

memorandum

DATE: February 9, 2009

REPLY TO
ATTN OF: KEC-4

SUBJECT: McNary-John Day Transmission Line Project Supplement Analysis (DOE/EIS-0332/SA-1)

TO: Mark Korsness,
Project Manager, McNary-John Day Transmission Line Project

Proposed Action: McNary-John Day Transmission Line – Review for significant new circumstances or information

Proposed by: Bonneville Power Administration (BPA)

Location: Umatilla and Sherman Counties, Oregon; Benton and Klickitat Counties, Washington.

Background: In 2002, BPA completed the McNary-John Day Transmission Line Project Final Environmental Impact Statement (EIS) (DOE/EIS-0332). The Final EIS analyzed the potential impacts of constructing, maintaining, and operating a new 79-mile, 500-kV transmission line between BPA's McNary and John Day substations. This line was proposed in early 2000 to address the need to increase transmission capacity for new power generation facilities expected to be developed in southeast Washington and northeast Oregon. The route of the McNary-John Day transmission line parallels an existing transmission line corridor for its entire length, and for most of its route, will use existing right-of-way (see Project Map attached).

In October 2002, BPA issued a Record of Decision (ROD) documenting its decision to proceed with construction of the McNary-John Day transmission line. Shortly after the ROD was released, however, many of the large generation facilities (gas-fired plants) proposed for construction in the area were put on hold, due to market conditions and the need to secure financing. BPA decided that the line would be built once the proposed generation facilities could commit funding for line construction. BPA proceeded with some preliminary construction activities, such as purchasing easements in specific sections of the line, and constructing the transmission tower pads on the Oregon side of the Columbia River crossing.

Although several of the originally proposed gas-fired facilities remain on hold, many wind farms have been constructed in the area over the past several years and more are proposed. These wind farms have been or need to be integrated into the transmission system. In 2008, BPA conducted a Network Open Season process to solicit requests from generators for access to BPA's Federal Columbia River Transmission System. During this process BPA received requests for an amount of transmission capacity significant enough to require that the McNary-John Day transmission line be built. Because of this renewed need for additional transmission capacity, BPA is now proposing to proceed with construction of the McNary-John Day transmission line.

Analysis: This SA analyzes whether there have been significant new circumstances or information relevant to environmental concerns since the Final EIS was completed in 2002. In conducting this analysis, BPA considered changes and refinements to the proposed project since that time, changes in the environment where the line will be built, and public input.

Project Changes and Refinements

The proposed project is essentially the same as described in the 2002 Final EIS and ROD. The line will follow the same route, including various short line routing alternatives, selected in the 2002 ROD. The following describes the changes and refinements to the project that have occurred, and assesses their significance relative to environmental concerns.

- The 2002 ROD selected *Alternative A – Relocate Building* for the short line route between the McNary Substation and the Columbia River. The alternative involved the relocation of a prefabricated office building within BPA’s McNary Substation property. BPA subsequently decided that the office building will be removed rather than relocated, and employees using the building will be relocated to a new office in the Tri-Cities area in Washington. Because the McNary office building will not be relocated at the site and will simply be removed, this change slightly reduces the potential environmental impacts of the proposed project, and thus is not a significant change relevant to environmental concerns.
- The 2002 ROD provided that either short-line routing alternative (i.e., either Alternative A or B) at two locations – Corridor Mile 32 and Corridor Mile 35 – could be constructed depending on the outcome of further negotiations with owners of tribal allotments crossed by Alternative A at each location. Alternative A at both locations involves constructing the new line parallel to the existing lines across tribal allotment lands, while Alternative B at each location involves routing the new and existing lines around tribal allotment lands. Negotiations with the owners of tribal allotments have concluded and BPA will construct Alternative A at both locations. This refinement of the decision already made in the ROD and already analyzed in the Final EIS does not represent a significant change in the project relevant to environmental concerns.
- BPA has slightly changed the lattice steel tower design that will be used for the project. However, BPA expects these design changes will not be readily noticeable because the height and style of the towers remain the same. In addition, the design changes are not expected to result in any significantly different or additional environmental impact from what was described in the 2002 Final EIS, and thus are not significant changes in the project relevant to environmental concerns.
- After completion of the 2002 Final EIS and ROD, BPA determined that expanding the east side of the electrical yard at McNary Substation by about 1.3 acres (80 feet by 700 feet), as originally proposed, is unnecessary. Instead, BPA now plans to connect the McNary-John Day transmission line into the existing Bay 7 at McNary Substation and use existing space in the fenced substation yard for the equipment necessary for the project (two new 500-kV breakers and associated disconnect switches and bus work). Because McNary Substation will no longer need to be expanded, 2 acres of permanent impacts to grassland that were identified in 2002 will not occur. This impact reduction does not represent a significant change in the project relevant to environmental concerns.

- In the 2002 Final EIS, BPA proposed to construct the McNary-John Day transmission line in one year, using multiple contractors to build various parts of the line simultaneously. Now, BPA plans to construct the line over three years. Because of this change, traffic along SR 14 will be impacted (minor delays and interruptions) to a lesser degree at any given time, but the impacts will be spread over three construction seasons instead of one. Fewer socioeconomic impacts will occur than described in the 2002 Final EIS. With fewer construction workers on site for a longer period of time, services and lodging will not be constrained, but overall local spending by construction workers from outside the area will still create a modest economic benefit to the area.

This longer construction period could affect agricultural fields for more than one season and disturb other lands over longer, yet less intense periods than originally proposed as workers access certain areas at different times for construction activities. As described in the Final EIS, mitigation measures include reseeded disturbed areas, as appropriate, and using other best management practices to prevent erosion. Overall, lengthening the construction period will not result in substantially different impacts from those described in the 2002 Final EIS, and it is not a significant change in the project relevant to environmental concerns.

- The estimated cost for constructing the project in 2002 was \$100 million. With inflation and an increase in steel costs, the project will now be over \$200 million. This change will not result in new or additional environmental impacts that have not been already considered.

Changes in the Environment

There has been little change in the environment along the transmission line route since BPA issued the Final EIS and ROD in 2002. The following summarizes the changes that have occurred and their significance relative to environmental concerns.

- **Land uses** along the 79 miles of transmission line right-of-way have generally remained the same since they were analyzed in 2002, though some development has occurred. Some in-fill development has occurred in local towns, and agriculture has expanded with conversion of crop circles to vineyards and development of new vineyards (see the next bullet for a discussion of vineyard-related changes).

Near the town of Plymouth, Washington, there is a new industrial facility just south of the right-of-way (project mile 5, not impacted by the transmission line); a rock quarry has been expanded within the right-of-way (project mile 6, transmission towers will avoid the quarry); and two new crop circles have been developed just north of the right-of-way (project mile 13, not impacted by the new line).

In the town of Paterson, Washington, at project mile 16, new houses have been built on previously empty plots adjacent to the south side of the existing right-of-way; the new line will be on the north side of the right-of-way in this area and will not impact the new houses.

New crop circles have been developed just south of the right-of-way near project mile 18; they will not be impacted. Existing poplar trees on tree farms at project miles 21 through 23 have matured since 2002, but the same acreage of trees will need to be removed as was analyzed in 2002.

A water treatment plant in project mile 49 has expanded into the south side of the right-of-way, but will not be impacted by the new line. At project mile 51, irrigated crop land has expanded just south of the right-of-way, and at mile 52 a new structure has been built just south of the right-of-way; neither will be impacted.

Overall land use changes since the 2002 Final EIS do not represent significant new information or circumstances relevant to environmental impacts concerning the proposed project.

- There are two areas along the transmission line route where **vineyards** have been expanded. At project mile 18, two crop circles have been converted to vineyards and expanded into the right-of-way. Four towers will now be in the new vineyards, permanently impacting about 0.2 acres of irrigated agriculture instead of grazed shrub-steppe land. At project mile 28, an expansion of a vineyard into the right-of-way will be permanently impacted by two towers (about 0.1 acres permanently impacted). Overall, additional land use impacts will be limited to these new vineyards developed in the right-of-way. The permanent impact will be limited to a total of about 0.3 acres; this will not result in additional significant adverse impacts.
- **Parks and recreational areas** located in the project vicinity have not changed and there will be no change to the impacts described in the 2002 Final EIS.
- There have been no changes to **geology, soils or seismicity** since the project was analyzed in 2002.
- There are no changes to the proposed project that will affect **stream or river** crossings and there are no newly listed threatened or endangered **fish species** in the project area. Therefore, there will be no impacts to streams, rivers or fish that have not already been considered. BPA still intends to implement all mitigation measures for fish species that were identified in the 2002 ROD. In December 2008, BPA sent letters to the U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration Fisheries Service (NOAA Fisheries) concluding that there will be no changes to impacts to threaten or endangered species from those determined in the 2002 biological assessment for the proposed project. USFWS and NOAA Fisheries concurred with BPA's determination on January 21, 2009, and January 22, 2009, respectively.
- **Wildlife habitat** and **vegetation** located along the line has changed slightly since the 2002 Final EIS due to increased agriculture fields developed in scrub shrub areas. Because there is slightly less native vegetation/habitat along the right-of-way, impacts will be slightly fewer than considered in 2002. There are no newly listed threatened or endangered wildlife species in the project area. BPA still intends to implement all mitigation measures for wildlife and vegetation that were identified in the 2002 ROD. In December 2008, BPA sent a letter to the USFWS concluding that there will be no changes to impacts to threaten or endangered species from those determined in the 2002 biological assessment for the proposed project. USFWS concurred with BPA's determination on January 21, 2009.

- At project mile 13, a **wetland** along an unnamed creek that crosses the existing right-of-way has expanded and the vegetation has grown since 2002. The access road's ford that crosses the wetland had been proposed to be upgraded, but because of the wetland expansion the access road will now be rerouted within the right-of-way about 300 feet to the north and cross where the wetland is narrower. The impacts will be similar to those originally described, with the permanent removal of low-growing vegetation and a possible increase in sedimentation to adjacent surface waters. Appropriate permits and best management practices proposed as mitigation measures in 2002 are still applicable and will be implemented. All other wetland and **ground water** impacts will be as described in the 2002 Final EIS.
- The impacts to **cultural resources** will be the same as described in the 2002 Final EIS. In November 2008, BPA contacted the Oregon State Historic Preservation Office (OR SHPO), the Washington Department of Archaeology and Historic Preservation (WA DAHP), the Confederated Tribes of the Warm Springs Reservation, Confederated Tribes and Bands of the Yakama Nation, and the Confederated Tribes of the Umatilla regarding the project. BPA will implement the mitigation measures it committed to in 2002 to protect and avoid resources (see attached Mitigation Action Plan), and is in discussions with the tribes about protection agreements and monitoring.

McNary Substation is now more than 50 years old, and could be eligible for listing in the National Register of Historic Places as an individual historic property. BPA had the substation evaluated in December 2008. The consultant found that the substation is not eligible for inclusion in the National Register as an individual historic property because the engineering and architecture of the control house lacks distinction, but the station may be eligible as a contributing element of a district composed of BPA's older electrical facilities. However, it was determined that the proposed work for this project will not adversely affect the potential historical significance of the substation because impacts would be limited to the electrical yard. Thus, the proposed work at the substation will not affect historic properties.

- **Visual resources** and view points along the project corridor have not changed since 2002.
- There have been no substantial changes to **socioeconomics, public services, and utilities** relevant to the environmental impacts of the proposed project. Impacts described in the 2002 Final EIS will be the same, with the exception of the changed schedule described above in project changes.
- There has been no change to the **air quality** status of the project area. Emissions generated by construction will be spread over a three year construction period, but emissions otherwise will be the same as those described in the 2002 Final EIS.
- The electrical loads on the line will be different now from the expected loadings that were used to evaluate potential **electric and magnetic field (EMF)** effects in the 2002 Final EIS. Load modifications are due to changes in power flows through the system and the different types of generation being integrated into the transmission system. A new analysis¹ shows that with the loadings now predicted, the *electric* field levels are not expected to change from predicted values in 2002. However, the *magnetic* field levels are expected to change.

¹ McNary – John Day 500-kV Transmission-Line Project, Electrical Effects, January 2002, Revised January 2009, Prepared by T. Dan Bracken, Inc. for Bonneville Power Administration

For the line configuration used along most of the route, the magnetic field levels adjacent to the north side of the corridor (where the new line will be located) will be slightly lower (about 12 percent) than predicted in 2002. About a dozen homes or other inhabited structures are within 400 feet of the line on the north side in this area. For the other line configurations (where a third existing line is in the corridor and where the new line will cross to the south side of the corridor), the magnetic field levels will be greater than those predicted in 2002 (increases range from 1 to 28 percent). In these areas, there are no structures adjacent to the corridor on the side where the new line will be located. Overall, though the projected magnetic field levels are different from those predicted in 2002, magnetic field level exposures to people living or working along the line will not only be low, but will be slightly less than determined in 2002. These changes are not significantly different from those previously considered.

Public Involvement

On October 21, 2008, BPA sent a letter concerning the McNary-John Day Transmission Line Project to landowners along the project corridor, Tribes in the project area, local, state and federal agencies, and other interested and affected parties. The letters provided an update about the current status of the project, notified interested parties that BPA would be preparing this SA, and asked for comments about the project and any information that BPA should consider in this SA. In addition, BPA posted information about the project and SA process on its website. BPA also held two open house style public meetings: one on November 5, 2008, in Paterson, Washington, and another on November 6, 2008, in Roosevelt, Washington. About a dozen people attended each public meeting.

BPA accepted comments on the project through November 20, 2008. In addition to comments received at the public meetings, BPA received two written comment letters. Most comments (44 percent) received were about project impacts (questions about compensation for towers located in fields, orchards and vineyards, moving irrigation circles, avoiding springs, historic areas, view sheds). Nineteen percent of the comments were questions about construction and schedule (who will build the line, will local people be hired, can BPA use local rock pits, permits required, when will the line be built on our land). Fifteen percent of the comments were about the project description (questions about location of the line in relationship to the existing lines and fields, and use of access roads). The remaining 22 percent of the comments were about the need for the project (statements that the line is needed to enable local wind projects), public involvement (have new residents been notified, is there opposition), and other non-project related questions (questions about another substation in the area).

The comments received in 2008 were similar to those received from the public in 2000, with no new issues relevant to environmental impacts. BPA will continue to work with landowners to address tower and access road siting and crop damage as committed to in the mitigation measures identified in the 2002 ROD. All comments and letters received are attached to this Supplement Analysis.

Findings: This Supplement Analysis finds that: 1) there are no substantial changes to the McNary-John Day Transmission Line Project since the Final EIS and ROD were completed in 2002 that are relevant to environmental concerns; and 2) there are no significant new circumstances or information relevant to environmental concerns regarding the project or its impacts. Therefore, no further NEPA documentation is required.

\s\ Stacy L. Mason

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Environmental Lead – KEC-4

CONCUR:

\s\ Katherine S. Pierce

Katherine S. Pierce

NEPA Compliance Officer – KEC-4

Date: February 9, 2009

Attachments:

Project Map

Mitigation Action Plan

Public Comments