

Comment Letters

Copies of the comment letters, comment forms, and emails received on the DEIS, as well as oral comments from the public meeting follow this page. Correspondence was designated with an identifying log number based on the order in which the item was received.

Log No.	Name/Affiliation
LTD-0001	Fred Sturgess
LTD-0002	Paul Leimbach
LTD-0003	Jean Riley - Montana Department of Transportation
LTD-0004	Lena Whitson
LTD-0005	Robert Stewart – U.S. Department of the Interior
LTD-0006	Rich Young
LTD-0007	Paul and Patricia Mammano
LTD-0008	Thomas Wood – Libby Fire Department
LTD-0009	John Wardell –U.S. Environmental Protection Agency, Montana Office
LTD-0010	John Smith
LTD-0011	Carolyn Fera
LTD-0012	August 15, 2007 Public Meeting Comments
LTD-0013	Warren McCullough – Montana Department of Environmental Quality
LTD-0014	John Smith
LTD-0015	Residents of Kootenai River Road
LTD-0016	Tom Ring - Montana Department of Environmental Quality
LTD-0017	John Smith
LTD-0018	John Smith
LTD-0019	John Smith
LTD-0020	John Smith
LTD-0021	John Smith
LTD-0022	John Smith

Proposed Rebuild of the Libby (FEC) to Troy Section of BPA's Libby to Bonners Ferry 115-kilovolt Transmission Line

I have the following comments about the Rebuild of the Libby (FEC) to Troy Section of BPA's Libby to Bonners Ferry 115-kilovolt Transmission Line Draft Environmental Impact Statement:

I am pleased the proposed action will ~~rebuild~~ ^{rebuild} in the same location as the existing line. I continue to have concerns that there would be serious impacts if the Pipit Creek re-route were to be implemented. These include:

1. Disruption of the active bald eagle nest
2. Damage to riparian areas at line crossing.
3. Removal of old growth trees along route.
4. Disruption of unstable slope between creek + River Road.
5. Increased sedimentation in Pipit creek (Bull Trout + Westslope cutthroat stream).
6. Hazards to young eagles from the power lines when learning to fly.

Name Fred Sturgess

Address P.O. Box 141

City Libby State Mont. Zip 59923

I am not currently on your mail list. Please add me to your mail list.

Please mail your comments by **September 4, 2007** to:
 Bonneville Power Administration
 Communications - DKC-7
 PO Box 14428
 Portland, OR 97293-4428

Fax (503) 230-3285, e-mail to comment@bpa.gov or submit them through the BPA Web site at www.bpa.gov/comment/.



①

LTD-0002
REC: 8/29/07

PAULA, LEIMBACH
394 N. CENTRAL RD
LIBBY, MT 59923

Bonneville Power Admin.

8/25/07

Public Affairs Off. -DKC-7

P.O. Box 14428

Portland, OR 97293-4428

REGARDING THE POWERLINE REBUILD BETWEEN
LIBBY & TROY MONTANA;

I DISAGREE STRONGLY WITH YOUR PROPOSAL
TO MOVE THE KOOTENAI RIVER CROSSING
0.75 MILES UPSTREAM.

I UNDERSTAND YOUR DESIRE TO LESSEN THE
INTRUSION ON THE CULTURAL SITES ADJACENT
TO THE FALLS & THE REALIGNMENT WILL
DO THAT.

BUT THE TRADEOFF IN VISUAL DEGRADATION
ALONG HIGHWAY 2 IS TOO HIGH A PRICE
TO PAY FOR THE CULTURAL SITE ENHANCEMENT.

THE DRIVE ALONG THE RIVER FROM THE
WEST SIDE OF LIBBY (END OF 4-LANES)
TO ABOUT 1 MILE WEST OF THE KOOTENAI
FALLS PARKING LOT IS ONE OF THE MOST
BEAUTIFUL DRIVES IN SOUTH LINCOLN COUNTY.

FRIENDS & RELATIVES TRAVELLING HERE FOR THE FIRST TIME MARVEL AT THE BEAUTY OF THAT stretch of Highway. IT IS TRULY PART OF THE CHARACTER OF THE AREA BETWEEN LIBBY & TROY & BOTH COMMUNITIES TAKE PRIDE IN IT.

I STRONGLY RECOMMEND THAT YOU LEAVE THE POWERLINE IN ITS CURRENT LOCATION.

IF THAT BECOMES AN OBSTACLE IN DEALING WITH THE TRIBE, THEN I RECOMMEND A COMPROMISE OF MOVING THE LINE NO MORE THAN 1/2 MILE UPSTREAM (660' MAXIMUM).

THANK YOU FOR CONSIDERATION OF THESE COMMENTS.

Paul A. Leimbach

P.S.

THE DEIS WAS WELL ORGANIZED & DISPLAYED & I THANK YOU FOR YOUR EFFORT.



Montana Department of Transportation

2701 Prospect Avenue
PO Box 201001
Helena MT 59620-1001

Jim Lynch, Director
Brian Schweitzer, Governor

LTD-0003
Rec: 8/31/07

August 31, 2007

Bonneville Power Administration
Public Affairs Office – DKC-7
PO Box 14428
Portland OR 97293-4428

Subject: Draft Environmental Impact Statement - Comments
Rebuild of the Libby (FEC) to Troy Section of BPA's Libby to Bonners
Ferry 115-kilovolt Transmission Line

To Whom It May Concern:

The Montana Department of Transportation (MDT) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the above referenced proposed project. The proposed project crosses MDT roadways in at least five locations and the proposed realignment at Kootenai Falls proposes occupancy within the US 2 right-of-way. Our comments are general to what is required when any utility affects MDT right-of-way.

From the document, we understand the five crossings are as follows:

- BPA Mile 15 – ± 0.35 miles north of JCT with MT 37 on Secondary 567 (Pipe Creek Road)
- BPA Mile 17-19 – ± 4.3 miles west of JCT with MT 37 on Secondary 260 (Kootenai River Road)
- BPA Mile 25-26 – ± Reference Post 22 on US 2
- BPA Mile 30.7 – ± Reference Post 34 on MT 56
- BPA Mile 32 – ± Reference Post 16 on US 2

In addition to these crossings, there are also areas that the Transmission Line appears to be within or directly adjacent to MDT right-of-way. These locations are along Secondary 567, Secondary 260, and US 2.

Where the Transmission Line crosses or is within the MDT right-of-way, BPA will be required to follow the MDT System Impact Action Process (SIAP) to obtain a utility occupancy permit. MDT will not grant an easement for the Transmission Line within the MDT right-of-way. The System Impact Action Process is a coordinated internal review that MDT has developed for non-MDT initiated requests to enter or modify our right of way.

In addition to the occupancy permits, BPA must also follow the SIAP review for any new access roads or modified existing approaches to MDT's facilities. Any of the access roads described in the document that tie into MDT's highways must go through this process for approval.

We also have the following comments concerning clarifications and/or corrections to the DEIS:

- Page S-3 – Removal of Existing Wood-Pole Structures – Within the MDT right-of-way, this should be revised as follows: remove all structures completely and fill the hole with appropriate backfill. Compact the backfill to prevent settling. Revegetate the disturbed area to match the existing surrounding area.
- Page S-3 – Line Routing and Corridor – This section should note the MDT permitting requirements listed above.
- Page S-15 – Vegetation Mitigation Measures – In the bullet “Cooperate with private, county, and federal landowners,” add “state” landowners to this bullet.
- Page 2-3 – 2.2.1 Line Routing and Corridor - This section should note the MDT permitting requirements listed above.
- Page 2-4 – 2.2.2 Transmission Structure Design – This section should note that BPA must coordinate with MDT on height requirements when crossing MDT facilities.
- Page 2-9 – 2.2.5 Access Roads – If access roads require approaches to an MDT facility, BPA must follow the MDT system impact process. The design of all approaches must take the safety of the traveling public into account.
- Page 3-17 – 3.2.1 Affected Environment Table 3-9 – The state of Montana land ownership does not include the MDT facilities. MDT will assist you in making this determination once the total area evaluated is known.
- Page 3-209 – 3.12 Transportation, Roads – Pipe Creek Road (Secondary 567) and Kootenai River Road (Secondary 260) are Secondary highways that fall under MDT jurisdiction, they are not county roads. Please make this correction
- Page 3-209 – Table 3-58 – The title of the table is incorrect. It should be “Annual Average Daily Traffic (AADT) within the Project Area”. We reviewed the numbers within the table and they do not match the MDT count information. I have included a new table with the correct numbers.

Road	2003	2004	2005
US Highway 2	3880	4100	3830
State Highway 56	770	1000	1000
Kootenai River Road	680	670	690
Pipe Creek Road (S-567)	1100	1010	1250

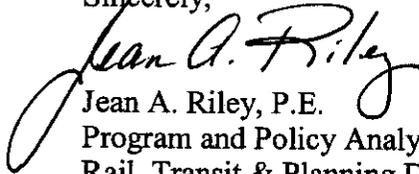
- Page 4-9 – 4.10.6 Transportation Permits – This section only discusses the permits for the transportation of large loads. The permits discussed previously are also transportation permits. The language may need to differentiate between permits for access to the transportation system and permits required for the transport of materials. Please make the necessary changes to this section.

BPA – Libby to Troy
MDT Comments
August 31, 2007

Page 3 of 3

Again, thank you for the opportunity to comment. If you have any questions concerning MDT's comments or corrections, please contact me at (406) 444-9456 or email at jriley@mt.gov.

Sincerely,



Jean A. Riley, P.E.
Program and Policy Analysis Bureau
Rail, Transit & Planning Division

P:\POLICY\WORK_FOLDER_JEAN\PROJECTS\MISSOULA\BPA-Libby-Troy_deis-comments-08302007.doc

Copies: Nancy Edwards, MDT Missoula Utilities
Walt Scott, MDT Helena Utilities
Richard Sipe, MDT Kalispell Maintenance
Stephan Herzog, MDT Kalispell Maintenance
Jim Skinner, MDT Planning
Nancy Johnson, DEQ
File

LTD-0004
Rec: 09-03-07

From: Lena Whitson
Sent: Monday, September 03, 2007 2:39 PM
To: BPA Public Involvement
Subject: Comment on Rebuild of the Libby (FEC)-to-Troy Section of BPA's Libby-to-Bonners Ferry 115-kilovolt Transmission Line

Comment on Rebuild of the Libby (FEC)-to-Troy Section of BPA's Libby-to-Bonners Ferry 115-kilovolt Transmission Line

View open comment periods on <http://www.bpa.gov/comment>

Lena Whitson

lwhitson@libby.org
(406) 293-7302
P.O. Box 364
Libby MT 59923

Thank you for the work done to create an extremely thorough DEIS on the BPA Libby-Troy Rebuild Project. Since it is like reading an exhaustive concordance, I resigned myself to reading sections of interest over different periods of time. Having done so, I concur with your Proposed Action to rebuild the Libby-Troy section at the same voltage (115 kV) with a combination of steel H-frame and single wood pole and steel pole structures with the Kootenai River realignment option. Cost and environmental concerns tended to make me agree with this option. Your consideration of the 1992 alternative transmission line routes and alternative realignment options (but eliminated) was appreciated, and it assured me that comments received prior to the DEIS had been taken seriously. The No Action Alternative seems nearly unthinkable due to the risk of fire, inevitable power outages with emergency repairs as a result of the deteriorating wood poles and cross arms. The rebuild job needs to be done. Thank you for your thoroughness in addressing the potential impacts of the three major realignment options and also mitigation measures for the impacts. Since the Proposed Action will also have impacts on the residents all along the rebuild, especially during the 2-month construction period, I hope construction will go smoothly and that residents will be cooperative. It is understandable that it will be a moderate to high impact during this time. In conclusion, thank you again for the public meetings, all the work put in so far, and sending the DEIS. May the rebuild project be successful without any major setbacks.

Sincerely, Lena Whitson



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 56, Room 1003
Post Office Box 25007 (D-108)
Denver, Colorado 80225-0007



August 30, 2007

9043.1
ER 07/0605

LTD-0005
Rec: 9/4/07

Kirk Robinson, Project Manager
Bonneville Power Administration
Communications - DM-7
P.O. Box 14428
Portland, OR 97293-4428

Dear Mr. Robinson:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement for the Bonneville Power Administration's (BPA) Rebuilding of the Libby to Troy Section of the Libby-Bonnars 115-kilovolt Transmission Line (DEIS) offers the following comments.

GENERAL COMMENTS

Threatened and Endangered Species

The U.S. Fish and Wildlife Service (USFWS) has been providing technical assistance on this project with respect to issues on grizzly bears and bald eagles will continue to work with BPA throughout the consultation process pursuant to Section 7 of the Endangered Species Act.

Land and Water Conservation Fund Program

The proposed study area includes four parks that were developed with assistance from the Land and Water Conservation Fund (L&WCF) program.

- 30-00340 – Libby – Fireman's Park/D
- 30-00370 – Libby Tennis Courts/D
- 30-00581 – Libby Fireman's Park Addition
- 30-00601P – City of Libby Parks Improvements
- 30-00631 – Lincoln County Kootenai Fall Park

We recommend you consult directly with the official who administers the L&WCF program in Montana to determine any potential conflicts with Section 6(f)(3) of the L&WCF Act (Public

Law 88-578, as amended). This section states "No property acquired or developed with assistance under this section shall, without the approval of the Secretary [of the Interior], be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the then existing comprehensive statewide outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location."

The administrator for the L&WCF program in Montana is Mr. Walt Timmerman, Grants Coordinator, Montana Department of Fish, Wildlife and Parks, P.O. Box 200701, Helena, Montana 59620. Mr. Timmerman's phone number is 406-444-3753.

Thank you for the opportunity to review and comment on this DEIS. If you have any questions concerning our comments on the L&WCF program, please contact Cheryl Eckhardt, Environmental Compliance Specialist, in the NPS Intermountain Regional Office at 303-969-2851.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert F. Stewart". The signature is written in a cursive style with a long horizontal line extending to the right.

Robert F. Stewart
Regional Environmental Officer

LTD - 0006
Rec: 09-04-07

September 3, 2007

Mr. Kirk Robinson
Project Manager
Bonneville Power Administration
Public Affairs Office -DKC-7
P.O. Box 14428
Portland, Oregon 97293-4428

Re: Rebuild Libby (FEC) to Troy Section – Transmission Line Comments

Dear Mr. Robinson,

Thank you for all your hard work in managing a project such as this and maintaining an eloquent and professional position throughout the process.

I wish to take a few moments (because that's all I can spare) to briefly comment on the draft EIS and hold my option open for potentially detailed involvement as I gain understanding of this large document.

From what I see on the page preceding the Table of Contents, the Proposed Action and the Kootenai River realignment option are BPA's preferred alternative. Because I believe what that means is the Pipe Creek and Quartz Creek alternatives will not likely be constructed and because the Pipe Creek alternative is the only alternative that directly affects me I will limit my involvement until I learn otherwise. This certainly does not mean I do not have an interest in the other sites but instead that I have only had the time to research the site near and on my property and feel as though I cannot speak responsibly about the other sites.

As far as critiquing the draft EIS goes I have just a few short comments.

I did not see the detail I expected about sedimentation and water quality and potential impacts as they specifically relate to the proposed stream adjacent road and R/W construction, vegetation removal, loss of root strength from larger older trees, steep slopes above the proposed construction and rain on snow for the Pipe Creek alternative.

I did see more specific detail about the Bald Eagle and other sensitive species that was helpful.

Little or no emphasis was given to the visual impacts on the Pipe Creek alternative relative to the corridor itself. This to me is a bigger issue than the structures and lines.

The corridors would be coming and going from my prospective, not only visible from my home and camping sites, but from the north or east including the other potential home sites including the top of the ridge to the east. To me these corridors would be devastating.

Information about T&E species, old growth, tribal consultation, alternative comparisons, mitigation measures, maps, pictures and overall organization of the draft EIS seemed to provide the proposal back ground needed.

My closing comment for you is this, Kirk, if your intention is truly to avoid the environmentally sensitive Pipe Creek re-alignment option, my faith in you, BPA, the process utilizing all the dedicated field and managerial professionals, and your statement about minimizing environmental impacts and demonstrating regional accountability, then in my opinion when this proposal becomes a reality it will be a win for us all.

Thank you,

Rich Young
Libby Property Owner

Ps. This is an answer to prayer.

LTD-0007
Rec: 09-04-07

From: AFPOPAUL@aol.com [mailto:AFPOPAUL@aol.com]
Sent: Monday, August 27, 2007 11:16 PM
To: Eaton, Tish K - KEC-4
Subject: Libby to Troy rebuild of power lines project...public comments

I've reviewed the Environmental Impact Report of July 2007 and would like to offer my response to the various plans and proposals. As a property owner in the Bighorn Terrace area whose property most closely would be impacted by tower 20/10; I am very concerned with the potential impacts upon the future use of my property as a location for the home we will live in after our retirement. Since we intend to build in 2009 (late) and your project will occur in 2007-2008, the impacts of the construction process are of less concern than the eventual effects upon our land that might occur within sight of our back windows (or even close by our home, if an access road is put through our property). Expansion of the rear right-of-way (under the 230 volt option) is very troublesome as this might remove most of the trees that grow between where the rear of our house will be and the mountain behind our property. Our view would be severely impacted by this. It would be easy to cast our vote for the "no action alternative" but I think a much better solution for us would be the Quartz Creek Realignment option. We acknowledge that this project likely needs to be done (especially as the line that fell and started a fire in 2003 was right at the rear of our lot!). However, moving the lines to the other side of the mountain will eliminate the need for the rear right-of-way OR the access road to reach structure 20/10 and have the benefit of giving us back the 50 foot section at the rear of our property. Careful examination of the impacts and options available do not seem to render the Quartz Creek Realignment unworkable. Each item reviewed and listed makes me more certain that the Quartz Creek option is the best one for not only us...but for almost every one of the property owners on the North side of Kootenai River Road. I hope this can work for both Bonneville Power and those of us most likely to be adversely impacted. Thank you. Sincerely; Paul and Patricia Mammano / Owners, Lot 53 Bighorn Terrace

LTD-0008
Rec: 9/5/07

Lincoln County Rural Fire Dist. #1 (Libby Rural)
P.O. Box 796
Libby, MT 59923

12/20/06

RE: Electric Transmission Line in the Bighorn Terrace Area of Libby, MT

To Whom It May Concern:

It is my understanding that you are in the process of planning to replace the transmission line through the Bighorn Terrace area. I would like to go on record requesting that you place the line away from the homes, so we can have safer access to them for fire fighting purposes. Power lines are always a major concern for fire fighters and if we can be proactive and avoid problems with them in a planning stage like this, it is very important that we be involved. Placement of fire fighting equipment is very important to us in making the fire attack more favorable, and if we have to worry about overhead lines in the area it makes it more difficult for our operations. We do have ladder and boom trucks that may be used on a residential fire and as you know that type equipment requires very special placement in and around power lines. If you would care to visit with me or inform me of any meetings you may have regarding this issue, you can reach me at 293-0248 or 293-7618 anytime. Thanks for your consideration in this matter.

Sincerely,



Thomas J. Wood, Chief
Libby Fire Department (Lincoln Co. Rural FD#1 and City of Libby)

Rec'd
DK
9/5/07
F&W

Rec'd
DK
9/15/07
KDW



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

August 30, 2007

Bonneville Power Administration
Public Affairs Office -DKC-7
P.O. Box 14428
Portland OR 97293-4428

Re: CEQ # 20070305, Rebuild of the Libby (FEC) to Troy
115-kV Transmission Line DEIS

Dear BPA:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Environmental Impact Statement (DEIS) for the Rebuild of the Libby (FEC) to Troy Section of BPA's Libby to Bonners Ferry 115-kilovolt Transmission Line, in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. The EPA's comments include a rating of both the environmental impact of the proposed action and the adequacy of the NEPA document.

The EPA does not object to the Bonneville Power Administration's (BPA) proposal to rebuild the Libby to Troy 115-kV transmission line along the existing transmission line corridor using the Kootenai River realignment option to avoid impacts to Kootenai Falls. The EPA does, however, have some comments and concerns regarding water quality, wetlands and wildlife impacts associated with proposed transmission line and road construction activities. Our comments and concerns along with associated recommendations are identified below and discussed further in our more detailed comments (enclosed).

Significant road construction is proposed along with the transmission line reconstruction (i.e., improving approximately 20 miles of existing access road, and constructing 4.5 miles of new access road on and off the existing transmission corridor). Road construction can result in significant adverse effects to water quality. Sediment from roads, particularly during road construction and/or reconstruction, and from poorly maintained roads with inadequate road drainage, is a major cause of adverse water quality impacts. It will be important for BPA to properly plan and design road work and to utilize adequate sediment and erosion control BMPs during construction, and to properly maintain roads, to minimize erosion and reduce sediment production and transport from roads. This is particularly important since the project crosses 24 watersheds, including Pipe Creek, Bobtail Creek, Quartz Creek, Hunter Gulch, Dad Creek,



Burrell Creek, China Creek, and is adjacent to the Kootenai River. Bobtail Creek, Quartz Creek and segments of the Kootenai River are water quality impaired waters identified on Montana's Clean Water Act Section 303(d) list.

We are concerned that even though best management practices (BMPs) are proposed for use during transmission line and access road construction, short-term increases in sediment to 303(d) listed waters are still predicted. The DEIS states that short-term increases of small amounts of sediment are expected from construction activities, and that the tensioning site at structure 18/11 has the greatest potential for generating sediment that could adversely affect Bobtail Creek. Our policy is that further degradation of 303(d) listed waters should be avoided.

We believe watershed restoration activities should be included in the project to reduce existing sediment sources in order to compensate for sediment increases associated with transmission line and road construction (e.g., stabilize existing eroding banks; improve/install BMPs on additional existing roads, perhaps in cooperation with the Forest Service to reduce existing road sediment sources). This would provide better assurance that no further degradation occurs to 303(d) listed streams during transmission line and road construction, since a small amount of sediment transport is still likely to occur even with use of BMPs during transmission line and road construction. Unless existing sediment sources are reduced, 303(d) listed streams will be further degraded during transmission line and road construction.

The DEIS states that there would be wetland disturbance from removal of structures 22/4, 23/8 and 26/2, and that construction of new structures would result in "low to moderate" wetland impacts, and that new access roads would not be constructed in wetlands where possible (which does not preclude wetland impacts during road work). The extent of wetland impacts from the proposed project, therefore, has not been quantified and is not entirely clear. We recommend that a table be provided in the FEIS showing the acreage of wetlands likely to be impacted by the proposed project, along with a discussion of the associated wetland functions and values that may be lost.

It is important that the BPA consult with the Corps of Engineers in regard to Clean Water Act 404 permit requirements for construction activities in or near streams or wetlands, (e.g., contact Mr. Allan Steinle of Corps of Engineers Montana Office in Helena at 406-441-1375). The 404(b)(1) Guidelines (found at 40 CFR Part 230) provide the environmental criteria by which 404 permits are evaluated. If there are significant wetland and/or river/stream dredge and fill impacts from a project, we generally recommend that a 404(b)(1) analysis be included as an Appendix to the FEIS, since inclusion of a such an analysis helps assure that 404 permit requirements are properly integrated into the NEPA process in accordance with 40 CFR 1500.2(c). Section 404 Dredge and Fill Permit rules/policies require that adverse impacts to aquatic resources be avoided and minimized as much as possible, and that unavoidable impacts to wetlands be compensated for. Wetlands restoration, creation or enhancement measures should be proposed to compensate for unavoidable impacts to wetlands to attain no net loss of wetlands. The goal of wetland mitigation should be to replace the functions and values of impacted wetlands in areas adjacent to or as close as possible to the area of wetlands loss.

We did not see a clear identification of when and where mitigation wetlands would be restored or created to compensate for wetlands impacted by transmission line and road construction to assure that there will be no net loss of wetlands as a result of the proposed project. We believe the final EIS should more clearly identify and disclose proposed wetland mitigation activities that would compensate for unavoidable impacts to wetlands. This information could be provided in the narrative of the EIS or in the 404(b)(1) analysis appended to the EIS.

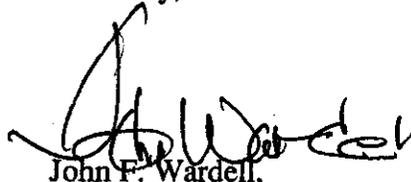
We also have concerns about potential impacts to the avian community from powerline operation due to bird strikes of the powerline and/or shield wires. We encourage BPA to use transmission line structural designs recommended by the Avian Power Line Interaction Committee (APLIC) to minimize adverse impacts to the avian community. This is especially important since the transmission line will be constructed in a river corridor with significant avian use. In addition, we recommend development of a monitoring program to determine if bird strikes or electrocutions occur as a result of this project. Field surveys conducted during the spring and fall migratory periods and the spring nesting period to locate birds which have been electrocuted or have struck transmission lines or shield wires will aid in identifying and modifying problem structures.

Finally, while we very much support control of noxious weeds along the transmission line corridor and access roads, we encourage prioritization of weed control methods that focus on non-chemical treatments first, with reliance on chemicals being the last resort, since weed control chemicals can be toxic and have the potential to be transported to surface or ground water following application. Herbicide drift into streams and wetlands could adversely affect aquatic life and wetland functions such as food chain support and habitat for wetland species. The DEIS indicates that overspray of herbicides could potentially affect water quality. We are particularly concerned about potential use of more toxic and persistent herbicides such as picloram (Tordon), since they have higher potential for stream and/or groundwater contamination. We recommend use of a 50 foot no herbicide spray buffer zone adjacent to streams and wetlands, and mechanical weed removal or hand-pulling of weeds adjacent to streams and wetlands. In addition we recommend that BPA commit to annual field reviews of the transmission line corridor and access roads, perhaps in coordination with local weed control Districts, to determine appropriate treatment or control measures for noxious weeds which may be needed on an on-going basis.

The EPA's further discussion and more detailed questions, comments, and concerns regarding the analysis, documentation, or potential environmental impacts of the Rebuild of the Libby (FEC) to Troy 115-kV Transmission Line DEIS are included in the enclosure with this letter. Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the Rebuild of the Libby (FEC) to Troy 115-kV Transmission Line DEIS has been rated as Category EC-2 (Environmental Concerns - Insufficient Information). A copy of EPA's rating criteria is attached. The EPA believes additional information is needed to fully assess and mitigate all potential impacts of the management actions.

The EPA appreciates the opportunity to review and comment on the DEIS. If we may provide further explanation of our comments and concerns please contact Mr. Steve Potts of my staff in Helena at (406) 457-5022 or in Missoula at 406-329-3313, or via e-mail at potts.stephen@epa.gov . Thank you very much for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Wardell", written over a horizontal line.

John F. Wardell,
Director
Montana Office

Enclosures

cc: w/ enclosures

Larry Svoboda/Julia Johnson, 8EPA-N, Denver
Robert Ray/Mark Kelley, MDEQ, Helena

**U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

EPA COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE REBUILD OF THE LIBBY (FEC) TO TROY SECTION OF BPA'S LIBBY TO BONNERS FERRY 115-KILOVOLT TRANSMISSION LINE

Brief Project Overview

The Bonneville Power Administration (BPA) prepared this DEIS to evaluate a proposal to rebuild a 17-mile-long section of BPA's Libby to Bonners Ferry 115-kilovolt transmission line, to replace an existing 115-kV wood pole transmission line that runs west from Flathead Electric Cooperative's (FEC) Libby Substation near the town of Libby, to BPA's Troy Substation, east of Troy, Montana. The 17-mile transmission line corridor passes between the Purcell and Cabinet mountains as it follows the Kootenai River canyon from the town of Libby, Montana to the town of Troy, Montana. The Libby-Troy line has been steadily deteriorating, and BPA is concerned that it threatens the reliability of the regional system. BPA needs to rebuild or reinforce the Libby-Troy section of its transmission system to provide safe and reliable load service to Libby, Bonners Ferry, Sandpoint and many smaller communities in northwestern Montana, and to anticipate for the future growth of the area.

Three alternatives have been evaluated: the Proposed Action; Alternative 1; and the No Action Alternative, along with three realignment options. The No Action Alternative would involve continued operation and maintenance of the existing line in its current location.

Under the Proposed Action, BPA would rebuild the Libby-Troy section at the same voltage (115 kV) and with the same number of circuits (one) as currently exists. The proposed rebuild would be located primarily in BPA's existing right-of-way corridor. A combination of wood and steel H-frame and single wood pole and steel pole structures would be used. Additional transmission line corridor width would be acquired in the form of additional easements or permitted areas in some sections to bring the corridor up to minimum BPA standards for 115-kV transmission line operation (60-80 foot corridor). The proposed transmission line rebuild would require improving about 20 miles of existing access road on and off the existing transmission corridor and constructing about 4.5 miles of new access road on and off the existing corridor. Improvement and construction would consist of the following activities: widening existing roads; installing or improving an estimated 210 culverts, drain dips and water bars; installing two bridges, one at Burrell Creek and one at China Creek; constructing an access road for bridge approaches to China Creek; clearing and disposal of brush and trees; soil excavation and embankment placement for new roads (except roads constructed west of the gate at the end of Kootenai River Road); placing sub-grade reinforcement material (approximately 20,000 cubic yards); and placing crushed rock (approximately 40,000 tons).

Under Alternative 1, BPA would rebuild the line as a 230-kV, double-circuit line. Steel single-pole structures would be used, and additional easements and permitted areas would be acquired to bring the corridor up to minimum BPA standards for 230-kV transmission lines (100

foot corridor). These realignment options: Pipe Creek, Quartz Creek, and the Kootenai River Crossing, were identified to minimize impacts to private properties and cultural resources. One realignment avoids adjacent residences along Kootenai River Road near Pipe Creek; another realignment bypasses landowners in the Bighorn Terrace subdivision, and a third realignment avoids the Kootenai Falls area by moving the river crossing approximately 3/4 mile east of the present crossing of the Kootenai River.

BPA's preferred alternative at this time is the Proposed Action (rebuild to single-circuit 115 kV) with the Kootenai River realignment option.

Comments:

1. Thank you for providing clear maps showing the transmission line rebuild corridor along with the three realignment options, including identification of transmission line proximity to rivers and streams (Figures 3-1 and 3-2). We also appreciate inclusion of Tables 2-3 and 2-4 that provide alternatives matrices for comparison of alternatives. These maps and tables facilitate improved project understanding, help define issues, and assist in evaluation of alternatives providing a clearer basis of choice among options for the decisionmaker and the public in accordance with the goals of NEPA.
2. We did not see any discussion regarding the possibility of burying the transmission line underground. While we recognize that burial of the transmission lines would involve greater costs and greater disturbance of soils and vegetation and/or carry a higher risk for site and water quality contamination due to the need for a petroleum-based product to cool the underground conductors, burial would also reduce visual impacts along the transmission line corridor. We believe it would be appropriate to include some discussion of these issues and documentation of BPA's reasons for eliminating transmission line burial from further consideration.
3. We do not object to the proposed rebuild of the Libby to Troy 115-kV transmission line along the existing transmission line corridor using the Kootenai River realignment option to avoid impacts to Kootenai Falls. We do, however, have some comments and environmental concerns regarding water quality, wetlands and wildlife impacts associated with proposed transmission line and road construction activities. Our comments and concerns along with our associated recommendations are identified and discussed in our subsequent comments.
4. It is stated (page 2-9) the proposed transmission line rebuild would require improving approximately 20 miles of existing access road, and constructing approximately 4.5 miles of new access road on and off the existing transmission corridor. Existing roads would be widened, and an estimated 210 culverts, drain dips and water bars would be installed or improved.

We note that road construction can result in significant adverse effects to water quality. Sediment from roads, particularly during road construction and reconstruction, and from poorly maintained roads with inadequate road drainage, is a major cause of adverse water quality impacts. It will be important for BPA to properly plan and design roads and to utilize adequate sediment and erosion control BMPs during construction, and to properly maintain roads, to minimize erosion and reduce sediment production and transport from roads. Sediment and erosion control practices to be used during road construction and maintenance to mitigate water quality effects from roads should be more fully described, perhaps in an EIS Appendix. This is particularly important since the project crosses 24 watersheds, including Pipe Creek, Bobtail Creek, Quartz Creek, Hunter Gulch, Dad Creek, Burrell Creek, China Creek, and is adjacent to the Kootenai River (page 3-2). For your information and consideration, EPA's general recommendations regarding road construction are:

- * minimize road construction and reduce road density as much as possible to reduce potential adverse effects to watersheds;
- * locate roads away from streams and riparian areas as much as possible;
- * locate roads away from steep slopes or erosive soils;
- * minimize the number of road stream crossings;
- * stabilize cut and fill slopes;
- * provide for adequate road drainage and control of surface erosion with measures such as adequate numbers of waterbars, maintaining crowns on roads, adequate numbers of rolling dips and ditch relief culverts to promote drainage off roads avoid drainage or along roads and avoid interception and routing sediment to streams;
- * consider road effects on stream structure and seasonal and spawning habitats;
- * allow for adequate large woody debris recruitment to streams and riparian buffers near streams;
- * properly size culverts to handle flood events, pass bedload and woody debris, and reduce potential for washout;
- * replace undersized culverts and adjust culverts which are not properly aligned or which present fish passage problems and/or serve as barriers to fish migration;
- * use bridges or open bottom culverts that simulate stream grade and substrate and that provide adequate capacity for flood flows, bedload and woody debris where needed to minimize adverse fisheries effects of road stream crossings.

We also encourage conduct of inspections and evaluations to identify conditions on roads that may cause or contribute to sediment delivery and stream impairment, and to correct road conditions impacting streams. It is important that road maintenance (e.g., blading) be focused on reducing road surface erosion and sediment delivery from roads to area streams. Grading (blading) of unpaved roads in a manner that contributes to road erosion and sediment transport to streams and wetlands should be avoided. Practices of expediently sidecasting graded material over the shoulder and widening shoulders and snow plowing can have adverse effects upon streams, wetlands, and riparian areas that are adjacent to roads. Road use during spring breakup conditions should also be avoided to limit runoff created road ruts during late winter thaws that increase road erosion (i.e., ruts channel road runoff along roads).

Forest Service Region 1 provides training for operators of road graders regarding conduct of road maintenance in a manner that protects streams and wetlands, (i.e., Gravel Roads Back to the Basics). If there are road maintenance needs on unpaved roads adjacent to streams and wetlands we encourage utilization of such training (contact Donna Sheehy, FS R1 Transportation Management Engineer, at 406-329-3312).

We also note that there are training videos available from the Forest Service San Dimas Technology and Development Center for use by the Forest Service and its contractors (e.g., "Forest Roads and the Environment"-an overview of how maintenance can affect watershed condition and fish habitat; "Reading the Traveled Way"-how road conditions create problems and how to identify effective treatments; "Reading Beyond the Traveled Way"-explains considerations of roads vs. natural landscape functions and how to design maintenance to minimize road impacts; "Smoothing and Reshaping the Traveled Way"-step by step process for smoothing and reshaping a road while maintaining crowns and other road slopes; and "Maintaining the Ditch and Surface Cross Drains"-instructions for constructing and maintaining ditches, culverts and surface cross drains).

5. Bobtail Creek, Quartz Creek and segments of the Kootenai River are listed as water quality impaired under Section 303(d) of the Clean Water Act by the State of Montana (page 3-3, also see MDEQ website <http://www.deq.state.mt.us/CWAIC/default.aspx>). As noted in the DEIS a Total Maximum Daily Load (TMDL) has been prepared for Bobtail Creek, and this TMDL and Water Quality Restoration Plan is available on the MDEQ website, <http://deq.mt.gov/wqinfo/TMDL/BobtailFinalTMDL/FinalBobtailCoverDoc.pdf>. It is important that the proposed Libby to Troy transmission line project be consistent with the Bobtail Creek TMDL and Water Quality Restoration Plan. A TMDL for Quartz Creek will be prepared in association with the TMDL for the Kootenai River TMDL Planning Area, and is due 2009 to 2012. It will also be important for the proposed transmission line to be consistent with the TMDL for Quartz Creek and Kootenai River.

Consistency with a TMDL that has not yet been completed means that any additional degradation of the impaired water (i.e., pollutant increase) should be avoided and if

pollutants may be generated during project activities on impaired waters, mitigation or restoration activities should also be included to reduce existing pollutant sources to offset or compensate for pollutants generated during project activities. Recognizing uncertainties and desiring a margin of safety, such compensation should more than offset pollutants generated, resulting in overall reductions in pollution. Watershed restoration activities that compensate for pollutant production during management activities in watersheds of 303(d) listed streams should be included in such projects, and restoration activities should be implemented within a reasonable period of time in relation to pollutant producing activities (e.g., within 5 years).

The DEIS states that use of BMPs would reduce potential sedimentation in Bobtail and Quartz Creeks preventing further degradation of these water quality limited streams (page 3-7). Mitigation activities for impacts to soil and water resources are identified on pages 3-14 and 3-15. These mitigation activities should reduce or minimize erosion and sediment production and transport during construction, however, even with use of such BMPs it is likely that some additional pollutant (sediment) delivery to 303(d) listed streams may still occur. The DEIS states that short-term increases of small amounts of sediment are expected from construction activities (page 3-138), and that the tensioning site at structure 18/11 has the greatest potential for generating sediment that could adversely affect Bobtail Creek.

We believe the FEIS should identify and discuss watershed restoration activities to control other existing sediment sources in order to provide compensation for the sediment production and transport associated with transmission line and road construction activities for 303(d) listed streams (e.g., stabilize existing eroding banks; improve/install BMPs on additional existing roads perhaps in cooperation with the Forest Service to reduce existing road sediment sources). Activities to control and reduce existing sediment sources are needed to provide full assurance that no further degradation occurs to 303(d) listed streams during transmission line and road construction, since a small amount of sediment transport is still likely to occur even with use of BMPs during transmission line and road construction. Unless existing sediment sources are reduced, 303(d) listed streams will be further degraded by transmission line and road construction.

6. EPA considers the protection, improvement, and restoration of riparian areas and wetlands to be a high priority. Wetlands and riparian areas increase landscape and species diversity, support many species of western wildlife, and are critical to the protection of water quality and designated beneficial water uses. Potential impacts on riparian areas and wetlands include: water quality, habitat for aquatic and terrestrial life, flood storage, ground water recharge and discharge, sources of primary production, and recreation and aesthetics.

Executive Order 11990 requires that Federal Agencies "take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency's responsibilities..." and agencies

are further directed to "avoid undertaking or providing assistance for new construction located in wetlands unless the head of the agency finds (1) that there is no practicable alternative to such construction, and (2) that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use...". In addition national wetlands policy has established an interim goal of **No Overall Net Loss of the Nation's remaining wetlands**, and a long-term goal of increasing quantity and quality of the Nation's wetlands resource base.

We are pleased that impacts to wetlands and floodplains have been evaluated (Section 3.4), and that none of the new structures would be constructed in wetland areas (pages 3-51, 3-54), and that BMPs would be used to minimize impacts to wetlands (pages 3-56, 3-57). We are also pleased that the DEIS indicates that all applicable Clean Water Act permits for work in wetlands and streams will be obtained (page 3-56).

As you know discharges of fill material into wetlands and other waters of the United States are regulated by Section 404 of the Clean Water Act, 33 U.S.C. 1344, which is administered jointly by the U.S. Army Corps of Engineers and EPA. It is important that the BPA consult with the Corps of Engineers in regard to 404 permit requirements for construction activities in or near streams or wetlands, (e.g., contact Mr. Allan Steinle of Corps of Engineers Montana Office in Helena at 406-441-1375). The 404(b)(1) Guidelines (found at 40 CFR Part 230) provide the environmental criteria by which 404 permits are evaluated. See Corps of Engineers Montana Regulatory Office website for further information, <https://www.nwo.usace.army.mil/html/od-rmt/mthome.htm>.

The DEIS states that there would be wetland disturbance from removal of structures 22/4, 23/8 and 26/2 (page 3-51), and that construction of new structures would result in "low to moderate" wetland impacts (page 3-52). The DEIS also states that new access roads would not be constructed in wetlands where possible, although this does not preclude wetland impacts as a result of road work. The extent of wetland impacts from the proposed project, therefore, has not been quantified and is not entirely clear. We recommend that FEIS include a clearer identification and disclosure of impacts to wetlands, and suggest that a table be provided in the FEIS showing the acreage of wetlands to be impacted by the proposed project, along with a discussion of the associated wetland functions and values that may be impacted.

If there are significant wetland and/or river and stream dredge and fill impacts, we generally recommend that a 404(b)(1) analysis be included as an Appendix to the FEIS, since inclusion of a draft 404(b)(1) analysis helps assure that 404 permit requirements are properly integrated into the NEPA process in accordance with 40 CFR 1500.2(c).

Section 404 Dredge and Fill Permit rules/policies require that adverse impacts to aquatic resources be avoided and minimized as much as possible, and that unavoidable impacts to wetlands be compensated for. Wetlands restoration, creation or enhancement measures should be proposed to compensate for unavoidable impacts to wetlands to attain no net

loss of wetlands. The goal of wetland mitigation should be to replace the functions and values of impacted wetlands in areas adjacent to or as close as possible to the area of wetlands loss. Wetland restoration is preferred to wetland creation or enhancement because restoration has a higher rate of success.

We did not see a clear identification of when and where mitigation wetlands would be restored or created to compensate for wetlands impacted by transmission line and road construction to assure that there will be no net loss of wetlands as a result of the proposed project. We believe the final EIS should more clearly identify and disclose proposed wetland mitigation activities that would compensate for unavoidable impacts to wetlands. This information could be provided in the narrative of the EIS or in the 404(b)(1) analysis appended to the EIS.

EPA/Corps policy has also accepted acre-for-acre replacement of wetlands as a surrogate for replacement of functions and values when there is a lack of definitive information on functions and values, although adjustments may be necessary to reflect the expected degree of success of mitigation, and provide an adequate margin of safety to reflect anticipated success (i.e., greater than acre-for-acre replacement is suggested when impacted wetlands have high function & value and likelihood of replacement of functions is low). Traditional mitigation is often not successful in fully restoring wetland function, and 2:1 or higher mitigation ratios are sometimes required to mitigate wetlands impacts. Construction/enhancement of wetlands to compensate for impacted wetlands should occur in advance or concurrent with activities causing wetlands impacts to reduce temporal losses of wetland functions.

We recommend that a Wetland Mitigation Plan be prepared to assure that adequate replacement of lost wetland functions and values occurs. This mitigation plan should include consideration of direct, indirect, and cumulative effects. It should contain a statement of goals, a monitoring plan, long-term management/protection objectives and a contingency plan (a commitment to conduct additional work if required to meet the goals of the plan). The mitigation plan should also include best management practices and mitigation measures that will manage stormwater runoff from roadways before it reaches wetlands, streams and other aquatic habitats. In general, wetlands, including mitigation wetlands, should not be used for treatment of stormwater. This Plan should be approved by the appropriate agencies before implementation of the proposed project.

7. The DEIS states that the proposed action and Alternative 1 would disturb 20 additional acres and 58 additional acres, respectively, along the transmission line corridor and approximately 4.5 additional acres due to access road construction (Tables 3-16 and 3-17), and that the realignment options would add additional right-of-way (ROW) clearing and road construction impacts (Table 3-18). The amount of soil disturbance identified in Tables 3-16 and 3-17 in the vegetation section of the DEIS appears to differ somewhat with soil disturbance acreage identified in Tables 3-2 and 3-4 in the section addressing impacts to soil and water resources. These inconsistencies should be corrected in the

FEIS.

8. As noted in the DEIS (page 3-38) soil disturbance creates conditions favoring the spread of noxious weeds. The DEIS states that transmission line and road construction activities would have a "moderate to high" impact on noxious weed spread in the project area (page 3-41). We are pleased that the DEIS also identifies proposed activities that would mitigate the spread of weeds (pages 3-45, 3-46). We support use of noxious weed mitigation and control methods, since many noxious weeds can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife.

Weed prevention is the most cost-effective way to manage and control weeds by avoiding new infestations and spread of weeds, and thus, avoiding the need for subsequent weed treatments (e.g., weed prevention practices such as minimizing ground disturbance, revegetating disturbed areas, use of weed free seed, cleaning vehicles and equipment, and other practices that prevent infestation and spread of weeds). Early recognition and control of new infestations avoids wider future use of herbicides and other control methods.

EPA encourages prioritization of weed control methods that focus on non-chemical treatments first, with reliance on chemicals being the last resort, since weed control chemicals can be toxic and have the potential to be transported to surface or ground water following application. Herbicide drift into streams and wetlands could adversely affect aquatic life and wetland functions such as food chain support and habitat for wetland species.

The DEIS indicates that overspray of herbicides could potentially affect water quality (page 3-7). We recommend use of 50 feet no spray buffer zones adjacent to streams and wetlands, and mechanical weed removal or hand-pulling of weeds adjacent to aquatic areas. Hand-pulling can be effective for weeds that do not contain extensive root systems near surface waters. It may be helpful to add a list of those weed species which can be effectively hand-pulled (i.e. those without large tap roots and spreading rhizomatous root systems). The herbicide application technique of hand or manual wipe-on (especially applicable for contact systemic herbicides such as glyphosate) is an option to control individual weed plants up to the existing water level adjacent to streams or sensitive aquatic sites.

Herbicides should be applied at the lowest rate effective in meeting project objectives and according to guidelines for protecting public health and the environment. All efforts should be made to avoid movement or transport of herbicides into surface waters that could adversely affect public health, fisheries or other water uses. The Montana Water Quality Standards include a general narrative standard requiring surface waters to *be free from substances that create concentrations which are toxic or harmful to aquatic life.*

It is important that the water contamination concerns of herbicide usage be fully evaluated and mitigated. All efforts should be made to avoid movement or transport of herbicides into surface waters that could adversely affect fisheries or other water uses. Herbicides, pesticides, and other toxicants and chemicals must be used in a safe manner in accordance with Federal label instructions and restrictions that allow protection and maintenance of water quality standards and ecological integrity, and avoid public health and safety problems.

Herbicide applicators should be advised of the potential for runoff of herbicides at toxic concentrations into the streams. The applicators should take precautions during spraying (e.g., applying herbicide only after careful review of weather reports to ensure minimal likelihood of rainfall within 24 hours of spraying; special precautions adjacent to the stream to reduce runoff potential; etc.). It should be unequivocally stated that no herbicide spraying will occur in streams and wetlands or other aquatic areas (seeps, springs, etc.). Herbicide drift into streams and wetlands could adversely affect aquatic life and wetland functions such as food chain support and habitat for wetland species. Streams and wetlands in any area to be sprayed be identified and flagged on the ground to assure that herbicide applicators are aware of the location of wetlands, and thus, can avoid spraying in or near wetlands.

We are particularly concerned about potential use of more toxic and persistent herbicides such as picloram (Tordon), since they have higher potential for more serious stream and/or groundwater contamination. We recommend that roadside drainage areas leading to intermittent and perennial streams be flagged as no-spray zones and not sprayed with picloram based herbicides. We also recommend that picloram not be used at rates greater than 0.25 lbs/acre, and suggest that the Forest Service consider applications of persistent herbicides such as picloram only once per year to reduce potential for accumulation in soil. Potential for persistent herbicides to accumulate in soil in harmful amounts are reduced if sites are treated only once per year (twice being the limit). Trade-offs between effective weed control and effects on soil productivity and leaching concerns may need to be considered. A second treatment application if needed should only occur after 30 days (or according to label directions).

For your information, Dow AgroSciences, the manufacturer of Tordon 22K, has recently developed supplemental labeling for Tordon 22K for areas west of the Mississippi River. They have directions for wick or carpet roller applications. Tordon 22K herbicide can be applied using wick or carpet roller equipment where drift presents a hazard to susceptible crops, surface waters, and other sensitive areas. One part Tordon 22K is mixed with 2 parts water to prepare a 33% solution. The wick method of application is more labor intensive but very effective at targeting particular noxious weeds adjacent to surface waters, wetlands, or protected plants.

Most picloram products, including Tordon 22K, are Restricted Use Pesticides (RUPs) requiring pesticide applicator certification to purchase and apply. It is important that U.S.

Forest Service employees be certified throughout the duration of the project. If commercial applicators will be contracted for RUP applications, we recommend checking to make sure their MT commercial RUP license is current. Please contact Montana Dept. of Agriculture at (406) 444-5400 for more information. Also, please note that registration for Access (which has picloram as an active ingredient) is cancelled.

Some suggestions we have to reduce potential water quality and fisheries effects from herbicide spraying are to assure that applicators: 1) are certified and fully trained and equipped with the and appropriate personal protective equipment; 2) apply herbicides according to the label; and 3) use treatment methods that target individual noxious weed plants in riparian and wetland areas (depending on the targeted weed species, manual control or hand pulling may be one of the best options for weed control within riparian/wetland areas or close to water). The herbicide application technique of hand or manual wipe-on (especially applicable for contact systemic herbicides such as glyphosate) may be an option to control individual plants up to the existing water level adjacent to streams or sensitive aquatic sites.

We also recommend that weed treatments be coordinated with the Forest botanist to assure protection to sensitive plants, and coordinated with fisheries biologists and wildlife biologists to assure that sensitive fisheries and wildlife habitat areas are protected. You may also want to consider use of a more selective herbicide (clopyralid) for use in conifer associated communities to reduce impacts on non-target vegetation. We also note that spotted knapweed, which is a prevalent noxious weed species in western Montana, is non-rhizomatous and should be relatively easy to control with lower rates of the most selective low toxicity herbicides.

For your information, the website for EPA information regarding pesticides and herbicides is <http://www.epa.gov/pesticides/>. The National Pesticide Telecommunication Network (NPTN) website at <http://nptn.orst.edu/tech.htm> which operates under a cooperative agreement with EPA and Oregon State University and has a wealth of information on toxicity, mobility, and environmental fate on pesticides which may be helpful (phone number 800-858-7378).

9. While we are pleased that a post-construction survey will be conducted to confirm whether weeds have been controlled (page 3-47, we also recommend that BPA commit to annual field reviews, perhaps in coordination with local weed control Districts, to determine appropriate treatment or control measures for noxious weeds which may be needed on an on-going basis.
10. We very much support proposed use of gates on access roads to discourage recreational vehicle travel on access roads (page 3-47), since motorized vehicles disturb soil, create weed seedbeds, and disperse weed seeds.
11. We understand that shield wires are often struck by birds in flight (Avian Power Line

Interaction Committee, APLIC). Accordingly, we encourage BPA to use transmission line structural designs recommended by APLIC to minimize adverse impacts to the avian community. This is especially important since the Libby to Troy transmission line will be constructed in a river corridor with significant avian use.

We also recommend development of a monitoring program to determine if bird strikes or electrocutions occur as a result of this project. Field surveys conducted during the spring and fall migratory periods and the spring nesting period to locate birds which have been electrocuted or have struck transmission lines will aid in the process of identifying and modifying problem structures.

12. Thank you for providing analysis and discussion regarding potential health and environmental effects associated with electromagnetic fields induced by the transmission line (Section 3.10 and Appendices H and J). We are pleased that the DEIS analysis predicts that the level of such impacts would be "low" (page 3-180).
13. The DEIS indicates that the proposed action would affect air quality by construction and vegetation removal activities which create dust, use of heavy equipment which emits pollutants (carbon monoxide, carbon dioxide, sulfuroxides, PM-2.5, nitrogen oxides, volatile organic hydrocarbons, aldehydes, and polycyclic aromatic hydrocarbons), and electric field corona which causes minor releases of ozone and nitrogen oxides (page 3-217). The City of Libby is a PM-2.5 and PM -10 non-attainment area. The DEIS states that the proposed action would conform with state and federal Clean Air Act regulations because the estimated annual PM-10 emissions are lower than 70 tons per year for conformity in a non-attainment area, and proportionally, PM-2.5 emissions are below 7 tons per year (page 3-218). The DEIS also states that all construction and maintenance activities associated with the proposed action would be "low" due to dust control activities and new vehicle emission standards and changes in fuel characteristics (pages 3-218, 3-219).

We recommend that the sources and associated growth trends, including mobile, stationary (woodburning or industry) and area (construction, forestry, agriculture) of PM-2.5 be analyzed further to provide information about the expected PM-2.5 levels associated with transmission line and road construction in comparison with current or historical levels. We also recommend showing the Libby area PM-2.5 and PM-10 ambient values and standards in micrograms/cubic meter in a table for comparison purposes to promote improved public understanding of the air quality issue.

In addition, we recommend that more detail be provided in the FEIS in regard to minimizing the dust and other emissions during construction including the indirect impacts (rock crushing and other material production and processing) as well as dust and mud tracking. In addition we recommend mention of limiting diesel emissions by reduced idling and modern diesel engines and/or use of Ultra Low Sulfur Diesel in the construction equipment.

LTD-0010
Rec: 9/6/07

From: John & Margaret Smith [mailto:mjsmith@kvis.net]
Sent: Wednesday, September 05, 2007 7:37 PM
To: BPA Public Involvement
Subject: Comments on the BPA Rebuild of the Libby (FEC)-Troy Section of BPA's 115-Kv Transmission Line

Dear Sir,

Please accept this letter with my comments as it is a day late. I have been told that BPA has stated that our previously submitted letters with questions and comments for draft EIS consideration last winter may no longer have any status. If this is true, may I ask why as virtually all the comments were not addressed in the recent draft EIS Report? Would you please refer to the letters for the comments as they are still valid, untreated and applicable to the draft...and now the final report.

My review of the draft revealed no reference (other than to the cancer threat...which is controversial) was made to the residents and others (please refer to my previous letters) that live very near, or travel under, the existing and proposed power line easement. The draft did present extensive details on such variables as bear habitat and line threat to low flying aircraft, but absolutely no reference to effects on the numerous humans such as aesthetics, safety and lot restrictions, etc. A recent newspaper article quoted a BPA official as stating that a major reason for effecting the Kootenai River Crossing Realignment was to remove power lines from being seen by those visiting the Falls visitor area. If tourist amenities were this important, why weren't considerations or benefits to populated neighborhoods discussed? This later consideration would seem even more important as it was concern for the many existing residents along the power line that led State of Montana to recommend the inclusion of the Quartz Creek Realignment when the project kicked-off. State officials should be alarmed to learn that their concern was largely ignored in the report. Poorly prepared EIS reports hurt everyone.

The disregard for local residents is further shown by the failure to publish the names of those who submitted written comments to the EIS in the EIS. Their comments, though solicited, were not responded to, published, categorized, quoted or counted in the draft or its Appendices. Accountability for possibly very important input was totally ignored.

It is also disconcerting to recall a previous disregard for residents that was caused by failing to notify the many residents of the largest populated area in the path of the transmission line that the Enhancement Project was underway. This failure prevented residents from attending scheduled project information meetings for two months.

The EIS, against all reason and consideration for fairness, was prepared by an in-house agency or BPA contracted agency. Fears relative to this reality have been substantiated. The intent of the EIS, and its process, have been badly short-changed. The welfare of an important part of the environment--residents--has also been badly neglected.

Thank you for accepting my comments, if you will.
Sincerely yours,

John D. Smith
7031 Kootenai River Rd
Libby, MT 59923
406 293-4965
mjsmith@kvis.net

LTD-0011
Rec: 09/12/07

From: Carolyn [<mailto:cfera@netscape.com>]
Sent: Thursday, August 23, 2007 11:37 AM
To: Eaton, Tish K - KEC-4
Subject: Rebuild of 115 K Transmission Line

My comments for the 115 K rebuild of the Libby to Troy Section of Bonneville Power Admin Line Project:

I was not able to attend your Libby meeting but have read the account in the Western News. I am a Big Horn Terrace property owner. I have read most of the draft environmental impact statement mailed in July 2007. Thank you for keeping me informed.

I have been told by the Corp of Engineers spokesperson that the generator at the Libby Dam that is not in operation now, will be operational in the near future come hell or high water, no ifs ands or buts, and the regrade dam will be built. Based on that assumption I believe that this rebuild project of the 115 K line should be built using Alternative 1 with the Pipe Creek and Quartz Creek re-routes.

You will be destroying flora and fauna during the rebuild. Why not do it all at one time instead of tearing everything up and then tearing it up again a few years down the road and at a much larger cost? Secure your right-of-way easements now for the whole thing, disturb plants, birds, animals, and humans once and only once. Get the electric and magnetic fields out of property owners yards.

If you decide not to do the 230 K alternative, then please consider the re-routes through Pipe and Quartz Creeks. Home owners need to get those lines out of their yards.

Carolyn Fera
6822 North 13th Street
Tacoma, WA 98406-1829

Libby Troy Public Meeting Comments
August 15, 2007

LTD-0012
Rec: 09-12-07

- If we submitted comments for scoping – do we need to resubmit for EIS review?
- Has a decision already been made on the route?
- Will Administrator (Steve W.) make final decision? Steve Wright in Portland
- Bighorn Terrace area construction – poles remain wood?
- Concern – steel looks industrial
- Will the poles be taller?
- How far off Kootenai. River Road is the line being moved over? (Total of 15 ft from fogline)
- Will I lose use of my property?
- Jog near Carpenter Road – will it remain?
- Price of Copper – increase – why not prefer 230 kv line? Would be more economical than readdressing in 40 years.
- \$140 m on generators – for transmission into Bell
- Is the analysis done by planners available to public?
- Reconfigure 230kv line to Noxon (?)
- Corps position – one additional unit brought online some thought to redundant station - 400 mw – value of 3 additional units
- If just one unit brought online, could Libby Dam handle without up grades?
- Noxon area growing. In just 20 years – much growth – did planners take that into consideration?
- Why aren't poles made out of concrete? (as in Europe)
- Concrete poles = maintenance savings?
- Steel poles more expensive than wood poles?
- Will you replace insulators also?
- Will you replace wires, too? (yes – thicker)
- With taller poles, will lines still be same distance from ground as now? Will there be a difference in EMF levels?
- Will poles be in same location as they are now?
- What was reason to keep line where it is now instead of going over Quartz Creek? Was it finances?
- If decision is made, will it be locked in for next 40 years?
- Will someone come in before end of 40 year period and propose 230 kv? (odds are against it)
- Will there be a written statement from BPA that says a 230kv line will not be built?
- Why won't BPA put that in writing – to help with sale of existing homes, etc.?
- Final EIS will replace pervading thought
- Were growth rates applied when developing alternatives?
- In earlier conversation ... Expense of new river crossing. Could you cross river earlier? Still must work with railroad – should revisit this.

Libby Troy Public Meeting Comments
August 15, 2007

- How difficult to go over the top on Quartz Creek? Major difficulties? Or impacts? What impacts are you concerned about? (Timber, grizzly bear, eagle, load) Has the proposed FS of clearing had any impact on decision? Look at cumulative impacts?
- If worried about Bears/Eagles – what is difference? Bears/eagles don't recognize USFS rig from BPA rig. (Temporary roads vs permanent roads, etc.)
- 80" row is pretty good fire break. Has anyone looked at approved USFS work – maybe line rebuild could be done at same time.
- Re: old growth timber – trees in my yard are old growth timber – you say you want to protect, but you will cut my trees for this project. Is it possible you'll cut more trees later?
- Fed lands = Fed transmission line row
- Single pole – double pole. Single pole would be less expensive?

Written comments received at public meeting:

1. Anonymous: "I'm in favor of the Quartz Creek Realignment. The impact on bears and birds seems to be more important than impacts on people."
2. Anonymous: "In favor of the Quartz Creek Realignment."

DEQ cover letter

September 4, 2007

Bonneville Power Administration
Communications - DM-7
P.O. Box 14428
Portland, OR 97293-4428

To Whom It May Concern:

The Montana Department of Environmental Quality (DEQ) has reviewed the Draft Environmental Impact Statement for the Rebuild of the Libby (FEC) to Troy Section of the Libby-Bonnars Ferry 115-kilovolt Transmission Line. DEQ submits review comments in the attachment to this letter.

DEQ recognizes the effort of BPA and the USFS in producing this Draft EIS. The document is well written, very comprehensive and extremely detailed. It contains a wealth of information on mitigating measures that would be employed to reduce potential impact levels. However, we believe that the general public may be easily overwhelmed by its level of detail, complexity of analysis, and heavy use of acronyms that seem to be directed toward resource managers rather than decision makers or the general public. The document would benefit from a succinct and readable summary of impacts that clearly communicates levels of impact remaining after mitigation is applied.

DEQ has identified several areas where additional information would clarify impact descriptions and support the substantive findings to be made under the Montana Major Facility Siting Act (Title 75, chapter 20, part 1, Montana Code Annotated) (MFSA). These are described in our comments.

The Draft EIS identifies the agency preferred alternative as the Proposed Action (rebuild to single-circuit 115-kV) with the Kootenai River realignment option. If carried forward as the agency selected alternative, the Final EIS should clearly describe the weighting of resources, land use impacts and other factors that led to not selecting realignments, such as Pipe Creek and Quartz Creek, that would avoid residences and subdivisions that have been built since the line was constructed. The Final EIS should compare impacts of realignments after application of mitigating measures to segments of the existing line that share common endpoints with each realignment. DEQ notes that several rebuilds of transmission lines by Western Area Power Administration over the past 15 years (Havre to Rainbow, Fort Peck to Havre, Fort Peck to Wolf Point, and Wolf Point to Williston) have utilized realignment of existing lines to accommodate substantial changes in land use since the lines were constructed.

Following publishing of the Notice of Availability for the Final EIS by BPA, DEQ will issue draft department findings of substantive compliance with MFSA, including a report supplementing BPA's studies as necessary to determine compliance of the project with Montana environmental protection standards.

The Montana Department of Fish, Wildlife and Parks and the Department of Transportation have also reviewed the document and provided comments under separate letters.

Please contact either Tom Ring (406-444-6785) or Nancy Johnson (406-444-6797) with any questions.

Sincerely,

Warren McCullough
Bureau Chief
Environmental Management Bureau
Montana Department of Environmental Quality

Attachment

GENERAL COMMENTS

The analysis in the Draft EIS (DEIS) does not directly compare impacts of the Pipe Creek, Quartz Creek, and Kootenai River realignments with equivalent segments of line on the existing location. In the Final EIS (FEIS) please provide a comparison of resource impacts after application of mitigating measures and other factors leading BPA to select either the existing line location or realignment. Discussion should help decision makers determine tradeoffs between alternatives and which alignment represents the least impact when various factors and costs are considered.

Residual impacts remaining after application of mitigating measures are not consistently described in the DEIS. For example, impacts to fish, amphibians, and reptiles are first described in Section 3.6.2 without application of proposed mitigating measures. Following this discussion, impacts that would remain after the application of mitigating measures are described on the bottom of page 3-137. However, in section 3.5.2 (Environmental Consequences of Action Alternatives – Wildlife) impacts are described and a list of mitigating measures is offered, but the reader is left wondering what the level of impacts would be after application of mitigating measures. Similarly, Tables S-1, S-2, 2-4, and 2-5 are very detailed but it is unclear what impacts would remain after mitigating measures are applied. Lastly, text in Section 3.17 Adverse Effects that Cannot be Avoided is not clear on the reduced level of impact after mitigating measures are applied. Readers would be better informed if residual impacts likely to remain after successful application of mitigating measures were clearly described.

Throughout the document impacts are classified as low, moderate and high. Please explain the impact threshold for each category for each resource.

NEED FOR THE PROPOSED ACTION

In 2003 BPA acquired ownership of the Libby-Troy section of a 115-kV transmission line that had been constructed by Pacific Power and Light in the mid-1950s to address concerns that the aging line would fail and adversely affect reliability of service in northwestern Montana. DEQ agrees that the transmission line is in need of major repair and that rebuilding the line to provide redundant load service is a cost-effective solution.

DEQ concludes that the need for a single or double circuit 230-kV line cannot be justified at this time. We also recognize that it may be wise to secure additional right-of-way to preserve the option of a future upgrade. If the acquired right-of-way were on public land, land use(s) would be less likely to change compared to private land.

PLANS FOR GRID EXPANSION

Another transmission path potentially being considered by BPA for future expansion of the grid was discussed during the public meeting held in Libby on August 15th. It could

be developed to handle future generation additions at Libby Dam, should they occur, and would consist of another 230-kV line from Libby Dam to Noxon and further west into Idaho. It was noted that BPA has a vacant right-of-way west of Noxon.

DEQ understands that the Clark Fork valley in the Trout Creek-Noxon-Heron area is seeing a substantial influx of new residents, with many second homes being developed. If this transmission path is proposed for development at some future date, a comprehensive comparison of alternatives and impacts will need to be completed at that time. Alternatives could include one from Libby Dam to Noxon and into Idaho, and a second alternative from Libby Dam to Bonners Ferry.

SUMMARY

Page S-11. Section S.3.1 lacks information describing the human environment and subdivisions.

Section S.3.3 lists the resources that may be cumulatively affected but does not tell readers what the cumulative impacts are likely to be.

Page S-14, mitigation measures, last bullet. Does the statement 'minimize or eliminate public access to project facilities through postings and installation of gates and barriers at appropriate access points' mean that public access would be closed on public land?

Page S-17, proposed action, first bullet. Would drainage structures that are installed as part of the project be maintained for the life of the project?

Page S-18, No Action Alternative column. While fires are mentioned as a result of a failing line, the secondary impacts of a major forest fire on fish and wildlife habitat deserve mention.

Page S-20, Visual Resources, Proposed Action and Alternative 1, first bullet. What would be the visual impacts of the described design modifications? Would the line be moved closer to or farther away from residences?

Page S-21, Recreation Resources, Proposed Action, bullet 2. Clarify whether short-term impacts to recreational use from closure of the road during construction would occur only on Kootenai National Forest land or on State of Montana land as well. Would recreation access be allowed on weekends and evenings?

Page S-22 and 2-35. Montana's standard for electric field strength at the edge of a right-of-way (ARM 17.20.1607 (2)(d)) has been adopted through the administrative rule making process, just as air quality and water quality standards have been adopted. It should not be considered a guideline as stated in the DEIS.

The rule is substantive, stating "for electric transmission facilities, that the electric field at the edge of the right-of-way will not exceed one kV per meter measured one meter above the ground in residential or subdivided areas unless the affected landowner waives this

condition, and that the electric field at road crossings under the facility will not exceed seven kV per meter measured one meter above the ground.”

ALTERNATIVES INCLUDING THE PROPOSED ACTION

Page 2-14. Would the conductor have to be 26.5 feet from the ground to meet BPA or NESC standards?

GEOLOGY, SOILS AND WATER RESOURCES

Page 3-12. Clarify why text at the bottom of the page describes impacts of the Quartz Creek realignment as moderate to high for clearing of new right-of-way and construction of new structures, while the following discussion only mentions low to moderate impacts.

LAND USE

Page 3-19. In Section 3.2.2 please list the types of activities that would be restricted on private land resulting from rerouting the line or acquiring additional right-of-way in the following areas:

- Near Structures 17/15 to 17/18;
- Structures 17/15 to 18/6 where additional right-of-way would be required; and
- Near structures 28/3 to 28/7, 29/1 to 30/2, and 31/1.

In our experience the easement would likely restrict or prohibit the use of private land for houses, garages, pole barns, some orchards and ornamental trees, flagpoles, tall radio and television antennas, operation of over-height vehicles or equipment, use of certain irrigation equipment, and excavation near the line. There may be other restrictions we are not aware of. These restrictions may apply to the Pipe Creek residential area and along Kootenai River Road and although people would be able to continue residential land uses, there would be new restrictions on land uses (see page 3-20). Acquisition of additional right-of-way would contribute to cumulative land use impacts by restricting uses listed above.

Any long-term restrictions to land use in the Bighorn Terrace Subdivision and restrictions on public lands need to be described on page 3-20.

What land use restrictions would apply to Lincoln County lands near structures 26/1 to 26/8?

Would the Pipe Creek realignment result in a net reduction of impacts to private land?

Would there be new restrictions on property adjacent to the line by moving it to the north side of Kootenai River Road? From Figure 2.5 it appears several residential properties would be affected by the move.

VEGETATION

Page 3-40. Effects on Geyer's biscuit-root. How would re-establishment of Geyer's biscuit-root occur when herbicides are used to treat weeds?

Tables 3-19 and 3-20. Is there any alternative alignment that would reduce old growth impacts? In the Pipestone planning subunit, how can the impact be moderate to high while still fully complying with old growth standards requiring there to be 10% old growth (Table 3-19)?

Page 3-37. Please clarify the level of impact to individual plants versus subpopulations for effects on Geyer's biscuit-root from construction of new access roads.

Page 3-46. While treating Dalmatian toadflax populations would reduce the possibility of transporting seed, seed can remain viable for up to 10 years. Vehicles would still need to be cleaned before moving from infested areas.

WILDLIFE

Page 3-81. What are the proposed spacings for conductor to conductor and conductor to ground? Would the suggested 60-inch spacing recommended by APLIC (Avian Power Line Interaction Committee) be maintained for the 115-kV line?

Page 3-100. Would fewer access roads be necessary because of longer span lengths and fewer structures under Alternative 1? Or would similar span lengths be used in Bear Management Units 1 and 10?

Page 3-110, first paragraph. The discussion should clarify whether there would be potential for re-growth of trees along the existing right-of-way should the Pipe Creek realignment be selected.

WILDLIFE – BALD EAGLE

Page 3-110. New bald eagle management guidelines from the USFWS (May 2007) suggest that a buffer between power lines and bald eagle nests be 660 feet if the activity would be visible from a nest and 330 feet if the activity would not be visible. Can the Pipe Creek realignment be modified to attain these revised buffer distances, and if so, would impacts to bald eagles be decreased?

Page 3-113 to 3-114. How long are agencies obligated to consider bald eagle nest sites which are no longer active, especially when the species is no longer listed under the Endangered Species Act? The Quartz Creek bald eagle nest was blown down six years ago and no new nest has been found since then in close proximity to the realignment. The May 2007 U.S. Fish and Wildlife Service (USFWS) document, *National Bald Eagle Management Guidelines*, states on page 15 that "Where nests are blown from trees during storms or are otherwise destroyed by the elements, continue to protect the site in the absence of the nest for up to three (3) complete breeding seasons. Many eagles will rebuild the nest and reoccupy the site."

FISH, AMPHIBIANS AND REPTILES

Page 3-139, end of third complete paragraph. While an increase in nutrients might lead to a short-term increase in productivity, this can be viewed as a negative impact if the goal in the area is to maintain existing water clarity and benthic productivity.

RECREATION

With many trails in the vicinity of the transmission line, it is possible that some people are using GPS. Would the line interfere with recreational use of GPS equipment, and if so, what steps would BPA take to address it?

Page 3-168. Text under Remoteness notes that public use of the Bighorn Trail would likely be restricted during the construction phase for safety reasons. Would public access to hiking trail #2W Historic Highway also be restricted during construction?

Page 3-168. Clearing of danger trees along portions of the historic Highway 2 hiking trail (#2W Historic Highway) will decrease the natural setting, creating more open views of Highway 2 on the valley floor or surrounding hillsides. This will affect the Naturalness component of the Recreation Opportunity Spectrum and potentially affect the experience of some trail users. Over time some vegetation would be allowed to grow, but not to the extent that it affects line operation or reliability.

NOISE, PUBLIC HEALTH AND SAFETY

Page 3-175. Text under "Toxic and Hazardous Substances" states that there are no known hazardous materials or contaminants. However, text on page 4-14, Section 4.23 Pollution Control Acts says "Most of the poles and cross arms removed from the 115-kV line were likely treated with a wood preservative (creosote or pentachlorophenol), listed as hazardous waste under RCRA." Please clarify these two statements.

Page 3-181. Two studies (Ahlbom et. al., 2000 and Greenland et al., 2000) raise the possibility of, but do not prove, an association between magnetic field strengths greater than 3-4 mG in homes and an increased incidence of childhood leukemia. The DEIS notes that average magnetic fields above 3 mG in homes are rare. Conservatively, how many homes along the proposed line and alternatives would be within a zone where magnetic field strength would exceed 3-4 mG as a result of the line?

Page 3-188. Would the Pipe Creek realignment result in a positive impact to some residences compared to the proposed action? If a positive impact would occur, how many residences would benefit?

Page 3-189, end of paragraph 8. Add 'In addition, current easement and right-of-way restrictions would be removed in the Big Horn Terrace area. These restrictions imposed on people's activities are designed to prevent electrocutions and line outages.'

Page 3-190, second complete paragraph. Although text notes that similar safety issues to the action alternatives and other realignments would be present during construction and installation of the structures and conductor for the Kootenai River Crossing Realignment, there are no people living in close proximity to this proposed realignment.

TRANSPORTATION

Page 3-210, paragraph 5. Would there be a delay at the Highway 2 crossing near Troy due to conductor stringing?

Page 3-210, paragraph 6. Text at the end of this paragraph states "If requested by an owner, BPA would consider installing controls such as gates to minimize unauthorized access. Impacts would be *low*." However, text on page 3-168 states that "ORV users may circumvent gates to use new roads and could develop new routes from the roads where terrain is suitable. If it occurs, such use likely would spread noxious weeds, eliminate vegetation, and result in erosion. This is considered to be a *moderate, long-term impact*." Please clarify these two statements describing impacts of unauthorized access.

Page 3-213, paragraph 2. Clarify text stating "these delays would be short-term (2 to 4 days)." Do you mean short delays would occur over a 2 to 4 day period?

Page 3-213, bullet two. Describe this mitigation measure in more detail. Who would determine when flaggers and warning signs would be used? Would BPA consult with Montana Department of Transportation and follow their recommendations?

Page 3-213. Mitigation. BPA should work with the Montana Department of Transportation to identify segments of Highway 2 where traffic control flaggers and warning signs would be stationed during clearing of trees that are directly above the highway along the historic Highway 2 hiking trail (#2W Historic Highway).

FIGURES

There are no topographic maps in the entire document. One should be included for reader information. Slope constrains line location and is a contributing factor in impact assessments.

Figure S-2 gives information about types of structures including height, span length and proposed corridor width. What are the base dimensions for each structure type?

Please indicate data sources for Figure 2-1.

TABLES

For Table 2-2 Summary of Engineering Characteristics for Realignment Options (page 2-15) clarify why the Kootenai River realignment for the 115-kV option would cost \$75,000 to construct, while the 230-kV option would cost \$43,000.

In addition to comments provided above, DEQ has enclosed a copy of pages with typographical or grammatical errors noted through page 3-86 of the document.

2 October, 2007

LTD-0014
Rec: 10-02-07

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

Subject: Comments on the Rebuild of the Libby (FEC) to Troy 115-Kv Transmission Line Project's July 2007 Draft EIS.

Dear Ms Eaton,

Thank you for accepting my late comments and for discussing the EIS.

I had mentioned my concern that the draft's content and wording failed to sufficiently provide for the welfare and safety of the residents living or traveling along the present easement. Part of the concern resulted from the emphasis and wording pertaining to "permanently lost" bear habitat and the threat transmission lines would have to low-flying aircraft should the Quartz Creek Realignment be used. Along with the under developed adverse impact to residents (aesthetics, land use restrictions, safety, the count and proximity of those affected, road traffic load, etc.), a reader might quickly conclude that the easement road impact to grizzlies (even if they existed in the realignment area) and relocated power line threat to aviators should preclude realignment. The dismissive statement "residential use adjacent to the transmission line corridor is low density" misses, and obscures reality somewhat as well. Statements such as "(wires) can cause serious electrical shocks", though correct, also seem a little short of the mark if current and future residents living around the wires are truly being considered.

Another concern, more appropriately for FAA action, involves the reality that an increasingly dense neighborhood is located 6 to 7 1/2 mi west of Libby, Montana. Along the north edge of a mile of this neighborhood is a steeply sloped hill below which there is an existing easement for electrical power lines. The lines run roughly east and west and are both adjacent to, and within, 24 parcels, many with residences. These parcels front Kootenai River Road. On the other side of the road, another 41 parcels, most with residences, front on the Kootenai River. The road separating the two sets of parcels and residences, Kootenai River Road, is increasingly used by residents, contractors, hikers, fishermen, and other visitors to a state wildlife area to the west.

On occasion, BPA uses helicopters to inspect the power lines. Flights are made on the south side of the wires because of the steep mountain slope immediately to the north. Flight altitudes are slightly above wire or tower height (in some areas, trees force higher altitudes) and speeds range from hovering up to perhaps 30-40 knots.

I have forwarded a chart of the neighborhood and an aerial photo to help the FAA better understand the area. Some existing homes fail to show up on the photo (taken from the

draft EIS) and I have pointed out that more homes are continually being built. It is also important to point out that there are many additional homes exist along the power line back towards Libby that should be considered as well. The draft fails to reveal this.

I have been told that BPA's flights are conducted under a waiver to Part 91 of FAA regulations and I realize that most power lines probably transit the elsewhere area where much safer flight operation (very few people at risk) can be conducted.

However, I am requesting BPA and the FAA to please evaluate if a waiver is appropriate for the flights being conducted slightly above or adjacent to power wires or among trees extremely close to homes, people and vehicles. Safe auto rotation opportunities/landing sites do not exist; flight operation is being conducted in a red flight performance envelope through the entire neighborhood. Emergency auto rotations from 70-120' altitudes or certain flight system failures can be extremely risky even if sufficient landing area exists and people are not nearby. The steep hillside north of the wires forces emergencies to be handled within the neighborhood...something very worth avoiding.

The costs of the granted FAA "waiver" are primarily, and inappropriately, borne by numerous third parties; innocent people living or simply being near the power line. These people are currently inadequately revealed and represented in the draft EIS.

Is it possible, within populated neighborhoods, to simply inspect lines from the ground to safeguard third parties? If line checks are required to be performed immediately next to, or from slightly above wires and poles, shouldn't the Quartz Creek Realignment be considered in a different light; one that competes more favorably with unused but existing bear habitat and wire concerns where flights must be extremely rare, at best?

Thank you for telling me that helicopter power pole erection and wire stringing operations will not be conducted in populated areas. Extreme safety concerns for heavy weight sling operations involving 105' poles or long heavy steel cables exist.

Please let me know if I can provide additional information or clarify my concerns.

Sincerely yours,

John D. Smith

Bornerville Power Administration
Kirk Robinson
P.O. Box 61409
Vancouver, Wa. 98666-1409

LTD-0015
REC: 10-04-07

Kirk,

The groups of affected properties owners are vigorously protesting any and all attempts by USBP Co. to expand their lines on our properties. This action directly impacts the value of our properties, threatening to reduce or de-value the monetary value in which we as property owners have spent a lifetime protecting as an investment. Thus according to the advice of our Real Estate advisor.

The Federal Government employs none of these property owners. They do not get to enjoy the luxury of a retirement package or benefits, which the Federal Government generously provides to you and Renee. The security of our retirement is in our property that we own, which we have worked a lifetime to secure as insurance for our own retirement years, as well as an inherited legacy for our children and grandchildren. In other words you are robbing us of our own retirement package.

I have you provided any clear-cut definition or explanation of your plan to any property owners? To-date, I nor any of the property owners to whom I have spoken, knows of any documentation provided by you. It suggests to us that you prefer to keep the details of this project in an undefined state. Can you offer any assurance of documentations of the presence of high-tension power lines that does not constitute a health hazard to the affected property owners and their families?

Can you please provide us with full detailed plans of this project? Can this be written in language by laypersons? If not please send interpreter.

Property owners want to obtain from you a site map providing detailed dimensions of property you are attempting to take from us. After you have provided this necessary documentation of what USBP Co. is proposing, it will be submitted to our attorney for review; the results of our review and subsequent consultation with our attorney will determine the direction in which we proceed, and will provide for you the results of that review. All affected property owners will sign this letter.

William M. Miller
Channah Miller
Joe Baker
Betsy Mack
Herbert & Londa Bower.

P.S. Do we live in the United States
of America, or have we
-moved?

LTD-0016
Rec: 10-04-07

From: Ring, Tom
Sent: Wednesday, September 19, 2007 7:36 AM
To: Kuntz, Gail K - DKR-MSGL; Eaton, Tish K - KEC-4
Cc: Nancy Johnson; Jones, Craig
Subject: FW: Provocative New Study on EMF Health Effects

We would appreciate if this new review was described in the Libby-Troy final EIS. We understand that the comment period has officially closed but we just learned of the study a couple days ago.

Call if you have questions.

Tom Ring
Environmental Sciences Specialist
Montana Department of Environmental Quality
PO Box 200901
Helena, MT 59620-0901

(406) 444-6785

University of Albany, New York– August 31 / **Serious Public Health Concerns Raised Over Exposure to Electromagnetic Fields (EMF) from Power Lines and Cell Phones**

An international working group of scientists, researchers and public health policy professionals (The BioInitiative Working Group) has released its report on electromagnetic fields (EMF) and health. It raises serious concern about the safety of existing public limits that regulate how much EMF is allowable from power lines, cell phones, and many other sources of EMF exposure in daily life.

Electromagnetic radiation from such sources as electric power lines, interior wiring and grounding of buildings and appliances are linked to increased risks for childhood leukemia and may set the stage for adult cancers later in life. A report from the BioInitiative Working Group (www.bioinitiative.org) released on Friday, August 31st documents the scientific evidence that power line EMF exposure is responsible for hundreds of new cases of childhood leukemia every year in the United States and around the world.

The report provides detailed scientific information on health impacts when people are exposed to electromagnetic radiation hundreds or even thousands of times below limits currently established by the Federal Communications Commission (US FCC) and International Commission for Non-Ionizing Radiation Protection in Europe (ICNIRP). The authors reviewed more than 2000 scientific studies and reviews, and concluded that the existing public safety limits are inadequate to protect public health. From a public health policy standpoint, new public safety limits, and limits on further deployment of risky technologies are warranted based on the total weigh of evidence.

The report documents scientific evidence raising worries about childhood leukemia (from power lines and other electrical exposures), brain tumors and acoustic neuromas (from cell and cordless phones) and Alzheimer's disease. There is evidence that EMF is a risk factor for both childhood and adult cancers.

Public health expert and co-editor of the Report Dr. David Carpenter, Director, Institute for Health and the Environment at the University of Albany, New York says *"this report stands as a wake-up call that long-term exposure to some kinds of EMF may cause serious health effects. Good public health planning is needed now to prevent cancers and neurological diseases linked to exposure to power lines and other sources of EMF. We need to educate people and our decision-makers that "business as usual" is unacceptable."*

Health questions about power line EMFs were initially raised by Nancy Wertheimer, a Colorado public health expert and Ed Leeper, an electrical engineer in 1979. Wertheimer noticed that children were twice or three times as

likely to have leukemia tended to live in homes in the Denver, CO area close to power lines and transformers. Now, there are dozens of studies confirming the link, but public health response has been slow in coming, and new standards to protect the public are necessary.

Brain tumor specialist Dr. Lennart Hardell, MD, PhD and Professor at University Hospital in Orebro, Sweden is a member of the BioInitiative Working Group. His work on cell phones, cordless phones and brain tumors is widely recognized to be pivotal in the debate about the safety of wireless radiofrequency and microwave radiation. *"The evidence for risks from prolonged cell phone and cordless phone use is quite strong when you look at people who have used these devices for 10 years or longer, and when they are used mainly on one side of the head."*

Brain tumors normally take a long time to develop, on the order of 15 to 20 years. Use of a cell or cordless phone is linked to brain tumors and acoustic neuromas (tumor of the auditory nerve in the brain) and are showing up after only 10 years (a shorter time period than for most other known carcinogens). *"This indicates we need research on more long-term users to understand the full risks"* says Dr. Hardell.

Dr. Hardell's work has been confirmed in other studies on long-term users. A summary estimate of all studies on brain tumors shows overall a 20% increased risk of brain tumor (malignant glioma) with ten years of use. But the risk increases to 200% (a doubling of risk) for tumors on the same side of the brain as mainly used during cell phone calls. *"Recent studies that do not report increased risk of brain tumors and acoustic neuromas have not looked at heavy users, use over ten years or longer, and do not look at the part of the brain which would reasonably have exposure to produce a tumor."*

Wireless technologies that rely on microwave radiation to send emails and voice communication are thousands of times stronger than levels reported to cause some health impacts. Prolonged exposure to radiofrequency and microwave radiation from cell phones, cordless phones, cell towers, WI-FI and other wireless technologies have linked to physical symptoms including headache, fatigue, sleeplessness, dizziness, changes in brainwave activity, and impairment of concentration and memory. Scientists report that these effects can occur with even very small levels of exposure, if it occurs on a daily basis. Children in particular are vulnerable to harm from environmental exposures of all kinds.

Co-editor of the report, Cindy Sage of Sage Associates says *"public health and EMF policy experts have now given their opinion of the weight of evidence. The existing FCC and international limits for public and occupational exposure to electromagnetic fields and radiofrequency radiation are not protective of public health. New biologically-based public and occupational exposure are*

recommended to address bioeffects and potential adverse health effects of chronic exposure. These effects are now widely reported to occur at exposure levels significantly below most current national and international limits."

Biologically-based exposure standards are needed to prevent disruption of normal body processes. Effects are reported for DNA damage (genotoxicity that is directly linked to integrity of the human genome), cellular communication, cellular metabolism and repair, cancer surveillance within the body; and for protection against cancer and neurological diseases. Also reported are neurological effects including changes in brainwave activity during cell phone calls, impairment of memory, attention and cognitive function; sleep disorders, cardiac effects; and changes in immune function (allergic and inflammatory responses).

Sage says *"the Working Group recommends a biologically-based exposure limit that is protective against extremely-low frequency (power line) and radiofrequency fields which, with chronic exposure, can reasonably be presumed to result in significant impacts to health and well-being"*.

Contributing author Dr. Martin Blank, Columbia University professor and researcher in bioelectromagnetics says *"cells in the body react to EMFs as potentially harmful, just like to other environmental toxins, including heavy metals and toxic chemicals. The DNA in living cells recognizes electromagnetic fields at very low levels of exposure; and produces a biochemical stress response. The scientific evidence tells us that our safety standards are inadequate, and that we must protect ourselves from exposure to EMF due to powerlines, cell phones and the like."* He wrote the section on stress proteins for the BioInitiative Report.

Contact: info@bioinitiative.org (open on August 31, 2007)

Report: available at www.bioinitiative.org (on August 31, 2007)

Title: BioInitiative: A Rationale for a Biologically-based Public Exposure Standard for Electromagnetic Fields (ELF and RF)

LTD-0017
Rec: 10/3/07

3 October, 2007

Re: Rebuild of the Libby (FEC) to Troy Section.....

Ms Tish Eaton - KEC-4
Project Environmental Lead
BPA

Ms Eaton,

The enclosed county subdivision plot better reveals the parcels and structures that exist along the west end of the line. It definitely aids revealing more "people existence" than figure 2-6 of the draft. All parcels have owners and a few new houses are added yearly. Road activity has significantly increased over the past few years.

An aircraft experiencing an emergency would somehow have to travel 600-800' before ditching in the river to avoid threatening people.

How is insurance covered? Does BPA have insurance to cover damage to residences, vehicles and structures? Is injury to people covered? Is death covered? It must be pointed out that insurance could not pay for or reverse all potential loss. How can increased/additional risk to those in or near the easement be justified if it significantly exceeds the risks borne by other citizens? Hopefully, these questions will be answered clearly in the EIS.

I will email some photos from houses, porches and road intersections showing towers and wires that would also help EIS readers better understand the environment.

Sincerely yours,


John D. Smith
406 293-4065
mjsmith@kvis.net

LTD-0018
Rec: 10/4/07

From: John & Margaret Smith [mailto:mjsmith@kvis.net]
Sent: Thursday, October 04, 2007 9:30 AM
To: Eaton, Tish K - KEC-4
Subject: 8 pictures for you

Ms Eaton,

Yesterday I mailed a plot of the neighborhood to you showing parcel layouts and homes. It would help to inform the EIS regarding the status of people activities.

Photo 002: from parcel 58 home to wires.

015: from parcel 58 home porch to wires

011: from parcel 58 home porch to wires looking E.N.E.

020: from KRR to wires behind homes on parcels 48 & 49.

014: wires adjacent to KRR and home at 5770 KRR.

010: wires over intersection of KRR and Quartz Creek Rd.

012: wires over KRR-Bohtail Rd intersection.

We will try get better photos when sunshine returns. Some of the attached photos might benefit from pointer arrows or highlighting, etc.

John Smith
406 293-4333
mjsmith@kvis.net

You have been sent 8 pictures.

PA020010.JPG
PA020011.JPG
PA020012.JPG
PA020014.JPG
PA020015.JPG
PA020017.JPG
PA020020.JPG
PA020022.JPG

These pictures were sent with Picasa, from Google.
Try it out here: <http://picasa.google.com/>

12/10/2007

LTD-0019
Rec: 10/8/07

A

F

From: John & Margaret Smith [mailto:mjsmith@kvis.net]
Sent: Monday, October 08, 2007 2:52 PM
To: Eaton, Tish K - KEC-4
Cc: TRING@MT.gov
Subject: RE: Draft EIS Comments re: Libby (FEC) to Troy Rebuild...

Dear Ms. Eaton,

Thank you for correcting my misunderstanding. I am now advised that helicopter cable laying may occur in our neighborhood. Hopefully, due to the critical nature of such an operation, it will be included in the EIS along with low-level line inspections to put people issues in a better perspective.

When BPA uses helicopters to lay cables in neighborhoods, are residents and others in the area evacuated and are emergency units brought in for air and ground crew safety? How long could our area undergo daytime evacuation and road closure? Does the state of Montana approve of helicopter cable laying in neighborhoods and who would be the approving authority?

Thank you again for ensuring I understood this issue.

John D. Smith
406 293-4065
mjsmith@kvis.net

12/10/2007

12 October, 2007

Ms. Tish Eaton
Project Environmental Lead
Portland, OR

Subject: Comments on the Rebuild of the Libby (FEC) to Troy 115-kV Line Project's EIS Process.

Dear Ms Eaton,

I received your message yesterday regarding helo-line operation and the information that the State of Montana does not regulate federal project helicopter use. Thank you. I will comment more on safety concerns in a few days, but another serious issue has arisen.

Yesterday I learned that BPA has arranged to purchase an easement on the NW corner of Kootenai River Rd. and Bobtail Rd. and is attempting to buy more easements or easement expansions. The selling owner resides at 63 Bobtail Rd. The easement runs under BPA wires adjacent to Kootenai River Rd and represents BPA's "Proposed Rebuild Section" currently being evaluated along with the competing Pipe Creek Realignment option. This evaluation, as part of the EIS process, has obviously been terminated by BPA, without notice, prior to EIS conclusion. BPA has chosen to overtly implement their preferred Proposed Rebuild routing... a pre-emptive decision was made.

The yet completed EIS process has obviously been blatantly abandoned and an issue, important to many people, was unilaterally decided. The Pipe Creek Realignment option had been strongly indicated as being in the general interest of many people because the proposed existing power line route travels right next to Kootenai River Rd, through residential yards and even over the top of vehicles traveling to or from town. The half mile routing clearly no longer made sense due to the road and residential area.

How could the information collection and review process, whose primary goal is to amass information leading to more efficient and fair decisions, that solicits and uses information from all involved agencies and people, be abandoned short of conclusion? How does any agency acquire the power to take such self serving action? Did those who may have allowed such power, know that it would be so badly misused?

BPA's confiscation of the EIS once again raises the question: should EIS's be conducted by, and controlled by, huge organizations that are not accountable to outside review and approval? How could congress allow such a thing to happen? How could states and counties allow this to happen?

Should "EIS" be deleted from the forthcoming report's title and should rate payers and tax payers be asked to pay for it? The decision to violate the EIS badly served the many agencies and people who had contributed to it's process.

Sincerely yours,

John D. Smith
7031 Kootenai River Rd.
Libby, MT 59923
406 293-4065
mjsmith@kvis.net

LTD-0021
Rec: 10/22/07

22 October, 2007

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

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

Dear Ms. Eaton,

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

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

BPA's unannounced pre-emption of the EIS process has left another helicopter line use in question. Section 2.2.8, at the bottom, either conflicts with, or was not included in your 10/11/07 clarification. It states that "Helicopters could be used for clearing and would be used intermittently for 6-7 months during removal of existing line and construction of the new line." It goes on to state "A small helicopter would be used to remove inaccessible wood poles and stringing the sock line." Would you please clarify if wood poles would be removed by helicopters near homes or next to well traveled roads along the line east of the wildlife area (the 7 1/2 mile stretch back to Libby).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely yours,

John D. Smith
7031 Kootenai River Rd.
Libby, MT 59923
406 293-4065

mjsmith@kvis.net

After 1 November, the email address will be: mjsmith@gorge.net

LTD-0022

Rec: 12/02/07

From: John Smith
Sent: Sunday, December 02, 2007 11:36 AM
To: WebFeedback
Subject: Web Site Comment

Comment was initiated from
http://www.efw.bpa.gov/environmental_services/Document_Library/Libby/

The issue of safety to residents in populated segments near or in the easement relative to helicopter use to inspect power cables was not addressed. Why?

John D. Smith