconvenience? Is it progress?

1424-006
I don’t buy that. Please don’t try to blackmail us with threats of blackouts. That is exactly what Enron and the rest of those corrupt corporations were telling us. We need to hear the truth.

1424-007
The BPA needs to stop thinking about cheap and easy. They need to think about management, and about respect for the concerns of the majority of us who depend upon this water, this watershed, and who love this area.

1424-008
By the way, BPA employees and their subcontractors are being paid money to come in and gouge another swath out of our watershed. Those of us such as myself, who go there to restore it, to repair the damage, do NOT GET PAID. We do it for free, because we give a damn!

1424-009
Thank you.

1424-010
1424-011
1424-012
1424-013
1423-001 and -002 Comment noted.

1424-003 Comment noted.

1424-004 and -005 Comment noted.

1424-006, -007, and -008 Comment noted.

1424-009, -010, and -011 The risk of blackouts is real. On August 10, 1996, a transmission outage on the BPA system blacked out 7.5 million customers up and down the west coast. BPA is working to make sure that does not happen again. Comments noted.

1424-012 and -013 Comment noted.
Chapter 3 — Comments and Responses - SDEIS

3-71

Biodiversity Northwest

Communications – KC-7

PO Box 12999

Portland, Oregon 97212

Subject: Comments on Kangley Echo-Lake Power Line Project

As there has not been sufficient time to review the 1800 page Supplemental Draft Environmental Impact Statement or the Non-Transmission Alternative study, Biodiversity Northwest requests an additional thirty days to review and allow for public comment both organizationally and for citizens who are also needing more time for adequate review.

Assuming the new deadline of April 1, 2003, all interested parties will have more adequate time to give proper examination of aforementioned articles and studies. Without the thirty day extension, BPA could be perceived as attempting to move pertinent information forward without sufficient public review. We hope that BPA compiles.

While Biodiversity Northwest will need more time to fully inspect the 1800 page SDEIS and the Non-Transmission Alternative, we would like to take this opportunity to encourage BPA to not proceed with the Cedar River Watershed like they’re proceeding with the Columbia River by backing out of contracts, commitments and promises.

With the Watershed as the preferred alternative, how is the City of Seattle, environmental groups and local citizens expected to believe the promises put forth in any BPA-administered mitigation package if it is not legally binding? We understand from BPA’s track record (e.g. the Columbia River) that the agency prefers to refrain from any legally binding commitment at all. How then can we believe anything that you offer at the negotiating table unless BPA will agree to sign under the legally-binding line?

Biodiversity Northwest encourages BPA to only discuss a mitigation package with the City if BPA is willing to be held accountable for their alleged promises.

Biodiversity Northwest also encourages BPA to follow the legal procedures as stated in the NEPA process which require the agency to seriously study all feasible alternatives and to be in compliance with scope of comments that request specific studies. The SDEIS, at first look, seems to fail in this regard, refraining from any feasible Non-Transmission Alternative that is more comprehensive, incorporating Entitlement negotiations, Demand Response programs, Demand- Side Management programs, Generation & Distributed Generation, Regional Availability of Natural Gas, Existing Distributed Generation, New Distributed Generation, Renewable Generation and emerging technologies.

BPA’s SDEIS appears to review only a handful of these possible Non-Transmission Alternatives and has admitted to failing to produce anything comprehensive because of lack of time. We’re encouraging you to take the necessary time. Tom Foley states that these studies will need to take place in the next few years and we’re asking that you study them now. The rest of Biodiversity Northwest’s comments will come after the public comment due date has been extended.

Submitted by Michael Shook, Outreach Director for Biodiversity Northwest

4649 Sunnyside Ave N. #321 Seattle, WA 98103

4649 Sunnyside Avenue North #321 Seattle, WA 98103

Phone: 206.545.3794 Fax: 206.545.4498 Email: info@biodiversitynw.org Web: www.biodiversitynw.org

1425-001 See response to Comment 1421-038.

1425-002 See response to Comment 1421-038.

1425-003 and -004 See response to Comment 1421-038.

1425-005 See response to Comment 1421-038.

1425-006 and -007 The consultants developed a comprehensive study of non-transmission alternatives that was not compromised by the time available to complete the analysis. See responses to comments 1421-038-004, -005 and -006. They found that “A high level of load reduction or additional generation is required to defer KEL. (Appendix J, Section 1.2)” See response to Comment 1421-032-003. The immediacy of the problem makes achieving this large amount of demand reduction even less feasible.
1426-001  See response to Comment 1421-039-002.

1426-002, -003, and -004  BPA would propose to make it such that some roads within the existing right-of-way could no longer be used. Those roads go through wetlands. In addition, BPA would work with the city of Seattle to see about removing from service other roads for the benefit of Seattle and BPA. Also see responses to Comment 1415-003, -004 and -005 concerning purchasing other lands.

1426-005 and -006  See responses to Comments 1415-003, -004 and -005. BPA would use its own funds.

1426-007, -008, and -090  BPA would use helicopters and other techniques to minimize disturbance to soils. Trees cut may be left inside wetlands to provide for wildlife cover and to minimize disturbance to the ground. Low-growing vegetation would be allowed to grow adjacent to and near streams. No clearing would take place inside the Cedar River canyon.
1427-001 Other than the concerns about Seattle's drinking water, there would be no direct impacts to people within the CRW. One to two homes may be removed outside the CRW. There would be visual impacts in the Kangley/Selleck area and to those people traveling inside the CRW.

1427-002 and -003 Comment noted.
Telephone comment by Ginny Kuehn
02/06/2003

Katie Saylor
3209 SE 44th St.
Fall City, WA 98024
(425) 322-3715

1428-001 See response to Comment 1421-039-002.

Suggestion to – instead of cutting new swaths through the Cedar River Watershed double-up your lines on the existing towers.

Kuehn, Ginny - DM-7

From: Joel Szafrak [joels@cedarriver.org]
Sent: Friday, February 07, 2003 1:01 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Project

Please extend the comment period for this project by at least 30 days. More time is needed for the public to read and digest the entire 1800 page EIS, and review the study on the Non-Transmission alternative.

Thank you for your consideration.

Joel P. Szafrak
Executive Director
Friends of the Cedar River Watershed
6513 23rd Avenue NW #201
Seattle, WA 98117
(206) 297-8441
F: (206) 297-5142

1431-001 Due to the very tight schedule, BPA will not extend the comment period.

Kuehn, Ginny - DM-7

From: MARGE CHISSUS [mchissus@atblicom]
Sent: Sunday, February 09, 2003 1:54 PM
To: comment@bpa.gov
Subject: alternate C
Importance: High

Dear Sir / Madame of BPA,

We are very much opposed to the alternate C, and feel along with many others it should be going through the water shed like proposed a couple of years ago. This whole thing has put us on “hold” for many months now in regards to excising our property. As soon as the ‘votes’ are counted we NEED a written statement from FP saying they are not using alternate C which would then take our property or:

28513 SE 236th St
Maple Valley, WA 98038
425-413-8867
mchissus@atblicom

Thank you for your time reading this.

1432-001 Comment noted.
1432-002 Comment noted.
1433-001 and -002 We have already undertaken our environmental review of sensitive areas such as streams and wetlands, and have published this information in the SDEIS. BPA's first priority in designing its facilities is to avoid where we can, span where we can't avoid, and mitigate for those sensitive areas that cannot be spanned. However, if BPA selects any other alternative other than Alternative 1, additional environmental work would be necessary, primarily surveys.

1433-003 Comment noted.

1433-004 and -005 Comment noted.
Re: Kangley/Echo Lake Transmission Line

Dear Mr. Driessen:

In regards to the Kangley/Echo Lake Transmission Line, also known as the Raging Cedar Powerline for the impacts this project will cause on the Cedar and Raging River valleys, I have the following comments.

1) Is this project necessary? BPA states that the new line is needed to accommodate electrical growth and reliability concerns in the Puget Sound area. As growth, I request that BPA pursue an aggressive conservation campaign before building a new powerline. Puget Sound residents, more than any other in the country, understand the need for conserving energy, and will do it if educated and asked to. And as for reliability concerns, I ask BPA to pursue electrical system changes to the best of its ability and the existing system's capability.

2) If BPA does build a new corridor or expand an existing one, it's imperative that it mitigates for the environmental impacts. BPA should acquire and protect nearby forestland including 400 acres along the Raging and Cedar River near Highway 18, and 600 acres near the Cedar River that is Section 26, owned by Plum Creek Timber Co, and currently subdivided for development. In order to pay for necessary mitigation, BPA needs to use its own funds, and not those of the Land and Water Conservation Fund or Forest Legacy money. If BPA decides that it can't afford mitigation, then it shouldn't proceed with the project.

3) If BPA does build a new line, I request the following: raise line height and minimize the corridor width over the Raging and Cedar Rivers to protect riparian forest; do not build any new roads, and install towers with helicopters; and replace invasive plant species such as scotch broom and blackberry with native vegetation in rights of way.

4) As for where to build the line, I request that BPA doesn't build it in the Cedar River Watershed. This 50,000-acre watershed provides low elevation forest habitat for wildlife, something that is being gobbed up by ever-increasing development in the greater Seattle area. The watershed has been logged in the past, but the City of Seattle has taken progressive steps to rectify the past damage by prohibiting further logging, thereby ensuring a continued and reliable source of clean drinking water. I don't see how clearcutting a swath of mature forests, erecting electrical towers and stringing power cables will do anything to preserve wildlife habitat and clean water.

Thank you.

Sincerely,

Amy Gulick
1436-001. BPA will work with the FAA to determine spans that need to be marked for safety.

Kangley - Echo Lake Transmission Line Project

“I'd Like to Tell You...

1. Please get plenty of bright balls on all of your power lines, including the high single ground wire. It's hard to see, so pilots can see them all easily.

2. I need more information about line flying. (I'm a very important)

3. I have these other comments...

Have a good day!

☐ Please put me on your project mailing list. (You are already on the mailing list if you have received a mailed notice.)

Name: Mark A. Starr
Address: 49388 S.E. 149th Place, North Bend, WA
E-mail Address: starrre@mindspring.com

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - MC #
P.O. Box 1999
Portland, OR 97207
1437-001 and -002  Comment noted.

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You..."

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments: WE BELIEVE THE PREFERRED (ALTERNATIVE) IS THE BEST-choice with the least amount of impact to THE SURROUNDING COMMUNITIES AND ENVIRONMENT. UTILIZING THE EXISTING RIGHT OF WAY REQUIRES THE LEAST AMOUNT OF NEW PROPERTY BEING DISTURBED.

   WE LIVE IN THE E.L. LOW (1) DEVELOPMENT.

☐ Please put me on your project mailing list. (You are already on the mailing list if you have received mailed notice.)

Name: TERRY R. KUHN
Address: 22426 - 3772 AVE SE 98038
E-Mail Address:

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - RC
P.O. Box 12999
Portland, OR 97212
1438-001 Comment noted.

1438-002 and -003 Comment noted.

1438-004 and -005 BPA is in discussions with Seattle about the possibility of decommissioning some roads outside the right-of-way. Some existing roads inside the existing right-of-way would be made such that people can no longer travel across them. Those particular roads would be replaced with new roads because the existing roads go through wetlands. BPA has purchased 350 acres of land immediately north of the watershed and is looking at the possibility of purchasing more lands.

1438-006 and -007 See response to Comment 340-002.
Chapter 3 — Comments and Responses - SDEIS

Bonneville Power Administration

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You ..."

1. Please have your environmental studies look at

   [Text space for environmental studies]

   [Signature and date]

   FEB 19 2003

2. I need more information about

   [Text space for additional questions]

   [Signature and date]

   [Signature and date]

   [Signature and date]

   [Signature and date]

1439-001 Comment noted.
1439-002 Comment noted.
1439-003 Comment noted.
1439-004 Comment noted.
1439-005 Comment noted.
1439-006 Comment noted.
1439-007 Comment noted.
1439-008 Comment noted.
1439-009 Comment noted.
1439-010 Comment noted.

1439-001

4. Convoygo to Maple Valley Substation, existing line (Yes)
5. Convoygo to Echo Lake Substation, existing line (Yes)
6. Convoygo to Maple Valley Echo Lake Substations (NO)
7. (NO)
8. (NO)

I have these other comments

[Additional comments]

1439-001 Comment noted.
1439-002 Comment noted.
1439-003 Comment noted.
1439-004 Comment noted.
1439-005 Comment noted.
1439-006 Comment noted.
1439-007 Comment noted.
1439-008 Comment noted.
1439-009 Comment noted.
1439-010 Comment noted.

Eloise Linn

30121 133rd Ave. S.E. Kent, Wa. 98034-5512

Sunshine Starbright@HotMail.com (Private)

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration

Public Affairs Office - RE

P.O. Box 12000

Portland, OR 97212
Chapter 3 — Comments and Responses - SDEIS

1440-001, -002, and -003 BPA's environmental analysis that was recently completed and published in the SDEIS included analysis on four "build" alternatives outside of the Cedar River Municipal Watershed, Alternatives A, B, C and D.

1440-004 and -005 Comment noted.

1. Please have your environmental studies look at the impact on the streams and wildlife out side the

2. I need more information about the water shed.

3. I have these other comments: Our country is in crisis on many fronts right now. We should be energetically researching systems that would reduce our need for electricity. People might be more willing to conserve energy if they were charged a higher rate for power used that exceeded a reasonable amount.

Please put me on your project mailing list. (You are already on the mailing list if you have received a mailed notice.)

Name: Sarah J. Tracy

E-mail Address: 

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - RL
P.O. Box 12999
Portland, OR 97212

Bonneville Power Administration
Chapter 3 — Comments and Responses - SDEIS

1441-001 Comment noted.

1441-002, -003, and -004 Thank you for your comment. BPA will offer landowners fair market value for the land rights needed for this project. Please refer to the SDBS, Section 4.11.2.5, Community Values and Concerns, Property Value Impact.
Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1. Please have your environmental studies look at .

2. I need more information about .

3. I have these other comments .
   (1) REA is doing a good job representing plan of options.
   (2) Although 1 is obvious choice for the people of SE King County
   (3) If other option is selected, you will get a huge negative response
   and will cause further delay/added costs.

[If you are already on the mailing list, put me on your project mailing list.]

Name: L. S. Riesewich
Address: 15031 SE 7th St Kent, WA 98032

Please mail your comments by March 1, 2003 to:
Bonneville Power Administration
Public Affairs Office - SC
P.O. Box 12995
Portland, OR 97212
Chapter 3 — Comments and Responses - SDEIS

1443-001 Our environmental studies included Alternative C, both Options C1 and C2. Land use impacts would be high with both options, and the impacts to the visual resource would be moderate to high for those residents where the transmission line would be the dominant visual feature.

1443-002 BPA will offer landowners fair market value for the land rights needed for this project. See response to Comment 1441-002. If BPA needs to acquire land rights across your property, and you disagree with BPA’s opinion of fair market value, BPA would be willing to review any additional market data that you may have, or review recent appraisals of your property. You may also choose to use the condemnation process, and have the courts establish Just Compensation for your property.

1443-003 and -004 Comments noted.
Chapter 3 — Comments and Responses - SDEIS

Kangley - Echo Lake Transmission Line Project

“I’d Like to Tell You . . .”

1. Please have your environmental studies look at . . .

2. I need more information about . . .

3. I have those other comments. My family has lived in the Pacific NW for 50 years. I favor the preferred Alternative No. 1 and would like to see no monies go to the City of Seattle and/or building of facilities for the City of Seattle. The decision should be made now and not delayed any longer as the new transmission lines when completed will save approximately 5 KWh/year of energy costs.

☐ Please put me on your project mailing list. (You are already on the mailing list if you have received mailed notice.)

Name: JOHN HUSON
Address: 20318 SE 243 ST Maple Valley WA 98038
E-Mail Address:

Please mail your comments by March 1, 2003 to:

Ronneville Power Administration
Public Affairs Office - RIC
P.O. Box 12999
Portland, OR 97212

1444-001 and -002 Thank you for your comment and concern for BPA’s financial situation. BPA is committed to mitigating the impacts caused by this project. Some of that mitigation may be to pay Seattle to offset the cost of right-of-way through the CRW.

1444-003 The preferred alternative would reduce losses by approximately 11 MW on peak.

Comment noted.

1444-004 Comment noted.
Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments

1445-001
The effect on families living along the existing roadway. The effect of not having people in homes there have used and adapted living as residents there along alternative A.

1445-002

1445-003

Please put me on your project mailing list. (You are already on the mailing list if you have received a mailing notice.)

Name __________________________

E-Mail Address ____________________

Please mail your comments by March 1, 2003 to:
Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1445-001, -002, and -003 Comments noted.
Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1. Please have your environmental studies look at:  

________________________________________________________

________________________________________________________

________________________________________________________

2. I need more information about:  

________________________________________________________

________________________________________________________

________________________________________________________

3. I have these other comments:  

Keep out the power line project you have in mind. Take it elsewhere. Thank you.

□ Please put me on your mailing list if you have received mailed notice.

Name: P.T. Naylor

Address: PO Box 7199

City: Covington, WA 98042

Date: March 1, 2003

Bonneville Power Administration
Public Affairs Office - A.K.
PO Box 13990
Portland, OR 97212

1448-001 Comment noted.
Kangle - Echo Lake Transmission Line Project

"I'd Like to Tell You ..."

1. Please have your environmental studies look at [Handwritten note: KELT 449]

2. I need more information about [Handwritten note: FEB 1 7 99]

3. I have these other comments: THE ROUTE THROUGH THE CREEK SLOPE WATERSHED IS THE COOLEST ROUTE TO UTILIZE. THIS IS THE LEAST IMPACT AT FAI. THE WATERSHED HAS BEEN LOAMED FOR MANY YEARS AND THE MINIMUM CLEARANCE FOR THE PROJECT IS OUTSIDE COMPARED TO ANY OBSERVED PRACTICE. IT WILL AFFECT CATTLE UPLANDS THAT IS GENERALLY MORE PRIME IF OTHERS WERE TO DREDGE FOREST. IN FACT, IT MORE CLOSELY OPPOSES NATURAL "WATERSHED" CONSIDERATIONS. NO TRIPS WILL EVENTUALLY BE ACCURATE TO SHIM

1449-001 and -002 Comments noted.

Please put me on your project mailing list. (You are already on the mailing list if you have received mailed notice.)

Name: Wayne C. Sage
Address: 25307 175th Ave. SE, Covington, WA 98042
E-Mail Address: wcsage@comcast.com

Please mail your comments by March 1, 2003 to:
Bonneville Power Administration
Public Affairs Office - BC
P.O. Box 12000
Portland, OR 97212
Chapter 3 — Comments and Responses - SDEIS

1450-001, -002, and -003 Comments noted.

1450-001

1450-002

1450-003

Please mail your comments by March 1, 2003 to:
Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97213
1451-001, -002, and -003 Comments noted.

1451-004, -005, and -006 Each of the alternatives will impact residential properties either directly, by having to acquire land rights needed for new right-of-way, or indirectly, by constructing a new line adjacent to residential property. See response to Comment 1441-002.

1451-007 and -008 See response to Comment 1395-001.

1451-009 and -010 Comment noted.

1451-011 Comment noted.

1451-012, -013, and -014 Comment noted.

1451-015 Comment noted.

1451-016 Our environmental analysis looked at the long-term health impacts of the proposed transmission line and concluded that the impacts would be mostly no to low impacts, and a high impact for the No Action Alternative.

1451-017 The loss savings benefits go to consumers through their retail utility, but not to BPA. See response to Comment 1421-056-001. Also, all alternatives for this project result in lower losses ranging from 4 to 11 MW lower than without the project. Comment noted.
Chapter 3 — Comments and Responses - SDEIS

Kuehn, Ginny - DM-7

From: William Rogers [preisio@msn.com]
Sent: Wednesday, February 12, 2003 1:01 PM
To: command@bpa.gov
Subject: Kangley Echo Lake Transmission line

As a resident of Winterwood Estates I am writing to endorse the BPA proposal for the Kangley Echo Lake Transmission line to be installed over the Cedar River Watershed. This is the best proposal for power lines installation available. It will not affect property values or endanger schools near the present lines running through Winterwood Estates.

Thank you,
William T. L. Sheryl-Jean Rogers
18810 S.E. 287TH St.
Kent, Wa. 98042-5425

February 12, 2003
P.O. Box 259
Maple Valley, WA 98038

Bonneville Power Administration
Communications Office - KC-7
P.O. Box 12999
Portland, OR 97212

Re: Proposed Kangley Echo Lake 500KV Transmission Line

Dear Sirs:

I believe the proposed route through the Cedar River watershed is the best one, especially considering the alternatives.

First, I think that Seattle's fears of their water supply becoming contaminated by silt run-off are unfounded. Was the water quality harmed when the first power line was constructed? And the chances of it happening are even more remote now with the use of modern, environmentally aware techniques such as the use of silt fences and employing helicopters to carry in much of the material.

Second, if the Seattle Water Dept. is so worried about their water supply being contaminated, why did they allow the construction of a fish ladder on the Cedar River at Landsburg Park? I would much prefer a little silt in my drinking water once than thousands of rotting salmon every year!

Third, the argument about disturbing the wildlife is ridiculous. The elk herds and deer have become so accustomed to people that they range freely through the Hobart-Maple Valley area. I have had to put up fencing to keep them out of our yard. And the demand for more land for "wildlife mitigation" is simply a land grab tactic.

The watershed route is the only sensible choice. Please do all that you can to avoid running it through populated areas. It will be to every one's advantage.

Sincerely,

Charles F. Stotts

1452-001 and -002 Comments noted.

1453-001 Comments noted.

1453-002 and -003 Comments noted.
We must examine and be able to survive loss of a double circuit (allowed exceptions include the one span across the Cedar River). Alternative B puts the 500-kV line on a tower with the existing Rocky Reach-Maple Valley 345-kV line. The 345-kV line is not as strong a source as a 500-kV line, so the simultaneous loss of one 500-kV and one 345-kV is not traumatic. Also they go to different locations, so we would not lose two lines into Echo Lake Substation.

From: Kuehn, Glinty - DM-7
To: comments@dps.gov
Subject: Kensey-Echo Lake Transmission Line Project

We live in Winterwood (20415 SW 180th S.E. Road) along one of your high voltage lines that have been considered for an expansion of the power line. We are concerned that the codes along our property and throughout the rest of our neighborhood is already fully developed and any expansion of the line would bring a host of forces changes in the permanent buildings and in the rather sensitive forest which has grown up just beyond the existing power lines. The power lines could really have a negative impact on the property values and the aesthetic beauty along the whole corridor through the neighborhood. I hope that your considerations include a clear assessment of the full impact, the terrible personal cost, as well as expense that such a change would have on this quite and outstanding collection of homes and the families living in them.

Comments noted.

Our analysis looked at the impacts to the social environment as well as the natural environment for all project alternatives under consideration including Alternative A. A summary of these impacts is contained on Table 2-3 in the SDEIS.
1458-001, -002, and -003 Comments noted.

1458-004 Comment noted
3-94

Chapter 3 — Comments and Responses - SDEIS

3-94-001, -002, and -003  Comments noted.

3-94-004 and -005  See response to Comment 1423-002.

3-94-006  See response to Comments 1421-032-002 and -003.

3-94-007 and -008  BPA and Seattle recognize that the risk for causing more than two events of massive erosion to happen in one year during the construction phase is extremely unlikely. Although extremely small, the risk is still there. BPA would purchase insurance just in case for the cost of a turbidity filtration plant if one were needed to be constructed.

3-94-009  Section 2.3.8 of the SDEIS examines the double-circuit alternative. The WECC Reliability Criteria (http://www.wecc.biz/documents/policy/WECC_Reliability_Criteria_082.pdf) does not permit exceptions for double-circuit towers but for short distances (e.g., river crossings). See page 28, Table I, Category C, Contingency 5 (Any two circuits of a multiple circuit powerline) and footnote g. BPA did a risk analysis for the WECC Reliability Probability Evaluation Work Group (RPEWG) to demonstrate acceptable performance for the proposed Kangley-Echo Lake line on a parallel right-of-way.

3-94-010  See response to Comment 1421-031-001.

3-94-011  Please see response to Comments 1415-003, 004 and 005.

3-94-012  See response to Comments 1421-038-004 and 1421-032-003.

Comments are included in the public record.
Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You..."

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments: I support BPA project for the Kangley - Echo Lake Transmission Line Project over the Cedar River watershed.

Please put me on your project mailing list. (You are already on the mailing list if you have received mailed notices.)

Name: James Z. Denny
Address: 18718 S E 286th St Kent WA 98031-5747
E-Mail Address:

Please mail your comments by March 1, 2003 to:
Bonneville Power Administration
Public Affairs Office - RC
P.O. Box 12990
Portland, OR 97212

1460-001 Comment noted.
1. Please have your environmental studies look at

2. I need more information about

3. I have those other comments. I would like to voice my support for the Kangley-Echo Lake Transmission Line Project to be installed over the Cowlitz River Watershed. It will have the least negative impact at this location.

1461-001 Comment noted.

Name: Della Wilcox
Address: 38025 194th Pl SE, Kent, WA 98032
E-Mail Address: 

Please mail your comments by March 1, 2003 to: Ronneville Power Administration
Public Affairs Office - RC
P.O. Box 13990
Portland, OR 97212
3-97

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You..."

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments: I fully support BPA's proposal for the Kangley - Echo Lake Transmission Line Project to be installed over the Kenzard River Watershed. This is the best alternative as it avoids the Gross Lake Elementary School. Thanks for coming to that solution.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice)

Name: Glori D. Hammers
Address: 8906 185th Pl SE, Covington, WA 98042

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 1299
Portland, OR 97207

1462-001 Comment noted.
Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You..."

1. Please have your environmental studies look at _____________________________.

2. I need more information about _____________________________.

3. I have these other comments:

I support your proposal for the new Kangley - Echo Lake transmission line to be installed over the Cedeo River Watershed as this would have the least impact on neighbors, schools, and the environment.

I am concerned by the effects on people.

Thank you for your attention.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name: ____________________________
Address: 7141 NE 195th St. Kent, WA 98032

E-Mail Address: ____________________________

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - BC
P.O. Box 12999
Portland, OR 97212

1463-001 Comment noted.
Comment noted.

Original Message:
From: Stan Fuller [mailto:stans@wa.net]
Sent: Thursday, February 20, 2003 8:23 AM
To: webstan@ipea.gov
Subject: re: Kangley-Echo Lake Transmission Line Project

I am opposed to a increase in power lines going thru my residential area (Winterwood). I think it is better to go thru the water shed. Stan Fuller 18315 SE. 264th. st. Kent, WA. 98032

STAN

1465-001 Comment noted.

1465-001
Thank you for the opportunity to comment on the proposed Kangley-Echo Lake Transmission Line Project and voice our concerns regarding our community's water system. As the board of directors for the water system (knew as Foothills Water Association) we feel it is our duty to make certain our community’s water source is not affected in any negative manner involving the proposed transmission lines.

Our community has only recently begun to enjoy our new water system after many, many years of effort involving planning and construction meetings with numerous government and private agencies. This community has suffered for literally decades with old, neglected surface water systems, resulting in a health hazard for the sixty plus homes that relied on these systems. The State Department of Health, U.S. Department of Ecology, U.S. Rural Utilities Services, and King County have all been actively involved in solving this major problem for this area. Our new water system has involved purchasing property with an active well, drilling an additional deeper well, constructing a 50,000 gallon water tank and booster pump station, purchasing an emergency generator, and installing miles of new water mains, pressure reducing valves, and individual meter bases and service lines for the new 72-hours that relies on our community’s water system. Of course, this entire project had to be professionally engineered and go through all the permitting and agency red tape involved with a project of this type. The funding for all this came from several sources, including a King County Community Development Block Grant, a construction loan from Washington State and a loan and grant from U.S. Rural Utilities Services. The total cost of this project is approximately $1.7 million dollars. The reason this cost is approximate is because this system is so new we haven’t closed out the project yet. This should happen within the next few months. The new system is performing well and soon (for the first time in decades to our knowledge) our community will be enjoying a health Department approved water system.

As stated earlier, this new water system has not come easily. There have been hundreds and hundreds of hours of work done by volunteers from the community involving meetings, paperwork and construction as well as current operation of this systems. This has not been a simple undertaking and we want to assure that the people involved with the Transmission Line Project take our water system seriously so an area that could be improved by their project.

We hope whoever is involved in this Transmission Line Project is aware that the proposed new line runs through the property that is directly adjacent to (part of) Foothills Water Association’s well, tank, generator and booster pump station. Foothills is concerned that there could be some mishap with the transmission towers or lines that would cause harm to our system or property. We would like to be assured that this transmission line project plan will include the protection of our new water system. Perhaps this would involve Bonneville purchasing or having in place an insurance policy that would include the Foothills property and all facilities.

We were also curious to know if Bonneville is still considering the alternative routes of 4A and 4B, which would route the transmission lines past the water system as well as homes in the area, helping to avoid possible dangers to those concerns. We would like to know if routes 4A & 4B are still being considered and if not, why not.

Again, thank you for allowing us to voice some of our concerns involving possible impacts to our community’s water system and, again, we would appreciate assurance from you that our concerns are being addressed.

Very sincerely yours,
FOOTHILLS WATER ASSOCIATION
BOARD MEMBERS:
Rick Kemey, Garret Morgan, Ruth Mackie
William Guerini, Charlie LaFleur
Pat Schaeffer, Bryan Marwood

PS. The names and numbers of some of the government agencies and officials involved with this water system are listed below:
Washington D.O.T - Jim Nelson 253 393-6764 Bob James 253 393-6764
USFWS - Vic Paulson 253 877-2881 Dale Darnell 509 664-0239
Washington State Public Works Board - Joanne Haag 560 725 5009
King County C/D/O/G - Eric Jensen 206 296 8596

1466-001 Comment noted.
1466-002 Comment noted.
1466-003 Comment noted.
1466-004 This item has been addressed in a letter to BPA dated March 3, 2003 and is summarized below. The Schultz-Raver No. 2 500-kv transmission line traverses east-west across the south end of the Foothills Water Assoc. (FWA) service area. The Raver-Echo Lake 500-kv transmission line extends to the north across the northwest corner of the FWA service area. The FWA’s well field is located about one block east of the current Raver-Echo Lake transmission line easement and abuts the south boundary of the Cedar River Watershed. Alternative 1 extends about 3,800 feet through the FWA service area. Alternative A would tap into the Schultz-Raver No. 2 500-kv transmission line near the west boundary of the FWA service area and extend west in an existing transmission line ROW. If Alternative 1 or A is constructed, a relatively small portion of the existing area that the FWA currently serves will be impacted. These impacts will be limited in intensity and area and will be primarily temporary.
Potential impacts to the groundwater supplies are discussed in Appendices F, M and Y. It is unlikely that the FWA’s groundwater source will be impacted by the construction or operation of the transmission line; however, spills of fuel oil, lubricants or other hazardous materials could occur. A Stormwater Pollution Prevention Plan that will include a hazardous materials spill response plan will be required to be in place during construction. These plans typically require vehicle fueling and storage, and storage of hazardous materials, to occur away from groundwater protection areas. This plan is intended to facilitate a rapid, appropriate response to reduce or eliminate potential impacts in the unlikely event that a hazardous material spill occurs.
1466-005 and -006 Please see response to Comments 1466-004.
1466-007 Routes 4A and 4B are still under consideration as are all of the alternatives analyzed in detail in the SDEIS.
The expected magnitudes of the electric and magnetic fields from the proposed Kangley–Echo Lake 500-kV line are described in Appendix E, Electrical Effects. As indicated in Appendix G, Assessment of Research Regarding EMF and Health, health effects research (through mid-2000) shows no convincing evidence that field levels associated with the proposed line cause harmful health effects. This conclusion represents the findings of numerous scientific review panels. Furthermore, regulatory organizations have stated that there are insufficient data to establish exposure limits based on long-term exposures to fields at the levels found near transmission lines.

Subsequent updates of the health assessment find that recent research findings have not altered the conclusion that there is no convincing evidence linking transmission line fields to adverse health effects. The latest assessment was prepared for the BPA Grand Coulee–Bell 500-kV project and includes research through May 2002 (see Appendix Z).

BPA must rely on assessments of known impacts and not on possible future findings. Epidemiological, cellular and animal research over several decades has not demonstrated a link between exposures to electric and magnetic fields from transmission lines with an adverse health effect. To speculate on the impacts of future legal proceedings arising from unidentified impacts is beyond the scope of the environmental process.

Comments noted.
Alternatives 2, 4A and 4B were located to avoid residences. Seattle does not want the transmission line to cross the CRW, but if it does, then only if it were parallel to the existing line to minimize impacts. That is the main reason for BPA choosing Alternative 1 as the preferred plan while recognizing that it could cause the removal of two homes.

See response to Comment 1395-001.
February 16, 2003

Bonneville Power Administration
Communications Office – KC-7
P.O. Box 12999
Portland, OR 97212

Reference: Kangley–Echo Lake Transmission Line Project

Dear Sirs:

Please leave our property for consideration of the new proposed location of your 300 Kilovolt transmission line. My property address is 19202 208th Avenue S.E.
Renton, WA 98058

My husband and I built our home at the above address in 1954 and `55. It has been my home all these years and I am very content here. The additional high voltage would impact the future sale of my property. Who would want to live under that? It is definitely a high-impact on the future land use. Please consider the alternatives in your final decision and let me live in peace as I have all these years. Thank you for the opportunity to express my request.

Sincerely,

Jewell Browning
19202 208th Ave. S.E.
Renton, WA 98058
(425) 452-0358

1469-001 Comment noted.

1469-002 Thank you for your comment. See response to Comment 1441-002.
I have felt from the beginning that the best and most reasonable route for the expansion of the Kangley-Echo Lake Transmission Line is through the Cedar River Watershed or Alternative 1. It will have the least impact on everyone and everything, including the Environment. To consider placing this transmission line anywhere else is simple ridiculous. To actually believe that in doing so will substantially harm the environment, as all the environmentalists groups and I believe, is also ridiculous. Anyone that believes this line should be placed outside the watershed where private property would have to be purchased and other property generally impacted when we have a viable route already in place in my opinion is doing so only because they have an agenda to push. As for the mitigation of impacts to the drinking water for the City of Sauvie’s I believe if there is actually an impact mitigation should be included. However, I should appear to me this should be a minimal amount of impacts to this area. In reality I believe the City of Sauvie’s is and will try to get BPA to have to spend money on mitigation of some sort only so as to prevent itself from having to do so in the future whether the project goes through the watershed or not. After many years of being involved in the process with State, County and Local Government and being one of two Council’s in the area in the past, including the Cedar River Council, they will do anything they can to stop or control how a project goes forward and will want to get something in return for nothing. Put the line through the Watershed and let’s move on...

I am currently on the mailing list & would assume I will hear through the mail on further developments on this issue.

Thank You

Frederick W. Coria
21235 230th Ave. S.E.
Maple Valley, WA 98038-8920

---

I am pleased to take a moment to comment favorably on the Kangley-Echo Lake Transmission line project. Amidst the flurry of opposing interests and opinions, the BPA has selected the alternative with the least negative consequences, and that makes the most sense for the environment, for impacted neighborhoods, and for the ratepayers. Congratulations for a job well done, and I applaud your courage to do the right thing under fire.
1472-001 Comments noted.

1472-002 Comments noted.

1473-001 Comments noted.

1473-002 and -003 Comments noted.

1473-004 Comments noted.
My wife and I have lived in the Hobart area for 18 years. Two years ago we moved ½ mile west into our dream home in Maplewood Estates. Alternative "C" of the BPA plan has a 500kv line running on our eastern property boundary. We would not have purchased this home had we known about the possibility of a 500kv powerline running next door. If this powerline is built, our back yard we will be moving.

I would like to talk about the human cost of this project. We spent two years looking for our home. I don't want to do that again!! Other people have spoken about being reimbursed for property easements, right of ways, etc. Will we be reimbursed for having this line bordering our property? I doubt it. Will this line reduce our property value? Of course. Our view will be a transmission line next door, instead of tall trees on a green belt. Are we going to have harder time selling our house? Of course. Are these being factored into the cost of this project? I doubt it. They should be!! Are my neighbors and I going to do everything possible to stop this legally? You can count on it.

I would like to talk about what Seattle calls the "pristine watershed and their legacy for the future". This watershed has been decimated by logging for about 100 years. There are more than 600 miles of gravel roads in the watershed. At the BPA meeting at the Seattle Center last week I was happy to hear that some folks from Seattle are planting trees in the watershed. Where do you think they are planting these trees? In the second growth forest, I don't think so. How about in a clearcut created by logging: How can a clearcut with some newly planted trees in an area with 600 miles of gravel roads, be called a "pristine watershed"? I suppose it is pristine compared to First Avenue in Seattle.

My definition of old growth is a forest where one could walk through with out seeing 10 to 15 foot diameter stumps. I don't think there is any of this left in the watershed. One needs to go to Mount Rainier National Park, Olympic National Park, North Cascades National Park or some of the Wilderness areas recently established by the Forest Service to see old growth. Nature, not man is the only cause of trees falling here!! This is the legacy we are leaving for our children. Not some watershed that's been raped for 100 years and now is untouchable!! Are people in Seattle that provincial or are they apathetic?

I would like to address vandalism on transmission lines. I believe that in the cost analysis, vandalism must be taken into account in the life cycle cost of any new transmission line. I am sure the BPA must keep records of vandalism repairs on transmission lines. It should be an easy thing to take into account.

The watershed is the best location for this new transmission line.

Sincerely,

Jon Zak
PO Box 551
Hobart, WA 98025
From:  Zak, Jon [Jon.Zak@METROKC.GOV]
Sent:  Monday, February 24, 2003 8:27 AM
To:  Lou Dreisen
Cc:  Gene Lynnard [Comment@pdp.gov]
Subject:  Kingfisher Creek Transmission Line Project

Dear Mr. Dreisen:

I found this information on the Seattle Public Utilities website. It should be obvious to anyone reading this document that the turbidity problems in the water of the Cedar River are the direct result of poor management by SPU. The BPA should not have to pay for any filtration plant.

This is the link to this webpage:
http://www.ci.seattle.wa.us/oc/ColorRiverHCP/4Road.htm

Below, I have copied and pasted this information for your use:

*Road Improvements and Maintenance*

Road improvement projects and maintenance activities will reduce sediment loading to streams from road-related landslides and erosion.

*Watershed Road Improvements and Maintenance*

Several road-related activities will be carried out in the watershed to minimize sediment delivery to streams: improve drainage patterns altered by roads, and provide fish passage. Roads are a major contributor to accelerated rates of sedimentation and erosion into streams, and thus can adversely affect water quality. Road Decommissioning

Many roads in the watershed were used almost exclusively for logging traffic in the past and will no longer be needed. The Over $5 million is designated to a road decommissioning program to disconnect 236 miles (36%) of the existing road network. This will have substantial benefits, as these roads will no longer contribute to sedimentation of streams and will not require the time and money involved in maintenance.

Roads will be decommissioned in a manner that will improve hillside drainage patterns and stability and minimize sediment delivery to streams. At stream crossings, culverts and fill material will be removed and other restoration efforts will be undertaken to restore natural stream function, benefit fish survival, increase spawning habitat, and protect the drinking water supply. Road Improvements

Road improvements will increase the functionality of the watershed road system while maintaining more natural flow patterns and providing for fish habitat. Existing roads will be improved for long-term control of sediment loading to streams and to allow for the expansion of fish habitat. Roads with priority stream crossings will be upgraded to provide passageway of 100-year flows, and problem stream crossings will be stabilized to reduce erosion. Ditches will be designed to empty away from streambanks and crossings will mimic the natural hillside flow patterns. Fish passage structures may be constructed in specific locations where roads block the connectivity of fish habitat and fish would significantly benefit from access to upstream habitat. Additionally, new roads may be constructed for emergency reasons or to establish access to new projects. These roads will be constructed according to rigorous standards to prevent road-related problems. Road Maintenance

Road maintenance standards will be improved as new technology and equipment become available to allow effective management of the watershed road system. Road maintenance activities will be carried out to allow use by the watershed staff and prevent any future sedimentation problems. Maintenance activities include: grading and shaping of the road surface; maintaining ditches and waterways; and cleaning culverts and catch basins; installation, replacement and repair of culverts; mechanical vegetation control; application and replacement of rock ballast and surfacing; and removal of material such as rock fall from cut banks.

Sincerely,

Jon Zak
PU Box 551
Hobart, Washington 98025
E-mail: jon.zak@metrokc.gov
Kuehn, Ginny - DM-7

From: Zak Jon [jon.zak@METROK0.C.GOV]
Sent: Monday, February 24, 2003 9:36 AM
To: 'Lou Drusek'; 'Gene Lundgren'
Cc: 'Comment@BPA.GOV'
Subject: Kangley Echo Lake Transmission Line Project

---- Original Message ----
From: Zak Jon
Sent: Friday, February 21, 2003 3:05 PM
To: Zak Jon
Subject: PM Kangley Echo Lake Transmission Line Project

Lou, Gene,

Please check out this site:
http://www.wapakee.net/jrj/earthquake/default.html

Click on 'Begin Slide Show'.

Under "Masonry Pool":
- Sedimentation due to failure of lakeshore
- Oil Fences
- Road construction in HCP
- Oil spill booms used to dampen wave action to minimize erosion from exposed soil
- Installation of a floating turbidity curtain in LAKE to isolate DIRTY WATER from WATER INTAKE
- Heavy Equipment operating near spill shore

Under "100 Road":
- Stump of fill at culvert outlet above Cedar River
- Quarter mile long series of tension cracks

Under "200 Road":
- Tension cracks above a creeping slope near Chester Morse Lake
- Relocate road into fill on solid ground
- Stumps
- Landslide in rocky cut slope

1476-001 and -002 Comments noted.

Prior to adopting the "Habitat Conservation Plan" SPU was logging like crazy in the watershed. I am happy that commercial logging has been stopped. However the BPA will cut less than 1/10 of one percent of the watershed area for the new transmission line corridor. If this was before the adoption of the "HCP" the cutting of trees would not have been an issue. The way SPU had been managing the watershed is a classic example of poor management, bureaucracy and shortsightedness. Now the precautions SPU is demanding the BPA takes in the construction of the new transmission line is HYPOCRISY!

Sincerely,
Jon Zak
PO Box 651
Hope, WA

1476-003 and -004 Comments noted.
1476-005 Comments noted.
1477-001 and -002 Comments noted.
1477-003 and -004 Trees are a valuable resource irrespective of where they would be located. BPA would minimize clearing for the project to the maximum extent possible.
1477-005 Comments noted.
1477-006 Comments noted.
1477-007 and -008 Comments noted.
1477-009 and -010 Comments noted.
1477-011 and -012 Comments noted.
1477-013 BPA’s environmental analysis on the proposed project addresses impacts on the human environment, which includes both the social as well as the natural environment. BPA does not rate wildlife habitat inside the CRW more important than habitat for wildlife and humans outside the CRW.
1477-014 Comment noted.
1477-015, -016, and -017 Comment noted.

From: Zak Jon [Jon.Zak@METROX.GOV]
Sent: Monday, February 24, 2003 9:36 AM
To: Lou Driessen
Cc: Gene Long, Comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Line Project

Dear Mr. Driessen:

My wife and I live on 2 ½ acres in a development of about 100 homes in Hobart. The water in our development is supplied by “Codar River Water & Sewer”. They buy their water from Seattle Public Utilities. Because we drink Seattle water, we too expect clean water. Our eastern property boundary will be the centerline of the proposed transmission line right of way for Alternative “C”. We would lose the trees on one quarter of our property. These trees are in a native growth protection area. Our trees range in size from 2-1/2 to 5 foot in diameter. I doubt there are trees this size in the lower watershed. Aren’t our trees as important as trees in the watershed? Alternative “C” would completely destroy our privacy and our views of magnificent trees in our backyard. It would destroy our experience of living in nature. This was the reason we bought this property.

I would like Seattle Public Utilities to answer these three (3) questions:

1. Where is the evidence that BPA has caused any harm to water quality or watershed operation in its 30 years of operating a power line in the watershed?

2. What evidence does Seattle have that clearing an additional 80 acres for a second power line is more damaging to water quality than failure to replant the 600 miles of logging roads already in the watershed? The total acreage of 600 miles of logging road is almost 1,900 acres. An additional 80 acres for a second power line is only 4% of the acreage of the logging roads already in existence in the watershed.

3. Clearing 80 acres of second or third growth forest for an additional power line would require less than 1/10 of 1 percent of the watershed total acreage of 90,240. How can this small an amount of clearing have any impact on water quality?

The “Habitat Conservation Plan” is a great idea. Too bad the Habitat Conservation Plan was not an idea of the City of Seattle. The City was forced to create a Habitat Conservation Plan to meet the requirements of the Endangered Species Act. How about the habitat of people living along Alternative “C”. Is wildlife habitat inside the watershed more important than habitat for both wildlife and humans outside the watershed? The people who lose their property will be paying the price for Seattle’s water. The City of Seattle will destroy the rural communities of Hobart and Ravensdale; all due to unsounded water quality issues. I wonder how history will look back at this?

1477-015 Alternative “C” would clearcut approximately 250 acres of private property for the new powerline right of way. How would any property owner in the Hobart/Ravensdale area be reimbursed for the aesthetic loss in property value due of this new right of way? This public right of way should be located on public property! The routing that BPA is proposing for Alternative “C” is ludicrous!!!

Thank you,

Sincerely,

Jon Zak
PO Box 551
Hobart
Alternative B7 passes over hundreds of individual residences. I can not speak for others, but I would never purchase a home under or near a 500 KV line. It is not fair to add this 500 KV line on any established neighborhood. I don't know how anyone could put a price on the reduction in property value and the aesthetic loss caused by this proposed line. I believe this proposed 500 KV line would result in a flood of lawsuits from the affected landowners.

I believe that any new route should pass through the watershed. There are existing transmission lines in the watershed already. This is the shortest route. There are fewer homes to pass over. The watershed has already been logged extensively. I have hiked up McMillan more times and every time I am shocked by the devastation I see in the watershed. Loss of streams, Any small stands of old growth timber could be easily avoided in the routing of the new line. This route would be less expensive for the BPA and would save money for all users of BPA power. A route through the watershed would not affect the adjacent communities. I can't understand why anyone in Seattle would be concerned with an additional transmission line in the watershed. How many people from Seattle have even visited the watershed? How much damage would a few more transmission towers do to a 90,000 acre watershed create.

I have been in the Sultan Basin Watershed. It is the watershed for the City of Everett. After signing in at a checkpoint anyone can visit the Sultan Basin Watershed. They even allow fishing and the use of canoes, kayaks and even electric powered boats on Spada Lake. This watershed is also heavily logged and there are clear cuts everywhere.

It's time to quit the politics and let the BPA run the line through the watershed!!

Sincerely,

Zak Jon
PO Box 791
Shoalton, Washington 98025
E-mail: jon.zak@juno.com
E-mail: jon.zak@metrokc.gov
Kuehn, Ginny - DM-7

From:  Zak, Jon [Jon.Zak@METROKC.GOV]
Sent:  Monday, February 24, 2003 9:39 AM
To:   Lou Driessen
Cc:    'Gone Lynam', 'Comment@lpa.gov'
Subject: Kewlley-Echo Lake Transmission Line Project

---Original Message---
From:  Jon, Zak
Dear Mr. Driessen:

I did a survey of the trees in our backyard. All our trees are second growth. These trees are in the right
of way for the proposed Alternative "C". All of these trees will have to be logged for the proposed
powerline right of way. The trees I measured ranged in diameter from 22 inches to 60 inches. A sixty
inch diameter tree is 5 feet! Are there trees this size in the lower watershed? Here is a partial
inventory of our larger trees:

<table>
<thead>
<tr>
<th>Tree</th>
<th>Diameter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cedar #1</td>
<td>31 inch</td>
</tr>
<tr>
<td>Cedar #2</td>
<td>47 inch</td>
</tr>
<tr>
<td>Hemlock #3</td>
<td>22 inch</td>
</tr>
<tr>
<td>Cedar #4</td>
<td>56 inch</td>
</tr>
<tr>
<td>Cedar #5</td>
<td>60 inch</td>
</tr>
<tr>
<td>Hemlock #6</td>
<td>25 inch</td>
</tr>
<tr>
<td>Cedar #7</td>
<td>44 inch</td>
</tr>
<tr>
<td>Fir #8</td>
<td>31 inch</td>
</tr>
<tr>
<td>Cedar #9</td>
<td>51 inch</td>
</tr>
</tbody>
</table>

To compute the diameter I measured the circumference of these trees at four (4) feet above ground level
and then divided by 3.1416.

1479-001 Comment noted.

1479-002 Aren't our trees as important as trees in the watershed? Our trees are very important to us!
These trees are one of reasons we purchased this property. If these trees are logged our view would
become transmission tower or transmission wire. These trees are worth a great deal more to us than
the market value we would receive from the BPA. Our trees are the "crown jewels" of our
property!! There is no reasonable amount of money that could reimburse us for the aesthetic loss
of these trees!!

1479-003 Comment noted.

1479-004 Comment noted.

Sincerely,

Jon Zak
PO Box 551
Hobart, WA  98025
BPA’s Non-Transmission Alternative (as presented in the SDEIS) isn’t complete or comprehensive enough and fails to be a feasible and legitimate alternative as legally required. BPA’s SDEIS appears to review only a handful of those possible Non-Transmission Alternatives and has admitted to failing to produce anything comprehensive because of lack of time. We’re encouraging you to take the necessary time.

Biodiversity Northwest requests a more thorough examination of a Non-Wires Alternative to obviate the need for a power line. The first draft of the Non-Transmission Alternative was not a sufficient proposal.

We request that BPA not assume a $25 million limit (cost of Watershed route) when researching the Non-Transmission Alternative — as BPA has done when figuring available dollars for a Non-Transmission Alt. (BPA has not used this dollar limit on any other route.) Tom Foley says that you’ll need to plan for future legitimate Non-Transmission alternatives soon and conduct a more comprehensive Non-Wires analysis, factor in money allowed for future studies NOW.

If you’re assuming “worst case scenarios” on the winter crisis (1 in 20 year chance for Arctic cold) and using them as the foundation of all your charts and the basis for your much-needed power line through the Watershed, then also figure in the “worst case scenario” costs of violation of the City of Seattle’s clean water supply that would cost BPA $110 million to replace. Be consistent about our “risk potential” when you run your numbers.

Biodiversity Northwest also encourages BPA to follow the legal procedures as stated in the NEPA process which require the agency to seriously study all feasible alternatives and to be in compliance with scoping comments that request specific studies. The SDEIS, at first look, seems to fail in this regard, refraining from any feasible Non-Transmission Alternative that is more comprehensive, incorporating Entitlement negotiations, Demand Response programs, Demand-Side Management programs, Generation & Distributed Generation, Regional Availability of Natural Gas, Existing Distributed Generation, New Distributed Generation, Renewable Generation and emerging technologies.

BPA believes it has followed the required NEPA procedures. In response to public comments, we prepared a SDEIS to consider additional alternatives not considered in the DEIS. In the SDEIS, we considered a reasonable array of non-transmission alternatives.

Double-circuit construction on the entire project will not meet the purpose and need. See response to Comment 1421-039-001 and Section 2.3.8 of the SDEIS.

BPA has undergone formal consultation with the USFWS. We also conducted focused surveys for spotted owls last year, and are conducting them again this year. Thus far, no spotted owls have been detected in the action area. The USFWS has determined that this project does not jeopardize the continued existence of spotted owls, and that the take attributed to this project is minimal. Our proposed mitigation would ensure that more potential owl habitat is protected if the project is built, compared to the No Action Alternative.
The preferred alternative (the Watershed) is an option only if BPA adheres to the following:

- Double-Circuit wires on entire project (no widening of path necessary)
- Spotted Owl Habitat issue resolved and mitigated (Biodiversity Northwest is as concerned as USFWS is on potential adverse effects to Spotted Owl habitat. This issue has not gone off our radar screen until we hear otherwise from USFWS.)
- Legal and binding commitment on any Mitigation Package with Seattle
- Develop legal contract that prevents BPA from entering Watershed in future.
- Remove roads in Cedar River Watershed after construction is finished.
- Acquire lands to add to Watershed to mitigate for removal of trees.
- Fund the replacement of a City Filtration Plant if you cause a violation (as noted in the WA State Dept. of Health standards) in the City of Seattle's water supply.

With the Watershed as BPA's preferred alternative, how is the City of Seattle, environmental groups and local citizens expected to believe the promises put forth in any BPA administered mitigation package if it is not legally binding? We understand from BPA's track record (e.g., the Columbia River) that the agency prefers to refrain from any legally binding commitment at all. How then can we believe anything that you offer at the negotiating table unless BPA will agree to sign under the legally-binding line? Biodiversity Northwest encourages BPA to discuss a mitigation package with the City only if BPA is willing or be held accountable for their alleged promises.

Biodiversity Northwest is still requesting a 30 day extension (until April 1) to provide adequate opportunity for public comment to be thorough and comprehensive. Without that 30 day extension, BPA (it appears) is trying to grease thorough scrutiny of their Supplemental Draft Environmental Impact Statement.

Submitted by

Michael Shank
Outreach Director
Biodiversity Northwest
4649 Sunnyside Ave N. #321
Seattle, WA 98103

BPA is in the process of finalizing a Memorandum of Agreement with Seattle that contains a description of the mitigation we have agreed to provide for this project. This is a legally binding document.

The MOA prohibits BPA from building new rights-of-way within the CRW. However, BPA has retained the right to make improvements (e.g., upgrades) within the proposed right-of-way for this project.

BPA will maintain the roads in the CRW that it uses in good working order. However, the CRW contains hundreds of miles of roads that were built to log timber and for other purposes, and are unrelated to any of BPA's projects. Therefore, BPA does not believe it is our responsibility to remediate or restore impacts created by others. However, in one instance, BPA has agreed to abandon 0.6 mile of BPA road.

Concerning the acquisition of lands outside the CRW, please see response to Comments 1415-003, -004, and -005.

Currently there is no water filtration plant on the Cedar River water supply, so replacement is not possible. BPA would purchase an insurance policy to cover the cost of a filtration plant in case a filtration plant would need to be constructed due to impacts from this project. It is unlikely that this would occur because of impacts from this project.

See response to Comment 1481-007. See response to Comment 1481-007.

See response to Comment 1421-038-001.
1482-001  BPA determines the height of its transmission lines by maintaining a safe clearance between the phase conductors and ground and other points such as other power lines, communication lines and roads. Raising lines is not economical and can cause safety problems for air traffic. Additionally, there are visual impacts that have to be considered. Right-of-way widths are determined by calculating how much the conductor swings and keeping a safe horizontal clearance to objects not on right-of-way such as buildings. Raising the line would not necessarily reduce the right-of-way width needed.

See also response to Comment 340-002.

1482-002 and -003 There will be some increase to the amount of roads due to the very short new “spur” roads needed to get to individual tower sites. Other new road segments are needed to bypass wetlands that existing road segments go through. BPA is in discussions with Seattle concerning the potential of closing more roads within the CRW. Concerning Seattle’s electric rates, BPA’s study of non-transmission options indicates those options at best would delay the need for this project by only two to three years making these non-transmission options not viable.
1483-001 and -002 The BPA as specified under the EPA rules pertaining to stormwater discharges into surface water bodies (40 CFR 122-124), shall obtain an NPDES permit for construction activities, including clearing, grading, and excavation, that disturbs one or more acres of land. Under Section 402 of the Clean Water Act, federal facilities (or projects) are subject to these permitting requirements. Administration of this program has been delegated to the State, however, for federal projects, EPA administers this program. BPA as a federal agency, will obtain a general NPDES permit from EPA Region 10. BPA will prepare a project specific Storm Water Pollution Prevention (SWPP) plan. This plan helps ensure that erosion control measures would be implemented and maintained during construction. It also addresses best management practices for stabilization, stormwater management, water quality monitoring, and other control measures. Additionally the SWPP plan contains a site-specific Spill Prevention, Control and Countermeasures (SPCC) Plan, that covers the project scope of work (including equipment, materials, and activities). Refer to Comment Letter #394 - Appendix A. Section 1.1.1.4 Storage, Assembly, and Refueling Areas, and 4.5.2.1.

1483-003 Please also see response to Comments 1420-001 and -002. A new transmission line does benefit the general public including those property owners who are directly impacted. The cost of a new power line are added to the cost of electricity people throughout the region buy. As the cost of the project goes up, so do the rates people pay for their electricity. BPA seeks the least cost alternative that has the least overall impacts. BPA has determined Alternative 1 through the CRW is its preferred route as having the least overall environmental impacts and the least overall cost.
Chapter 3 — Comments and Responses - SDEIS

1484-001 and -002  Comment noted.

1484-003 and -004  In actuality, the maintenance costs, based on present worth, are not a large cost contributor for comparison analysis. The CRW does provide protection for the transmission lines, but the special care BPA maintenance crews will need to take to preserve/enhance wildlife habitat and to protect water quality in the Cedar River and Rock Creek more than make up for any savings BPA would see as a result of security within the CRW.

1484-005 and -006  The increased costs for going through the CRW are based on mitigation for removing timber covered by Seattle's HCP and for mitigation for potential impacts to Seattle's drinking water source. BPA has included mitigation measures for the other routes based on the type of potential impacts they would have to wildlife habitat and other resources.

1484-007  Please see response to Comments 1420-001 and -002.

1484-008 and -009  The SDEIS provides general socio-economic impacts of the proposed transmission line for all route alternatives. Please refer to Section 4.11.2.5, Community Values and Concerns, Property Value Impact. If the Record of Decision identifies that the construction alternative has been selected along a specific route, then specific appraisals will be prepared for the land rights needed.

1484-010, -011, and -012  See response to Comments 1484-008 and -009.

1484-013  BPA staff appraisers are not required to be state certified. However, all BPA staff appraisers have chosen to be state certified. BPA staff appraisers follow the Uniform Standards of Professional Appraisal Practices and follow all applicable federal guidelines. Also see response to Comment 1429-021-001. If BPA needs to acquire land rights across your property, and you disagree with BPA's opinion of fair market value, BPA would be willing to review any additional market data that you may have, or review recent appraisals of your property. You may also choose to use the condemnation process, and have the courts establish Just Compensation for your property.

1484-014  Comment noted.

1484-001

Comment noted.

1484-003

In actuality, the maintenance costs, based on present worth, are not a large cost contributor for comparison analysis. The CRW does provide protection for the transmission lines, but the special care BPA maintenance crews will need to take to preserve/enhance wildlife habitat and to protect water quality in the Cedar River and Rock Creek more than make up for any savings BPA would see as a result of security within the CRW.

1484-005

The increased costs for going through the CRW are based on mitigation for removing timber covered by Seattle's HCP and for mitigation for potential impacts to Seattle's drinking water source. BPA has included mitigation measures for the other routes based on the type of potential impacts they would have to wildlife habitat and other resources.

1484-007

Please see response to Comments 1420-001 and -002.

1484-008

The SDEIS provides general socio-economic impacts of the proposed transmission line for all route alternatives. Please refer to Section 4.11.2.5, Community Values and Concerns, Property Value Impact. If the Record of Decision identifies that the construction alternative has been selected along a specific route, then specific appraisals will be prepared for the land rights needed.

1484-010, -011, and -012

See response to Comments 1484-008 and -009.

1484-013

BPA staff appraisers are not required to be state certified. However, all BPA staff appraisers have chosen to be state certified. BPA staff appraisers follow the Uniform Standards of Professional Appraisal Practices and follow all applicable federal guidelines. Also see response to Comment 1429-021-001. If BPA needs to acquire land rights across your property, and you disagree with BPA's opinion of fair market value, BPA would be willing to review any additional market data that you may have, or review recent appraisals of your property. You may also choose to use the condemnation process, and have the courts establish Just Compensation for your property.

1484-014

Comment noted.
February 26, 2003
To: Lou Driessen
BPA - RC-7
PO Box 12999
Portland, Oregon 97299

Re: Kangley/Echo Lake Transmission Line

Dear Mr. Driessen,

This letter is in response to the EIS for the proposed Kangley/Echo Lake Transmission Line.

Before building the proposed 9-mile long transmission line through the Cedar River Watershed, I urge you to consider other alternatives, including energy conservation programs, revising contracts with Canada and other electrical system changes.

This transmission line will severely impact forests, wetlands and other wildlife habitat and corridors in the Cedar River Watershed. Salmon in the Cedar and Raging Rivers may be affected as well as the quality of the drinking water source.

If the Bonneville Power Administration does in fact decide to build the transmission line through the watershed, BPA must fully mitigate for the impacts of a new line and propose specific steps to achieve proper mitigation for this project.

Proper mitigation for any new or expanded corridor should include acquiring and protecting nearby forestland. Since there is not adequate ancient forest left in the area to acquire that is equivalent to the quality of forest proposed to be clear cut for the transmission line, it is necessary to increase the amount of lesser quality forest acquired. Since this is BPA's mitigation project, these forest lands need to be purchased with funds from BPA's budget and should be factored into the total cost of the transmission line project. These lands should include:
- 400 acres along Raging River near Highway 18 and
- 600 acres near the Cedar River (Section 25, owned by Plum Creek Timber Co., and subdivided for development).

To protect riparian forests, a mitigation plan should also include raising the height of lines and minimizing the width of the clear cut corridor by placing 2 circuits on each tower over the Raging & Cedar Rivers. To minimize the impact of construction, the installation of towers should be done by helicopter, and no new roads built.

Finally, the mitigation project should address eradication of weeds, such as Scotch broom, that migrate into the area as a result of clear-cutting. Native plant restoration should occur in areas previously inhabited by weeds.

Please consider other options to building a transmission line through the watershed. If these alternatives are considered and BPA still decides to build a transmission line through the watershed, they must do so with the least impact, the proper mitigation plan and they must factor the costs of mitigation into the costs of the project.

Thank you for your time and consideration.

Sincerely,

Kristen Paynter
construction. Maintenance of both the existing corridor and the proposed corridor would include yearly monitoring for noxious weeds and the treatments prescribed. The following treatment methods would be used to control the spread of noxious weeds: machine cutting, hand cutting, pulling and re-planting with native plant species and or grasses. Outside the CRW, herbicides may be used with the permission of the landowner.

1485-010 BPA has considered other alternatives to building a transmission line. See Chapter 2 of the SDBS.

1485-011 Comment noted.

1486-001 and -002 Comment noted.
BPA would replace some existing roads within the Cedar River Watershed that currently go through wetlands with new roads that would bypass wetlands. No fill would be placed within wetland. The roads replaced would be made such that vehicles could no longer traverse them and would have to use the new roads. BPA would also make it such that one particular road on the north side of the watershed, just outside the watershed, could no longer be used by the public. No additional roads outside the watershed would be decommissioned. BPA is in discussions with Seattle on potential other roads that could be decommissioned within the watershed.

Comment noted.

BPA would replace some existing roads within the Cedar River Watershed that currently go through wetlands with new roads that would bypass wetlands. No fill would be placed within wetland. The roads replaced would be made such that vehicles could no longer traverse them and would have to use the new roads. BPA would also make it such that one particular road on the north side of the watershed, just outside the watershed, could no longer be used by the public. No additional roads outside the watershed would be decommissioned. BPA is in discussions with Seattle on potential other roads that could be decommissioned within the watershed.

Comment noted.

The insurance has a limit of $105 million. This was the estimated cost of building a water filtration plant designed to meet the Cedar River Watershed's requirements.

Comment noted. Please see Chapter 2 for information on BPA's conservation programs and funding and Appendix J for information about non-transmission alternatives.
Comment noted.

Comment noted.

Comment noted.

BPA and SPU are working together to control the spread of noxious weeds in the existing corridor and will continue to work together in the future on the proposed corridor. The existing corridor has had little or no effect on water quality in the CWR.
BPA has begun to recognize the seriousness of the impacts this project would have, but should acknowledge the effects of cumulative impacts of transmission lines crisscrossing the forests of this region. Contrary to BPA’s impression that this project poses low impacts to ecological and cultural resources, the cumulative effects of this and other BPA lines is significant. When combined with other loss of forest, these effects become quite significant.

Alternatives
Appropriately, the new document looks at additional alternatives. Some of these would run through Maple valley, which would severely impact rural lands. Others would impact forests across the Cascades. All of the construction alternatives have serious impacts. None should be constructed as proposed.

We strongly oppose the preferred alternative, due to its huge impacts on the ecosystem and a municipal watershed. We are also opposed to Alternative C as it has unacceptable impacts on forests and rural communities. Alternative D also has unacceptable impacts on ecological, recreational and community resources.

Alternative B, by rebuilding in the existing corridor has fewer, but still significant impacts on those resources. Alternative A, by primarily using existing corridors, has less impact on residential areas than C. Double-circuiting all or most of the proposed route would be a better choice than most of the other alternatives.

BPA has still not demonstrated a compelling need for construction of a new line at this time. BPA must seriously consider the conservation/load management alternative, at least in the near term.

Mitigation
If BPA pursues a construction alternative, it must fully mitigate for the impacts of constructing and maintaining a line, whichever route is selected. This a required element of any federal project. Earlier, BPA had failed to provide adequate mitigation, thereby avoiding the true costs of alternatives. This is only partially corrected in the SDEIS. Additional measures are described, but some are inadequate or only vaguely mentioned without specifics. These must be explicitly described in the FEIS with binding provisions. In addition, all alternatives should be treated equitably in achieving a high standard of mitigation.

In other cases, these measures are actually standard practices (sometimes called best management practices or BMPs) and not really project mitigation measures. They do not fully offset, reverse, or rectify the impacts of constructing the proposed project. Thus, BPA’s suggestion that “maintaining environmental quality” and “minimizing impacts” are two of the purposes of this project is not convincing.
Habitat
BPA cannot externalize the costs of this project, as it has done with previous lines, and mitigating for habitat losses from powerlines is required. The loss of the forest is more than just a loss of timber revenue. It is a permanent loss of habitat that is rapidly disappearing - especially in the foothills of the Cascades in King County. The cost of such replacement must be included in the total cost of the preferred alternative, then compared among the alternatives. The sale of timber by the underlying landowner does not mitigate the long-term impacts of logging. Past practices of ignoring the permanent loss of forest are no longer acceptable.

The Cedar River watershed encompasses a unique lowland forest that will be protected in perpetuity, thanks to the City of Seattle’s vision and commitment. Surrounding remnants of the original forest, the second growth has been growing and developing for up to 100 years. Nowhere else in the county will we see such ancient forests - at low elevation and in large blocks. This is also a critical ecological connection to Tiger Mountain and Rattlesnake Ridge. Many forestlands in the Cedar River Watershed will approach old growth status with proper land management. While lands in the Raging River may be managed for timber, they will still provide age classes of over 40 years. In the powerline right of way, trees will never exceed a few years old. Due to conservation easements being developed in that valley, it should not be converted to urban uses. This and its location make this valley particularly significant for forest ecosystem conservation. Thus, BPA should mitigate for the difference in this type of forest, by acquiring and conserving for forestry an equivalent amount of land that would otherwise be converted to non-forest uses.

The impact of the BPA line will be in perpetuity, therefore the mitigation must be in perpetuity. The only reasonable solution is that BPA must replace the lost habitat.

The SDEIS alludes to acquiring replacement forest to mitigate for forests cut for the new line, but offers no specifics on location, size or quality. How can a reviewer determine if the mitigation is adequate for an alternative when there are no specifics? Construction is carefully spelled out and the mitigation is just a vague promise. Personal conversations with BPA staff indicate forest mitigation is planned only for the Cedar River portion. The Raging River is ignored, despite a long stretch of the proposed line bordering and then crossing the river. Clearcutting this close to a river is just not acceptable today.

We have previously suggested lands that would be good candidates for offsite mitigation for loss and fragmentation of forests. At a minimum, mitigation should include two tracts. One is section 25 just south of the watershed. The other is protection of about 300 acres of lands along the Raging River where the lines parallel and/or cross the river. The latter would not only help to mitigate forest and impacts, but river and fisheries impacts as well. The Final EIS should be
specific, stating that at least these lands will be acquired and managed to develop late-successional forest characteristics.

It is disturbing that we have heard that BPA is looking at Land and Water Conservation Funds or Forest Legacy funds to acquire some of the replacement habitat land. These funds are limited and are for pro-active conservation, not to pay for required mitigation for a federal project. This is a BPA project with BPA impacts and mitigation must be paid for by BPA--not robbing other critical conservation projects.

BPA has committed to combining the new circuit and existing circuit on one set of towers where they cross the Cedar River. This addresses a critical need. However, the same approach should be taken at the Raging River crossing.

The height of transmission lines at Cedar and Raging River crossings should be high enough to allow late successional forest to grow to 200' tall in the riparian zone of the river and to mature heights on the slopes above the river bottom. Given the topography on either side of the river, that should be feasible. BPA should also increase the height of the towers in that vicinity.

Water Quality

The proposed mitigation for the Cedar River watershed route includes efforts to prevent toxic material entering the river. This is appreciated, but the standard for a municipal watershed must be high. Extraordinary provisions are needed. We support the City of Seattle’s efforts to protect the water supply. There are also risks to the salmon and water quality of the Raging River, and appropriate mitigation should be applied to any activities in that valley, including the expansion of the substation.

Vegetation Management

The EIS contains vague language about best practices for vegetation management. This should be replaced with solid objectives of types of habitat and timeframes for achieving success. This should include eliminating Scotch broom and other invasive weeds, restoring native habitat of varying types and initiating work simultaneously with construction.

Without the changes noted above, our opposition to this project will continue. Thank you for this opportunity to comment. Please keep us apprised of any actions related to the project.

Sincerely,

/\ Charles C. Raines
Director
Cascade Checkerboard Project

See response to Comment 1423.

See response to Comments 1485-006, -007, and -008.

See response to Comments 1485-006, -007, and -008.

See response to Comment 1485-009.

See response to Comment 1485-009. We may not be able to initiate work at the same time as construction. However, there are practices such as putting down straw and seeding with grasses that could reduce the spread of noxious weeds. Hydoseeding may also be an alternative.
We are concerned about the proposed 500-kV power line being built so close to our house. Our water source is supplied from a well that is right next to the proposed right-of-way. How is this going to affect our water? After talking to our real estate agent and home appraiser, this would have a huge effect on the current value of our home and we would like to know if we will be compensated for the value loss? We will have to live with consistent noise levels. This large power line will create. We have aesthetic concerns and don’t want to look out my back door at this huge steel tower. We are also concerned about the health risk from being exposed to such a high level of EMF.

Please contact us if you have any further questions/answers about your concerns. Phone # 360-484-7522 or 253-760-1194

Thank You

Charles A Taylor
Maria K Taylor
Chapter 3 — Comments and Responses - SDEIS

1. Please have your environmental studies look at:

2. I need more information about:

3. I have these other comments:

   WE HAVE 2 TRANSMISSION LINES NEAR OUR HOME, AND WE DO NOT WANT ANOTHER. WE ARE CONCERNED THAT OUR PROPERTY VALUE WOULD DECREASE THAT IT MAY CLOSE US TO COUNCIL MEETINGS. THERE ARE JUST TOO MANY HOMES IN THIS AREA.

   THANK YOU.

☐ Please put me on your project mailing list. (You are already on the mail list if you have already mailed notice.)

Name: JEFF JACOBS
Address: 18815 S 287 ST Kent 98042
E-Mail Address: JACOBSWGO@ATTBI.COM

Please mail your comments by March 1, 2003 to:

SONOVALE POWER ADMINISTRATION
Public Affairs Office - BC
P.O. Box 13969
Portland, OR 97211

1494-001, -002, and -003 See response to Comments 1484-008 and -009.
To Whom It May Concern:

Hello, my name is Beth Hamilton. I am a fifth grade teacher at Woodridge Elementary School in the Bellevue School District in Bellevue, Washington. In school, we had a botanist from the Cedar River Watershed come talk to our 5th graders about the watershed. We also will visit and learn about the watershed in March. In addition, as a school we do "stream team" which is a project to help the city of Bellevue keep the streams safe and clean for the salmon in the fall.

Therefore, my students are very knowledgeable and have strong feelings about our natural resources and natural areas. As a teacher and a resident of the area, I am concerned about a power line being placed in the sacred area of the watershed, as are my students.

To further our learning inside and outside of school, my students have compiled information and opinions about the power line being put through the watershed. They have written letters to you, the Bonneville Power Administration, to voice their concerns. I hope you take the time to read and listen to their concerns. They may only be 10 and 11 years old, but they have great ideas and insight! Thank you for taking the time to read our letters.

Sincerely,

Beth Hamilton
Teacher

P.S. Replies can be sent to my name at the above address.

1495-001, -002, -003, and -004 Comments noted. We appreciate the time your students took writing to us. BPA is committed to protecting the CRW if a decision is made to implement Alternative 1.
To Whom It May Concern,

Hello, my name is Christie. I am in the fifth grade at Woodridge Elementary school. A little over a week ago we had a guest speaker come talk to us. He talked to us about how you and the rest of B.P.A. are thinking about putting a power line through the Cedar River Watershed.

I think that is a bad idea! Why I think that is a bad idea is because you will clear cut 90 acres of trees. It is like all of a sudden someone cuts your house down so they can have more power. Would you like that? I don’t think anyone would like that! Even though they are animals, they still have feelings!

Another very important thing that building a power line could do is pollute the water we drink! Do you want water that is clean and fresh or more power? We can live without power, but we can’t live without water. We need it to be clean so we don’t get sick! I want the water to clean! I think everyone else wants clean water too!

Well, I hope my letter helps you change your mind! If you end up building the power line I hope you do things to protect the animals! The man who came and talked to us said it could cause a landslide so maybe you could do something to prevent that from happening! So, I hope that you take some of my advice and think about this decision carefully! Thank you for reading my letter, it means a lot to me!

Sincerely,

Christie Melby

1496-001, -002, -003, and -004 BPA is committed to protecting the drinking water in the Cedar River and the animals that use the Cedar River Watershed. Though BPA needs to clear trees for the right-of-way, clearing and then planting with species useful for forage for deer and elk will benefit these animals. We will consider your comments and all the comments received on this project carefully.
To Whom It May Concern,

Hi! My name is Abigail. I am in 5th grade and go to school at Woodridge Elementary. One day a man named Clay Antieau, from the watershed, came to talk to us about the Cedar river watershed, and that’s why I am contacting you. When Clay left I got concerned about the power lines going through the watershed. I am concerned that this will hurt the animals and might make a fire.

I am worried about you putting in a power line because it might hurt the animals that live there. You might hurt the animals that live there because you would have to clear cut 90 acres of trees. That’s where birds live! They would then need to find a new habitat where you’re replacing them with power lines! I felt that the animals should be able to keep their homes... besides they were there first!

When you put in the power lines I am worried that it might start a fire. If a fire would happen, animals might die and their homes would be destroyed. I feel that the animals should be kept safe with no threats from the power line.

As you probably can tell, I am very concerned about you putting in a power line through the watershed wildlife system. I have some questions that might concern you putting in the power lines. How many power lines are you going to put in there? Why don’t you put the power lines through the city? Why don’t you build it around the watershed? Why don’t we vote?

And why don’t we conserve the energy? Thank you for listening to my letter.

Sincerely,

[Signature]

1497-001 BPA is proposing to construct one transmission line next to the existing BPA line through the watershed. BPA supports many conservation programs throughout the Northwest and has done a study that suggests that not enough energy could be conserved to remove the need for this new line. See Section 2.2.9 and Appendix J of the SDEIS.

1497-002, -003, and -004 BPA is concerned about potential impacts to wildlife and will purchase other lands that will be preserved for wildlife.

BPA is required to have firefighting equipment on hand during construction and will comply with any fire restrictions if there is high fire danger during construction.

BPA did consider other alternatives that would be build around the watershed, including alternatives that would require removing homes. Our preferred alternative was selected because, overall, it has the least potential environmental impacts.

1497-005 Thank you for your comments.
Chapter 3 — Comments and Responses - SDEIS

To Whom It May Concern,

My name is Grace Gunarso. I am in the 5th grade at Woodridge Elementary School in the Bellevue District area. We had Clay Antieau, from the Cedar River Watershed, talk to us about the Watershed. I think that putting a powerline through the watershed would make the water dirty and could cause a fire.

It will cause a fire because trees might fall to the power line. For example the fire might go through any city and burn it down. I feel that we could lose a lot of electricity by the fire.

It could make the water dirty if the power line fell in the water. For example when it rains the dirt could go in the water. So if we drink the water it will not taste good as it was before.

I think it is not a good idea because it could make the water dirty or you could cause a fire. You could do half underground and half above ground. Or, you could make it through the city. Thank you for reading my letter.

Thank you,
Grace Gunarso

1498-001

1498-002

1498-003

1498-004

Thank you for your comments. BPA has had a transmission line in the Cedar River Watershed for over 30 years. This existing line has not caused dirty water or a fire. BPA is required to cut trees that might be a danger to the line. These “danger trees” need to be cut so that what you are concerned about will not happen.

BPA has considered putting the line underground, but it is very expensive and so it is not being considered. BPA also is considering putting the line through neighborhoods outside the Cedar River Watershed. These other routes also have impacts to people and wildlife.
Chapter 3 — Comments and Responses - SDEIS

1499-001, -002, and -003 Thank you for your comments. Please see response to Comment Letter 1498.

Trees that might pose a danger to the transmission line must be cut for safety reasons. Though trees would be cut, there are other trees close to the area and animals would likely move to those trees for shelter. BPA is proposing buying other land that would replace the wildlife habitat impacted by the proposed line. That land could not be developed and would provide habitat for animals forever.

To Whom it May Concern,

Hi my name is Danielle. I’m in 5th grade at Woodridge Elementary. I am writing to power because you want to put a power line through the watershed. I am here to tell you what I think about that. I think you shouldn’t put the power line through the watershed because you might hurt animals or kill trees.

I think it might hurt animals. For example, when you cut down trees you can kill birds, squirrels, and other animals that live in trees will also be hurt. This is not good because they won’t have homes.

I think it’s bad to cut down 90 acres of trees. This is bad because then we won’t have trees for shade and to block the rain. Less air destroys animal’s homes.

I think you should put the power line through the underground. This would save animals and trees by not cutting down trees or their habitats. Thank you for reading my letter.

Sincerely,
Danielle

[Handwritten Signature]
To Whom It May Concern,

Hello, my name is Julian. I am in 5th grade in Bellevue. My teacher is Mrs. Hamilton. A man from the Cedar River Watershed came to my school and told us about the watershed. I live here in Bellevue and I think you should not put the power line there because you can hurt the animals or kill the plants.

I think putting the power line through the watershed could hurt the animals when you chop the trees down. Bird’s homes will be destroyed, then they will have to move. I think the birds should be able to keep their homes because they put a lot of hard work into their nests.

I think you should not put the power line there because you will kill the plants when you chop trees down. The plants will die when you and the construction machines will walk and run over the plants and then they will have to grow again. It will take them a long time to grow and you will kill bugs that live in them. Some plants might be endangered plants too.

By putting a power line through the watershed you would be killing plants or hurting animals. Instead you could do it differently. You can build around the watershed or you can build under the watershed. Thank you for listening.

Sincerely,

Julian

1500-001, -002, -003, -004, and -005 Please see responses to Comment letters 1498 and 1499.
To Whom It May Concern,

Hi my name is Tyler. I'm 11 years old and I go to Woodridge Elementary school. We had a person from the watershed talk to us about what you want to do to the watershed. I think that putting a power line through the watershed is a bad idea because you could kill animals or cause a landslide.

I think putting a power line through the watershed could kill animals. You could kill animals by destroying rare animal homes. For example, you could kill animals and they might become instinct or kill animals that are illegal to kill.

If you put a power line through the watershed, then you could cause a landslide. If you cause a landslide then you will kill animals, destroy their homes, or mess up your plans for a power line.

Thanks for listening,

Tyler
Hello, my name is Mengan Cuthill. I am a 5th grade student at Woodridge Elementary School. I am writing to you because I have heard of your idea of putting in a line of power through the Cedar River Watershed. My classmates and I are very worried about this. I am concerned about you hurting animals that live there and killing 90 acres of trees.

Many animals and wildlife live at the watershed. If you build a power line through the watershed it would destroy animal habitats and they would not have anywhere to go. What if some people came up to you and said, “Oh sorry, but you can no longer live here because the people of Bellevue need more power.” What would you say?

Another thing, you would kill many trees and acres of plant life in the process of building the power line. Trees and plants are living creatures, not just us. It would also change the air we all breathe. All that for power.

I and others would feel very hurt if you put in a man-made structure. It would destroy tree and plant land. Also the animals would not have a place to live. So, please don’t put a power line through the watershed. Many people are concerned about your idea. Maybe you could build the power line somewhere else or we could conserve energy. Those are only a few ideas.

Thank you for your time,

Mengan Cuthill

Megan Cuthill
Hi, I'm Chaz. I'm a fifth grader at Woodridge Elementary. On Monday February 3rd, Clay Anstead came to our school from the watershed. He came to talk to us about how you want to put a power line through the Cedar River watershed. I have not been to the watershed before but I know that it's a well protected area. I am concerned about the power line going through the area. I am writing because you are going to wreck the animal's homes and pollute the water.

One reason is because you will force animals out of their homes and feeding areas. For example, you will destroy bird homes because they live in trees. Also you will most likely destroy their watering areas. I feel that this is wrong. I think that because you don't want to destroy people's homes but what about the animals homes? If you put your power line there they will have to find a new habitat. Do you even care about them?

One other thing that could happen is you could pollute the water system. For example, you might cause mud to slide into the water. I don't think that you should not put those huge man made structures through the watershed.

Please consider this. And please, make the right choice about the power line. Thank you for your time.

From,
Chaz DeMontrun
To Whom It May Concern,

My name is Eli. Recently someone came to my school to talk to us about the BPA building a power line through the Cedar River Watershed. He tried to convince my classmates and I that this would be a bad thing. I think it would be okay to do this, but here is an idea so the BPA doesn’t cut as many trees down. I love trees.

I think you should use helicopters to lift the parts you need for a power line to the sites you want to build the power line. Then you wouldn’t have to cut down trees to make new roads. There would be more habitats for the animals this way. Plus, trees provide oxygen and we need oxygen to live.

I love trees. Humans are important and we need electricity. On the contrary, animals need homes too. So we need to make an even balance. Put a power line through the Cedar River Watershed but try not to cut as many trees. Thank you for your time.

Sincerely,

Eli  
Eli

1504-001, -002, -003, and -004  Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

BPA is proposing to use helicopters for construction in the Cedar River Municipal Watershed.
Chapter 3 — Comments and Responses - SDEIS

1505-001, -002, -003, and -004 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

TO WHOM IT MAY CONCERN,

My name is Yuto and I am 10 years old. I go to Woodridge Elementary School. Mr. Antéau from the Cedar River Watershed came to Woodridge Elementary School to talk to the 5th grade students. He asked us if you should put a power line through the Cedar River Watershed.

I am writing to you because I think you shouldn't put a power line through the watershed.

One reason why I think you shouldn't put a power line through the watershed is that you are going to cut down 90 acres of trees. I think if you need to cut trees you shouldn't put a power line through the watershed. By killing trees, it could destroy animal homes.
For example, if we lose trees, birds, and bugs could lose their homes and that will hurt them. If I was a bird or insect I would not like losing my home.

If you put a powerline in, it could pollute the H2O. You could kill salmon and we drink that water. If we didn't drink water we would die. It would be sad to die and would not be good to drink polluted water.

If I was in the BPA, even if it takes lots of money, I would not build the powerline through the watershed. I suggest building it underground. It would be much better to not cut trees or do bad things to the animal habitat.

Sincerely,
Yuto
To Whom it May Concern:

Hi my name is Sterling. I'm writing because I heard that you want to put a power line through the Cedar River wetland. I don't think that is a good idea because it can hurt animals and you will cut down 90 acres of trees permanently. By cutting down trees it will destroy animals like squirrels and birds. homes. This is bad because then

1506-001 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.
they would have no need to live.

If you don't put the power line
through the water shed it will sure

animals by not destroying their home.

I don't think putting the power
line through the watershed is a good
idea at all. I hope you don't put the
power line through the water shed.

Thank you for reading my letter.

From,

Sterling
Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

1507-001, -002, and -003

To: BPR

I am a 5th grade student. Everyone on my
name is Robin Green. I am writing you because you want to put a power
line through the water shed. I think this is a bad idea because you are
gonna hurt people and hurt animals.

I think it would hurt animals because in order to put in the
in the power lines and pull you want to clear the access so trees permanently
That could hurt animals because you would have trees, bushes, and other
animals. The water that it runs by natural habitats and many pieces and more.

My conclusion is that it is a bad idea to put the power lines through
the water shed because you could harm the trees and hurt permanently. I also
think it is a bad idea to put the power lines through the water shed, the power lines
hurt water ways until its out of the water shed. Then put it above ground.

Thank you,
Robert Green
Hi my name is Tiffany and I am a fifth grader. I am writing this because I don't think you should put the power line through the Cedar River watershed because you can hurt the animals. It will hurt the animals because they would lose their homes and they could get hurt. For example, a bird could lose its home because you could knock its tree that it lives in.

I think instead of building the power line through the watershed I think you should build the power line around the watershed. I think that because we don't want you to hurt the animals.

Thank You,
Tiffany
Chapter 3 — Comments and Responses - SDEIS

1509-001, -002, -003, and -004  Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501

1509-001
1509-002
1509-003
1509-004

1509-001
1509-002
1509-003
1509-004

Hi my name is Kevin and I wrote to let you know that I think you should not let the power line through the Cedar River Watershed is polluted.

To Whom It May Concern,

Water — If you put the power line through the Cedar River Watershed is polluted.

Kevin
February 14, 2021

Please provide comments

1509-001, -002, -003, and -004 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501
Dear RPA,

My name is Joe Joe, Council 820, from Woodridge Elementary School. Mr. Habegger is a Botanist from the Watershed. He came to talk to us about the Watershed. I’m also a part of Stream Team, a group of kids that make sure the streams are clean. From what I see, putting a powerline right through the Watershed could kill lots of trees and probably pollute the water.

If you put the powerlines through the Watershed it could kill trees. When you have to go put your machines in you will have to cut down trees. The water needs trees because they give the water oxygen.

You could also pollute the water by making smoke and maybe electrocuting the water. If that happened, our water wouldn’t be healthy for us to drink. Our water needs to be clear because if it isn’t clear, we will get sick.

I don’t think you should put the powerline here, but I think I know a solution. You might be able to put the powerline half way above the ground and half way underground so you wouldn’t have to pay as much. Thank you for your time.

Sincerely,

Joe Joe

1510-001, -002, -003, and -004 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.
To Whom It May Concern,

Hi my name is Courtney, I am a fifth grade student at Woodrige Elementry. At school we had Clay Antieau come and teach us about the Cedar River Watershed. We learned all about the plant life and wildlife there. I am writing to you because I am concerned about the animals and polluting the water if you build a powerline through the watershed.

The watershed is filled with wildlife that has lived there for many years. Putting a power line in there might disturb their natural life style. They might not even want to live there anymore. There aren't many wild places like the watershed and I think for the animals sake, do not interfere with that natural place.

I am also concerned about the water. Clay told us it might cause a land slide. If the dirt gets into the water it could contaminate it. Some of the rarest salmon are being released into the rivers and lakes. If the water gets to dirty the salmon will die and so will many other fish, frogs, and insects.

I know we need energy but maybe if we used less we wouldn't need a power line. If we really need it, then we could build it around the watershed. Then it wouldn't bother any wildlife. I hope this letter gave you some other idea to get energy.

Sincerely,

Courtney
To whom it may concern,

Hello my name is Brian. I'm a fifth grader at Woodridge Elementary. I heard about the powerline going through the watershed. I think you should find a different way no matter what it takes. It's better then ruining the habitat of many animals. The animals make the watershed a natural area.

The animals make the watershed a natural place. If you put in a powerline, some animals would have to leave. This is bad because animals make the water better because the fish eat the bugs. If you put in a powerline you'll contaminate the water, the fish will die, the bugs will fill the water with eggs, and the fish won't be there to eat them. So, the water will be full of bug eggs, which is bad for the water.

Instead of making the powerline above ground, I suggest you put some underground. You could put the powerline so they're above ground until the watershed, then make them go underground through the watershed. It's the least frustrating way because it wouldn't be messing up the watershed. Thank you for taking time to read my letter.

Sincerely,

Brian
3-146

Chapter 3 — Comments and Responses - SDEIS

1513-001

To whom it may concern:

Hello, my name is Brian and I am a student at Woodridge Elementary. I am concerned about the power line going up and wouldn't want it going through the watershed. I learned about the water with stream team. As a class we go and check the water to see if it is good for the salmon. I learned about the watershed from a man named Mr. Antho, a botanist, from the watershed. I have two main reasons why I don't want the power lines going up. One, is that it could hurt or kill animals and second, is that the construction would pollute the water.

I think putting the power line through the watershed would hurt the animals! You would be hurting or killing them with man made structures that would be destroying their homes. For example, all the birds and squirrels would have to find new homes and habitats. You're cutting down 90 acres of trees. That's a lot of animal homes! This could kill the plants also that could be rare and hard to find. If I were an animal, I wouldn't want to find a new home and building an all new home.

The water will be danger too. It would either kill the fish or make them sick. This could mess up the food chain in the water. The fish also have to find new homes with different rivers until it all goes away. I hear that they are putting rare salmon in the river. This would pretty much wipe them out from the start! We, too, drink and use this water, this could hurt us. You could try to get it all out but then you would use too many chemicals to do that. I also feel strongly about this because it would not only make salmon die or find new rivers, but this could hurt us too!

So altogether it could kill animals, trees, fish, and pollute the water. I would hate for it to come up but if you had to, then maybe you could try to do it around the watershed. Or, half under ground and half on top to miss the watershed. You could even use other lines. Anything to keep this sacred area special.

Sincerely,

Brian

1513-002, -003, -004, -005, -006, -007, and -008 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.
Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . .

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments:
   
   a. The fish & wildlife in our area already benefit from a more viable habitat within the watershed. Outside the alkaloids, particularly along route A & C, the habitat is much more fragmented. A wetland is much more a need of protection of the limited fragmented habitat than the angled prairie habitat.

   b. Choose Alternative G through the watershed!
   
   Do not choose A = C - through fragmented habitat!

☐ Please put me on your project mailing list. (You are already on the list if you have received mailed notice.)

Name: Jeff Herrenhut
Address: 26337 SE 234th Ct
E-mail Address: Maple Valley WA 98038

Please mail your comments by March 1, 2003 to:
Bonneville Power Administration
Public Affairs Office - RC
P.O. Box 12999
Portland, OR 97212

1517-01, -002, and -003 Comment noted.
Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1. Please have your environmental studies look at:

2. I need more information about:

3. I have these other comments:
   The King County Council is planning on adopting a
   revision to the Critical Areas Ordinance that would prohibit
   all property owners from cutting any trees on 65% of their land.
   If King County commits to be so impotent,
   it is totally inappropriate to even consider putting the
   PPA line through these same lands.
   "NO" to Alternatives A-C
   "Yes" to Alternative 1!

☐ Please put me on your project mailing list. (You are already on the mailing list if you have received mailed notice.)

   Name: Kathy Meyers
   Address: 9609 E. 224th St.
   E-Mail Address: Maple Valley, WA 98038

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - RC
P.O. Box 1292
Portland, OR 97222

1518-001 and -002 Comment noted.
Chapter 3 — Comments and Responses - SDEIS

1519-001, -002, and -003 Comment noted.

1. Please have your environmental studies look at

2. I need more information about

3. I have three other comments

1519-001

1519-002

1519-003

Please select Alternative I through the watershed

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice)

Name: 
Address: 
E-mail Address:

Please mail your comments by March 1, 2003.

Bonneville Power Administration
Public Affairs Office - KC
PO Box 13999
Portland, OR 97212
Kangley - Echo Lake Transmission Line Project

“I’d Like to Tell You . . .”

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments: Please Put the Line Through the Watershed. (Proposed Alternative D) When All Costs Are Considered, Including Costs to the Area Residents That Would Be Negatively Impacted by Other Routes. Alternative 1 is Clearly the One with the Lowest Total Cost/Impact. Regardless of Which Route Is Taken, Please Make Certain to Pay a Fair Price to Any Dislocated Persons.

☐ Please put me on your project mailing list. (You are already on the mailing list if you have received a mailed notice.)
Name: George Laudermark
Address: P.O. Box 339
E-mail Address: Holcut, WA 98025

Please mail your comments by March 1, 2003 to:
Bonneville Power Administration
Public Affairs Office
1717 W. Wazee St.
Denver, CO 80202

1520-001 Comment noted.

1520-002 Relocations are subject to specific regulations under Public Law 91-646. The brochure, “Your Rights and Benefits as a Displaced Person,” provides information for parties displaced from their residences, businesses or farm operations and can be obtained at the following Web site: http://www.fhwa.dot.gov/realestate/rights/index.htm. The purpose of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 is as follows: “The purpose of this title is to establish a uniform policy for fair and equitable treatment of persons displaced as a result of federal and federally assisted programs in order that such persons shall not suffer disproportionate injuries as a result of programs designed for the benefit of the public as a whole.”
1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments - There are salmon-bearing streams and many species of wildlife that would be harmed by alternatives A through. The rural wilderness area already have "damage" habitat as compared to the undeveloped. Please do not degrade the natural habitat any further. CHOOSE ALTERNATIVE 1 - THROUGH THE WATERSHED.

□ Please put me on your project mailing list. (You are already on the mailing list if you were received mailed notice.)

Name: Gayleen Lindermark
Address: P.O. Box 2941
Email Address: Holbrook, WA 98248

Please mail your comments by March 1, 2003 to:
Bonneville Power Administration
Public Affairs Office - HC
Portland, OR 97212

1521-001 and -002 Comment noted.
1521-003 and -004 Comment noted.
Bonneville Power Administration

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . .

1. Please have your environmental studies look at the

2. I need more information about

3. I have these other comments. Which alternative you choose, you should fully integrate the
damage caused by installing the new line. To minimize damage by using helicopters
to install new lines, don't cut new roads. Reduce non-native plants in rights-of-way
with native species. Please by acquiring new foreground, either this have suggested
that you could acquire 300 acres along Payette River near highway 19 and
the Cedar River in Section 25, currently owned by
Plum Creek Timber. These last acres are subdivided for
development. Thank you for taking the time to consider my
comments.

☐ Please put me on your project mailing list (you are already on the mailing list if you have received mailed notices.

Name: Joe Gutsberg
Address: 12710 Beacon Ave. North Seattle WA 98133-7129
E-Mail Address:

Please mail your comments by July 22, 2002 to:

Bonneville Power Administration
Public Affairs Office - RC
P.O. Box 1200
Portland, OR 97212

1522-001 See response to Comment 340-002.
1522-002 BPA is proposing to use helicopters for construction on
Alternative 1 to reduce the need for new roads.
1522-003 BPA is working with agencies, landowners and tribes to
determine the best plant mix for animals. Native species
would be part of that mix.
1522-004 Please see response to Comments 1415-003, -004, and -005.
Chapter 3 — Comments and Responses - SDEIS

1523-001 Comment noted.

1523-002 Comment noted.

1523-003 Comment noted.

1523-004, -005, and -006 Comment noted.

1523-007 Comment noted.

1523-008 Comment noted.

Kangley - Echo Lake Transmission Line Project
"I'd Like to Tell You..."

To Mr. Girl, Seattle, Washington:

The depth of the Lake has been lowered on the Cedar River Indian Reservation. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve. The depth has been lowered to the point where it is no longer easy to get to the Reserve.
Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments

Please do not put this new project through Winterwood Estate. We support the Cedar River route.

Thank you.

☐ Please put me on your project mailing list. (You are already on the mailing list if you have received a mailed notice.)

Name

Address

E-Mail Address

Please mail your comments by March 1, 2003 to:

Ronneville Power Administration
Public Affairs Office, P.O. Box 1909
Portland, OR 97207

1524-001 Comment noted.
1525-001 Comment noted. Alternative 1 is BPA's preferred alternative.

1525-002 Comment noted.
Electromagnetic fields may be a health hazard

Barrell Hay
Special to The Seattle Times

Q: How much danger are EMF transmissions in and around the house? My friend saw a claims adjuster for electrical fields and tries to shield himself from this energy as much as possible, claiming it causes cancer. I had heard this is not true.

A: First we need to clarify some commonly misunderstood terminology as we are talking about two distinctly different things. An electrical field exists around all charged objects: lightning, power lines, appliances, even though it is not operating, such as the vacuum cleaner lying on my daughter's room. A magnetic field exists only if electricity is flowing — when I plug it in, the vacuum is in operation.

Several studies in the 1970s tried to show a link between living near power lines and childhood leukemia, among other illnesses. Many studies still lack scientific proof by electromagnetic fields.

The National Academy of Sciences reviewed the mountain of evidence in 1996 and determined that "the current body of evidence does not show that exposure to these fields presents a human health hazard.

Review by other U.S. governmental agencies and health authorities in other countries came to similar conclusions. But in 2003, the World Health Organization (WHO) listed EMFs in its Class B, "Possibly Carcinogenic to Humans" category, the lowest level risk category. This was based on a small but statistically significant association between EMFs and childhood leukemias that could not be ignored.

The organization's mining system has identified:

- Carcinogenic to humans: tobacco, asbestos.
- Probably carcinogenic to humans: formaldehyde, diesel exhaust.
- Possibly carcinogenic to humans: coffee, gasoline engine exhaust, electromagnetic fields.

The latest theory is that "contact-cancer" occurs when a person is exposed to low levels of EMFs over a long period of time. This suggests that EMFs are a significant risk factor for leukemia.

This theory and many others are being studied, and WHO expects results in 2 to 5 years. The organization has an advisory panel that examines claims about EMFs at the electronic level with an unimpeachable amount of information on this subject.

Some critics say that the WHO's view makes sense to me. In 1996, it found no evidence of any cancer risk from EMFs, but said, "Further studies are recommended to reduce exposure."
Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1. Please have your environmental studies look at

2. I need more information about

3. I have three other comments as follows: The displaced people who have lost property or had their use and serenity impaired should be paid much more than has been offered.

   You have saved a lot of money by giving this power & need to make this right.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

   Name: [Redacted]
   Address: [Redacted]
   Email Address: [Redacted]

Please mail your comments by March 1, 2003 to:

Ronneville Power Administration
Public Affairs Office - RC
P.O. Box 1200
Portland, OR 97212

1526-001 and -002 See response to Comment 1520-002.
BPA has analyzed the impacts on a per unit basis for all of the alternatives. The impacts were quantified for distance (miles), area (acres) and other units such as milligauss and decibels. Please see the summary table of impacts in the SDEIS, Table 2-3, located from page 2-67 through 2-74.

1527-001 and -002 Comment noted.
1527-003 Comment noted.
1527-004 and -005 Comment noted.
1527-006 Comment noted.
1527-007 Comment noted.
1527-008 Comment noted.
1527-009 and -010 Comment noted.
1527-011 and -012 Comment noted.
1527-013 Comment noted.
1527-014 See response to Comments 1484-008 and -009.
1527-015 Comment noted.
1527-016, 017, and -018 Comment noted.
1527-019 Comment noted.
1527-020 The estimated cost to acquire land rights was included in the economic costs for all alternatives.
1527-021 and -022 See response to Comment 1474-011.
1527-023 BPA is trying to work with all property owners. The issue for property owners is often concerning the value they think their property is worth compared to the fair market value as obtained from other properties recently sold in the same area. BPA felt it was inappropriate to discuss the specifics of individual negotiations at a public meeting. BPA will continue to work with landowners to try to find a common solution.
1527-024 On the watershed, the City of Seattle has the responsibility to protect drinking water. This responsibility is monitored by the State Department of Health and the federal Environmental Protection Agency, as well as the public. The watershed also has an established Habitat Conservation Plan (HCP). The proposed acquisition of the properties is only one aspect of the mitigation plan to protect the watershed. BPA recognizes that the private properties in this area exhibit some of the same qualities as found in the watershed in regard to timber, vegetation, and wildlife, but the private properties do not have the same public responsibilities.
Dear Mr. Smith,

I am writing in regard to your taking the second line through the Seattle Water Shed. I was pleased you were considering that route. It would seem it would be much less costly, environmentally less intrusive, and adversely affect less people. At one of your meetings, I heard people speak of your professional conduct and applaud us.

I hope you will reconsider the amount of money you offered the five land owners. "Remploye your line leaves them land unable to develop as they had planned. I know that route saved you must money I knew. I hope you will consider that and compensate them more fully.

Sincerely,

Margaret R. Crabtree

1528-001 and -002 Comment noted.

1528-003 and -004 See response to Comment 1527-023.
Chapter 3 — Comments and Responses - SDEIS

1529-001 Most of these two comments quote the regulations, and as such we note the references. Concerning the listed categories of impacts, BPA believes each category referenced above has been adequately described in the EIS. BPA agrees that the proposed project and its associated management practices could have potentially significant impacts. That is why we immediately proceeded to produce an EIS rather than an Environmental Assessment. However, we believe the preferred alternative, and its associated mitigations and best management practices mitigate those potentially significant impacts to a level below the level of significance with the exception of impacts to forested wetlands due to right-of-way clearing and to the visual resource. In fact, we believe the proposed project represents an environmental net benefit to the CRW, and to the public. We disagree that it is improper to use relative terms such as “low, medium or high” to discuss the nature of the impacts. We believe making these assessments helps the public and decision-maker to be better informed concerning the nature of the various impacts upon the environment.

Dear Mr. Driessen,

This comment letter is submitted in response to request for comments for the Kangle Lake Transmission Project Supplemental Draft EIS (SDEIS). I feel that although this NEPA document is better than the Draft EIS it still falls to disclose and describe impacts consistent with 42 USC Section 4321. The description of impacts must be described within adequate “context and intensity”. Intensity depends on the magnitude and duration of an impact. In this case, the impacts relating to property values, surface water, views, geology and soils, wetlands, and fish and wildlife impacts have not been adequately described. A discussion of low, moderate, and high does not meet the requirements of NEPA as follows:

Sec. 1502.16 Environmental consequences.

This section forms the scientific and analytic basis for the comparisons under Sec. 1502.14. It shall consolidate the discussions of those elements required by sections 102(2)(C)(i), (ii), (iv), and (v) of NEPA which are within the scope of the statement and as much of written 102(2)(C)(iii) as is necessary to support the comparisons. The discussion will include the environmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, the relationship between short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented. This section should not duplicate discussions in Sec. 1502.14. It shall include discussions of:

(a) Direct effects and their significance (emphasis added) (Sec. 1508.8).

(b) Indirect effects and their significance (emphasis added) (Sec. 1508.8).

(c) Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned. (See Sec. 1506.2(d)).

(d) The environmental effects of alternatives including the proposed action. The comparisons under Sec. 1502.14 will be based on this discussion.

February 28, 2003

Department of Energy
Bonneville Power Administration
Acting Mr. Lou Driessen, Project Manager
600 N.E. 119th Avenue
P.O. Box 3321
Portland, OR 97268-3321

Re: Supplemental Draft EIS Comments on the Proposed Kangle Lake Transmission Project

1529-001
The property owners along all proposed transmission lines outside the watershed hired an expert economist, Greg Easter, of Property Counselors to review the DPA previous analysis contained in your Draft EIS. We also have had numerous discussions with appraisers and realtors in King County that totally dispute your SDEIS conclusion that there would be low to moderate long-term impacts to property values expected (see Chapter 4 SDEIS). Alternative C, in particular, would displace 30 to 35 homes whereas Alternative A (Preferred Alternative) would displace two. Thirty to thirty-five homes in the Hobert area is a significant percentage of the entire community and hence the document should disclose there would be a significant adverse impact.

Several factors are considered in determining the impacts to properties including environmental and socioeconomic. Some of the socioeconomic impacts must be generalized until specific appraisals are conducted on the impacted properties. Also see 1484-008 and 1484-009.

Please let us know if we can be of further assistance. If you have any questions, feel free to contact me at (425) 391-4700. Thank-you for your consideration in this matter.

Sincerely,

Carol A. Beck, J.D.
Environmental Consultant and Hobert Resident

Cc: Senator Maria Cantwell
Dino Kostis, State Senator, 5th Legislative District
Glenn Anderson, State Representative, 5th Legislative District
Cheryl Pflugh, State Representative
Rae Simko, King County Executive
David Ivens, King County Council
Larry Phillips, King County Council
Andi Fliesinger, Mayor, City of Issaquah
BPA thoroughly examined a number of alternatives, including conservation and changes to the grid (see Section 2.2 of the SDEIS). Please see response to Comments 1415-003, -004, and 005. BPA would need to construct some new short spur roads to get to the new tower sites from existing roads. In addition, BPA would build new road segments to replace existing roads that proceed through wetlands. BPA and an independent contractor have looked at other non-transmission alternatives, as described in the SDEIS, and have determined they do not meet BPA or the region's needs. Non-transmission alternatives would only delay the need for the project by about 2-3 years. BPA thoroughly examined a number of alternatives, including conservation and changes to the grid (see Section 2.2 of the SDEIS).
Public Meetings
COMMENTS TO
KANGLEY-ECHO LAKE TRANSMISSION LINE PROJECT
Monday Meeting, February 3, 2003

PUBLIC INVOLVEMENT
DATE: FEB 03 2003

Mount Si Senior Center
North Bend, Washington

Reported by: Betsy E. Decater, RPR
License No. 601-835-443
Table 2-3 of the SDEIS summarizes the impacts and costs of the alternatives considered.

BPA is concerned about mitigating environmental impacts whether inside or outside the CRW. Inside the CRW the issues are contaminating the drinking water for the city of Seattle and surrounding communities that also use the Cedar River Watershed for their supply and the impacts to the established Habitat Conservation Plan. As a result, BPA is proposing to use extensive best management practices and use special engineering techniques and construction practices to minimize impacts to the drinking water. BPA is also looking at purchasing lands to compensate for the lands that would be changed in character within the CRW and its HCP. BPA is also committed to minimizing impacts to the environment outside the CRW including the drinking water (likely wells) to individual residences and potential impacts to the creeks and rivers where low-growing vegetation would be left. BPA would use conventional designs and construction methods while also implementing best management practices to those areas outside of the CRW including those areas outside the CRW on the preferred alternative. BPA can minimize impacts to the environment to those properties outside the CRW by implementing conventional best management practices and conventional designs and construction techniques.
correctly, which is to say, if you -- and this is a little bit of the conversation I had with you earlier, that if you were to offer the same mitigation on routes A, C, B, or D that you're offering for your preferred route, I'm certain that your costs for routes A, B, C and D would quadruple probably from where they are.

And I know you don't have time to get those numbers and I don't think -- and I know it isn't necessary to go to the extent of detailing those numbers, but if you did go to the extent to put a number out there, if you would just put a qualitative judgment on each of the numbers you have that says, here, here's what we put in the study as one figure, but if we had to do the same equivalent kind of things, then I think that would be useful. There's another chart --

MS. DIANE ADAMS: Let me stop you right there. Gene, do you want to respond?

MR. GENE LYNARD: What you're asking for is to compare apples with apples, and we don't have all of the apples. We have the apples for the preferred. We have a good handle on what the mitigation cost is for that. The different types of mitigation we're talking about here mostly is compensatory mitigation, and we don't know what that mitigation -- those mitigation measures come from the regulatory agencies, Corps of Engineers, King County, State
The cost figures in the SDEIS include the best management practices anticipated for each route, using special design and construction techniques inside the Cedar River and Kent watersheds and conventional designs and construction techniques for those areas outside of the watersheds including those areas outside the watershed for the preferred alternative. The cost for each alternative also includes costs to process potential condemnation cases and to work with a great many more landowners and on some options, the removal of many homes. As noted in the SDEIS, the costs are greater for those alternatives outside of the CRW.

In Alternative B, the existing double-circuit 345-kV line is replaced with a double-circuit 500-kV line. To meet the need, a 500-kV line is required. Unfortunately, it is not feasible to modify the existing line to add a 500-kV circuit on the other side. The existing structures are simply not designed to carry a 500-kV line. The only feasible approach is to tear down the existing line and replace it with double-circuit 500-kV, operating one side at 500-kV and the other at 345-kV.
power lines. But what really kind of bothers me a little bit, being a Depression kid, is the tearing down of a line bothers me.

Isn't there any way in this overall program that that line up there with only power lines hanging on one side and the other side is vacant, to save that line or to use it in some manner?

Ms. IVY TYSON: I can address that. We built that line as a 345 kV line and then that technology became kind of obsolete, so Bonneville doesn't build 345 kV lines anymore. We build 500 kV lines in replacement. The existing towers would not support putting a 500 kV line on them because of the strength of them and because of how much clearance they have from the line to the steel and issues like that.

So in order to upgrade it, we would have to tear it down and rebuild it. Did that answer your question?

MR. MARK STARR: Well, mostly. I'm sure you know a lot more about this than I do, but the very fact of just tearing it down bothers me. It's like building a new school and then 12 years later somebody wants to tear it down and build another new school. And I'm just fishing around to see if there isn't some way in the overall program of distributing power lines in the Northwest that that line can be saved, whether you give it to Puget Sound Energy or
you do something with it to keep it.

MS. IVY TYSON: Right. Well, one of our
alternatives is to keep it and build another parallel line
to it.

MR. MARK STARR: And it would keep the line
that has just one power line on it?

MS. IVY TYSON: Right. So, I mean, we have
two alternatives: One is to tear it down and rebuild it,
and one is to build a power line to it.

MR. MARK STARR: Well, that makes me feel
better already.

MR. GENE LYNARD: And also that line is about
50 years old, too.

MR. MARK STARR: Well, I may be, too, and I'm
built out of this stuff, and that stuff's built out of
steel. It ought to last a hell of a long way yet. Gene,
I'm just joking.

The second comment I would like to make
would be a lifesaver. To those of us that have had a lot of
experience flying power lines, and I've flown a lot of power
lines, the more of those bright bulbs you put up there, and
they must be rather expensive compared to even putting a
meeting on like this; the easier it is for us to see,
particularly in inclement whether and so on when, oops,
there's a power line, particularly that what I call a ground

BPA will work with the FAA to determine spans that need
to be marked for safety.
wire & ck. that big single line that's way up on top.

Because some pilots coming by there, they might not be that well acquainted with the line, will see maybe three or four, whatever they are, great big power lines sagging across the valley and they think that if they go over those big lines that are sagging across the valley that they're in the clear, but they're not, there's that line that you have going across there.

And a very good friend of mine in Kittitas County ran into that line on May 18th, 1980, the same day the mountain blew its top, he ran into that high line up there and flipped his airplane over and killed him. And I'm speaking not just on his behalf, he was a very good friend of mine, but this has happened to a number of pilots that have hit lines. And those balls aren't all that expensive, and then we can say to Puget, let them know Bonneville Power has balls.

MS. IVY TYSON: Well, we always work with the FAA to mark the lines.

MR. MARK STARR: Well, yeah. I mean, beyond the FAA in an area of common sense. I've been around the FAA a lot, but beyond that, the lines up there, it is hard to see. Put on some goggles sometime when you're out crop-dusting like he was and try to see that line. It's hard to see.

BPA will work with the FAA to determine spans that need to be marked for safety.
Chapter 3 — Comments and Responses - SDEIS

1420-001-003 To the extent that consumers are applying demand side management (DSM) (conservation) measures, or the retail utility is sponsoring DSM programs, those effects have been incorporated into the electric demand forecast. In the examination of non-transmission alternatives, the consultants found, “The range of 412,000 MWh to 1,500,000 MWh of required energy reduction is high compared to the level of annual growth in the Puget Sound Area of approximately 1,000,000 MWh. The DSM programs would need to reduce energy each year from half to one and a half times the annual energy growth.” See Appendix J, Section 6.4 and the response to Comment 1422-005-001.

MS. DIANE ADAMS: Thank you, Mr. Bonewits. Thank you for being so patient.

MR. RICHARD BONEWITS: Well, that’s fine. I’m training for tonight. We’re going to have a very controversial subject tonight. Critical Areas Ordinance, Sensitive Areas Ordinance to you, and be glad that you work for the federal government and not the private citizen of King County, because mitigation would really be expensive if you had to comply with it in every detail.

But this point has to do with I want to ask the engineer or the planner, as they make their presentation tomorrow at the following meeting, to really stress the point of the relationship in terms of the year-over-year demand growth versus conservation.

You’ve made that in the past, and I know we’re a small group and we’re very informal here today, but that question needs to be answered before its asked for most people. It will just save you a lot of time. And if my recollection is right, what you’ve told us before suggests that we are such voracious hogs of power that our year-over-year demand growth is ten times, at least ten times larger than what we save in conservation. And if that’s a true statement, you ought to say it. One of you ought to just say it.
MS. DIANE ADAMS: Why don't we go ahead and move into the formal comment period now, and we have two speakers signed up, Mr. Jon Zak and Mr. Richard Bonewits.

MR. RICHARD BONEWITS: Thank you. My name is Richard Bonewits. I'm chairman of the Greater Maple Valley Area Council. We serve as citizens advocates for the unincorporated portion of Tahoma School District. It means not including the City of Maple Valley. There are about 14,500 in the service area.

First I want to summarize. BPA has studied the issue of where to put another 500 kV transmission line to serve the Puget Sound region three times over the past three years, and three times they concluded that it should be through the Seattle Watershed because it is the shortest, least costly, does the least environmental damage, affects the fewest people and preserve their other existing routes. And this is one of the answers to one of your questions. Part of the reason for leaving one of those other lines vacant or not touching it at this time around, it still gave them a little bit more growth for the future in case they missed their estimate.

But I've checked their estimate against the National Power Consumption, and their estimate is within -- he said 2 percent. The annual growth rate that's allowed is
normally a percent and a half to three, and you can find
that at the Department of Energy report that comes out
periodically.

These three studies ought to be enough to
convince people that the route through this watershed is the
best route, but don't count on it. Citizens in this
community need to stand up and speak in behalf of BPA's
tentative decision to help ensure that when this line is
built and energized it really is in the watershed. And I
know we don't have many people here from North Bend today,
and I was hoping to see a few more from this region or from
Kittitas County, because I'm encouraging every one of you to
come downtown to Seattle tomorrow and join us. We're going
to be there.

BPA has provided the technical detail, the
supporting analysis in the SDEIS that they briefly reviewed
with you. This line is needed to meet the region's power
and way above the conservation savings that we have been
touted so loudly by the politicians and the various people
in Seattle and other places. Conservation is useful, but it
does not offset our voracious appetite for electrical
energy. Year-over-year energy demand exceeds conservation.

Others following me will show you, not so
much today, because so far Jon is the only one that came to
follow me, but tomorrow we're going to expect to show you
again the differences between land stewardship by the City
of Seattle and people that live in the rural area, and
you'll find that we compare very favorably with the City of
Seattle in their stewardship of their wonderful watershed.
We know they're doing a good job, but they just recently
started it. They got into it because they anticipated being
cought short by the Endangered Species Act and were urged to
put that plan together about seven years ago.

And I'm proud that they did it, but damn
well I want them to finish it up. get rid of all the 650
miles of roads in the watershed. It's many times more than
the lines that you're planning to use. Others will describe
the impacts tomorrow if this line is built outside the
watershed. We'll also show you that the rural residents
have done a better job at stewardship. And I want you to
know that in our team we have over 1500 people that signed
petitions that went to Bonneville last year and in four
groups, roughly four to five groups, mainly two large ones,
the one that I really act as the leader of and another group
that thought that they were better off fighting the battle
by themselves, but there were two others that joined us, and
we were joined by the mayors of Issaquah, Maple Valley, the
Covington City manager, and they all have written letters to
Bonneville supporting the route through the watershed and
irate about putting it anywhere else.
In addition to that, since Janette's here today and she works for King County councilmember David Irons, and he has been with us from day one, your King County councilman from this district. We have U.S. Representative Jennifer Dunn with us on this in our position, two state representatives, Glenn Anderson, Cheryl Pflug, and the members of the King County staff of Maria Cantwell. It took a while, but we got them. So I'm asking everybody here to stand up today and give your comments. Jon, you're next.

MR. JON ZAK: My name is Jon Zak, and I live on two and a half acres in a development of about a hundred homes in Maple Valley. Our eastern property boundary will be the centerline of the proposed transmission line right-of-way line for Alternative C and we would lose the trees on one-quarter of our property. These trees are in a Native Growth Protection area. These trees range in size from two and a half to five foot in diameter breast height above the ground.

Alternative C would completely destroy our privacy and our view of the trees in our backyard. It would destroy our experience of living in nature. This was the reason we bought this property. As part of Habitat Conservation Plan, the map was prepared showing the age of
trees in the watershed. On BPA's preferred alternative
route, the age of the trees is 10 to 30 years. The trees in
my property in the Native Growth Protection zone make the
trees in the watershed look like toothpicks.

I'd like to talk about what Seattle calls
the pristine watershed and a legacy for the future. The
watershed has been decimated by logging for about a hundred
years. There are over 600 miles of gravel logging rods in
the watershed. I would like to show you some pictures now.
This is a picture taken from McClellan's Bute looking down
into the watershed.

MR. RICHARD BONEWITS: Jon didn't explain
that he's a mountain climber.

MR. JON ZAK: McClellan's Bute, you can see
that as you're driving up I-90. There's another picture and
you can see the cut and the erosion around that road.
Another picture, just some of the logging roads. This was
taken in June, so there's still a little bit of snow.

And there's Chester Morris Lake. You can
see all the second- and third-growth trees. And this is a
view of our backyard, so this is in an area that would have
to be cut because these trees are endangering the power
lines. And this is another view of our backyard.

MS. DIANE ADAMS: Jon, when did you take
those pictures?
MR. JON ZAK: Last June of 2002. And I've got some more pictures taken off the Seattle Public Utilities website. They didn't have enough pixels, so I couldn't blow them up, but this shows some road construction. And, you know, I don't think that heavy equipment is using vegetable oil.

MR. RICHARD BONEMITH: We didn't see any helicopters there either.

MR. JON ZAK: Here's a picture of Chester Morris Lake, and you can see they separated the good water from the bad water with that boom. And you can see more heavy equipment, you know, construction workers right around the lake shore. Some more heavy equipment building the road. And then here's showing some erosion on an existing logging road. That's it with the pictures.

Pictures of the construction in the watershed by Seattle Public Utilities proves their hypocrisy. Seattle Public Utilities has one standard for themselves and another one for the BPA. I believe conservation organizations should be spending their time and efforts on something more critical than the Cedar River Watershed. How about George Bush's proposal for cutting trees in national forests to prevent fires? How about all of the clear-cutting on the Raging River Watershed just north of Tiger Summit along Highway 18? Activities like the
passage of the Wild Sky Wilderness Bill and the addition of
the Alpine Lakes Wilderness Area are far more important than
a watershed that is off limits to the public.

I would like Seattle Public Utilities to
answer these four questions:

Number one: Where is the evidence that BPA
has caused any harm to water quality or watershed operation
in its 30 years of operating a power line in the watershed?

Question two: What evidence does Seattle
have that clearing an additional 91 acres for a second power
line is more damaging to water quality than failure to
impressively replant the 600 miles of logging roads already
in the watershed?

I did a calculation of the acreage of all
the logging roads in the watershed. The total road acreage
is over 2600 acres. An additional 91 acres for a second
power line is only three and a half percent of the acreage
of the logging that's already in existence, and this does
not even include any acreage for existing clear-cuts.

Question three: When is Seattle going to
acknowledge to the public that it was ordered to develop an
extensive water treatment system as the result of pathogen
problems in 1992, part of those plans included the
development and design of a water filtration facility?

And the final question, number four:
Clearing 91 acres for a second power line would require one-tenth of one percent of the watershed's total acreage of 90,240. How can this small an amount of clearing have any impact on water quality?

The Habitat Conservation Plan is a great idea. Too bad the Habitat Conservation Plan wasn't an idea in the City of Seattle. The City was forced to create a Habitat Conservation Plan to meet the requirements of the Endangered Species Act. How about the habitat of people living along Alternative C? Is the wildlife habitat inside the watershed more important for both wildlife and humans outside the watershed? The people who lose their property will be paying a price for Seattle's water. The City of Seattle will destroy the rural communities of Hobart and Ravensdale all due to their unfounded water quality issues. Thank you.

On Route B and D, Camp Waskowitz, owned by Highland Public District, has received historic status. Concerned that B and D will affect it. Why does the watershed get more preference than the camp? Kids?

You have done the study three times and were comment noted.

Comment noted.

Comment noted.

Comment noted.

Comment noted.

Comment noted.

Comment noted.

Comment noted.

Comment noted.
1420-006-001 Comment noted.

1420-007-001 BPA will work with the FAA to determine spans that need to be marked for safety.

1420-008-001 After BPA released a draft environmental impact statement in June 2001, BPA was asked and agreed to analyze in greater detail alternatives outside of the watershed, and to look at non-construction alternatives. BPA has conducted this additional analysis and concluded that Alternative 1 is still the preferred transmission line route. The final decision will be made by BPA’s Administrator in a Record of Decision, scheduled for August 2003. People on the project mailing list will be sent notice of the decision.

1420-009-001 and -002 Please refer to the SDEIS, Section 4.11.2.5, Community Values and Concerns, Property Value Impact. King County was included in the study. If an easement is acquired across your property, BPA’s offer would be based on a professional real estate appraisal.

1420-010-001 See response to Comment 1389-001.

1420-010-001 There are multiple things that could delay the Record of Decision, such as BPA choosing a different alternative other than the current preferred alternative, new information obtained from the comment period for the SDEIS that would result in more studies, drastic changes in BPA’s economic health, a sudden downturn in anticipated load growth beyond currently anticipated, and many other unforeseen items. BPA is committed to use its best efforts to have a Record of Decision in August 2003.
3-182

Chapter 3 — Comments and Responses - SDEIS

1420-011-001 and -002  EMF has no impact on water quality. Water passing through magnetic or electric fields is no different from “unexposed” water.

1420-012-001  The trees that would be removed from the right-of-way for the preferred route vary in age from young plantations to stands that have trees upwards to 80 years of age.

1420-013-001  Please see Chapter 2 of the SDEIS for the costs of each alternative. See also Table 2-3.

1420-014-001  See response to Comment 1421-039-002.
CERTIFICATE

STATE OF WASHINGTON

COUNTY OF KING

I, BETSY DECATER, a Certified Shorthand Reporter and Notary Public in and for King County, Washington, do hereby certify that I reported in machine shorthand the above-captioned proceedings; that the foregoing transcript was prepared under my personal supervision and constitutes a true record of the proceedings.

I further certify that I am not an attorney or counsel of any parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

WITNESS my hand and seal in Sammamish, County of King, State of Washington, this 3rd day of February, 2003.

My commission expires 03-20-06

[Signature]

Notary Public in and for the State of Washington residing at Sammamish.
COMMENTS TO
KANGLEY-ECHO LAKE TRANSMISSION LINE PROJECT
Tuesday Meeting, February 4, 2003

Seattle Center, Rainier Room
Seattle, Washington

Reported by: Betsy E. Decater, RPR
License No. 601-835-443
1421-001-001 and -002 Comment noted.

1421-002-001 and -002 Comment noted. Please see Section 4.13 of the SDEIS for information about noise impacts.

1421-003-001 and -002 Comment noted.

1421-004-001 and -002 Comment noted.

1421-004-003, -004, -005, and -006 See response to Comment 1389-001.

1421-005-001 BPA is conducting the environmental review on the proposed project on the human environment. The human environment includes both the social environment and the natural environment. The social environment includes such resources areas as land use, recreation, transportation, socioeconomics, noise, public health and safety, aesthetics, and cultural resources. Before BPA makes a decision on locating any of its major transmission facilities it looks at all environmental impacts, costs and how the alternative would affect the transmission system. Natural resources, including wildlife, are not favored over social resources in BPA's decision-making.

1421-006-001 Comment noted.
The CRW knew the filtration requirements in 1996. The Toll River filtration was completed in 2000 by Seattle Public Utilities. The CRW is using the BPA project, using political pull to have BPA pay for this filtration system. The new RIM would occupy an area equal to one-tenth of one percent of the CRW - (141 Square miles). Seems like a "minor" impact! Alts B and D would impact much greater area.

Selling a property with power lines, increasing tower height, higher voltage, additional lines, potentially makes my property unsaleable.

I've had to put improvements to my property on hold until I know which route you'll build. As a result, the original estimate for my improvements has risen by 37%. While I've been on hold! I can't write any of this off on my taxes - it's my loss due to your project.

If BPA is concerned about people, why not design towers that are aesthetically pleasing rather than a requiring filtration systems. "Surface Water Treatment Rule" (refer to federal standards for drinking water)

1421-006-002 Comment noted.

1421-007-001 Comment noted.

1421-008-001 Comment noted.

1421-009-001 and -002 See response to Comments 1420-009-001 and -002.

1421-010-001 See response to Comment 1389-001.

1421-011-001 BPA's primary concerns when designing our towers are strength and safety. Aesthetics is difficult to quantify. Some find our towers aesthetically pleasing, others do not.
3-187

Chapter 3 — Comments and Responses - SDEIS

1421-011-001

negative visual impact?

1421-012-001

This is all political for CRW and Sierra Club. I agree underground transmission lines would be the best way to go. I realize it's cost prohibitive. Then why force the line across other alternatives when human beings are impacted - financially, aesthetically, noise pollution, everything!

1421-012-002

I live along Alt. B/D, served by the Sallal Watershed. Will you enforce the same mitigation measures (i.e., helicopter logging, microspiles, etc.) to protect this watershed?

1421-012-003

The Rocky Reach No. 5 line is directly over the electric box (generator) which delivers water to Mt. Si and Sallal homesteads (Alt. B-D).

1421-012-004

CRW's mission statement is in support of "people" and the environment/ecology. The Sierra Club supports CRW's mission statement. To achieve the mission statement, the Sierra Club is willing to use "aggressive grass roots action on an unprecedented scale to influence public policy." (See their website.) If they are in support of people, then why put people at risk? We the people along alternatives along 1421-012-005

1421-012-006

1421-013-001

1421-013-002

1421-014-001

1421-014-002

1421-015-001

1421-015-002

1421-012-001 and -002 Comment noted.

1421-012-003, -004, -005, and -006 Comment noted.

1421-013-001 and -002 BPA may use helicopter construction for alternatives outside the Cedar River Watershed and the watershed belonging to the city of Kent. Helicopter construction would be an option for the contractor who would determine if it would be economical to use a helicopter as compared to constructing roads and crane pads such that erosion would be kept to a minimum.

BPA is committed to using the most efficient method of construction while minimizing erosion. In the Cedar River Watershed the issue is also associated with Seattle needing to build a $105 million turbidity filtration plant if BPA's project were to trigger a massive erosion event. No such concern about a filtration plant exists outside the CRW.

1421-014-001 Comment noted.

1421-015-001 and -002 Comment noted.
1421-016-001, -002, and -003 You are correct. The current water quality in the CRW is good.

1421-017-001 and -002 Comment noted. If BPA were to decide to construct the project through the Cedar River Municipal Watershed, it would purchase the land rights from Seattle Public Utilities, who own title to the CRMW. The disposition of any monies that would be obtained by SPU for the timber that would be removed to construct the line would be up to SPU, not BPA.

1421-018-001 and -002 BPA has not committed to purchasing a filtration plant. BPA has agreed to purchase insurance that could pay for a filtration plant in the event the project causes Seattle to need to construct such a filtration plant by order of the Department of Health. BPA is committed to safe guard Seattle’s drinking water with multiple mitigation measures that would reduce or eliminate erosion.

1421-019-001 BPA’s transmission line easements do not allow structures within the right-of-way. BPA does not control location of structures outside of its right-of-way.

1421-020-001 BPA has no information on where the staging area(s) would be located at this time. The selection of staging areas would be at the discretion of the contractor and would be approved by the landowner. No staging areas would be in the Cedar River Watershed.
the staging areas - this makes the alternatives difficult to evaluate. You should at least have some alternatives for locations of staging areas.

The way you've numbered/identified your alternatives is very confusing. 1, 2, 3, 4, A, B, C, D - you should have started over when you added alternatives.

Mitigation lands not specifically defined.

Double circuit over Cedar River but not over Raging River.

Specific properties proposed as mitigation are not enough. Specific properties need to include properties along Raging River.

Land mitigations need to be paid for by BPA.

How do you mitigate for TV interference?

If you put taller double circuit towers on each side of the Cedar River - you could allow the vegetation to grow taller near the Cedar than you would otherwise allow.

BPA used numbers (1, 2, 3, and 4) to represent alternatives being considered in the Cedar River Municipal Watershed and letters (A, B, C and D) to represent alternatives being considered outside of the watershed. Since this labeling was used in the draft environmental impact statement (DEIS), BPA decided to continue to use it for the SDEIS.

Please see response to Comment 340-002.

Comment noted.

See response to Comments 1415-003 and -004.

See response to Comment 1415-005.

Interference with television reception can be corrected by any of several approaches: improving the receiving antenna system; installing a remote antenna; installing an antenna for TV stations less vulnerable to interference; connecting to an existing cable system; or installing a translator. BPA has an active program to identify, investigate, and mitigate legitimate complaints.

BPA is proposing to use double-circuit towers within the existing ROW on each side of the Cedar River.
The CRW provides drinking water to the entire City of Seattle and surrounding areas. This affects between 1.5 and 3 million people. These people are not trying to "confiscate" or otherwise impact the people (property owners) who are in potential alternative areas. This is an issue of power needs vs. Environmental/drinking water concerns. This has nothing to do with "property values."

To inject the fear of sale value of a property into this issue ignores the basic premise, and is very selfish.

The need to conserve energy is very real, and a valid approach for this reason, the nontransmission alternative should be seriously considered. In that light, social policy in regards to commercial advertising in particular needs focus.
Chapter 3 — Comments and Responses - SDEIS

1421-030-001

BPA is continually meeting with the city of Seattle concerning crossing the CRW with a new transmission line. BPA is in negotiations with the city of Seattle, the City and BPA are in negotiations. The issues for Seattle are impacts the transmission line could cause to their drinking water and to their Habitat Conservation Plan. BPA would implement best management practices to help mitigate the impacts to the drinking water and to the HCP. BPA has also purchased 350 acres, and would purchase more lands to help mitigate crossings of the watershed.
watershed, and that's also very important and then trying to
find ways to mitigate for the impact that this project may
have on that Habitat Conservation Plan.

So we're looking at not only construction
mitigation, and certainly you probably heard about some of
those already that includes special footing types on the
watershed, micropiles, using helicopters to place structures
in place as opposed to using a large crane to place, also
using helicopters to take some trees out of the area, taking
care of how the roads are placed and any new roads that are
needed are placed and making sure that there's no erosion
coming off the roads. And our best management practices,
using silt fences and bales of hay at every disturbed area,
if that's necessary. So we'll be studying every disturbed
area and determining what needs to take place in those
areas. I'm looking at using two double-circuit towers, for
instance, for crossing the Cedar River Watershed, or the
Cedar River itself, excuse me, in that canyon because,
again, we're very concerned about the potential for erosion
into the Cedar River because of the drinking water quality
aspects and it also happens to be important to the corridor
from the wildlife standpoint.

In addition to all that, we're looking at --
certainly BPA's already purchased 350 acres immediately
adjacent to and north of the Cedar River as a possibility of
turning that over to the City of Seattle for compensation for 90 acres that the right-of-way would take out of the habitat, and we're also -- BPA is also looking at some other properties as a potential, besides that 350 acres, also with the potential of turning those properties over to Seattle. So negotiations are still ongoing, which I think at this point it's been ongoing for quite a while, and I think that's a good sign that we're still talking to each other. Certainly time is of the essence. I think one thing that wasn't mentioned in much detail is that we are looking at starting construction, if possible, and if everything comes to a proper conclusion on the preferred plan, we would like to start construction like in the August time frame on the preferred plan with the energization, completion of the project and energization by the end of this year. As Brian mentioned earlier, BPA still thinks it's important, not really from our standpoint but Seattle's standpoint, King County's standpoint and to some degree also Canada with the Canadian entitlement standpoint, that this project is built and we build back in the reliability that's needed in our system. So the local area, including Seattle, really needs this project. If it were to go to one of the other alternatives, we would probably likely add another two years on our schedule as a minimum because the only alternative
The Canadian Treaty power is produced at dams in the U.S. (See Appendix I.) In an agreement from the 1960s, the Canadians sold their one-half share of the benefits to the United States for 30 years. Those sales are now expiring. Both the Canadian and U.S. utilities have been planning for this eventuality when determining their resource needs. According to published information, British Columbia is approaching load/resource balance, including the return of the Treaty power. U.S. utilities have planned to develop or purchase the power needed to meet the return obligation. British Columbia sells power to California mostly in the spring, summer and fall. During the winter cold weather event that triggers the need for the proposed line, British Columbia would also be seeing increased demands, and would use all of the power to meet their own needs.
MR. BRIAN SILVERSTEIN: I'm sorry, why don't you go ahead with the question.

MS. CINDY DENSMORE: Well, I'm just wondering if you bought the power from BC instead of building this line, and then my other question is that -- I'm nervous -- we also sell energy to California, okay. Why can't we -- sorry --

MR. BRIAN SILVERSTEIN: I can try and answer that. Because this is the least cost alternative for the Canadians. They want their power back that's produced in the United States. We have looked at other alternatives to returning the power over the transmission system. We spent more than ten years in discussions with the Canadians and an agreement was signed in 1999 to require the return of that power. That's what they would prefer because it's to their advantage to get the power returned.

MS. CINDY DENSMORE: But are they going to sell that power to somebody else?

MR. BRIAN SILVERSTEIN: I don't think that's very likely in the wintertime. That's when they need it the most. They're a winter peaking area just like we are.

MS. CINDY DENSMORE: Well, but for 30 years they have not used this power. Now all of a sudden they're going to use this power?
MR. BRIAN SILVERSTEIN: I think part of the reason if you look at the forecast of the supply and demand situation in Canada, they are load resource balance, they are approaching load resource balance, so this is the point that they need that power back, that is correct.

MR. LOU DREISSEN: What's happened is the same thing in the Vancouver area, in particular, has happened in the Seattle area. So if you are familiar with King County and how it's grown, Vancouver has grown very large also. So they're continuing to add load to their electrical demand. So they're in a similar situation really to what King County is currently. So they want to have the ability to be able to not only to sell power to California like they have or to the Northwest, we bought power from them also, but also to get that power back to them because they really need it in the Vancouver area, just like Brian said, during their winter just like we do in the Northwest.

MR. BRIAN SILVERSTEIN: Typically Northwest utilities both in the United States and Canada will sell to California in the summertime when their demands are peaking because of air-conditioning loads. In the wintertime the power tends to travel north. So there's really no reason to be selling large amounts of power into California in the winter. The direction is the other way when Vancouver and Puget Sound area loads are peaking during the cold weather.
MR. MICHAEL SHANK: Two questions. Lou, you admitted not having done a detailed analysis on all the other alternatives but having done so on the preferred, so my question is why haven't you, as you are kind of legally required to within processes that have been established for years, why haven't you spent the time on the nontransmission alternatives like you have on the watershed?

Secondly, you evaluated the nontransmission alternative under that understanding that you had $25 million, and so how would the $25 million be funneled into and how long would it last under a nontransmission alternative? You're required to explore that alternative not under the understanding that, okay, we're going to write a check to the watershed which is our preferred, how much would that check sustain us for a nontransmission alternative, you're required to check it out not under any kind of price quote which you have done. and I'm wondering -- the two questions: Why haven't you explored in the systems analysis, engineering analysis other alternatives like you did with the watershed? Because you claim all alternatives are on the table, but you just said five minutes later that you're ready to move and by the end of the year you'll be constructing. So there's some inconsistency there. But particularly the $25 million on the nontransmission, why did you use that as kind of a parameter

1421-032-001 and -002 BPA thoroughly examined non-transmission alternatives in the SDBS. Please see Appendix J.

1421-032-003 and -004 The consultant’s study examined non-transmission alternatives in terms of feasibility as well as economic effectiveness. In Appendix J, Section 1.2, they find “As illustrated in Figure 1, a 3-year deferral of the line would require 100% of the available load relief from the large aluminum smelter in the area, plus operation of all existing generation not expected to be on-line, plus load relief from 28% of industrial load in the area. To put the 28% industrial participation rate in perspective, we reviewed information from 13 utility DR programs, and found only four with participation rates above 5%.” This finding is without regard to cost.

The BS also considers the economics of each alternative. The $25 million figure was established as a reference to compare non-construction alternatives to the preferred alternative.
to work within because that actually shouldn't have been there as a parameter.

MR. LOU DREISSEN: I'll try to answer the first one. Maybe Brian can answer the second one. For starters is BPA elected, and it's not required, elected to look at the preferred plan and do a detailed engineering and environmental and survey aspects to that alternative with the hopes, strictly with the hopes that we would be able to finish this project in the time frame that we thought it was needed.

From a legal standpoint, we do not need to do detailed engineering and those kind of aspects on every alternative. We need to do a reasonable search, and we've done that, and most of our search has been associated with what we consider a maximum impact. So we've looked at more than likely what will take place in those other alternatives so that we compare one alternative against another. We have looked at it from a cost standpoint. We've looked at every alternative so we can have a comparative analysis from one alternative to another, and if one of those alternatives were to be chosen, which is usually what BPA does in most of its projects, is that the detailed engineering and detailed survey doesn't happen until after a directed decision because there's a tremendous amount of costs associated with that. That's a lot of time associated with that.
So, again, from a timing standpoint, BPA elected to take the risk to do the detailed engineering and detailed survey studies during the time frame that we were doing the environmental analysis on all the alternatives, recognizing that in the end BPA may end up choosing one of the other alternatives, in which case all of these costs would be subcosts and we would need to do the same kind of an issue on the alternative that actually gets chosen.

So strictly BPA wanted the project -- saw that the project needed to be done within the time frame we're looking at. Actually, originally we were looking at the need for this project to be completed last year, so now we're looking at this year based upon the new load forecast and other aspects and also went back and added additional routes in our environmental process.

MR. BRIAN SILVERSTEIN: To respond to Michael's questions regarding the analysis of the nonconstruction alternatives, there are really two components to the analysis that the experts did for us. The first is a technical feasibility, what does it take to defer the need for a time and is that achievable, and the second is an economic evaluation of comparing that cost against the project.

The chart that I show here, which showed the amount of load reduction that's required for both the
aluminum smelter and the large industrial loads, and the
amount of generation that would need to be on line has no
limitation on economics. That's simply a physical need of
the system. Okay? And so their evaluation showed, for
example, that demand reduction at industrial plants would
need to be 28 percent of the load. Regardless of what we
pay in the way of incentives, that is a huge, huge
participation into band reduction programs. Typical
response is on the order of five percent in industrial
programs around the country based on their survey.

Now, the second part of the analysis does look at
economics, and one of the things that we look at in the
analysis is a cost comparison of various alternatives. As
the consultants noted, the amount of payments that's
available given the projected cost of the project is
relatively small on a dollars per kilowatt basis. And even
if you doubled or tripled or quadrupled the cost of the
project looking at the other wires alternatives, you would
get no where near the level of incentive payments that we've
seen in other demand response programs around the country.

MR. MICHAEL SHANK: Just a point of clarification
of what I was asking to your question. I wasn't recommending
that you do similar involvement because I understand there
was some contract -- potential contracting bids going out
already on the watershed, which is actually undermining the
Cultural resources are evaluated for their eligibility for listing in the National Register of Historic Places. The criteria for eligibility are found in the Code of Federal Regulations, 36 CFR 40.4. BPA requires its cultural resource contractor to prepare determination of eligibility forms, which it then submits to the State Historic Preservation Officer for review. The Tribes receive materials about the cultural resources assessment and determinations of resource eligibility for their review.
1421-034-001 No, they have not. BPA is committed, if the preferred alternative is chosen, to use the extensive best management practices outlined in the SDEIS. BPA recognizes that this project may be held to higher standards than those used by Seattle in the past. BPA is very concerned about the potential impact to Seattle’s drinking water.

1421-035-001 Approximately 86 acres would be cleared within the proposed right-of-way. Additional “danger trees” would be taken outside of the right-of-way. Danger trees are any trees that may pose a threat to the safe operation of the line.

1421-035-002 Please see Table 2-3 in the SDEIS which compares the various alternatives.
alternatives, and it’s at the very bottom we have the cost
for each of the alternatives.

   UNIDENTIFIED MALE SPEAKER: Okay. Thank you. I
just didn’t have that.

   MR. GENE LYNARD: And that’s on the cd.

   MR. CHARLIE RAINES: Good evening. I’m Charlie
rains, and I’m speaking on behalf of the Sierra Club. We
still have questions about the need for this line but will
address those in our written comments. Tonight I’ll focus
on construction alternatives. BPA has proposed its new
power lines through the Cedar River Watershed and the upper
Raging River Watershed. The City has just completed their
HCP which is protecting the forests of the Cedar River
Watershed which is prime habitat for wildlife and drinking
water for over a million people.

   The Sierra Club is opposed to a linear clear-cut
through the watershed that’s proposed by BPA. This could
seriously damage the low elevation forest and resulting
impacts on fish and wildlife and water. BPA’s corridors
right now are weed infested wastelands and BPA has projected
alternatives that would have eliminated the additional
clearing by double-circuiting the existing towers. Due to
public opposition and the grossly inadequate draft EIS, BPA
has now written a new EIS. Appropriately, the document
looks at other alternatives, some of which would run through
Maple Valley which would severely impact rural lands, others would impact forests across the Cascades. None of the alternatives should be constructed as proposed.

If BPA chooses on the construction alternatives, it must be fully mitigated which is required by any federal projects. Unfortunately, the mitigations proposed in the EIS are not sufficient for any of the alternatives. In many cases just too vague. BPA says it will protect the water quality of the Cedar River Watershed. We urge you to continue your discussions with the City of Seattle to actually accomplish this. The EIS also alludes to acquiring replacement forests to mitigate for the forest cut for the new line but offers no specifics on location, size or quality. How can a reviewer determine if a mitigation is adequate for an alternative when there are no specifics?

Conversations with BPA staff indicate forest mitigation is planned only for the Cedar River portion. The Raging River is ignored, despite a long stretch of the proposed line bordering and then crossing the river. Clear-cutting this close to a major salmon river is not acceptable today. We understand that BPA is considering acquiring Section 25 just south of Cedar River, but there's been no commitment to acquire the entire section nor that BPA would fund it. We understand that BPA is considering forest legacy or other conservation funds to acquire some of...
that land. These are critical for other projects, and BPA should be paying for the impacts of their projects with their own funds.

The EIS contains vague language about the best practices for vegetation management in the right-of-way. This should be replaced with solid objectives of habitat and time frames for achieving them. So we urge BPA to pursue conservation and other electrical system changes before building a new power line, if a line is constructed to fully mitigate any new or expanded corridor, including acquiring and protecting nearby forest lands. Until these issues are addressed adequately, we will continue our opposition to this project. Thank you.

MS. CINDY BERRIES: Hi. My name is Cindy Berres, and I'm concerned about BPA's proposal to build a power line through the Cedar River Watershed, which the City has just recently protected from logging. I feel they should mitigate any new or expanded corridors by acquiring and protecting nearby forest lands along the Raging River and Section 25 near the Cedar River. Also I believe that there should be no new roads built and they should install the towers with helicopters. Thank you.

MR. MICHAEL SHANK: As there has not been sufficient time to review the 1800 page supplement draft environmental impact statement or the nontransmission

1421-036-010 and -011 BPA is working with SPU to develop a vegetation management plan for both the existing and proposed rights-of-way. The plan will prescribe site-specific management practices that provide habitat, protect and restore aquatic resources, and control weeds.

1421-036-012, -013, and -014 Comment noted.

1421-037-002, -003, and -004 See response to Comment 340-002.

1421-038-001 BPA is allowing 45 days for public/agency review of the SDEIS. We acknowledge that the document contains a lot of information, and that an EIS consists of two documents, i.e., the draft and final EISs. We anticipate releasing the final EIS on July 1, 2003, and a Record of Decision in August. To maintain this schedule, BPA cannot assure that comments received after March 1, 2003 will be considered in the FEIS.
3-206

Chapter 3 — Comments and Responses - SDEIS

1421-038-001

1 alternative study, Biodiversity Northwest requests an
2 additional 30 days to review and allow for public comment.
3 both organizationally and citizens also needing more time
4 for adequate review.
5
6 Assuming the new deadline of April 1st, 2003, all
7 interested parties will have more accurate time to give
8 proper examination to the stated articles and studies.
9 Without the 30-day extension, BPA could be perceived as
10 attempting to move pertinent information forward without
11 sufficient public review. We hope that BPA complies. While
12 Biodiversity Northwest will need more time to fully inspect
13 the 1800 page SEIS and the nontransmission alternative, we
14 would like to take this opportunity to encourage BPA to not
15 proceed with the Cedar River Watershed like they’re
16 proceeding with the Columbia River, by backing out of
17 contracts, commitments and promises.

18 With the watershed as the preferred alternative.
19 how is the City of Seattle, environmental groups and
20 citizens expected to believe the promises put forth in any
21 BPA administered mitigation package if it is not legally
22 binding? We understand from BPA’s track record, example.
23 the Columbia River, that the agency prefers to refrain from
24 any legally binding commitment at all, and how, then, can we
25 believe anything that you offer at the negotiating table
26 unless BPA will agree to sign under the legally binding

1421-038-002

BPA is committed, and legally bound to implement the
mitigation measures that it inserts into its Record of
Decision, pursuant to 40 CFR 1503.3 That federal
regulation states, in part, “Mitigation (§ 1505.2(c)) and
other conditions established in the environmental impact
statement or during its review and committed as part of
the decision shall be implemented by the lead agency or
other appropriate consenting agency.”
3-207

Chapter 3 — Comments and Responses - SDEIS

1421-038-003 Comment noted.

1421-038-004, -005, and -006 BPA believes it has considered a reasonable array of non-transmission alternatives, including demand response programs, demand-side management measures, local power generation, and the availability of natural gas, solar and wind power as alternative energy sources. A study of non-transmission alternatives was undertaken as a direct result of scoping comments.

The examination of non-transmission alternatives was comprehensive in that it examined the three broad categories of measures: demand response, demand-side management and generation. The measures were looked at individually as well as packaged together to take advantage of the best characteristics of each. Please see Appendix J.

1421-038-007 and -008 BPA is very concerned about the schedule for this project and has not extended the comment period.
Chapter 3 — Comments and Responses - SDEIS

1421-039-001 and -002  Rebuilding the existing line to a double-circuit line essentially provides no additional capacity to serve the Puget Sound load. This is because BPA must plan for an outage of the double-circuit line as required by the North American Electric Reliability Council (NERC). Whereas, if we build a single circuit line parallel to the existing line, the NBRC Criteria (and more specifically the Western Electricity Coordination Council Criteria) does not require us to consider the outage of both single-circuit lines. See also response to Comment 1459-009.

1421-040-001 and -002  Comment noted.

Thank you.

MR. ELDON BALL: I am Eldon Ball, and looking through the information that were provided, I noticed that for Alternative B you have an existing 150-foot right-of-way with towers 150 feet high with a single circuit 345 kilovolt line. It's proposed if that alternative be used that it be replaced with 185 high double 500 kilovolt circuit line. Now, perhaps the cost of doing that in Alternative B is more than would be done by I think it's only nine miles on your preferred alternative versus I think it was 38 miles the other way. If you choose alternative -- the preferred alternative, then my question, and I think this should be thoroughly considered, why not replace the single circuit line that you have there within the existing I believe it's 150-foot right-of-way with a double circuit similar to what's proposed for Alternative B and that way you wouldn't need to require any new right-of-way? I would think that the damages would be far less. Thank you.

MR. RICHARD CHAMPLIN: May name is Richard Champlin. I noticed some comments up there on the wall that indicate that some people seem to think that this is a lot of tree huggers versus property owners, and it's kind of sad that some people have got that into their head, because this is not about that. Nobody's trying to take anybody's property away. This is about a forest, the Cedar River...
Watershed, which threads the City of Seattle and surrounding areas, which is one of only a few in the entire United States that is so clean it needs no filtration system other than what nature has provided. This is also, whether it is indicated in the provided documentation by BPA or not, about an energy fateful brought about by regulation and a subsequent opportunistic energy fraud perpetrated by Enron and other companies.

We were told some time ago there was a shortage coming up, which I believe was manufactured, and that therefore we need to upgrade power. We are still being told this in spite of what has happened over the last year and a half. I have not forgotten about Enron and the way they scammed the entire Western United States. Evidently some have forgotten, but I hope you haven't. Because of this ongoing perpetuated threat of having our lights, our heat and our dialysis machines suddenly turned off, we're supposed to throw our entire concept of environmental stewardship out the door. We are supposed to be concerned now about energy shortages and quote, unquote national security more than we are about clean water.

If polluted water lost an entire species of salmon and other fish, the loss of habitat and further degradation of a fast disappearing forest and the insult to the people that might have hunted and fished there before we came is...
not a threat to our national identity and pride, then what is it? Is it progress? I don't buy that.

Please don’t try to blackmail us with threats of blackouts. BPA needs to stop thinking about cheap and easy. They need to think about management and about respect for the concerns of the majority of us who do depend on this water, this shed, and who love this area for its beauty. Thank you.

MR. RON IVIERSON: I'm Ron Iverson. I have property in the Hobart area which will be affected by Alternative C. I've been to probably ten meetings on this, and I guess I can sum it all up: BPA, you did it right the first time; and the second, democracy does work. I've been to eight meetings and get damn tired of people that have cultural diversity problems and things like that. First few meetings we had I thought this thing was resolved, and then March 26th Margaret (inaudible) had some comments and you probably got tired of listening to four people say they want to tear down the existing power line -- I'm not making this up -- abrogate the Canadian treaty, litigate, litigate, litigate with dollar signs in their eyes. I got tired of that. I was kind of ticked off about that.

But I think this product that you guys have put together is much better. I have looked at -- there certainly can be no argument on any of us if the water
Chapter 3 — Comments and Responses - SDEIS

quality is going to be affected, we would all go away. If there's any compelling evidence that building a parallel line is going to degrade that water system, we would all say look at some other alternatives. There's no compelling evidence. And it looks like Seattle's concerns for water quality predates the proposed line. I think we all want something that has the least impact on people, the environment, and we can't throw out cost completely.

So the bottom line, I think you guys have done a really good thing here. I have seen some things on poles and mitigation and so forth that I didn't see before, so my compliments to you. And, finally, I want to say something about Biodiversity Northwest, which is not exactly in your back pocket. I think Michael Shank and his crew look at things aggressively and, by golly, their comments said deep six Alternative C. Michael, I do appreciate you being willing to take a look at all these things and get rid of one of the dumbest alternatives you can say. I said with the math that any third grader could figure out that was the worst alternative.

MS DIANE ADAMS: Sir, let's keep our comments focused on the draft EIS, please.

MR. RON IVERSON: Final thing, I would say you did a good job. One compelling comment I heard from a lady was why would you use the power of eminent domain to screw up

1421-040-003 and -004 Comment noted.

1421-040-005 and -006 Comment noted.
There were several comments previously received requesting BPA specifically study routes B and D as viable alternatives to crossing the Cedar River Watershed. Those comments came from the city of Seattle, Tribes and environmental groups. Alternatives B and D are constructible, though very expensive. They do present their own environmental issues as indicated in the SDEIS. Alternatives B and D, if not chosen for this project, could still be used for some future transmission line project currently not planned.

Please see response to comments 1421-032-001 and 1421-038-006.

Comment noted.

The analysis of non-transmission alternatives (Appendix J) does not reference and was not based on the Business Plan EIS.
The analysis of non-transmission alternatives, Appendix J, examined six different economic perspectives. Ratepayer Impact Measure (RIM) - Transmission Company, while important, was only one of the measures. See Appendix J, Section 3. Even assuming societal costs and benefits were the basis for a decision, the non-construction alternatives cannot meet the need. See response to Comment 1421-032-003.
double. BPA has a choice to look at societal costs and
societal benefits and that is the choice that you should
make.

It's imperative -- you state that it is imperative
to keep the transmission business lines looking at rates.
That's not imperative. That's a choice. If you don't make
a choice to look at all the societal costs and benefits,
develop a nontransmission alternative that's viable, you're
not doing the public any good and don't think that this is
over. Thank you.

MR. RICHARD BONEWITS: Well, I'm not going to ask
you to justify the demand. I'm not going to ask you to
change people's habit because we can't get them to turn the
light bulbs off or put timers on the water heater. We've
been through all of that a year ago. It's all in the book.
Those answers are there.

90 percent of the power demanded for this power
line comes from Seattle and the suburban cities. Less than
one percent is used in the area within which it's running.
A major BPA quadrangular transmission line grid already
exists in this area, and believe me there's 110 kV, 230 kV
and 500 kV lines already there. All proposed transmission
lines cross sensitive rivers, either the Cedar or the
Snoqualmie, many streams and wetlands and forested lands,
all proposed routes have the potential for significant
In this -- in what you have planned, the approach you took, you made Seattle a beneficiary to a BPA construction management plan that the rural area citizens would love to have. It is more protective to the environment than your own past practices, your present practices or anything demanded by King County and certainly is not going to make what we call the Critical Areas Ordinance. Seattle is also beneficiary to a generous mitigation plan that more than compensates for the environmental damage of a second power line. Proposed route through the watershed -- outside the watershed, I should say, will result in more damage and you're going to see firsthand evidence, and some of you folks in Seattle that doubt that, we're encouraging you to get off the tour bus through the watershed. We have been on that, too, but we want you to come out and look at the rural area and we're going to show you that the trees are bigger on the outside than they are in.

Seattle raised water quality issues, but that's a red herring, too. No one is going to compromise water quality, no one is proposing to do anything about compromising. There's been an existing line in the watershed for 30 years and there's no evidence of a problem.

In '92 the Seattle was ordered to come up with a
design for a filtration plant. It has not been implemented yet. It was ordered to do so by the State of Washington.

It is still not in place. It could more for itself by getting rid of the roads and doing what it says it's going to do in the Habitat Conservation Plan than it can about arguing with the 92 acres.

Now, the cost is an issue, and the studies clearly show the difference, and, therefore, isn't any doubt in my mind that when you go one level more in detail and put the mitigation to it, it may quadruple again and it's going to quadruple on the longer routes.

Lastly, if the folks at Seattle would like something to really look at, consider studying another alternative route: The Rocky Reach, the Renton line, you could energize that one and run it right down the middle of Lake Washington on pontoons with 180 foot towers on it.

That might be more environmentally friendly.

MR. RICHARD TINSLEY: Some places in the country have some pretty terrible water, but we're fortunate here in the Seattle area to have good water, so clean and pure that we don't have to build an expensive filtering plant for it. We want to keep it that way. For the last 50 years or so, Seattle has had a practice of buying up private lands in the watershed so they can maintain the purity of their water.

And through this diligent effort they have managed to do so.
The land is not open to the general public. It's not open for recreation, et cetera. They want to keep it for water quality, and as an added bonus we get the wildlife habitat and so on. I'm not convinced at all that this transmission line needs to be built, but if it is built, it should not be built in the Cedar River Watershed. If it is in the Cedar River Watershed, that will make more of an impact. You have your vehicles driving up and down for maintenance, you have the oil percolating into the ground, and there's more of a potential for polluting the water which would require us to build an expensive filtration plant. Don't put it in the watershed. Thank you.

MR. SCOTT TAYLOR: HI, guys, I'm Scott Taylor. I am a tree hugging property owner. I live outside of Hobart over on Tiger Mountain, and I work in Seattle. So no matter what decision BPA makes, I get it one way or the other. If they go through the watershed and the water quality is compromised, I will drink it at work. If they go through my backyard and they compromise the water quality of my well, I get it at home. So I'm able to see both sides of the story.

I want to give you guys some compliments on your EIS. You guys went through an awful lot of work on identifying mitigation techniques. Specifically I was impressed about the vegetable oil instead of hydraulic fluids. That's pretty cool. I didn't know you could do
that. Helicopters, I knew about that; the micropile
footings, that's awesome; temporary mats; minimize
vegetation cutting. You guys have gone through an awful lot
of -- I mean, there's a whole list on page 5-4 of all the
stuff you are going to do to minimize impact to the Cedar
River Watershed. and I applaud you on that.

However, I would like to point out what I think to
be a bit of political hypocrisy. That list isn't there if
you go through any of the alternatives, and that frankly
pisses me off. If you guys are going to take helicopters
and do micropile footings on this, which is the Cedar River
Watershed. why not do it on hundred year old trees that are
in my backyard. I have spotted owls, two of them, in my
backyard right where this photo was taken. Your
responsibility is not to Seattle. it's to the environment.
And if you are guys are minimizing impact and going through
this whole list of stuff that you can do just for Seattle,
do it for all the other alternatives as well. Thank you.

MS. PAM TRUJILLO: Well, I have to agree with what
Scott just said. If I could, I'd like to introduce myself, my name is Pam Trujillo. I'm directly affected with both
options B and D. I am also a King County model horse farm.
I am a King County wildlife refuge, which includes, just
like Scott said, eagles, falcons, bats, owls, coyote. I
have a herd of about 40 elk that actually sleep in my front
1421-046-001

yard, among other things.

Additionally, I have a legal service that I
provide in North Bend, but no matter what, as has been
brought out here, we're all personally affected, whether
it's the watershed in drinking water or whether or not it's
our own personal lives. However, one thing I did want to
bring out is, for example, as a personal homeowner, I back
to a historical conservation reserve. And when you look at
the Seattle City, and I don't know if there are any Seattle
people here. I haven't heard from them, they offer
visitation for 10,000 children to view natural habitat.

1421-046-002

However, Camp Waskowitz, which I back to, offers visitations
for 6,000 children during the course of each year. That has
not been addressed as being also an issue of habitat
problems that may exist in the sense of how are children
being affected. How's the environment from a family
standpoint being affected?

1421-046-003

But we have to look at not only the facts. I read
on the website the Sierra Club mission statements, the
Biodiversity mission statements and so forth, and it's very
clear that their issues are for the rights of the general
population. However, I have to also agree with Scott that
if there are going to be certain mitigation issues and
pylons and so forth directed, helicopters coming in to do
this and that, we, too, as homeowners should get the same

1421-046-004 and -005

1421-046-002 and -003 Both Camp Waskowitz and the Cedar River
Municipal Watershed have major BPA transmission lines
located within their boundaries, and both would be
impacted by project alternatives i.e., 1-4B would impact
the CRMW, and Alternatives B and D would impact
Camp Waskowitz. Should BPA select any of these
alternatives, it would work with the landowner to
minimize impacts. See also response to Comment 1420-
005-001.

1421-046-004 and -005 Please see response to Comment 1420-001-002.
I know for myself personally during the time that this has gone on, and I did want to mention one thing -- I'm running out of time here -- there was a request for a deadline extension. I received notification and anybody who's involved in this received notification in May. I feel that's adequate time for an extension, and I can tell you from a personal standpoint I have been put on hold as regard to anything to do with my property, whether it's remodel ventures, whether it's a sales venture, and if this continues to go on hold, I cannot offer my property without the potential of a lawsuit with this still being in a hold mode.

I realize there's a lot of issues that all of us are affected with, we don't -- no one wants a power line, but the fact is we can't allow just emotion to lead this. It has to be a fact of whether or not we do need power, and I'm out of time. Anyway, I would like to say for the record that I don't feel an extension is in my best interest or in the best interest of the homeowners. There's adequate time to have read what's out there and to digest the EIS and today isn't the first day for that.

MS. HELEN JOHNSON: My name is Helen Johnson, and I'm a 60-year-old grandmother from Hobart, and this is the last place that a 60-year-old grandmother from Hobart wants
to be. I've only given one other public speech, and it was right here last year and it was probably the same speech I'm going to give tonight. But this is important because I think sometimes that we get lost in facts and we forget about people.

I want to tell you a little bit about Hobart. Hobart is a very, very special place. It's made up of very special people. It's been here for a hundred years. It was here before the watershed. It was -- the watershed was donated to the City of Seattle by a member of a Hobart family. Now, if this isn't biting the hand that feeds you, I don't know what is. We're made up of many second and third generation families in Hobart. We've poured our heats and our souls into this land. Many of us grew up there, we were born there. We've stayed there and lived there and we've buried our loved ones in the Hobart cemetery, and now you want to tell us that it's all for nothing because you're going to destroy this little area all for the -- for more power for the City of Seattle. We don't need it, they do.

This is not a newly rich neighborhood made up of wealthy landowners. These are hard-working folks who have lived there all their lives and they have taken good care of this land for years. We don't even have a store out there except for one little mom-and-pop grocery store, and it's run by a third generation Hobart family.
Last year I listened to some wonderful young people who give tours through the watershed and they say tourists love it, and we do, too. And we know why they love it, because we live there, we have the same animals, we have the same plants on this side of the fence. On our side of the fence on any day you can see the elk, deer, bear, cougar, possums, raccoon, coyotes, too many kinds of birds to list. And they don't know they're not supposed to be over here, so they live where we do too. And we take care of them. We take care of them better than the City of Seattle ever has.

We do have one thing in Hobart that the watershed doesn't have, and that's people, but I'm beginning to think that people really don't count much anymore. So I'm begging you to consider the consequences to the farms and the homes and the people before you make this decision and please do the right thing so the citizens of Hobart can get on with their lives. Thank you.

MR. HILLARY LORENZ: My name is Hillary Lorenz. My land is underneath proposed route Alternative C. I've been in public water since 1985 as an operator, carry a four-year degree in public water policy, and I worked in the late 1990s for two and a half years for Seattle Public Utilities at Landsburg out at Lake Youngs as a water treatment operator.
Chapter 3 — Comments and Responses - SDEIS

BPA has received information from SPU: "Landsburg Raw (CPR-1) Turbidity Data (in pipeline downstream of diversion) 1993 to 2001 - Daily Readings." In reviewing this data we found there had been only one spike to 5 NTU on 12/29/96. If BPA decides to build this project, BPA plans to monitor water conditions in the vicinity of the project.

My job for Seattle Public Utilities at Landsburg was to raise and lower the gates of the diversion dam to take more or less water through the diversion pipe out of the Cedar River, transport it down to Lake Youngs where it was treated and sent on to the City of Seattle and other purchasers-vertisors. During the two and a half years that I was there at Landsburg, the City of Seattle performed a practice they called forebay cleaning. And that's where we raise the gates on the Cedar River diversion dam, allow the water -- all of the water to go down the natural stream channel. We dried out the intake structure for the pipe that goes down to the transmission line that goes to Lake Youngs.

They entered that intake structure with a backhoe, rubber-tired backhoe, and they scooped sediment out of that. I read in here on the third item, page 5-4. Use of vegetable oil in place of hydraulic fluids within the Cedar River Watershed. I tell you now, they didn't use vegetable oil in that case, backhoe. If you go to Landsburg and you walk behind that diversion structure, you'll find thousands of cubic yards of sediment that they have piled up over the years from this regular practice of entering their intake structure.

These are the same people that are talking to you about concerns of water quality, having your vehicles on...
their land in the watershed, they are entering the actual intake structure with hydraulic equipment. I ask you that if you are going to continue negotiations or discussions with the City of Seattle you talk to them about flow studies and the turbidity studies that they have performed during the forebay cleaning. They will have it on record. They keep track of that sort of thing. They’re required by law to keep track — as they raise or lower the gates, they have to keep track of the gauging station where the river elevation is, they have to keep track of turbidity as they change the diversion on that river. So it’s going to be on record, and I ask you to talk with them about their forebay cleaning practice. Thank you.

MR. JON ZAK: My name is Jon Zak. I live on two and a half acres in a development of about a hundred homes in Maple Valley. Our eastern property boundary will be the centerline of the proposed transmission line right-of-way for Alternative C. We would lose trees on one quarter of our property. These trees are in a native growth protection zone. The trees range in size from two and a half to five feet in diameter breast height above the ground. We never would have purchased this property if we knew a power line would be in our backyard. Alternative C would completely destroy our privacy and our views of trees in our backyard. It would destroy our experience of living in nature. This
3-225

Chapter 3 — Comments and Responses - SDEIS

1421-049-006  Comment noted.

1421-049-004

1421-049-005

1421-049-006

1421-049-006  Comment noted.

was the reason we purchased this property. Part of the
Habitat Conservation Plan, a map was prepared showing the
age of trees in the Cedar River Watershed. On the BPA's
preferred alternative route, the age of the trees is like 10
to 30 years. The trees on my property in the native growth
protective zone make the trees in the Cedar River Watershed
look like toothpicks.

I would like to talk about what Seattle calls the
pristine watershed and their legacy for the future. This
watershed has been decimated by logging for a hundred years.
There are over 600 miles of gravel logging roads in the
watershed. I would like to show you some pictures.

This is from a book published by the Sierra Club
published in 1965, it shows some old growth along the Sock
River. You're not going to see any of that on the Cedar
River. There's another picture of the Sock River forest.

This is a picture of a trail in the Ashland Curtis Grove on
the way to Snoqualmie Pass. This is a picture of the Cedar
River Watershed, Chester Morris Lake. There's quite a bit
of difference. Here are more pictures. Look at the road
cuts and erosion. Chester Morris Lake and see the
clear-cuts and logging roads.

And this is our backyard. Another shot of our
backyard. These are some pictures off the Seattle utilities
website, some of the erosion on the travel roads. Here's
some of the heavy equipment. Like Hillary said, they are not using vegetable oil. Here's more heavy equipment, people working right around Chester Morris Lake. That's all the pictures. If anybody wants to see them, I'll have them later. Anyway, thank you.

MS. LISA TAYLOR: Hi, I'm Lisa Taylor, and I'm a resident of Tiger Mountain. My husband is Scott. We live at the north end of Alternative C. My grandfather grew up on the Olympic Peninsula, as did my father, and I grew up in southeast Bellevue and Eastern Washington. I think for those of us who live this long in this community have our hearts broken by what has happened to our environment. And I applaud the City of Seattle and all the other environmentalist groups, of which I am a frequent donor, for their efforts to recover these areas.

However, I'm also a property owner, and strangely when I bought my property, I thought that I would be the owner of that property, that I would have the responsibility and the right to protect my old growth forest. My husband and I clear blackberries by hand and we plant native species along our seasonal creek. Since we purchased our home four and a half years ago, we discovered that we had properties that were illegally subdivided and spent our savings to buy those properties to avoid lawsuits and to protect that forest area. We subsequently discovered that King County
overlooked certain aspects of the construction of our home and it would require being underpinned in our foundation, that was a second mortgage. We then discovered that we may be seeing power lines in our community that could cause erosion or damage to our home or even loss of our community. Now I hear that we have environmental laws that may be put into practice in King County that will prevent me from even replanting the blackberries that choke the north end of my seasonal creek. So I'm wondering, feeling like an ant stepping -- trying not to be stepped on by the giants, if my property is an environmental jewel that must be protected at all costs, if I am a part of a rural economy that should be protected by our Growth Management Act or if I'm a resource to be used by the urban areas for their landfills and their power lines. So I'm not sure what to say anymore except that I'm getting really tired and I'd like BPA to make their decision and I'd like them to make it soon. As an environmentalist, I believe the best option is through the watershed and I urge the City of Seattle to continue their negotiations and let's no be penny wise pound foolish. There are a lot of private properties out there that were formerly forest industry that can be added to that watershed. I think you would find enormous support from the local community, as well as perhaps BPA, to continue to add
To date, our environmental studies, including the EIS, draft and supplemental DEISs, and final EIS have exceeded $1 million. The funds to pay for these costs come from BPA's customers, since BPA is self-financed. BPA does not receive the appropriations that other government agencies typically receive, but recoups its operating and maintenance costs through its rates. The team that BPA has retained to assist in the environmental analysis are experts in their respective fields and were hired by BPA to undertake an objective analysis of the environmental impacts of the proposed alternatives. Their impact ratings were based on objective factors that were identified for each resource, and are contained in their technical study reports as well as in the EIS. With respect to BPA funding an independent review of the environmental analysis that was undertaken for the proposed project, BPA does not feel that this would be necessary.
of that money available to the citizen groups to do an
independent review of this. Because the consulting firms,
and I know these consulting firms, and they are not doing
independent research, they are doing advocacy for your
preferred action.

So it's a two-part question: How much have you
spent on consultants and would you be willing to make even
10 percent of that available to the public. to public groups
to do an independent review?

MR. GENE LYNARD: As far as the environmental, the
cost for the environmental work to date, we're over a
million dollars.

UNIDENTIFIED MALE SPEAKER: And part B of the
question?

MR. LOU DREISSEN: Part B. I don't think BPA would
be interested in pursuing, giving any monies to private
groups to review our documents.

UNIDENTIFIED MALE SPEAKER: I'm shocked.

MR. JON ZAK: Last year some of the environmental
organizations were talking about double-circuiting, and I
understood you explained how because of redundancy it wasn't
feasible. Then I was surprised to hear you mention
double-circuiting across the Cedar River. So I don't know
if that's an exception to the rule or if you could do that
why can't you do it through the five-mile stretch through
the Cedar River Watershed.

MR. BRIAN SILVERSTEIN: The reason that we're concerned about putting the two circuits on the single tower or what's called double-circuiting is because of the risk of a single event, a wind storm, ice, snow loading or landslide taking out both circuits at the same time. There's a brochure at the back that explains the planning criteria that Bonneville and all utilities use in North America for planning their grids, and they require us to consider loss of a double-circuit as a single event.

There is an exception. There's a footnote to the table that says for certain very short occurrences, such as crossing of a river, it's acceptable to use double-circuit towers and not have to consider that from your evaluation. It's on that basis that we made the decision that would be acceptable to use the two double-circuit towers to cross the Cedar River, but clearly it would not be an exemption for the nine-mile project.

MS. HELEN JOHNSON: Well, I have a couple of questions. We hear conflicting things about Seattle's water. Last year I believe the King County councilwoman told us they had two infractions, and then we have people telling us that their water is so pure that they don't need a filtration system. I know for a fact that they were in the watershed last year asphalt paving roads, and I believe 1421-053-001 and -002 Comments noted.
they were doing work on bridges and the mess they're making at Lansburg is just incredible.

So, you know, I mean, I'm not so sure that their water is so pure and I'm not sure Seattle doesn't have an ulterior motive here. I'm just curious if you're really going to do all that much damage because they're already doing damage.

MR. LOU DREISSEN: Well, I don't really at this point want to talk for Seattle, but I'll try to give you my understanding of the situation is that Seattle is mandated to provide a level of drinking water quality associated with rules that the Department of Health has in place. So what those rules indicate is that they can't exceed five turbidity units two or more times per year.

So Seattle monitors the water very closely at their outtake point. So anytime that the water turbidity gets to about a level of three and a half to four turbidity units, they start really looking at shutting their system down. And they shut their system down a dozen or two dozen times a year, depending upon the storm activity that goes on. So their five turbidity units is a fairly pure level, and that -- the turbidity could well exceed 50 to a hundred turbidity units during a storm event. So they monitor that water very closely.

And the events that you were describing, I
don't -- you know. I don't know all the events that have
happened out there, but I know one, for instance, is that
they had a beaver dam break and during a storm event they
can monitor that water very closely as the turbidity rises.
But as in this case here, it was a slide, it was a part of
the beaver dam breaking, they had no forewarning when that
turbidity hit their outtake point. So they clearly exceeded
the five turbidity units at that event.

The difference is that they are exempt from
natural causes, and that was determined a natural cause. So
they're exempt from that, so it's okay. And I believe the
other events have been the same way. The landslide there in
the reservoir, upper reservoir was naturally caused, caused
by the earthquake activities. So those kind of activities
are exempt from the regulations.

What is not exempt are predictable events,
predictable meaning by construction, for instance, by our
transmission line construction. They're also very concerned
anytime you have to do road construction inside the
watershed because, again, those are predictable events. You
could have two main events happen or more without triggering
the need for having to build a turbidity filtration plant.

The other issue that a lot of people get mixed up
with is that they are building what some people call a
filtration plant currently. That filtration plant will not
take care of turbidity. It takes care of bugs in the water.
So that filtration plant costs them a lot of money, well
over a million dollars, or a hundred million dollars. They
don't want to spend another hundred million dollars or more
for a turbidity filtration plant. So really that's what the
issue is is turbidity in the water. So that's what
everybody is concentrating on currently. everybody meaning
Seattle and also obviously that's BPA. So we're trying to
prevent erosion, we're trying to prevent turbidity in the
water.

MR. RICHARD BONEWITS: I want to answer Helen's
question. I am a user of Seattle water, and like many of
the rural areas, I have Seattle water supplied to me through
a purveyor. I can speak to the subject of quality. I don't
have any question about Seattle's water management. I know
that watershed manager. I know some of the people that work
there. I even know Mrs. Pager, who I have worked with in
other venues, and they're all very concerned about
maintaining water quality. So that's not the issue.

But there is an issue at least as far as I'm
concerned about taste. And, in my own case, the answer to
it was simple, put a filter in my house. That's what we do.
we filter Seattle's water. And that's what a lot of people
find they have to do because, as they pointed out, there's
times of the year the turbidity, for various reasons, some
The cost of adding to the currently planned “filtration bug killing plant” with a turbidity plant is $105 million (estimated), which is what is currently being used for a dollar figure. The currently planned filtering plant will not filter turbidity so that component would have to be added on.

Comment noted.
The preferred alternative would reduce losses by approximately 11 MW on peak. This would result in annual energy savings of 48,180,000 kWh, valued at nearly $2 million per year. This is cost-effective from a total resource cost and societal perspective. Retail utilities and others who use the BPA transmission system return energy losses to BPA. Therefore the retail utilities, and their consumers, would benefit. It does not make money for BPA.
this line saves energy and the amount is significant, at the
time of normal peak it’s about 11 megawatts of peak power.
that means that the total losses on the system will be
reduced and the amount that the retail utilities have to
return to us to replace that is reduced by 11 megawatts. So
their consumers benefit. But there’s no financial
consequence to Bonneville transmission. I might say our
friends on the other side of the house in our power business
t line, they and their customers will, in fact, benefit.
CERTIFICATE

STATE OF WASHINGTON

COUNTY OF KING

I, BETSY DECATER, a Certified Shorthand Reporter and Notary Public in and for King County, Washington, do hereby certify that I reported in machine shorthand the above-captioned proceedings; that the foregoing transcript was prepared under my personal supervision and constitutes a true record of the proceedings.

I further certify that I am not an attorney or counsel of any parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

WITNESS my hand and seal in Sammamish, County of King, State of Washington, this 4th day of February, 2003.

[Signature]

Notary public, State of Washington, County of King

My commission expires 03-20-06
COMMENTS TO
KANGLEY-ECHO LAKE TRANSMISSION LINE PROJECT
Tuesday Meeting, February 4, 2003

Seattle Center, Rainier Room
Seattle, Washington

Reported by: Betsy E. Decater, RPR
License No. 601-835-443
1422-001-001 This is discussed in Appendix H. For security reasons, parties must sign a nondisclosure agreement to receive a copy of Appendix H.

1422-002-001 BPA negotiated with British Columbia for more than 10 years to develop the details of the Treaty power return. The March 29, 1999, Entity Agreements codify the obligations. See Appendix I for a description of the Treaty. While there have been ongoing discussions between BPA and Powerex at all levels, no new agreement was reached. The Canadians are entitled to have the power returned to meet their own needs.
See response to Comment 1422-002-001. If you take a look at the Puget Sound Area load bar graph in the EIS, you will notice that if the Canadian Treaty return is eliminated (the purple part at the top of the bar graph, page 1-5) the need for the project only changes by two years, from 2004 to 2006.

Terms of the High Ross agreement are incorporated into the planning studies. The High Ross return from Canada slightly reduces the power flowing from south to north. The amount of demand response required is much larger than utility programs have achieved in the past. See response to Comment 1421-032-003. The short time makes it even less likely that these large amounts can be found.
construction of that line using the demand alternatives that you analyzed?

MR. BRIAN SILVERSTEIN: My interpretation is that if we had more time, more alternatives and greater quantities would be available, but my belief is we might be able to push it out for a couple of years. It just means we would have to build the line a couple of years later than our current schedule.

MR. FOLEY: One of the things if you had more time, you might be able to see whether or not some of these plants were built, for example, and that would -- so I think we would be -- there's always value in delay if you don't -- you know, if you don't run into a problem with not being able to meet load. So you've got this trade-off obviously.

UNIDENTIFIED FEMALE SPEAKER: I wasn't here in the beginning, so maybe you guys covered this. I'm just curious in relationship to all those questions about could you delay the project. It's my understanding that Bonneville has a curtailment plan in place now for -- with local utilities so if the line reached certain loadings that local utilities would have to get some of the industrial customers to shut off even this winter. Is that still in place?

MR. BRIAN SILVERSTEIN: Yes, the curtailment plan is in place, and the curtailments would, in fact, be...
For the winter of 2003-04, 381 MW of load reduction or additional generation within the Puget Sound Area is required. Two years later, the amount increases to 841 MW. See Appendix J, Section 2.4.
Transmission customers return energy losses to BPA - the costs are not included in the rates. Therefore, the savings are not included in the Ratepayer Impact Measure (RIM) - Transmission Company Cost Test. The savings are considered in the Total Resource Cost (TRC) Cost Test and Societal Cost Test. See Appendix J, Section 3. Because the loss savings are a benefit to consumers that offsets the cost of the line, under the latter two measures the savings would reduce the incentives available for non-transmission alternatives.
MR. BRIAN SILVERSTEIN: So let me try that. So if you look at it just from a transmission business line perspective or transmission -- right, from our perspective, we do not get compensated directly for the losses. The losses are returned by the retail utilities. But if you look at the analysis that they did for total resource costs, for instance, delivery price of power or the societal costs, the value of those lost savings are, in fact, included in the analysis.

So I think they are correctly accounted for, and I think one way to look at it, if you look at it from those perspectives, the loss savings are really offsetting against the cost for the transmission lines. So, in fact, the transmission lines cost zero, or, in fact, it saves money for consumers as a whole.

Thank you very much.
CERTIFICATE

STATE OF WASHINGTON

COUNTY OF KING

I, BETSY DECATER, a Certified Shorthand Reporter and
Notary Public in and for King County, Washington, do hereby
certify that I reported in machine shorthand the
above-captioned proceedings; that the foregoing transcript
was prepared under my personal supervision and constitutes a
tru record of the proceedings.

I further certify that I am not an attorney or
counsel of any parties, nor a relative or employee of any
attorney or counsel connected with the action, nor
financially interested in the action.

WITNESS my hand and seal in Sammamish, County of

Notary public
'State of Washington'
at Sammamish

My commission expires 03-20-06
COMMENTS TO
KANAGLEY-ECHO LAKE TRANSMISSION LINE PROJECT
Wednesday Meeting, February 5, 2003

Maple Valley Community Center
Maple Valley, Washington

Reported by: Betsy E. Decater, RPK
License No. 601-835-443
1429-001-001 and -002  Comment noted.

1429-002-001  Seattle has given BPA its comments in meetings and in writing. People concerned about commenting about the alternatives can come to BPA's public meetings, write to BPA, comment to their elected officials (local, state, and congressional) and write the Mayor of Seattle. BPA will study all the comments and use those comments along with the information in the EIS to make a decision.

1429-003-001  Comment noted.

The activities that you describe taking place on your property involve criminal trespass (illegal dumping, performing unwanted recreational activities and holding parties), and should be pursued by the County Sheriff's Office. Any help you could obtain for law enforcement, such as license plate numbers, names/address from any discarded mail, pictures and/or typical times of occurrence would aid law enforcement in arresting those who are responsible.
then the western side of our property would also have an
easement along it. The reason we object to that option and
feel that it should go in the watershed is we have such a
difficult time with the public using the easement for
recreational, dumping, partying on, and it’s very hard to
get them to leave at times, they’re rude. And we contact
the police, the police tell us that we’re to hold the people
until they can get there, and you can’t do that. And so
this really puts an onus on the property owner because they
believe that this is government property and belongs to the
public.

MR. DAVE PIMENTEL: Howdy, gentlemen. It’s been a
little while. Just got in from Oregon. We weren’t even
planning on being here, but I’m glad we showed up and just
sat down really basically. When we went through the whole
deal last year, we felt that we had some stiff opposition
from downtown, so to speak, and what I want to know is what
is -- what’s it like? What’s the atmosphere on the other
side like right now? You know, what do we, who oppose
Alternative C, what’s our best path to take to make sure
that the position is held that you’re preferred alternative
goes through?

MR. LOU DRIESEN: I assume that you’re talking
about downtown Seattle, not downtown --

MR. DAVE PIMENTEL: That’s correct.
MR. LOU DRIESSEN: Well, you call it opposition.
I'll call it differences of opinion. There's folks around
that are concerned about the impact this line could have
crossing the watershed. They're concerned about the impacts
to the drinking water, they're concerned about the impacts
to the Habitat Conservation Plan, which Seattle went through
a lot of effort to put that into place.
So those folks are still concerned. The issue
hasn't gone away. We're working with Seattle at this point
and we're meeting like on a weekly basis with Seattle trying
to figure out a way to where we can take care of most of
their concerns. So as part of that, BPA has gone through
this detailed engineering and surveying analyses, we were
able to figure out where the new towers are going to go, for
instance, and where any of the new access roads are going to
go. And with that information, we were able to determine
exactly what kind of mitigation measures from an
environmental perspective need to take place.
So as a result of that, we were able to determine
that we will not be filling in any wetlands, for instance,
so that was a big issue. We were able to minimize clearing
outside of the right-of-way. We were able to minimize
clearing inside of the right-of-way to the extent BPA has
determined that it's okay for one span just to cross the
Cedar River, for one span it would be okay to double-circuit
such that a new line would go inside the existing
right-of-way that's out there now, and we would put in two
double-circuit structures and put both lines, existing line
and new line, on those two double-circuit structures. And
by doing that, no clearing will need to take place across
the Cedar River.

So these are all fairly large concessions.

Another fairly expensive method we just started using at
BPA, we said we are going to use specialty footings inside
the watershed, we are going to use what we call micropyle
footings, and it's something that is evolving as we go
along. The design of that is evolving as we go along, so we
intend to use those.

Also, we intend to use a helicopter to place
structures. So that normally we would have to use a large
crane to go out there and install the structures, we don't
need a large crane if we use a helicopter. So we will use
helicopters after the footings are in place to put the
structures in place and use the helicopter also to string
the line. We're going to use a helicopter to help do some
of the logging out there. So these are all trying to
minimize and possibly even eliminate any potential erosion
that would take place out there. So that's a concession on
the drinking water quality aspect.

On the Habitat Conservation Plan we're working
Alternative A consists mainly of three parts: One part goes from Covington to the north where an existing line would be taken down and replaced with a new double-circuit line, which would carry both the existing line and the new line. Part two goes around the existing BPA substation with new right-of-way and would require removing some homes. Part three would be between Kangley and Covington where there is an existing vacant right-of-way available where the new line could be constructed. You are referring to Part three where the new line could occupy vacant right-of-way that has been vacant for many years. BPA recognizes a new line within this vacant right-of-way would have high impacts to adjacent homeowners.

UNIDENTIFIED MALE SPEAKER: Alternative A affects the community that I live in, and you made a comment that you didn’t think that you could take it down long enough to do whatever, you know, to put up the new line. I’m kind of
confused by that because my understanding was that you were actually going to put a third line using the additional right-of-way that you've had since about 1942, which now most everybody uses as a nice screen to their property. And so I'm a little confused by what you said. If you have to, quote, take it down. Why would you do that if you're going to just put up another line?

MR. MIKE KREIFE: The proposal there is you're talking about the Covington Maple Valley 230 kV line. The proposal there is to take that -- because our right-of-way is only -- it only can take either a single structure, either double circuit or single circuit. We will take a single circuit down and replace it with a double circuit, put the existing line back on one side and build a new line on the other side. So essentially we're not going to put two parallel structures there, or one set of structures, the old and the new line. So you have to take the old one down before you put the new one up.

UNIDENTIFIED MALE SPEAKER: So you already have two?

MR. LOU DRIESS: There's two parts to this. Basically -- actually, there's three parts to this Alternative A. So Alternative A would start at Kangley, for instance, and from Kangley to Covington there's a vacant right-of-way that's available. Near Covington there's two
existing lines already in that right-of-way, but there's a
central portion on the right-of-way. This new line would
utilize the central portion.

What Mike's talking about is from Covington to the
north.

UNIDENTIFIED MALE SPEAKER: No, I'm talking about
the piece that goes through Winterwood Estates.
MR. LOU DRIESEN: Right through there Alternative
A would utilize the central right-of-way which is on the
north side of those two lines.

UNIDENTIFIED MALE SPEAKER: Right. And that's the
area where you have went and cleared all the trees and --

MR. LOU DRIESEN: That's correct. A lot of trees
have grown up inside of our right-of-way there and people
use that like for backyards and will definitely impact the
folks that live alongside that right-of-way.

UNIDENTIFIED MALE SPEAKER: So that's not the part
you're talking about taking down. You would, in fact, put a
third line in there.

MR. LOU DRIESEN: That's very correct.

UNIDENTIFIED MALE SPEAKER: But when it turns and
goes through Covington, then you would still only maintain
two towers. Is that what you are saying?

MR. MIKE KREIFE: The part I was talking about was
the section right here where we have one circuit we would
The existing line on the Cedar River Watershed was built in the late 1960s and has served load growth in the area for nearly 35 years. The new line should serve the area for at least another 30 years and maybe longer depending on the availability of new power generation technologies.

**Transcript:**

> replace with a double circuit. I think the part you're talking about is here where there's a single circuit and we will add a circuit on that right-of-way, so they're both part of the same plan. So it's --

> MS. DIAN ADAMS: Does that answer your question, sir?

> UNIDENTIFIED MALE SPEAKER: You would have in that area where it goes through three sets of towers?

> MR. MIKE KREIFE: That's correct.

> UNIDENTIFIED FEMALE SPEAKER: Once this is completed, how many years do you anticipate this will hold the amount of power that's needed?

> MR. MIKE KREIFE: Well, I've gotten that question tonight from a couple of people. In fact, we had it a year ago in some of the questions, which I wrote a response. The line we have through there now starts in Monroe to Echo Lake to River, that's the north-south line. It was built in the late '60s, early '70s, so it's approaching 30 years. It has provided good service. It's hard to look at the future and know what growth's going to be. Actually, load growth now is much less than it's been in the last 30 years. We had six to seven percent load growth for a long time, we have two percent load growth now.

> I would suggest -- my experience, I've had 30 years in planning, I would suggest that it would last at
least as long, but there are things happening in the power
supply business, distributed generation, fuel cells, you
hear about them in the news. They have been around a long
time, a lot of people are trying to figure out how to mass
produce them. When they are mass produced, they will be
cheaper. You could very likely have your own power supply
produced by gas in your own home. It could happen. 20, 30
years, the load growth is all handled, at least at residence
with those devices. It could happen at some point that no
new transmission, major grid type transmission is needed.
But I would say that line, short of that happening, that
line should last 25 or 30 years.

UNIDENTIFIED FEMALE SPEAKER: I was just
wondering, you were talking about you were going to be
minimizing the amount of timber you'll be taking down in the
watershed to try and help them out to meet some of their
environmental goals. I guess. Well, on my land that's in
preferred alternative I, anyways. I asked them to minimize
the amount of trees that they took down on one of my lots
should they come across there because I spent a lot of money
in developing a 20-acre piece there that I have a creek that
goes through there also that was of great concern to King
County as to a hundred year flood plain.

So I had to have a lot of engineering done having
to do with that hundred year flood plain, and that cost a
1429-007-003 and -004  Due to the height of the trees within the proposed right-of-way, very few trees can remain within the 150' right-of-way with the exception of very deep drainages and canyons. For the selection of danger trees outside of the right-of-way, the stable tree criteria would be used on all properties along the preferred route. Trees that were deemed not to pose a threat to the new transmission line would be left. Consideration is given when danger trees are selected to impacts regarding landowners from this clearing.
that line. So in this case here we determined that BPA would take some risk and that outside the right-of-way -- inside the right-of-way we would not allow any trees to grow unless it's in a deep canyon. So on flatter terrain or on sloping terrain, we would not allow any trees to grow inside of our right-of-way.

Outside the right-of-way, we're going to take a look at it from a -- more from a maintenance standpoint, take a look at trees that could potentially fall into the line because they're diseased or because they're heavily leaning toward the line. So there are still going to be trees taken in the watershed outside the right-of-way, there will be trees taken, but not as many as there would have been otherwise if we were to take every tree that would potentially fall into the line. So I don't know what the situation is on your property, but I would hope that they would use a similar kind of thing on your property also. So inside the right-of-way we're not allowing any trees to grow inside the right-of-way unless they're trees that -- while you couldn't call them trees, shrubs.

UNIDENTIFIED FEMALE SPEAKER: I understand on the right-of-way and they said maybe they could replant some shrubs, but I'm talking about the trees outside the right-of-way, she was calling every tree a dangtered tree. That lot was scalped when she got through with it, and so a
few trees left on the lot next to it, so --

MR. RICHARD BONENWITZ: Thank you, Diane. My name
is Richard Bonenwitz. I'm chairman of the Greater Maple
Valley Area Council. Area residents are pawns in this BPA
500 kV transmission line location issue. As several of the
speakers that are here tonight were at Seattle yesterday and
spoke to the environmental people and to Council Member
Margaret Pagler who also is on an environmental committee
with me for watershed planning for this area, they're going
to tell you, they will be able to tell you if you want to
talk to them that some Seattle residents have willingly or
unwittingly developed an extraordinary but limited interest
in protecting a relatively small part of the environment of
King County, the Seattle watershed.

We want to give Seattle people credit for their
recent discovery of the environment, as reflected in their
Habitat Conservation Plan that Lou mentioned. They were
forced into it knowing that they were going -- they were
going to be facing ESA. They were requested to get it out
and get it done so they could show some progress before ESA
was laid down as a requirement.

But as you will hear from others here, clear-cut
logging of more than 70,000 acres over the last 90 years
with the intended construction of 650 acres of logging road
is not exactly environmentally friendly. Many of you have

1429-008-001 Comment noted.

1429-008-002 and -003 Comment noted.

1429-008-004 Comment noted.
done a better job preserving your streams and wetland. And
even after having a 500 kV line across the watershed for
more than 30 years, some Seattle residents and politicians
have decided that the power line should go outside the
watershed and one of those routes is over your head. We
don't know which one, but one of them is.

We have confronted them with the information also
that they have been aware of all the time. Lou mentioned
three things they're concerned with. There are really
principally two: One's the environment and the other is
water quality. They mentioned water quality. In the case
of the water quality issue, there was a fecal coliform
incident in 1992 after which the State Department of Health
ordered them to develop a water filtration facility design
and implementation plan and told them the next incident they
were going to implement it.

This was before Bonneville thought about the
studies that led up to their scoping studies two, three
years ago and came back last year. Some of us knew about
this before them. In fact, Laura's son is a water quality
specialist operating for Seattle at times in the past, very
familiar with the requirements. The studies were done, the
designs were complete, the ionization plant is being built
right now. I live near it, it's half a mile away, mile
away, not quite a mile. but the filtration plant has not
been built. Still holding up on it.

So if there's another fecal coliform incident, the
theory that the Department of Health will be on their tails
to get that filtration plant built whether or not the power
line goes through the watershed or not. They know that, but
the story still keeps coming out and that's what you'll see
in the press. But to Seattle's credit, many of its people
did participate in these public meetings, including
Councilman Margaret Pagler last night. There has been no
participation from most of the other cities in the region
which share BPA's electrical power, not from Bellevue,
Kirkland or thereabouts.

Bonneville has done its job. It's doing its job.
There are four groups in your community who have gathered
more than 1500 petitions opposing routes outside the
watershed who are here tonight. One of them is Dave and his
wife back there, and the other one is one that I have sort
of led all the way through it, but we've kept coordinated
together on this and working together to get those
signatures, and I want to give them kudos and I also want to
give kudos to some of our elected representatives.

Jay is here representing Cheryl Pfliig, he works
for her. Sara is here, works for Glen Anderson, another
state representative, and Neal behind here works for
Councilman David Irons. They have been with me, behind me
3-261

Chapter 3 — Comments and Responses - SDEIS

1429-009-001 BPA appreciates the feedback. We wanted to put the SDEIS on our web page, but BPA’s security office suggested that we not do so. We hope that we are allowed to put these documents on our Web site in the future.

1429-009-002 Comment noted.

1429-008-006

1429-009-001 BPA appreciates the feedback. We wanted to put the SDEIS on our web page, but BPA’s security office suggested that we not do so. We hope that we are allowed to put these documents on our Web site in the future.

1429-009-002 Comment noted.

1429-009-001 BPA appreciates the feedback. We wanted to put the SDEIS on our web page, but BPA’s security office suggested that we not do so. We hope that we are allowed to put these documents on our Web site in the future.

1429-009-002 Comment noted.

1429-009-001 BPA appreciates the feedback. We wanted to put the SDEIS on our web page, but BPA’s security office suggested that we not do so. We hope that we are allowed to put these documents on our Web site in the future.

1429-009-002 Comment noted.
been at a bit of loggerheads. The Sierra Club does not want to see any kind of activity through the watershed; whereas, I actually think that's the preferred alternative.

So we actually chatted for at least a half an hour yesterday, and we were actually able to find some common ground, and I would like to share some of that. While we disagree on the exact route which one should go, we're both very much stewards of the environment. If BPA can consider themselves also stewards of the environment, I think that you guys can make everybody happy, or at least minimize the damage.

Specifically, if you guys actually choose to go through the watershed, I want to see some of the things that the Sierra Club wants to see. I want to see Plumb Creek added to the watershed and forked over as part of the mitigation. There's also a hundred acres of property near the Raging River that can be added as well. You guys are also double-circuiting a section across the Cedar River.

Both myself and Sierra Club would like to see that across the Raging River as well.

So I think that there are some extra mitigation steps that you guys can have to make everybody happy. And, likewise, the Sierra Club agrees on my point that if you guys go through anything like Alternative C or A or B or D that you take the same mitigation measure for that.
environment that you are through the watershed, specifically, micropylings, helicopters, vegetable oil. All the things that you would do for the watershed, we require that you do outside the watershed as well, and I'd like to see you add that to the costs that you have put forth in your EIS. Thank you.

MS. LAURA LORENZ: I'm a resident of Hobart for over 40 years, and my comment is going to be very brief. In 1947 the City of Seattle bought 90,400 acres of land -- the Seattle city bought 90,400 acres of land for $2.21 an acre for their watershed, and as a result they closed the watershed so nobody could enter it. But it also obliterated several communities, Harriston and Taylor, School District 409, which is Tahoma, lost tax dollars for support of their school district. The citizens no longer could fish or hunt in this area or use it for recreation in any way. The Cedar River got drained, and I mean really drained. In the summer you can't find enough cool spots for the big fish to live and you can't recreate in it any longer because it's too shallow frequently if you have a dry summer.

Both BPA and Seattle are public entities, and I strongly suggest and believe that public entities or organizations should be used when -- public lands should be used for public uses at any time they can do it instead of going through private lands. So if BPA can go through the
watershed, I'm for it. They have already gotten what they
needed there and they have it and we have sat fast enough.

Let's let them use the public land and let the private
people have a little bit of peace and let 1971's decision to
go through the watershed stand in 2003. Thank you.

MR. JON ZAK: Good evening. My name is Jon Zak.

I live on two and a half acres in a development of about a
hundred homes in Maple Valley. Our eastern property
boundary would be the centerline of the proposed
transmission line right-of-way for Alternative C. We would
lose the trees on a quarter of our property, and these trees
are in a native growth protection area. The trees range in
size from two and a half to five foot in diameter. We never
would have purchased this property if we thought the power
line would be running through our backyard. Alternative C
would completely destroy our privacy and our views of trees
in our backyard. It would destroy our experience of living
in nature. This was the reason we bought this property.

On the BPA’s preferred alternative route, the one
through the watershed, the age of the trees is like 10 to 30
years. The trees on our property in our native growth
protection zone make the trees in the watershed look like
toothpicks. I’ve got some pictures here to show you of some
old growth. This is the Curtis Grove on the way up to
Snoqualmie Pass. Some more pictures I showed Seattle but to
let them know what big trees look like. You may not be
aware of what the watershed looks like, so here's a picture
of the upper watershed. You can see there's a couple of big
trees standing outside and it's been logged for almost a
hundred years, 70,000 acres.

Here's another view, there are 621 miles of
logging roads. See Chester Morris Lake and more Clear-cuts
and old logging roads on the other side of the lake. And
then here you see a big road cut and more clear-cuts. This
is our backyard. There's another picture of our backyard.

This is off the Seattle Public Utilities website.
This was some work that they did. See this logging road?
It's starting -- sedimentation that's running towards the
river. Here's some other work they were doing right around
Chester Morris Lake with the heavy equipment, probably not
using vegetable oil in the hydraulic systems. Other
pictures show heavy equipment. So -- well, the pictures of
the construction in the watershed by Seattle Public
Utilities proves their hypocrisy.

Seattle has one standard for themselves and
another one for the BPA. I would like Seattle Public
Utilities to answer a couple of questions: Number one,
where is the evidence that BPA has caused any harm to the
water quality or watershed operation in its 30 years of
operating a power line in the watershed?

Comment noted.
Chapter 3 — Comments and Responses - SDEIS

1429-011-010

Comment noted.

1429-011-012

Wildlife habitat is important inside and outside the CRW. The area inside the CRW does have a Habitat Conservation Plan approved by USFWS and NMFS. BPA would also seek to minimize impacts to the wildlife habitat outside the CRW by minimizing clearing and construction particularly near and across streams and rivers. As noted in the SDEIS, BPA has labeled Alternative 1 as the preferred route recognizing the ability to mitigate impacts to the wildlife inside the CRW and the impacts to people and wildlife outside the CRW. See Table 2-3 for comparisons.

1429-011-013 and -014 Comment noted.

1429-012-001 and -002 Comment noted.

And, number two, clearing 91 acres for a second power line would require one-tenth of one percent of the watershed's total acreage of 90,240. How can this small an amount of clearing have any impact on water quality?

The Habitat Conservation Plan is a great idea. How about the habitat of people living along Alternative C?

Is wildlife habitat inside the watershed more important than habitats for both wildlife and humans outside the watershed?

The people who lose their property will be paying a price for Seattle's water. The City of Seattle will destroy the rural communities of Hobart and Ravensdale all due to unfounded water quality issues. I wonder what history will say about this. Thank you.

MISS HELEN JOHNSON: I didn't plan on speaking tonight, but my name is Helen Johnson and I live in Hobart and I consider it a privilege to live in Hobart. It's a very special, unique place. It's been there over a hundred years. It was there before the watershed. We have descendants left of the original homesteaders there. They have spent all their lives there. They were born, lived their whole lives there, graduated from school there. They stayed there on the land that they loved, we poured our hearts, our souls into it. We buried our loved ones in the Hobart cemetery. And we have taken much better care of that land than Seattle ever dreamed of doing.
We bought right up against the watershed. The only thing that separates us is a fence. We have the same plants, same animals, same endangered species. And the environmentalists are worried about the watershed, but they don't care if you're on the wrong side of the watershed. They don't care about the species over there. It just doesn't make any sense to come to an area like that and destroy it all for some power for Seattle. Because we don't need the power, Seattle does.

And, you know, it's just we've been there too long, we're too hard working. We just want to be left alone to live our lives. As far as I'm concerned, Hobart should be off limits to everybody but the people that live there, including the government and including King County. And the only extinct -- or people that are endangered of being extinct there are the people, not the animals. It's the rural homeowners.

MS. ALEDIA MORGAN: I'm Aledia Morgan, and I'm on the preferred route. Alternative number one, and you all seem to think that we're only talking about the watershed being affected here. Well, there's at least five people on this route that are being affected. And I moved there in 1976 with my husband, this was the farm of my dreams here, and anyways my husband passed away 16 months after we purchased this property. And so, anyways, then he was a...
truck-driver and we had our own truck. So, anyways, I got
into the truck and started driving the truck down the
property so I wouldn’t lose my farm, and, you know, to
support my family.

And, anyways, I managed, I was concerned back in
1980 -- he passed away in ’78. I bought it in ’76, he
passed away in ’78. I was concerned that I may lose the
farm, so I decided to subdivide it back in ’80. And so I
subdivided it into some five acre tracts in case I wasn’t
able to do the trucking or in case I was to get hurt or in
case I would have to sell some of it and wouldn’t lose the
whole place.

But, anyways, I never had to sell any of it. I’m
trying to move along fast. But then it came to King County
in ’97 decided that they were going to take the right to
subdivide a 20-acre piece away from us, so I decided to
subdivide that in ’97 and it took almost five years to do it
and a hundred thousand dollars. So, anyways, then
Bonneville comes along on March 22 of 2000 and starts
informing me that they’re planning on Alternative 1,
they have got two other alternatives they’re thinking about
but they want to go through Alternative 1.

So, anyways, I go ahead and give them the okay to
go ahead and to survey my property to, you know, do what
they need to do because I figure if they’re going to go
Chapter 3 — Comments and Responses - SDEIS

1429-013-001

BPA apologizes for the disruption that this project has caused people along the project routes. It is our intent to treat people fairly and with respect. Please refer to Section 4.11.2.5, Community Values and Concerns, Property Value Impact. If you are aware of any sales in your area that are comparable to your property, please send them to BPA and our appraisal staff will investigate them for comparability.

1429-013-002

through, they're going to go through, there's not going to be a lot I'm going to be able to do about it and in the hopes that they're going to pay me for my losses.

Anyways, so far to date they came to me, they did an appraisal on October 25th to 27th and they finally got it back to me on March 8th of 2002, and they want to buy this property. I mean, they have been trying to buy our property out there -- I mean, you-all think this has been going on since June for you. Shoot, this has been going on since March of 2000. We've been in hell since March of 2000. I'll guarantee you that.

And so, anyways, they came along and ruining one five acre tract of mine. I mean totally ruining it, and then they're ruining over half of another five acre tract. They came and offered me in March -- well, I wouldn't meet with them in March because I was going on vacation. They came along in April, they offered me $160,000 for two five acre tracts that they're ruining. There will be a building spot on one of them, but it had over 500 feet of building of house feet and now from the right-of-way to the corner of the property line it is 180 feet.

On the other corner, there's a hundred -- 244 feet, excuse me, and they want to pay me -- I put in a road that cost me over $75,000. I put in power and phone that cost me $40,000. I mean, I'm not a rich woman, I'm not a
Big developer, I still truck every day to pay for this and this is my retirement. This is the only retirement that I have. So they're not just affecting the watershed here, they are affecting my life. There is other people that they're affecting that their homes. There is a person who has a home there. They have come in there and offered them practically nothing for their home. The woman has had a stroke since this has been going on, the pressure is intense. I had to contact a lawyer in April so they would quit calling me on the phone while I was driving a dumptruck trying to back up, not to driver over top of people while I was backing up. I had to get a lawyer to write them a letter to tell them to quit calling me on that phone because that's the phone I get my work on, so I have to answer the phone. I finally got to recognize the ID number, so I didn't answer it anymore.

So I -- you know, this is not just about the Seattle watershed. And I asked you people in June to please, you know, not leave us five people out there at the mercy of Bonneville, because I'll tell you what, they're at our door every day, they insisted upon appraisal of the other lady's house during Christmas. Her husband was away while they had a family member that was sick, and I had to call them up and say you don't need to be bothering her at Christmastime, you can wait until after Christmas, but.
you know, and they finally let her do that. But it's been a battle. Every day it's a battle. It's a battle with them, and they plan on stealing our property and I truly mean that.

MR. ROBERT GARLAND: I'm Robert Garland. I'm the president of the Winterwood Estates Homeowners Association, and we have several of our residents here tonight. We are affected by the A transmission line. That transmission line, if put through, will make the last lady's problem look like Sunday school play because there will be about 15 to 20 percent of our residents that will be directly affected either through the fact that the power lines will take out all the trees and have power lines within 30 feet of their house or will take down all the trees and expose the power lines that are there now and ruin the view and the value of the property. So there is -- we have 364 homes in our community and every single division of our community will be affected because of the way the power line runs through at an angle.

We support the BPA's approach to trying to affect the least amount of people possible. All of the other, at least A and C, it appears, will have a tremendous impact on lots of people, not just five, and it will have a devastating effect even perhaps on one school which is in our community. This power line will not run very far from
BPA has determined that the proposed 500-kV transmission line would require a right-of-way 150 feet wide, along with necessary access roads. If the Record of Decision identifies that a route, other than the current preferred route were to be selected, it would not be possible to construct this year. Many activities including specific surveys, design, additional environmental analysis, appraisals as well as negotiations for land rights with landowners would need to be completed.

Comment noted.

Comment noted.
Magnetic fields are dangerous to the public. I think if you can go over the watershed, it's got to be that way. We can't impact schools, we can't impact people's homes. I've had a childhood leukemia, you don't want to go there, and I think we just need to protect the general public.

There's a lot fewer people impacted, and it's tragic for those that are, but it seems that, you know, they're the powerful people. We all don't like government shoved down our throat, but I think they have really done their work, they have really done their studies, and you have to look at the least number of people affected. You cannot go over schools, you can't go over neighborhoods like that. The property that other people are talking about around the watershed that own property aren't -- it isn't inhabited with population to the extent that the schools in Winterwood is. We just have to look at that.

MR. RON IVerson: As many of you know, I'm a Hobart area homeowner or landowner. I talked last night and I'll just summarize and say BPA did it right the first time. They did it right this time, only this time they did it -- I really want to compliment you. The way your construction stuff and the fact that you're using vegetable oil instead of motor oil, I don't know how you can do any more mitigation than that. This is a real nice document, but it's hard to read.
BPA is following the U.S. Fish and Wildlife Service protocols for surveying for the northern spotted owls. Those surveys call for surveys to be conducted over a two-year period during the nesting period of the spotted owl (March 15th through June 15th), unless the project would be constructed in the year the first survey would be conducted. Surveys were conducted during the nesting period in 2002, and they are scheduled for 2003 as well. If any spotted owls are identified, BPA would comply with timing restrictions so as not to disturb the protected species.
efficiency of putting this second line through will more
than take care of the cost of the line. Is that right?
MR. MIKE KREIPE: The energy losses.
MR. RON IVerson: Yes. In other words, they're
saying the technology will be so much better that the
economic value and the loss savings is greater than the cost
of the line.
MR. MIKE KREIPE: It's really not due to
technology. If this were to happen 20 years ago, the same
situation of today, it's just the physics of how losses
occur in the system.
MR. RON IVerson: Final thing is: What's the
bottom line on cost. If you read this baby, would you
rather spend 23 million bucks of your taxpayer money or
double that to 50 million going through Alternative C?
Look at all these costs. I really empathize with the lady
here who's losing some of her property and so forth. But I
heard that Sierra guy talk last night, and he wants to
litigate. The longer this thing hangs on, the worse it's
going to be for everybody. So slyly litigators, I have no
use for that outfit, and I listened to them afterwards and I
appreciate what you guys are up against. Are they going
to give her a section of land? Hell no. Are they going to
give me any land? Hell no. But this guys holding out
they'll give a whole section 25 and he's holding these guys
hostage for that. So be aware that some of the
environmentalists, these Greenies will really be
anti-Greenies as far as I'm concerned.

MR. HILARY LORENZ: My name is Hilary Lorenz. My
property would fall under Alternative C. Last night I spoke
about forebay cleaning at the Landsburg Diversion Site. I
wanted to read from a -- the Draft Final Landsburg Master
Plan. This was put out by Seattle Public Utilities. This
is from their executive summary. On page 7 of that, it
says, Presently the Landsburg intake forebay is cleaned once
yearly during a shutdown of the intake. Deposited silt,
sludge and organic debris are removed by SPU crews using
hand tools and power equipment. That's just Seattle's
documentation of what they do in forebay. I have two other
documents I'd like to speak from, both of them are generated
either by SPU or for SPU, Seattle Public Utilities.

One is an executive summary from their Cedar River
Facilities Planning Project where they discuss the potential
construction of filtration facilities at the Lake Youngs.
The facilities planning project consisted of a series of
tasks that addressed various technical aspects and planning
considerations relating to the implementation of ozone
treatment for SPU's Cedar River water flood. Prudent
planning also resulted in consideration of granular media
filtration and other particle removal technologies.
The summary conclusion in this executive summary says that SPU is planning to implement substantial improvements to its water treatment and supply facilities at the Cedar River source. These projected improvements are based on multiple barrier approach to public health protection and feature the addition of ozone disinfection compatible with addition of filtration facilities at New Lake Youngs intake and roll water pump station. Additional treatment facilities, including filtration, may be justified if, one, regulations change; two, there are new health effects data; three, long-term costs can be minimized through alternative delivery and public/private partnerships.

And I would suggest that they're looking for reduced costs with partnerships maybe with BPA. One other document I want to read from, the Seattle Water Department, Cedar River Surface Water Treatment Rule Compliance Project, dated January 1996. In the executive summary of that under pilot study objectives, they studied -- in this document they studied two treatment regimes. One was ozone treatment only, which is what they are progressing with now. The other alternative was ozone/filtration. Ozone/filtration, the additional benefits of filtration combined with ozonization including turbidity and particle removal providing a further barrier to parasite removal.
disinfection by-product precursor removal, case in order.

reduction, as well as increased system operational

flexibility must be balanced against the added cost for

filtration. Optimum filtration conditions should provide

effective removal of contaminants in the most cost effective

manner. That's from 1996 they're looking at cost effective

manner of filtration.

MS. JOANNA PAUL: I'm Joanna Paul, and I'm in the

area of number one. We will lose our home if BPA comes this

way. None of this was our idea. We lived in the Burien

area and were purchased 25 years ago after 14 years by the

Port of Seattle. We have done this once before. We moved

out to where we thought we could get away from the airplanes

and everything else. We had no idea that a power line was

going to come in. Having a power line come through is not

the issue. The issue is our property. They will be taking

two and a half acres that our house is on and we have over

seven. There is no compensation for that. None of this was

our idea. This has caused us a great deal. It has caused

me a stroke, closing a business and they have undervalued

our property by at least a hundred thousand dollars.

Now, I don't know about you, but a hundred

thousand dollars is a lot of money to me. And we also feel

that we've been harassed. We get calls several times a day.

Not only are we called but then they come out -- and when I

1429-017-001  See response to Comment 1429-013-002.

1429-017-002 and -003  BPA apologizes for the disruption that this

project has caused people along the project routes. It is

our intent to treat people fairly and with respect. We

have offered to buy the lot and house in an effort to

negotiate an agreement. We do not have authority to

condemn more property than is needed for the

transmission project. We can condemn only the

necessary right of way. Our measurements indicate that

the house would be approximately 18 feet from the

outer edge of the right of way and approximately 71 feet

from the nearest conductor of the power line, if the line

is built.
1. speak of them I'm referring to BPA -- there's notes left on my door, my car windshield. One phone call is enough. And when we say we're not going to take their offer, which is a hundred thousand dollars less, at least, we're told they will condemn us and they will not only condemn us but then they will take just what they need, not our house, so the power lines will sit seven feet from our house.

2. You're talking about how dangerous it is. It's dangerous to us. I have no problem with the routes. I have a problem with not receiving fair compensation. None of this was my idea. BPA literally showed up on my doorstep in December and said they wanted to do this. If they get away with this, if they condemn our property, if they take what they want to take and not pay for it, keep it in mind because it's our property this time. It may be yours next time.

3. MR. GEORGE McFADDEN: My name is George McFadden. I live in Issaquah. I want to speak this evening about minimizing environmental damage and the public participation process. Having reviewed some of these options, I believe that the shortest route through the watershed is probably the one that also is the least environmentally damaging. I understand that you have many people that see that differently, including the City of Seattle. But I also want to point out in terms of public participation, when the City
of Seattle abandoned the 16 road inside the watershed, they put heavy equipment in the stream, they removed a roadbed, they put more sediment in their water supply than this project will ever hope to do.

The people who live along Dead Dog Road, I'm sure the City has told you that they have a fourth practice application file, you can comment till Friday. They're going to put gravel packs along Dead Dog Road to haul rock into the watershed and then they're going to haul logs out. I'm sure the City of Seattle has informed the neighbors.

I'm sure they have held public meetings, and I'm sure they have allowed you to comment. That is the process and it should happen. It could be a little disingenuous if they don't. Thank you very much.

UNIDENTIFIED MALE SPEAKER: I guess my question is why is BPA so resonant in providing these folks that are being affected with the proper compensation -- why is BPA so resonant in apparently providing proper and fair compensation to these people that are being affected. You know, that in itself gives you a bad black eye after all the good work you've done on your study. And I guess I wonder why you would be so miserly with five or six people when you can accomplish what needs to be done and affect the least amount of people and look like heroes except that all of a sudden you come up looking rather stingy.
And I guess that's a big concern to me to think that you would be that way, because like she said, it could be our property next. And if you go through Winterwood Estates, you're not going to have just five people on you. And like I said, you just might as well fold up your tent because the lawyers will tie you up for at least ten years or more.

MR. LOU DRIESSIS: Well, I'll try to address that a little bit. It's just a fact of life in this business here is that nobody wants transmission lines. No matter where we go, there's going to be people that are not going to like what we're doing. From a fair compensation standpoint, that process and what we go through is that we have often our own appraisers go out there and they appraise the property and they take a look at that and they present that appraisal to the landowner.

And if the landowner doesn't like it, we offer to have it done by an independent appraiser, and in this case this year the independent appraisers were brought in and they appraised the property, and that value was presented to the people. And those appraisals are based on fair market value of similar properties that have sold in the area on a recent basis.

As a federal agency, BPA has difficulty in there's some rules in place, laws in place that we cannot pay a lot
BPA's offer is based on either a staff appraisal, or a contract appraisal. BPA's contract appraisers must be certified in the state where the property to be appraised is located. BPA's staff appraisers are not required to be state certified, but have chosen to be certified in at least one of the states within BPA's service area. Both BPA's contract appraisers and staff appraisers must adhere to the "Uniform Standards of Professional Appraisal Practices," as well as the "Uniform Appraisal Standards for Federal Land Acquisitions." BPA requires that any contract appraiser be state certified and maintain a positive professional reputation, and must be familiar with the property types being appraised.
Chapter 3 — Comments and Responses - SDEIS

The language in the transmission line easement document identifies what can be constructed. If the rights have already been acquired with the original easement, no additional compensation will be offered.

1429-020-002

property?

And part B of my question is: In areas where you do currently have easement but you increase or impact the area, for instance, I've got fairly large towers running through the north side of my property, but if you decided to make even bigger towers, how do you handle situations like that where you clearly impact the value of my property but you already have that easement?

MR. LOU DRIESS: I think there's a couple of questions there. One, we choose an appraiser hopefully that the landowner agrees with also, but it needs to be an appraiser that's recognized, so -- by the appraisal community. The second question if BPA already has the right-of-way, then in most cases BPA also has the right to certain construct -- in the case of Alternative A, construct a transmission line. There used to be a transmission line there one time. It's a long time ago, trees have grown back, but nonetheless BPA has the right-of-way there and has the rights to construct another line there.

BPA would like to see what impact that it has on the landowner there, only in the sense that if there's any like crops growing there, impacts to like crops. So in these cases here, there's no crops there. There are trees there and in a lot of cases BPA maintains that those trees belong to BPA. In your case there where there is an
The BPA staff appraisers have reviewed the Kangley-Echo Lake Project appraisals with a value of $25,000 per acre for rural residential home sites. We could not find a discrepancy as far as a value of $25,000 per acre. However, on the appraisal summary table, there is a "total value of property," including land and improvements. The value per acre could be misconstrued if the value of the improvements was not itemized separately from the land. The total property value includes land, improvements (if any), uneconomical remnants (if any), timber, etc. If you would like to review the appraisal prepared for the landrights needed by BPA on your property, BPA's appraisal staff is available to answer any of your questions.
put total appraised value or the appraisal value per acre
there is $25,000 an acre on the front, but yet on the inside
you're telling me my land's worth 30,000. But they're
offering me 25 on front. And then on top of it, I don't
know if the rest of you are aware, he was talking about
hired appraiser. Well, their appraiser for my property is
their on-staff appraiser. Tom Walcott, and he is not
licensed by Washington. Portland, he is out of Portland.
He's not licensed in any other state to appraise. He does
not have to be licensed because he's federal.
I called the Department of License, Real Estate
Appraisal Section and talked to Mr. Ralph Burkdoll. And,
anyways. I asked him doesn't Tom have to be licensed to
appraise here, and he said, Well, if he's federal, no, he
doesn't, but he has to go by the appraisal guidelines. But
it's also very hard for Tom Walcott, who's in Portland, and
when he came and sat at my table. I asked him, I said, do
you know certain regulations, certain things in King County
that are going on, and he did not know. He could not come
up with the right answers for that.
And I've been told that an appraiser cannot come
in out of an area that he's not familiar with and properly
appraise anyone's property. And then when I talked to you
in June. I asked you about, okay, I'm going to have an
appraiser appraise my property. So I used the same
appraiser, I paid for him. I hired him. I paid for him, and
I had him appraise my property, the same one that you people
had hired to appraise the other people's properties, and you
still weren't happy with the appraisal that he came up with
because it came up quite a bit higher than your appraisal,
so --

MR. LOU DRIESSEN: I do not know the details in
your situation there.

UNIDENTIFIED FEMALE SPEAKER: You're not aware of
any of these details, none of these real estate specialists
have ever told you about any of this?

MR. LOU DRIESSEN: They have told me about some of
the items, yes.

UNIDENTIFIED FEMALE SPEAKER: Well, then, maybe
you and I need to talk.

MR. LOU DRIESSEN: I'll talk to our realty
department about your situation.

UNIDENTIFIED FEMALE SPEAKER: Do you have any
comment on -- why Tom Walcott -- you sat here and told these
people that you use an outside appraiser. You didn't use an
outside appraiser on my property. Why Tom Walcott?

MR. PAUL WOOLSON: Tom Walcott is a skilled
appraiser working for the federal government. I don't know.

Tina, that this is the vehicle --

UNIDENTIFIED FEMALE SPEAKER: Well, you told these
people that you are using a licensed appraiser. You're
making your guys look good again. They have no idea. They
have no idea.

MR. PAUL WOOLSON: Tom Walcott is a skilled
appraiser working for the federal government. Whether we
use a fee appraiser or whether we use a staff appraiser, the
appraiser still has to follow the same regulations. It's
called "Use Pop." they still have to follow the same
appraisal practices, and Tom Walcott did.

UNIDENTIFIED FEMALE SPEAKER: But how can he be
familiar with this area?

MR. PAUL WOOLSON: And there was a disagreement
with value. Bonneville Power and the property owner are
still negotiating, and there's still a possibility we might
be able to reach a settlement. Tina. And I think that's all
we're still trying to do.

UNIDENTIFIED FEMALE SPEAKER: I still want to talk
with you people too, but I want these people to know what's
going on. Bonneville is not all the good guy that they are
making themselves out to be. They intended to go through
this watershed, they plan on going through this watershed.
None of you people, I don't care what they tell you, have
ever been of risk of them going through your property.

I have rebar in my property. I have cement just
off my property that they have poured and tested for holding
these new towers that they're going to put. If any of you
want to come to my place, I'll be glad to show you the
rebar, the tower test spots they already poured. They have
poured every fourth tower test spot. They plan on going
through here. They just don't want to condemn the watershed
because then they will look like the bad guy, and they can
have my property. I don't care. They can have it. I don't
want to hold up progress, but I just want to be paid.
compensated for it. I don't want any more people displaced.
I'm sorry.

MS. DIANE ADAMS: And I understand your concern
and I think your comment has been recorded and heard by BPA.
They clearly continue negotiation, I guess --

UNIDENTIFIED FEMALE SPEAKER: Well, they need to
hear it, then. The rest of the people need to know what's
going on with us five people because they haven't heard it.
They haven't. They might have heard us, but they're really
not listening and they don't want anybody else to know.

MS. DIANE ADAMS: Well, you've been heard tonight.
I guarantee it. There is one more question and we will
recess back into the open house.

MR. DAVE PIMENTEL: Well, excuse me, after that,
you know. I hate to even ask this question. My concern
is -- and, you know, that's some fresh information that
really brings light how the government works, and it's true
and I believe you. However, I still have a question.

Is it true that after this comment period on March 1st, you know, you’re going along here saying we’re going through the watershed, we want to go through the watershed and on March 2nd you could say, Ha, alternative C, and we would have no recourse at that point. How would that work. If -- you know, I’m not presuming that you’ll do that. But could that happen? And, if so, how would that change the whole scheme of actions that would take place?

MR. LOU DRIESEN: Well, I think I addressed that earlier, that that is a possibility and I want people to know that. I want to warn people about that, is that BPA has gone through an extensive process here and each time we’ve come back to you folks we have the same solution, that is, Alternative 1 as being our preferred. That could still change.

MR. DAVE FIRMTEL: What can change that? The political powers downtown?

MR. LOU DRIESEN: The political powers of other folks is a possibility or something else that comes along that we currently don’t know about. Just looking at the whole aspect of, you know, cost to the system and environmental issues, the administrator will take a look at all of those aspects and determine which route looks the right route to go with.
MR. DAVE PIMENTEL: You guys aren't new at this game. You've been doing this for a long time.

MR. LOU DRIESEN: We've been doing this for a long time, and I think we're trying to show you that we're trying to do at least a good job. So we're looking at all the aspects, we've laid all of those aspects out in this document here. They're the same issues that our administrator will take a look at, our team will come up with a proposal for the administrator, and then the administrator will decide.

But part of that is also outside of the scope of this document, and that is the discussions with Seattle, for instance, and some other factors. So right now this looks like the best route to go and that's the direction that we're heading into. But please do not take this as our final decision because a final decision will not come until the earlier part of August. So we will also be coming out with a final EIS in July. There again, there will be a proposal in a document, but it still will not be the final choice. The final choice will be when we put a record decision together.

And as far as BPA trying to look like the good guy, I don't think we have ever tried to look like being the good guy. We are trying to do what we consider to be the right thing. We are looking at actual factors associated
1429-023-001 and -002 Comment noted.

1429-024-001 After the FEIS is released, people can comment on the FEIS, but there is no formal comment period. Comments received on the FEIS are summarized in the Record of Decision.
Chapter 3 — Comments and Responses - SDEIS

1429-025-001  Yes

1429-026-001  Typically the preferred alternative is the alternative implemented if an alternative other than no action is chosen, but the agency could pick a different alternative based on comments received and other circumstances.
Chapter 3 — Comments and Responses - SDEIS

1429-027-001 Alternative 2 was originally suggested as an alternative because it avoids existing homes. The city of Seattle, prefers that if a line has to cross the CRW, that it be next to the existing 500-kV line to minimize the overall impacts to the CRW. Alternative 1 is next to the existing line.

MR. DAVE PIMENTEL: He failed to answer my question.

MR. SCOTT TAYLOR: He doesn't have to answer it.

MR. DAVE PIMENTEL: I would like to know why he can't answer that simple question.

MS. DIANE ADAMS: Lou, do you want to repeat your response?

MR. LOU DRIESSEN: I do not want to answer that question because it may jeopardize our discussions with Seattle. Thank you.

UNIDENTIFIED MALE SPEAKER: I'm just looking at the map here, and it looks like Alternative 2 would cure the whole problem.

MS. DIANE ADAMS: I think what the gentleman is looking at here is going Alternative 4A instead of 4B. Was that correct, sir?

UNIDENTIFIED MALE SPEAKER: Yes, yes. It doesn't look like there's any housing in that area at all.

MR. GENE LYNARD: Alternative 2 begins at this point here and goes up. Alternative 2 wouldn't require any homes to be taken.

UNIDENTIFIED MALE SPEAKER: That's what it looked like to me.

MS. DIANE ADAMS: And that alternative is still on the table; is that correct?
MR. LOU DRIESEN: All the alternatives are still on the table.

UNIDENTIFIED FEMALE SPEAKER: When we went to Seattle last time, we were told that if they put the bigger power lines on the Highway A that the people would have to live 350 feet away from the power lines. Now they're telling me you only have to be 75 feet away from it. When we built there, it was a law we had to be 150 feet away from it. Now, why, what's the problem? What happened between Seattle this spring or summer till now?

MR. LOU DRIESEN: I think there may be some difference of perception. I'm not sure where you're getting these numbers. It may be the difference between the right-of-way width and the distance away from the transmission line itself. I believe that the right-of-way that we have in your area there, there's an existing 230 kv line -- well, it's 345 kv line energized a 230 and that line will be torn down and a new line would be put in its place, double circuit, with one side would handle the existing line and then the other side would be the new line. That right-of-way is 150 feet wide.

For the new larger towers, new larger line, 150 feet wide would be adequate for that new line. Houses can be constructed immediately adjacent to that right-of-way, and in a lot of cases houses are adjacent to that.
The location of the airport was identified in the Land Use, Recreation, Transportation Technical Study Report in Appendix L, and identified on Figure 13 in that report. The Crest Airpark appears to be located approximately 3/4 mile south of Alternative A, at its closest point. The EIS concluded that since the towers would be less than 200 feet high, that they would not enter navigable airspace, therefore, Alternative A would have no long-term impact on this or any other airport in the vicinity of the project.
BPA supports the use of fuel cells and other distributed generation alternatives to meet future power needs. BPA's Energy Efficiency Organization has two programs to promote these technologies. The first is the Energy Web, which integrates the utility electrical system, telecommunications system, and the energy market to optimize loads on the electrical network, reduce costs to consumers and utilities, facilitate the integration of renewable resources, increase electrical system reliability and reduce environmental impacts of load growth.

The second is BPA's Fuel Cell Development Program, which has the goal of accelerating the commercial availability of residential-scale fuel cell systems to meet the distributed power needs of our customers. Because they generate clean, efficient, environmentally-friendly power, fuel cells are a promising source of supplementary electricity to meet future demands. Potential applications include: on-site generation in remote locations, solving power quality or reliability problems, improving system efficiencies where both electricity and hot water are needed, offsetting the need to build new power lines and other applications where environmental impact is the focus. While fuel cells have great potential, they'll need a few more breakthroughs before they can reliably and cost-effectively defer transmission upgrades.
MR. MIKE KREIPE: We have a pilot program. I can't remember the numbers exactly, it was more than ten sites -- we bought equipment and we're sitting them in ten locations to learn about them. It's part of our looking at new technology and determining how it really operates and whether they're mature to go into further.

MR. LOU DRIESEN: This is for the fuel cell technology.

UNIDENTIFIED MALE SPEAKER: Are you close enough to be able to defer these kind of projects at all? Are you close enough to any kind of breakthrough there where you are able to say we don't need to do anything?

MR. MIKE KREIPE: Take the fuel cell because it's probably the most important thing to talk about here. I do a little bit of reading in that, and they were -- of course, it was the power source in the space programs way back to the '60s. Of course, they're -- it's very expensive. I mean, that isn't the issue there, they needed the power source. It's been 34 years since we know about and working with these. I know ten years ago it was forecast that they would be commercial now.

I know in the last few years people admitted it's taking so much time. There are demonstration sites out now, so it's being sold, it seems to be running -- it's getting to fruition a lot slower than what was expected ten years
ago. I don’t know if it’s going to slow down some more.
It’s kind of an unknown. All I can say is it’s not come as
fast as it’s been expected, but I hope it’s still going to
come. I still expect it to come. It’s just going to take
some more time.

MR. LOU DRIESSEN: BPA is also involved with other
research associated with making our transmission grid more
efficient. So we, for instance, placed a newer technology,
certainly new to us, in Maple Valley Substation that allowed
us to defer construction of new facilities. So it’s a type
of equipment that makes our facilities much more efficient
under certain circumstances. So we’re also continually
looking at our existing system and trying to figure out ways
to make it more efficient using existing technology.

For instance, in the late ‘80s and early ‘90s, BPA
had the project of looking to bring another transmission
line across the Cascades into Seattle. And by constructing
a new substation in Ellensburg area we were able to defer
that new line, and right now it’s still not on our books as
being needed. So we’re continually looking at new
technology and looking at our existing system to see how we
can make it better. We don’t like to spend money building
new facilities any more than anybody else does.

MR. MIKE KREIPE: And just so -- part of what Lou
was talking about was FACS devices. It’s come up in these
When BPA acquires rights-of-way for its transmission facilities, they are not made available for public use. Sometimes landowners and BPA can work together to place gates across access roads that BPA uses to access its transmission facilities.

1429-031-001 and -002  Comment noted.

The landowner needs to continue with their planning and construction. If BPA were to choose a route that would directly impact a residence, then BPA would pay for the value of the home at that time. Improvements to the home would increase its value and BPA would pay for that fair market value.

1429-034-001  Comment noted.

1429-035-001 and -002  Comment noted.
CERTIFICATE

STATE OF WASHINGTON
COUNTY OF KING

I. BETSY DECATER, a Certified Shorthand Reporter and Notary Public in and for King County, Washington, do hereby certify that I reported in machine shorthand the above-captioned proceedings; that the foregoing transcript was prepared under my personal supervision and constitutes a true record of the proceedings.

I further certify that I am not an attorney or counsel of any parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

WITNESS my hand and seal in Sammamish, County of King, State of Washington, this 5th day of February, 2003.

[Signature]

[Notary Public in and for the State of Washington, residing at Sammamish]

My commission expires 03-20-06
COMMENTS TO
KANGLEY-ECHO LAKE TRANSMISSION LINE PROJECT
Thursday Meeting, February 6, 2003

Tahoma Senior High School
Kent, Washington

Reported by: Betsy E. Decater, RPR
License No. 601-835-443
MS. MARGARET CRABTREE: And I think Alternative 1, I prefer that because there's less disturbance. There's already an existing one across from it, less disturbance to the environment and the people and it will be less cost. I think that should be important and really considered.

KATHY MYERS: My name is Kathy, with a K, Myers. M-y-e-r-s. I just wanted to state my support for the preferred Alternative 1. I think that is by far the wisest choice.

UNIDENTIFIED MALE SPEAKER: Yeah. On your preferred route going through the watershed, then, the way I understand it, if that's turned down for some other reason, then the process is go back all the way through the whole scope of what we've been going through the last four years?

MR. LOU DRIESS: No. We've done everything, at least from our opinion, that we need to do. We've identified all these different alternatives, and it's a matter of choosing one of those alternatives. So we do not need to go back and redo all of the scoping meetings and the environmental NEPA process anyway.

So it's just a matter of when -- the administrator get's to decide which option does he choose. So it could be any one of the options, any one of the routing options or the no-action, which means we do nothing, or the option that Mike was describing earlier and that's what we call the...
MR. GENE LYNARD: I would add, if one of the other alternatives would be chosen other than the preferred, there would be a lot of environmental work that would need to be done. We would -- for the preferred, we recognized it as a preferred early on and we knew we had endangered species in the area, so we prepared a biological assessment and we initiated consultation with the National Marine Fishery Service and the Fish and Wildlife Service. We have also conducted a culture resource survey along the whole length of Alternative 1 and dug 1170 holes as part of our responsibility under the Archeological Protection Act. And on B and D, for example, in the National Forest, we would have to do -- survey for survey and managed species in addition to endangered species. There would be a lot of work involved in that.

UNIDENTIFIED MALE SPEAKER: Then assuming that all the routes are still on the table, can you give me a ranking in terms of what route after Route 1 would be looked at next?

MR. LOU DRIESSEN: We don't rank the different alternatives. I think if you will look at the document, there's a table in there, Gene.

MR. GENE LYNARD: Yeah, Summary Table 2.3 in the EIS is a summary of all the impacts of all the different

BPA does not rank the options in that way. It would have to take a look at all the factors to determine the next likely option. Table 2-3 compares all the options, including cost.
resource areas along with the cost of each alternative.

UNIDENTIFIED MALE SPEAKER: Is some of it, then, done by cost only then?

MR. GENE LYNARD: We have looked at the cost, what each alternative would cost and then that cost information is in that same table. It's Table 2.3, which is in here. It's also in the CD contained in the summary.

MR. LOU DRIESSEN: So we -- BPA and other utilities have tried to rank different alternatives some years ago, and we found that that doesn't really work because the rankings are based upon what your perspective is. So if your perspective is from a landowner, then you're going to weigh it one way. If your perspective is from not wanting to take any trees out from a wildlife habitat standpoint, you're going to weigh it another way.

So what we've done is we've outlined what we consider the impacts are for every alternative, and you can come up with your own conclusion about which one you think is best, including, like Gene says, also from a cost standpoint. So that table includes all the different impacts from all the different categories and also from the cost. And then you can take a look at that and I think you'll see why we chose the preferred route as being the preferred.

UNIDENTIFIED MALE SPEAKER: Yeah, I was just
BPA can comment on the final EIS, but no public meetings will be held. BPA has 30 days after the final before they can sign a Record of Decision, which will designate BPA decision about the project. BPA will notify the public of the decision.

Looking to clarify what you were talking about. I think what John was alluding to is you're going to get a lot more resistance, especially from this group. If we feel it's coming through the alternate that's going to effect us. So we're trying to get a handle on is there going to be another comment period if you decide to go with another route or are you going to just go and start building it?

MR. GENE LYNARD: No, there won't be another comment period.

UNIDENTIFIED MALE SPEAKER: So how do we know, then, if our alternative or the one that's going to effect us is going to be considered. If it doesn't -- you can't explain or guarantee what it's going to cost. You don't really have what parameters you're going to decide about. So we're going to go home thinking we are safe, and then all of a sudden there's going to be trucks pulling up. That's the concern I have.

MR. GENE LYNARD: Well, the Environmental Impact Statement, what it does is it contains all the impacts that would happen for each alternative. It's a full disclosure document. The administrator is not required to select the least impact alternative. The administrator will be looking at the cost of the project, looking at how each one of these affects the system, and he'll be looking at what impacts would be created by his decision. And that information is
in the EIS.

But the part is when are you going to know, after
the administrator does make a decision, we publish his
decision in what's called a record of decision. And that
record of decision will contain his decision, plus all
comments that have come into the agency since the final was
produced. They will be summarized.

UNIDENTIFIED MALE SPEAKER: When the decision is
made I don't really care about. My concerns are if you make
a decision other than the main one, I want to have time to
comment on it and gather the troops to oppose it. And
you're telling me I'm not going to have that opportunity and
you're not offering the criteria you're going to use.

You're saying it's an impact statement, but they don't have
to go by it. So I'm going to leave here the same way I came
in, not knowing what you are going to choose, and basically
it's going to come to a political thing, you can't even say
it's going to be close, or environmental impact or who has
the most political clout.

MR. LOU DRIESSEN: Well, that's why I mentioned
earlier, I don't want people to get the misconception that
the final route is chosen. What we have done, though --

UNIDENTIFIED MALE SPEAKER: But the final route
being chosen doesn't really mean anything because you're
going to choose it without giving us a chance to respond to
MR. LOU DRIESEN: No, you are responding to it by coming to these meetings. That’s why we have the scoping meeting, that’s why we’ve had this meeting. That’s what these meetings are all about. We’re getting your comments, and we know that Alternative A and C --

UNIDENTIFIED MALE SPEAKER: Well, I can tell you that most of my neighborhood is not here because the fact is that you are going with the preferred route and they assume you’re going to go that way. If it goes somewhere else, you’re going to get a lot more resistance and they’re not going to have a chance to speak.

MR. LOU DRIESEN: I’m not sure you were at our scoping meeting this last time because this room here was filled with people who were opposed to Alternative C and Alternative A. I think we’ve gotten the message pretty clear about if we were to choose Alternative A or C there’s going to be a large opposition to either one of those alternatives. And that’s what these meetings are all about, so that’s all included. And that’s why there’s such a huge volume here, because it includes all the comments. We’ve gotten a tremendous amount of comments on these different alternatives. So I think we understand what the issues are.

UNIDENTIFIED MALE SPEAKER: Okay. I’ll take your word for it. But if it goes through A or C, you’ll see some
BPA has identified Alternative 1 as the proposed route for this line. BPA is willing to take the risk to survey and acquire land rights along Alternative 1 so that the line could be constructed after the Record of Decision, with as little delay for energization as possible. BPA acknowledges that the final decision will not be made until the Record of Decision, which is scheduled for August 2003. If the decision is made to choose another route, then energization would be delayed by several years.

people jumping up and down.

MR. LOU DRIESSEN: We fully expect that.

MR. GENE LYNARD: And we are taking comments on
the EIS, and we hope we get them, up until March 1st. We'll
take input at any time, but for it to be included in the
final EIS we need them by March 1st.

UNIDENTIFIED MALE SPEAKER: Yeah, you claim that
you haven't decided which route you're going to take, but I
think you guys have pretty much cut and dry you're going to
go with the preferred route because you're already trying to
buy off the property owners out there. I don't know what
you guys are worried about. It looks like it's going to go
right through the property.

You guys have said that's your preferred route.
You've had your people out there, I don't want to say
harassing us, but I am one of the property owners which this
line is going to affect, you're going to take a house, you
know, destroying our livelihood which we have built there.
So I think you guys pretty much made a decision, and to say
these other routes, I don't believe it for one instance,
since I know for a fact you guys have been trying to buy
land from these people and us for practically pennies on a
dollar.

I mean, I'm just pretty much can't believe you
guys are up there saying you have alternative routes and you
already basically -- by doing that you have already decided
which way you're going to go. I mean, doesn't that make
sense? You don't go around and pay somebody a bunch of
money for their land and then say, hey, we're going to go
this way.

MR. LOU DRIESSEN: As I mentioned earlier, that's
the risk that BPA was willing to take, that there's a lot of
efforts that went into the preferred route because we think
that this project is necessary for this area and we need to
got this project done. And if we don't do this effort in
parallel with what the environmental process is, then we
would not be able to energize this line when we think this
line needs to be energized. So if we were to wait until the
record decision and then go through and do the survey and
engineering work and the environmental detail associated
with that and then construct, you're looking at another two
years down the road.

So we think this project is needed as soon as
possible. We, in fact, were trying to build this project
last year and we weren't able to do that because we needed
to go back and, like Gene mentioned, reopen our document
again and look at the different alternatives. So we put a
lot of effort into this preferred alternative, and I don't
think any one of us is denying that, including working with
the landowners along there and including buying properties.
because we have bought some properties along in there.

We've also bought 350 acres north of the Cedar
River Watershed as mitigation for crossing the watershed.
So a lot of effort has been put into the project, and BPA is
willing to forego all of that if the decision is go to with
one of the other alternatives. So I want to make it clear
again, we have not made the final decision. It's always
possible that one of the other routes gets chosen. So until
August, when we will make a final decision, all the
different options, all the different routing options are
still on the table. They're all still viable, they're all
still possible.

MR. CLOYD PAXTON: Well, my name is Cloyd Paxton.
Let's talk about the effects of EMF. To whom it may
concern, I pray it's BPA, magnetic field is a moving charge
of particles which might enforce acts on electric current
forced and exerted on a given object, like human's bodies,
machinery, animals, so on and so forth. That's in Webster,
Page 23, Book of the EMF National Institute of Environmental
Health Sciences, like the Hanford atomic generator that
produced electricity, science knew how to make electricity
but did not know how to get rid of the breaking up of the
atomic nucleus. So we have lots and lots of radioactive
material in large lit vats and containers that causes
nausea, vomiting, headaches, diarrhea, loss of hair.
teeth -- destruction of white blood cells and hemorrhages.

Now, that's also proven back in 1920 as a fact. Still we
don't know what to do with radioactive radiation water
that's leaking into our stream.

Let's talk about melatonia efforts or effects in
laboratories. In the book EMF, melatonia is the hormone
secreted by the penal gland in adverse proportion to the
amount of light received by the retina important to
regulating the biorhythm in the eye of a person. And isn't
it ironic, I say isn't it ironic that my wife has Uveitis?

it's an inflammation of the uvea. and it's inside the
eye ball of the eye.

Now, doctors call that bird-shot eye, which has no
meaning in Webster's language. She's blind. Her driver's
license has been taken away because of her blindness. The
inflammation is on her retina. We live within 175 feet of
that middle line of power, that power line. We are going
under the power line at all times. Since the 40 years we
have been, had heart surgery twice. two angioplasty
operations. Now my heart rhythm is off beat. it don't beat
right now. Had it checked here just not too long ago and
it's missing a beat.

Why all this is happening to me I don't know. But
why we take care of the spotted owl, the fish and the bugs
and that kind of environment but there are no laws for
people telling them how far they should stay away from the
EMF power lines. I say it takes the course of time to
really know what it's doing to the people. Like the Hanford
project, I hate to think of the 500 kV's running across my
property -- right now it's 230 or 240. I am worried about
and frightened of the 500 kV. How much more can we take?
Man can destroy himself, like it says in the Bible.

Now, I wonder about that power line, the power
line that's right by my place. There's a strand of about
2,000 feet. It goes across the Maple Valley River over
across -- or across the Maple Valley Highway, across the
river and on the other side is a stretch of about 2,000
feet. I have seen that baby when they had an earthquake and
looked like that thing was flopping around like galloping
gerty, and what's going to happen when they put a 190-foot
pole up there? I don't know. It worries me, basically,
with all that 500 stuff coming. That's all I got to say.

MR. JON ZAK: Good evening. My name is John Zak.
I live on two and a half acres in a development of about a
hundred homes in Maple Valley. Our eastern property
boundary will be the proposed transmission line right-of-way
for Alternative C. On BPA's preferred alternative route,
the age of the trees is 10 to 30 years. The trees on my
property range in size from two and a half to five foot in
diameter. The trees on my property make the trees in the

1430-005-003  Comment noted. BPA's tower design standards exceed
seismic loading standards so our towers will withstand
earthquakes.

1430-006-001  Comment noted.
watershed look like twigs. I would like to talk about this
Cedar River Watershed. This watershed has been decimated by
logging for about a hundred years. There are over 600 miles
of logging within the watershed. I would like to show you
some pictures.

I hiked up McClellan's Butte looking into the
Cedar River Watershed. You can see I'm standing in some
trees that have been there forever and looking down into the
logging. This is another picture looking at some of the
road cuts. There are 621 miles of gravel logging roads in
the watershed. And Seattle complains about erosion, but how
much erosion is caused by all the road cuts from the logging
roads?

Picture looking down at Chester Morris Lake. See
the different ages of the trees. Logging roads on the
hillsides of the second and third growth timber. A similar
picture. I'd like to show a picture of some old growth
trees. This is what the watershed should look like. This
is the Ashland Curtis Grove on the way up to Snoqualmie
Pass. Another picture of the Ashland Curtis Trail from the
Ashland Curtis Grove.

This is a picture of our backyard. Here's another
picture of our backyard. It will go through our eastern
property boundary and all these trees will have to be taken
down. And here's some of the -- this is some of the work
that Seattle Public Utilities has done on the watershed.

That's actually on their website, it's public information.

See a logging road, all of the erosion?

I have another picture of equipment right around Chester Morris Lake. And BPA will be using vegetable oil in their hydraulic systems. I wonder what Seattle will be using? Here's more equipment. Here's a picture of Chester Morris Lake. You can see the bad water and the better water.

Pictures of the construction in the Cedar River Watershed by Seattle Public Utilities proves their hypocrisy. Seattle Public Utilities has one standard for themselves and another one for the BPA. I would like Seattle Public Utilities to answer these three questions:

Number one, where is the evidence that BPA has caused any harm to the water quality or watershed operation in its 30 years of operating a power line in the watershed?

Two, what evidence does Seattle have that clearing an additional 91 acres for a second power line is more damaging to water quality than failure to progressively replant the 600 miles of logging roads already in the watershed?

Three, clearing 91 acres for a second power line would require one-tenth of one percent of the watershed's total acreage of 90,240. How can this small amount of
clearing have any impact on water quality? That's it.
Thank you.

MS. TINA MORGAN: I might need an extra minute or something, but right now I want to speak on behalf of Bonneville. I spoke on behalf of ourselves. We live on Alternative Route No. 1, and we have pretty well accepted the fact that we feel that Bonneville is going to come through our properties and will eventually be able to meet an agreement with the watershed and come through the watershed. So we have pretty well resigned to the fact that they are coming through our properties.

And, anyways, and my opinion of the watershed trying to hold Bonneville up for 230 million, and I don't know how much it is now, if it's even become higher than that, for a filtration system that just because they want Bonneville to buy it to go through the property. I mean, to go through their watershed. So I don't agree with what the Seattle watershed is trying to do with Bonneville. They spent a lot of money on environmental issues and their money that they want for this filtration plant could be spent to help save the fish, to save other environmental issues, so -- and Bonneville is very sensitive, I feel, from what I've read, to environmental issues.

And I also -- I hauled logs out of the Seattle watershed after my husband passed away in 1978, and I did so
until 1992 until they closed the watershed down. And sometime in the '90s I actually quit hauling in the watershed, particularly I'm not exactly sure on the day they shut the watershed down to logging, but I will tell you we had over a hundred trucks coming out of there a day and we were creating a cloud of dust over that watershed that you could see all the way to Seattle, and they weren't too worried about the filtration system at that time.

So I really do feel that Seattle is holding Bonneville up. And as far as impact goes to other people's properties, this probably makes the most sense to go this way, they're impacting the fewest amount of people. But what we're asking for is where we're at is you guys have been living this since sometime last year. We've been living this since March 22nd of 2000. And, anyway, that was our first contact. BPA contacted me March 22nd, and I'm assuming probably the rest of the folks, about their proposal routes about the new 500 kilowatt line. Preferred route at the time was Alternative No. 1 at that time also, through the watershed. They would also affect five private property owners, and I am one of them.

Starting in the winter of 2000/2001, they asked for a letter of permission to enter my property, which I signed on December 8th of 2000. BP started that process of
surveying and staking their proposed right-of-way across our property. Well, I want to finish this. I spoke for BP, now I want to speak for me.

Anyways, on September 11th of 2001, they contacted us about appraising our land. BP sent out an appraiser to our properties, to my property, anyways, on the 25th and the 27th, 2001. During that time, I was very cordial and friendly towards all of the BP folks that came by, and I even showed them where there was already stakes in the ground to save them time on surveying my property. And I actually have a survey -- antique survey post that's from the early 1900s when they came through my land that they have used for satellite pinpointing.

Anyways, they assured me they would pay me fair compensation. I gave them total access to my property.

April of 2002, BP contacted me about the appraisal on my property was complete as of March 8th, 2002. I'm reading faster. They were ready to present me with the appraisal and also were prepared to write me a check at that time. They also have said that they are not in the habit of necessarily buying property, but then in another time they said they do that all the time, so I'm not sure which one they do.

They are affecting two buildable five acre parcels of mine. There will be no building site left on one of the
five acre parcels, they're taking over half of the other
five acre parcel for easement -- for their easement leaving
an area of 180 feet from their easement to the property line
to build on. Who wants to build on 180 feet from a power
line? The major value of this five acre parcel has been
lost. Okay?

The BP appraiser for the loss on these two lots
offered me $160,000 at that time. So I decided to have my
own property -- at that time I told them I would have it
appraised myself by an appraiser. So I had it appraised at
that time, and, Lou, I told him that's what we were doing at
the summer meetings, and he said that he would wait for that
appraisal. So, anyways, that appraisal was completed and I
turned it in to Bonneville, and they weren't obviously happy
with that appraisal because that appraisal came in about a
hundred thousand dollars higher than what they had appraised
my land to be.

Anyways, and the other thing, on the appraisal.
ye said on the front of their appraisal that they were
valuating my land at $25,000 per acre on the front page of
their appraisal, but on the inside of the appraisal, the
part of the appraisal I'm not supposed to really have, they
valued my land as the true value of timber, land and
improvements at $30,000 an acre. So I don't quite get why
it's 25 on the front page and then 30,000 on the inside.

See response to Comments 1429-013-002. BPA did not
agree with the conclusion of value presented by the
appraiser that you hired. If you would like to discuss the
differences in the appraisals with BPA's staff appraisers,
please contact us.

BPA staff appraisers are not required to be state certified.
However, all BPA staff appraisers have chosen to be state
certified in at least one of the states within BPA's service
area. BPA appraisers follow the Uniform Standards of
Professional Appraisal Practices and follow all applicable
federal guidelines. Also see response to Comment
1429-021-001.
Chapter 3 — Comments and Responses - SDEIS

1430-007-005 BPA apologizes for the disruption that this project has caused people along the project routes. It is our intent to treat people fairly and with respect.

And their appraiser, Tom Walcott, is the one who did it. He's their in-house appraiser. He's not licensed in the State of Washington or even Oregon. BP informed me that federal government appraisers do not have to be licensed. BP's Tom Walcott is totally unfamiliar with King County land values and does not live here and work here in our day-to-day real estate market. I had a talk with Ralph Burkdoll from Washington State Department of License and Real Estate Appraisers about this. He said he would like to look at their appraisal.

So what I'm asking for I don't think -- I'm asking for fair. We are all asking for fair compensation for our property. And we are afraid that -- you know, we are sure they are going to go through our property and we are -- you know, have recited ourselves to that fact. But we need to have fair compensation for our property and we need -- you folks are going to be off the hook, we've all believed, truly believe, of course, the final decision won't be, but as soon as the final decision comes down, if we haven't sold our properties before then, they will condemn us. And we have been told this. They tell us that every day.

Every time they call us, 'We're going to condemn you, we're going to condemn.' We're told this constantly. Anyways, you have no idea when you give an easement you have no rights left on your property. You can only use it for

1430-007-005
pasture basically, you have no rights. If they let you use it for pasture. They will permit you to grow some products on it, some crops or something, as long as they're within a certain size and so on and so forth. But you have to get a permit from them to do that. You have to pay for a permit, unless they waive this permit.

You have no idea what you're giving up when they take an easement from you, and all we want to do is be paid for the damages and for that compensation. And I'm sorry if I took a little bit too long, but I thought I started out on BP's side as far as where they need to go, but we need to be compensated and we are asking in that neighborhood, there's only five of us, for your help and for your support. And the state representatives that you have had on board, we need help from those state representatives because I don't feel at this time that we're going to get a fair shake unless we get some help. Thank you.

MR. DON BRIEMANN: I got most of my frustrations out before, but I just wanted to reiterate basically what this woman is saying. If we are going to be spending these many millions of dollars for the thing, why can't you just go offer them a hundred thousand over, no matter who it effects, unless you're talking a hundred homes. I understand you are talking five to ten properties. So why don't we just go from 100,000 over property value and half a

BPA must follow Public Law 91-646, 49 CFR Part 24, as well as the federal acquisition guidelines.
MR. STEVE BRUNETTE: Like I said, I’m a property owner, and Tina has pretty much said what I’ve kind of felt all along. They are going to come through our land. And we have a house, we actually have two homes in which it is going to affect. We have a barn underneath one of the right-of-ways right now which is an existing line and they’re going to take that, too. It’s too close to the line. It will start a fire and burn down the other line, that’s going to be gone.

We have a horse that’s been living there, and I can’t have a building over 10-by-10, so I don’t know where it’s going to go. And we have a rental house there, and it’s a business. That’s kind of our retirement. We figured...
BPA has contracted for an appraisal of your property with a local appraiser. Upon receipt, we will be in a position to make you an offer on your property. BPA has been negotiating with other landowners along the preferred route for options to purchase transmission line easements, since the decision has not been made to construct.

Comment noted.

Comment noted.
continuity in rural King County as this is being really quickly. I find it interesting that the county finds my property to be a precious environmental jewel but yet the City of Seattle seems to think it's a highly developed urbanized community. I thought it was my yard.

So I would like to offer some words of maybe not support, maybe not advice but certainly opinion towards -- directed towards BPA. Our communities support what needs to be done here. I have researched and so has my husband at great length nearly every organization and every document that you guys have brought up. We have looked at your regulatory requirements, the mechanical engineering need gets it. I understand why those are needed to maintain a healthy power grid. Unless we can deliver on-site power as all alternative energy resources in the next six months, I don't see us getting out of this.

So given that, I think that your preferred alternative is the clear answer. Also in the time that I've spent with my community in discussing this, and clearly we've been doing so since May of last year at great length. I discovered that there was a large amount of property owned by Plumb Creek, a timber company, to the south of the watershed that is between the watershed and Seattle's tap. I also understand, and this is fact that you know, others need to verify for themselves, don't take my word for it.

BPA has an option to purchase 640 acres from Plum Creek immediately south of the watershed in the Kangley/Selleck area. This property could be divided into 20 acre parcels. BPA would prevent commercial or residential development on this property if it is acquired.
that the water table in that area is very shallow. This
property has been subdivided for five acre lots. Should
these properties be developed, the Puget Sound is suddenly
going to find septic drain fields and chen lawns in their
water table for their water supply. The City of Seattle
needs this property. I believe it is in the best interest
of my community for them to acquire this property.

Additionally, the 350 acres that the BPA has
offered I think is also of benefit. I think additionally
the community is probably going to ask for and support in
your negotiations with the City of Seattle that a buffer be
placed along the Raging River in order to protect that area
more fully and that those lines there be double-circuited to
cross the river as you have with the Cedar.

So in the end, I believe that our communities
would back a negotiations with Seattle that would increase
the protection of that area in order for you to get on with
your project. I believe that is ultimately in the best
interest of the City of Seattle, the local community and the
Bonneville Power Administration. I am somewhat frustrated
with the City of Seattle in their discussions regarding the
water filter. We've also spent time researching this and
the data seems to say to me that the City of Seattle has
needed a turbidity filter, will need a turbidity filter and
just doesn't have the cash for one. I do think they are
All alternatives would receive the appropriate level of environmental mitigation. On the watershed, the issue is associated with surface drinking water for the city of Seattle and some other local communities, along with the potential of Seattle needing to install an expensive turbidity filtration plant as a result of excessive amounts of turbidity caused by construction of this project. In addition, the watershed has a Habitat Conservation Plan established with the USFWS and NMFS. This project needs to mitigate for potential impacts to the HCP. Private properties also have environmental concerns which BPA would address locally on that property, such as minimizing impacts to wells used for drinking water and minimizing impacts to creeks used by endangered fish species by keeping low-growing vegetation. Concerning where the funds come from for the purchase of lands to mitigate impacts to the watershed, those funds will be from BPA. BPA would likely buy more property than is necessary and would be selling those remaining portions. BPA is looking at other agencies to see if they would be interested in purchasing those remaining portions from BPA with whatever fund they have available, which may be from conservation funds.
you. I concur with your choice. And if it becomes our
alternative route, I would be adamantly opposed to it.
Thanks ever so much.

MR. JOHN HUSON: I just wanted to express my
approval of the preferred Alternative 1 and also if there is
any kind of extension to this process beyond what we have
here, I want to express some dismay and hope that it ends
here, and we will fight to the end, wherever that end might
be. Thank you.

MR. RICHARD BONEWITS: My name is Richard
Bonewits. I'm chairman of the Greater Maple Valley Area
Council. We've been in this battle for the community for
three years. We know these people almost as well as we know
our own family. This is the last of many meetings. I have
been to at least 10, possibly 11, I've lost count, which
were conducted by Lou and his crew in support of this power
line project over the last three years. You haven't heard
half of the questions that have been raised and you haven't
heard half the answers, but they have given good answers,
solid answers every time. We have checked them on the power
lines. Lisa said, the power demand requirements, we've
checked conservation and we've checked alternative energy
forms and a whole bunch of other things. The factors
haven't changed.

BPA came to the right conclusion the first time.
three years ago, and two times since, the power line is
needed. There's no question in the engineers' in our
group's mind, and we had some 35 and 40 people from this
community that we took to Seattle last year. engineers,
lawyers, people that live in the area, all kinds of people.
All routes will incur some environmental damage, quite a bit
as a matter of fact. All of them cross one or the other
major salmon bearing rivers, streams, wetlands and so on.
There isn't even a question of a doubt the Seattle
Public Utility watershed route is the least costly, the
least damaging and affects the fewest people. And I want to
tell you that last year this group of ours, a few of them
here tonight, but we really operated with what I call an
opposition steering group, about ten people maximum, it had
environmentalists, as I said, lawyers, engineers and project
managers, people with experiences similar to yours. Over
1500 people in our area signed petitions opposing all routes
outside the Seattle Public Utilities watershed.
Your elected representatives here in the City of
Maple Valley, Covington and Issaquah joined us in letters
and comments to Bonneville in opposition to routes outside
the watershed. Your state representatives, both of them
from District 5, my district, have supported me, are
constantly in touch with me by e-mail. "Do we need to put
any more muscle into it, Dick?" And they're ready to go to
Chapter 3 — Comments and Responses - SDEIS

BPA has looked at the potential mitigation costs needed for all the alternatives and those costs are reflected in the overall costs depicted for each alternative as stated in the SDEIS. The SDEIS has already acknowledged that those alternatives outside the CRW would be more expensive than the preferred alternative.

Jennifer Dunn has been involved in it, our state or our U.S. Representative from District 8, and even Senator Cantwell has sent emissaries to meetings and my house and met with some of the people that are here and they are still in contact with us. Don't stop with your comments now. I'm telling you, don't leave it here with just words that you've spoken.

I want you to write to Bonneville and I want you to put a carbon copy in the mail, Post Office Box 101, Maple Valley 98038. I will get it. I will see that all of these politicians and including, I failed to mention, our own county councilman for the District 13 -- District 12, rather. Dave Irons, his aide is here tonight again with us, the two state representative aids were with us last night, we had Senator Cantwell's aide with us the night before in Seattle. So don't stop here. Write your comments and send me a copy of it.

The other thing I want to leave Bonneville with two -- I want to say this to you: You have been knowledgeable, professional and courteous, and Diane has been a great facilitator. I have given her a hard time. She's tried to control me, that's pretty tough. There are two messages I want to leave with you: Provide equal consideration for avoiding construction damage to all routes.
and mitigation thereof. If you do that, the result you've
already come to in this impact statement says that the costs
are far higher in Routes A, C, B and D. Anyone with half a
brain can see that if you were to give us the peanut oil or
the vegetable oil and the hydraulic system and the
helicopters and the pooper scoopers and all the other things
that you have to do to satisfy Seattle, your Route A would
probably be over a hundred million, probably we'd see C and
D up somewhere around two hundred million and Route C would
be up around a hundred and fifty. So don't forget those
when you make your final decision.

And this last one is for your administrator to
take home for you. Don't destroy the great amount of public
goodwill that you've created, you've built. Recognize that
your compensation offers are low. I own real estate in this
area and I know what the value of Tina's land is. You need
to recognize the right value for destroying two parcels of
land. She's told you she will sell it to you. Just do it.
It's a pittance in comparison with what you need. So,pleasethat will be clearly in the message that you get in
writing form us. Thank you.

MR. CLOYD PAXTON: I would like to know why
Governor Locke is not entering this project here? I mean,
all the people that's got power lines on their property,
they don't get any compensation for what they have got and

Comment noted.
it looks to me like the taxpayers shouldn't have to pay
taxes on that land. The King County ought to take care of
them taxes. That is no good to us, you know what I mean, as
far as you might be able to drive over it, but you can't
raise cattle on it or do a lot of things you want to do on
it. So why don't King County pay the taxes on all this
land?

I mean, it's just certain ones that's going to get
it, but they're the ones that are valuable, you know what I
mean, they need it. So I'd like to know why we couldn't get
together with Mr. Locke or something like that or whoever it
takes and get our taxes paid by King County or whatever, you
know. free. That's all.

MR. LOU DRIESSEN: Maybe Cindy can answer the
governor's office. We got to put you on the spot sometime.
Cindy.

MS. CINDY CUSTER: For Bonneville I work with
elected officials and the state agencies and the
legislature, so I talk to your representatives not
frequently but at least keep them up to speed on what's
going on and I do work with Governor Locke's staff person
who deals with energy issues. And he is very aware of this
project, he saw your petitions and is keeping a close eye on
what's going on. He's chosen at least at this point not to
take a public stand, but he's certainly aware of what's
1430-014-001-0001

MR. CLOYD PAXTON: Well, I think it would help you, BPA, you know what I mean?

MS. TINA MORGAN: Well, I'm of the opinion that maybe BP, on his comment, maybe share in some of the taxes seeing is how they take a lot of rights away from the property owner because they pay a one-time fee for the easement and then have the rights to use it therefore and tell the property owner what they can and cannot do. So it does seem a little unfair to me for a one-time payment and Bonneville uses it forever, gets to make money off the power that goes across there, even though you call it nonprofit. But, I don't know, there seems something wrong with that system to me. But my actual question for myself was I was wondering how much money to date or do you have any idea has this controversy with Seattle Watershed caused you?

MR. GENE LYNARD: Well, as far as the environmental effort, the cost of environmental documents and the meetings and hiring of consultants, we're over a million dollars in the last three years. This is an unusual project and this is a particularly expensive environmental effort.

MS. TINA MORGAN: I see. But since you had your original preferred and then when watershed -- when the watershed threw a monkey wrench into your project, I was happening with the line.

1430-015-001 and -002 You may want to contact your local taxing authority(ies) and provide them with a copy of BPA's easement document, and inquire whether a reduction in your property taxes is possible.

1430-015-003 The costs would be about $10 to $13 million more than conventional construction including special designs and construction techniques and purchasing properties.
BPA’s Administrator will make the decision on this project.

Some discussions have taken place about decommissioning roads. Those discussions are continuing and no commitment has been made.
decommissioning logging roads as a method of mitigation?

Mr. Lou Driessen: Yes. They have brought that to
the table, so that's part of the discussions along with
other things.

Mr. Jon Zak: Thank you. I would also like to
thank Dick Bonewits for all the work he's done on this so
far for the people in Maple Valley.

Mr. Richard Bonewits: I want to answer Cloyd's
question. The Governor has been notified by our group about
this. All 13 King County councilmen have been notified
about it. The Governor did have, through the Department of
Ecology, have the regional manager call me and wonder what
the deal was, and I spent about two hours one day giving him
the background, education.

My position with politicians goes like this:

You're either for us or shut up, and you get most -- those
are your two choices, either come out actively helping or at
least recognize there's more than one side. And for all of
you to understand this, I want you to clearly understand
what he told me, because this is not the first time that
I've been involved with Bonneville, they're generally a
professional group, and this is a professional group, but
let me tell you, Seattle has told us clearly they do not
intend to take this going down. That's why your letters are
necessary. You need to keep it up. You need to talk to
your neighbors. You need to get them to write them, whether you're under A, you're under C, and we have been up and talked to the people under B and D. So, please, write your letters.

UNIDENTIFIED MALE SPEAKER: I got here kind of late and I didn't feel worth throwing any speeches. I've talked too much already, one thing I want to ask, make sure I got it clear, I've got some friends in California in the engineering business, and part of that fiasco was the lack of transmission. They haven't made any investment, and so you just hear about Enron, but it's really cost them because of the lack of transmission. I know you guys haven't had a chance because of all the things you have to put up with too, but as I understand this thing, if we put this line through, we will save five megawatts; is that right?

That means you're not going to have to buy five megawatts which falls to the benefit of the taxpayers. Now, all the folks that are Greenies, you know, Planet Earth and all that kind of stuff, and alternative energy, which I buy myself. I throw some extra bucks in where I live, why would they not recognize that it's really imperative to get the project because it will pay for itself? Am I missing something?

In other words, if you get this thing through, the efficiency you're going to have because of this new line is
1 going to save you five megawatts, which is a couple of
million bucks at today's prices if the thing goes up. So
this thing is going to be a heck of an investment; is that
right?

MR. GENE LYNARD: That's five megawatts annually.

UNIDENTIFIED MALE SPEAKER: So I hope you use that
when you're talking to the folks in Seattle. One thing I
have gotten from some of these people like Sierra Club and
these other guys with other agendas and the Seattle people
that are bitching about water, you're not going to touch
that. Is this thing does make sense and you do have to make
an investment for the rate payers on transmission lines. So
I think you ought to use that. I don't think anybody that
I've been at any of these meetings is anti-environment.
We're all pro-environment. And if you took a poll here, you
would probably say has BPA chosen the most environmentally
sound alternative? I don't know anybody that says no. So I
hope you use that when you are talking to Seattle. And I
want to echo Dick's things. I think you guys are very
professional.

MS. CLOYD PAXTON: I understand that you have
bought 350 acres next to the watershed for Seattle, where no
one even in Seattle knows where the watershed is at, but
these five people that have five homes that you're going to
be using. I can't understand why you can't pay them the

1430-019-001 and -002. BPA did take advantage of an opportunity to acquire 350 acres from the Trust for Public Land. The preferred alternative crosses this parcel, it has potential mitigation benefits, and can be resold if the decision is not to construct this route. See response to Comment 1429-013-002.
BPA has the power of eminent domain, or the power to condemn. BPA works closely with landowners to come to a satisfactory agreement if possible. If negotiations are not successful, and the decision has been made to construct a project, BPA would use its power to condemn to secure the necessary land rights. This would apply to land rights needed from any landowner along the route to be constructed, including the City of Seattle, if the preferred route is selected. BPA generally requires six months to acquire rights to property.
The aluminum smelter at Kaiser is shut down and will be dismantled. The aluminum smelter process is continuous in that bauxite is added while the finished aluminum is being poured from the pot. The pots must be kept energized in order to keep the process going. The conductors on our lines are all 2.5 inch or smaller. The blue haze you see is corona, a result of the high voltage stress around the conductors and hardware. The blue haze is not heat being given off by the line.
So that's the way -- they're hooked up in series and they need -- and they have a certain delivery voltage for the whole thing, so that's essentially -- they have to have enough of them to equal the delivery voltage. Could they make them smaller? I don't know a lot, but I know enough to be dangerous. I don't know enough about the design and whether they can modify that in ways, but that seems to be consistent with all the plants. They all have the pot lines that are 50 to 75 megawatts apiece. It's pretty standardized. I don't know if it's old technology.

MR. CLOYD PAXTON: I used to work in a foundry and I know they do that, they can take it down and they can take in a foundry, out of the bull ladle and put it into billets and, you know, put it in blocks and then put it back in when they want to use it. That way they can shut the heat down. But you talking about these big lines that's going over that they lose a lot of heat, you take that line like out there where I live on Petrovsky, and that thing must be about that big around, four inch, I suppose, huge.

MR. MIKE KREIPE: An inch to two inches.

MR. CLOYD PAXTON: Well, you can see a blue haze off of that when it rains. You know, it looks like about 20 inches. Is that heat that's going -- that you're getting rid of or the lines are getting rid of?

MR. MIKE KREIPE: That's actually the ionize --
the effect of the high voltage. stress voltage right at the
conductor, it's many thousands of volts and ionizing there
right around it. If you get sharp points, that's why you
notice all the connections are rounded, they have shields
around them, if you get sharp points where it will build up
on that point and you'll see the purplish bluish lights.
It's fairly benign. But it's just a result of the high
voltage stress at that point.

MR. LOU DRIESSEN: It is a loss. And so when
these transmission lines get constructed, we try to make
sure that these little blues that Mike's talking about. that
don't occur on conductors. But also Mike is trying to
explain that there's heat loss on those lines, but actually
those lines are fairly efficient. So the actual losses on
the 500 kV line are 2 percent or less?

MR. MIKE KREIFE: Yeah, two.

MR. CLOYD PAXTON: What if you have bigger lines.
do you have less problems?

MR. LOU DRIESSEN: The more kVs you go, the lower
your losses are. So that's one reason why a lot of
utilities try to put up higher kV lines. But even at low
loss, it still has a loss. You know, it's still a loss. And
that small loss is about five megawatts per year.

MS. TINA MORGAN: Yeah, to touch back on Steve's
question. I think what we'd really like to know from the

1430-021-001

1430-022-001 and -002 BPA does have the right of condemnation. This
includes private properties and the city of Seattle. Seattle
is aware of this.
neighborhood that we're in is you have continually told us
that if we don't deal with you in the way that you want us
to deal that you are going to condemn our properties. We
get told that -- Jill wasn't like that, she wasn't
necessarily telling that to us every day. But since you've
had a few new people, we hear that quite often.

And we would like to know if you're treating
Seattle in the same manner because they're not wanting to
cooperate with you. Are you giving them the same continual
threat of condemning them as you're giving us? I think we'd
really like an answer to that.

And have you told them outright that you will, you
know, quite possibly condemn them or are you actually
considering a possible condemning of Seattle watershed for
your line? We'd really like you to tell us where you're
going with that with the Seattle watershed because we hear
it every time we talk to one of your representatives.

MR. LOU DRIESSEN: In our discussions with
Seattle, the condemnation issue has come up several times.
So they know we have that right and that we're -- that we
can exercise that right. So it is on the table with
Seattle. We haven't told them that we will condemn them one
way or the other. As long as negotiations are continuing,
which they are, we are not looking at exercising that. So,
yes, that discussion has taken place with Seattle.
The public comments received on the DEIS and SDEIS are in the FEIS.

Comment noted.

Comment noted.

The SDEIS did not report the loss savings for all of the alternatives. However, we have the information from studies. The loss savings for the other alternatives range from 4 to 11 MWs fewer losses than without the project.
CERTIFICATE

STATE OF WASHINGTON
)

COUNTY OF KING
)

I, BETSY DECATER, a Certified Shorthand Reporter and Notary Public in and for King County, Washington, do hereby certify that I reported in machine shorthand the above-captioned proceedings; that the foregoing transcript was prepared under my personal supervision and constitutes a true record of the proceedings.

I further certify that I am not an attorney or counsel of any parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

WITNESS my hand and seal in Sammamish, County of King, State of Washington, this 7th day of February, 2003.

My commission expires 03-20-06
<table>
<thead>
<tr>
<th>TOPIC</th>
<th>COMMENT NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td>access roads</td>
<td>1487-002, 1487-006, 1487-020, 1487-024, 1447-009,</td>
</tr>
<tr>
<td></td>
<td>1415-008, 1493-001, 1481-009</td>
</tr>
<tr>
<td>anadromous fish (sockeye, coho, chinook) fisheries</td>
<td>1447-006, 1492-030, 1515-009, 1515-018, 1434-004,</td>
</tr>
<tr>
<td></td>
<td>1487-013, 1485-003, 1403-001</td>
</tr>
<tr>
<td>aviation safety</td>
<td>1436-001</td>
</tr>
<tr>
<td>Canadian Treaty</td>
<td>1492-007</td>
</tr>
<tr>
<td>Cedar River pack trail</td>
<td>1487-030 thru 038</td>
</tr>
<tr>
<td>consistency with federal, state, and local laws and regulations</td>
<td>1492-037</td>
</tr>
<tr>
<td>consultation with tribes</td>
<td>1434-006, 1487-002, 1487-005, 1487-006, 1487-010,</td>
</tr>
<tr>
<td></td>
<td>1487-039, 1487-046</td>
</tr>
<tr>
<td>cross-Cascade, cross-mountain line</td>
<td>1492-008</td>
</tr>
<tr>
<td>cultural resources</td>
<td>1492-039, 1487-006, 1487-022, 1487-024, 1487-026,</td>
</tr>
<tr>
<td></td>
<td>1487-028, 1487-032, 1487-036, 1487-039</td>
</tr>
<tr>
<td>culverts</td>
<td>1487-013</td>
</tr>
<tr>
<td>cumulative effects</td>
<td>1487-006</td>
</tr>
<tr>
<td>deer and elk</td>
<td>1487-045, 1487-048, 1496-001</td>
</tr>
<tr>
<td>detail in analysis of alternatives</td>
<td>1492-018</td>
</tr>
<tr>
<td>drinking water - CRW</td>
<td>1492-032, 033, 034, 035; 1400-001, 1415-006, 1484-005,</td>
</tr>
<tr>
<td></td>
<td>1485-007, 008; 1496-001, 1527-024</td>
</tr>
<tr>
<td>drinking water - Kent</td>
<td>1447-002, 009, 010, 011; 1492-032, 033, 034;</td>
</tr>
<tr>
<td>energy savings</td>
<td>1444-003, 1451-017</td>
</tr>
<tr>
<td>environmental justice</td>
<td>1487-006, 1487-036</td>
</tr>
<tr>
<td>groundwater contamination</td>
<td>1447-014, 015; 1493-001, 1492-032, 033, 034, 1466-004</td>
</tr>
<tr>
<td>Habitat Conservation Plan, HCP</td>
<td>1515-016, 1487-010</td>
</tr>
<tr>
<td>hazardous spills, SWPPP</td>
<td>1492-032, 1466-004, 1483-001</td>
</tr>
<tr>
<td>health effects</td>
<td>1451-016, 1467-002</td>
</tr>
<tr>
<td>insurance policy for watershed</td>
<td>1459-007, 1481-003, 1481-011</td>
</tr>
<tr>
<td>King County code</td>
<td>1489-001, 1489-005, 1489-006, 1492-037</td>
</tr>
<tr>
<td>land use impacts</td>
<td>1529-002</td>
</tr>
<tr>
<td>landowner compensation</td>
<td>1395-001, 1441-002, 1443-002, 1474-003, 1493-001,</td>
</tr>
<tr>
<td></td>
<td>1527-023, 1520-002</td>
</tr>
<tr>
<td>Landsburg Mine</td>
<td>1447-014</td>
</tr>
<tr>
<td>Category</td>
<td>References</td>
</tr>
<tr>
<td>-----------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
</tr>
<tr>
<td>mitigation</td>
<td>1489-001, 1489-005, 1492-004, 1492-005, 1492-035, 1434-004, 1487-006, 1487-018, 1527-024, 1529-001, 1415-003, 1415-005, 1444-001, 1481-006, 1481-007, 1484-005, 1485-008</td>
</tr>
<tr>
<td>noise</td>
<td>1390-003</td>
</tr>
<tr>
<td>non-transmission alternative</td>
<td>1425-006, 1482-003, 1488-004, 1530-001, 1423-002, 1481-004</td>
</tr>
<tr>
<td>northern spotted owl</td>
<td>1481-006</td>
</tr>
<tr>
<td>noxious weeds</td>
<td>1434-003, 1485-009, 1491-004, 1491-034, 1481-005, 1423-005</td>
</tr>
<tr>
<td>purpose and need</td>
<td>1492-006, 1481-005</td>
</tr>
<tr>
<td>Raging River</td>
<td>1515-014, 1403-001, 1415-006, 1423-005, 1485-008</td>
</tr>
<tr>
<td>renewable generation</td>
<td>1411-001</td>
</tr>
<tr>
<td>Rock Creek</td>
<td>1447-006</td>
</tr>
<tr>
<td>seismic standards</td>
<td>1409-001</td>
</tr>
<tr>
<td>socioeconomic impacts</td>
<td>1529-004</td>
</tr>
<tr>
<td>stream impacts</td>
<td>1447-006, 1489-003, 1489-005, 1487-010, 1426-007, 1433-001</td>
</tr>
<tr>
<td>system reliability</td>
<td>1492-009, 1459-009, 1485-007, 1485-008, 1423-005, 1451-001</td>
</tr>
<tr>
<td>threatened and endangered species</td>
<td>1434-003, 1492-026, 1492-029, 1515-017</td>
</tr>
<tr>
<td>vandalism</td>
<td>1474-011</td>
</tr>
<tr>
<td>vegetation impacts</td>
<td>1515-014, 1515-016, 1487-006, 1487-048, 1492-026, 1522-003, 1423-005, 1426-007, 1476-003</td>
</tr>
<tr>
<td>visual resources</td>
<td>1492-039, 1427-001, 1443-001, 1482-001</td>
</tr>
<tr>
<td>water purification plant</td>
<td>1400-001, 1481-011</td>
</tr>
<tr>
<td>wells</td>
<td>1493-001, 1466-004</td>
</tr>
<tr>
<td>wetlands</td>
<td>1447-009, 1498-001, 1489-001, 1492-015, 1492-018, 1433-001, 1438-004, 1482-003, 1488-001, 1530-001, 1415-003, 1423-005, 1426-007, 1426-002</td>
</tr>
<tr>
<td>wildlife</td>
<td>1477-013</td>
</tr>
</tbody>
</table>