

# **Appendix B**

## **Scoping and Consultation**



## **SCOPING ANNOUNCEMENTS**



## Department of Energy

Bonneville Power Administration  
P.O. Box 61409  
Vancouver, WA 98666-1409

TRANSMISSION BUSINESS LINE

May 4, 2005

In reply refer to: T-DITT2

### **To: People Interested in the Port Angeles-Juan de Fuca High Voltage Direct Current Transmission Project**

Bonneville Power Administration (BPA) has received and is responding to a transmission interconnection request from Olympic Converter, LP (OC). OC is proposing to install a direct current underwater cable between Vancouver Island and Port Angeles for the transmission of electricity. As part of this project, OC has requested to interconnect to BPA's transmission system. The interconnection would be in the vicinity of a Port Angeles, Wash. substation owned and operated by BPA. The purpose of this letter is to provide a description of the proposed project (which includes the interconnection, the converter station, and the underwater and underground cable) and the environmental process, to invite you to a public meeting and to inform you on how to comment on the proposal.

The proposed interconnection would allow for a direct connection between BPA's transmission system and British Columbia's transmission system using an underwater transmission cable from Victoria Island, British Columbia, Canada to Port Angeles. Sea Breeze Pacific Juan de Fuca Cable, LP (Sea Breeze Pacific) is carrying out the planning and permitting for the project. The project would be constructed as a 550-megawatt (MW) High Voltage Direct Current (HVDC) transmission line using underground cables, as well as submarine cables under the Strait of Juan de Fuca, an international waterway.

BPA and the Office of Electricity and Energy Assurance (OEEA), which are separate organizational units within the U.S. Department of Energy (DOE), are collaborating on the environmental process. DOE is the lead federal agency for the environmental analysis. Implementation of the project would require that certain actions be taken by BPA and OEEA. BPA's proposed action would be to offer a transmission interconnection agreement to OC, and OEEA's proposed action would be to issue a Presidential Permit that would allow construction, operation, maintenance, and interconnection of the project at the United States International Border.

### **Open House Public Meeting**

BPA will assess the environmental impacts of the proposed interconnection project in compliance with the National Environmental Policy Act. The purpose of the public meeting is to invite public participation in the environmental process, and to solicit public comments for consideration in establishing the scope and content of the EIS. BPA and OC representatives will be available to discuss the proposed project and respond to any questions you may have. Representatives from the City of Port Angeles are also expected to attend to answer questions about the Washington State Environmental Policy Act.

**Open House**

Tuesday, May 24, 2005

4 to 7 p.m.

Peninsula College, Room J47

1502 E. Lauridsen Blvd.,

Port Angeles, Washington

**Schedule**

The environmental review is expected to be complete by summer 2006, at which time a final Environmental Impact Statement and Record of Decision (ROD) will be released. Following release of the ROD, construction of the proposed project could start as early as June 2006, with a proposed operation date of December 2007.

**How to Comment**

Comments will be accepted through June 8, 2005. Send letters with comments and suggestions, and requests to be placed on the project mailing list, to Bonneville Power Administration, Communications – DM-7, P.O. Box 12999, Portland, OR, 97212; FAX them to 503-230-3285; or submit your comments online at [www.bpa.gov/comment/](http://www.bpa.gov/comment/). Please include the name of this project with your comments.

**For More Information**

BPA is committed to providing reliable, low-cost transmission products and services to the region while minimizing environmental impacts and demonstrating regional accountability. If you have questions regarding the environmental process, please contact the environmental project lead, Rick Yarde, Bonneville Power Administration – KEC-4, P.O. Box 3621, Portland, Oregon 97208-3621, toll-free telephone 1-800-282-3713; direct phone number 503-230-3769, fax number 503-230-5699, e-mail [rryarde@bpa.gov](mailto:rryarde@bpa.gov). If you have other questions or would like more information on the project, please call me at (360) 619-6326, or toll-free 1-888-276-7790. Additional information is posted on the BPA Web site at [http://www.transmission.bpa.gov/PlanProj/Transmission\\_Projects/](http://www.transmission.bpa.gov/PlanProj/Transmission_Projects/).

Sincerely,

*/s/ Mark Korsness, 5/4/05*

Mark Korsness  
Project Manager  
Transmission Business Line  
Bonneville Power Administration

Enclosures: map and comment form



## Department of Energy

Bonneville Power Administration  
P.O. Box 61409  
Vancouver, WA 98666-1409

TRANSMISSION BUSINESS LINE

May 10, 2006

In reply refer to: TNP-TPP-3

### **To: Parties Interested in the Port Angeles-Juan de Fuca Transmission Project**

The U.S. Department of Energy (DOE) is currently in the process of preparing an Environmental Impact Statement (EIS) for its role in potentially approving an application for construction and operation of a proposed international transmission line by Sea Breeze Pacific Juan de Fuca Cable, LP (Sea Breeze). The purpose of this letter is to provide an update on the schedule for the draft EIS and upcoming opportunities for public review and comment.

This proposed 550-megawatt (MW) transmission line would extend from the Bonneville Power Administration (BPA) Port Angeles Substation in Port Angeles, Wash. in the United States to the greater Victoria area, British Columbia, in Canada.

In order to construct its proposed project, Sea Breeze has applied to the Office of Electricity Delivery and Energy Reliability (OE), an organizational unit within DOE, for a Presidential permit for the proposed project. Sea Breeze has also submitted a request to BPA, another organizational unit within DOE, for interconnection of its proposed project to the Federal Columbia River Transmission System (FCRTS), which is owned and operated by BPA, at BPA's Port Angeles Substation. As part of the consideration of these applications, OE and BPA, acting on behalf of DOE, are preparing an EIS to comply with the National Environmental Policy Act (NEPA).

### **Anticipated EIS Schedule**

DOE completed the scoping process for the EIS in summer 2005. Since then, specific information concerning Sea Breeze's proposed project was fully fleshed out, and resource surveys were conducted. A draft EIS is now nearing completion and is expected to be available for public review during the summer of 2006. A minimum 45-day draft EIS public review and comment period will be provided and at least one public meeting concerning the draft EIS will be held.

After the draft EIS public review and comment period ends, DOE will prepare a final EIS that responds to all public comments and makes any necessary revisions to the EIS. DOE currently expects that the final EIS will be completed and made available to the public in early 2007.

DOE then will issue a record of decision (ROD) that identifies the respective decisions by OE and BPA whether to grant or deny the authorizations requested by Sea Breeze. DOE currently expects that it will issue this ROD in spring or summer 2007. This schedule may change as DOE continues through the EIS process.

**For More Information**

If you have questions or would like more information on the project, please call toll-free (800) 622-4519. Additional information is posted on the BPA Web site at [http://www.transmission.bpa.gov/PlanProj/Transmission\\_Projects/](http://www.transmission.bpa.gov/PlanProj/Transmission_Projects/). You may also contact me directly at (360) 619-6326.

For inquiries regarding the Presidential permit process, contact Dr. Jerry Pell by mail at: Office of Electricity and Energy Reliability, U.S. Department of Energy, Washington, DC 20585, by phone: (202) 586-3362, by fax: (202) 318-7761 or by e-mailing [jerry.pell@hq.doe.gov](mailto:jerry.pell@hq.doe.gov).

Sincerely,



Mark Korsness  
Project Manager  
Bonneville Power Administration

## **SCOPING COMMENTS**

**Port Angeles-Juan de Fuca Transmission Project  
PUBLIC SCOPING COMMENTS ORGANIZED BY EIS SECTIONS**

Below is a list of entities that sent written comments during the May 4, 2005 through June 8, 2005 comment period.

Environmental Protection Agency  
Thomas Deeney  
Ken Morgan  
U.S. Fish and Wildlife Service  
Deborah Munro  
Squaxin Island Tribe

Washington Department of Community, Trade  
and Economic Development  
People for Puget Sound  
Lower Elwha Klallam Tribe  
Suquamish Tribe

The following is a list of all the comments received during the scoping period, including those received at the public and agency meetings. The comments are generally categorized by sections of the draft EIS.

**1. PURPOSE AND NEED**

- What is the Purpose and Need for the proposed project.
- The EIS should include an analysis of the effect of the proposed transmission line on the existing BPA transmission line from Olympia to Port Angeles.
- The project EIA should include a complete assessment of the likely users of the Port Angeles – Juan de Fuca HVDC Project and how their transmission needs would affect the Olympia-Port Angeles corridor.
- The purpose and need statement should also demonstrate that the installation of the proposed power transmission line across Juan de Fuca Strait is in the public interest.
- To where will wind power be sold?
- Is the power for local use only?
- To where will wind power be sold?
- How will this benefit Port Angeles residents?
- I think this is a great project to pursue, I am very pleased that the possibility of increasing the use of wind power is being considered.
- I am very much in favor of wind power, it is clean and plentiful. Go for it!
- The EIS should include a clear statement of the underlying purpose and need for the proposed project including broader public interest and need.
- Is the power for local use only?
- To where will wind power be sold?

**Scope**

- We believe that correctly defining the scope of the EIS is the first step towards an accurate assessment of the environmental impacts of the proposed project.
- There has been much discussion in recent years about whether the Olympia-Port Angeles line needs to be upgraded in order to accommodate higher and more frequent peak loads.
- BPA, with the assistance of the non-wires alternatives group, has determined that an upgrade is not needed now because there are other ways of meeting the infrequent peaks on the Olympic Peninsula.

- It will, therefore be important to study whether the building of the proposed Port Angeles-Juan de Fuca transmission line would lead to increased loads on the Olympia-Port Angeles Line and whether those increases would again raise the question of upgrading the Olympia-Port Angeles line.
- Such an upgrade [of the Olympia – Port Angeles Line) would have environmental consequences of its own and would require its own EIS.
- The Project EIA therefore should include a complete assessment of the likely users of the Port Angeles-Juan de Fuca HVDC Project and how their transmission needs would affect the Olympia-Port Angeles corridor.
- For example, if sole use of the Project is to allow wind projects on Vancouver Island to access customers on the Olympic Peninsula, then the effect on the overall transmission system would be minimal. In fact, such use would enable BPA to delay upgrading, allowing BPA to use power currently serving the Peninsula in other parts of its system.
- ... if the purpose of the line evolves into providing access to the grid for bulk power transfers through the entire BPA transmission system and western interconnection, then the effect on the Olympia-Port Angeles corridor would likely be large.
- The [EIS] statement should also demonstrate that the installation of the proposed power transmission line across Juan de Fuca Strait is in the public interest.
- How will the environmental impacts outside the US borders be mitigated?
- Is there an understanding between the US and Canada that indicates how impacts, if any, from both sides of the border will be addressed?

#### **Public Involvement**

- Thank you for sending the informational packet for this project.
- Thank you for the opportunity to comment on the scope of the environmental review for the Draft EIS for the Port Angeles-Juan de Fuca HVDC Project.
- Community acceptance for such projects may be easier if there are shared opportunities, such as local employment, education, economic, and other benefits.
- Thank you for the opportunity to comment on the EIS scoping for the proposed project the Port Angeles-Juan de Fuca [HVDC] Transmission Project.
- Thank you for the opportunity to provide input in the process and the Lower Elwha Klallam tribe looks forward to working with the Department of Energy and Sea Breeze during this project.
- Thank you for your letter dated May 2, 2005 informing the Suquamish Tribe of the interconnection request by Olympic converter, LP for its proposed installation of a direct current underwater cable between Port Angeles and Vancouver Island.
- To date, the Suquamish Tribe has not received any notification of this project from either the project proponent nor its permitting and planning designee.
- As you know, early participation by Tribes is beneficial to all parties and normally helps avoid delays and surprises.
- ...I urge you to forward this letter to both Olympic Converter, LP ad Sea Breeze Pacific Juan de Fuca Cable, LP so they may contact me at their earliest convenience.
- While representatives of the [Suquamish] Tribe may not be able to attend the scoping meetings, we appreciate the opportunity to submit comments and voice our concerns.
- Again, I appreciate your letter and hope to stay involved as the project moves forward. Please keep my office abreast of developments in this project, including forwarding copies of any relevant project planning, settlement, or regulatory oversight documents.

We look forward to participating with the project proponents in the planning and implementation of this project.

## 2. PROPOSED ACTION AND ALTERNATIVES

### Proposed Action

- What are the characteristics of DC current/pulses?
- What are the criteria for cable burial?
- What will be done if sediment prohibits burial?
- How is the cable protected against backhoe digging?
- Where will the power be transmitted?
- Will drilling happen at night?
- Will a shoreline permit be needed?
- How far from the shoreline will work take place?
- What level of route surveying will be conducted to ensure maximum plan burial of cable to minimize future environmental and socioeconomic impacts of unburied cable?
- What is the track record for these types of projects elsewhere?
- Will ships' dragging anchors hit the cable?
- Will underwater cable be suspended across high points anywhere?
- Will submarines be affected?
- What is the voltage of existing overhead lines.
- Where in the street will the cable run?
- Can the cable be routed through a less populated area?
- Will the city get a percentage of profits from cable operation?
- How much extra cable will there be underwater in case of earthquake or landslide movement?
- What will fiber optics be used for?
- Will the cable under Liberty Street be direct burial or in a conduit?
- How many volts?
- How deep under the street will the cable be buried?
- How deep is the direct drilling into the water?
- Have other routes been considered?
- Would this affect future development at the Rayonier Mill site?
- How will this benefit Port Angeles residents?
- How deep will the cable be under the sea floor where tankers anchor?
- Will power be lost if a ship's anchor drags through the line? Or during storms?
- How will repairs be made?
- Where will the converter station be sited?
- Re-site buried line on Ennis Creek (or elsewhere) to avoid impacts to residential streets.
- Check NOI cable lengths with current materials and plan: lengths of underwater cable and terrestrial cable at each end.
- Once we [Suquamish Tribe] are aware of some of the details, we will better be able to [submit comments and voice our concerns] .... At this stage, I am most interested in information about the physical scope of the project and proposed implementation schedules.

### Alternatives

- The Council on Environmental Quality recommends that all reasonable alternatives should be considered, even if some of them could be outside the capability of the applicant or the jurisdiction of the agency preparing the EIS for the proposed project.
- EPA encourages selection of feasible alternatives and that will minimize environmental degradation.
- ...laying the DC cable along the east side of the BPA property instead of the west side would be shorter, and avoid tearing up Porter Street and less of Park Avenue.
- Will separate, but parallel cable routes be studied that would reduce the amperage and the DC magnetic field associated with each route in half.
- The EIS should include range of reasonable alternatives that meet the stated purpose and need for the project and that are responsive to the issues identified during the scoping process.
- Some ideas to think about when developing a range of alternative actions for the proposed project may include:
  - Energy consumers and impacts on rate payers
  - Existence of alternative sources of electric power and regional integration of power supplies
  - Different on- and off-shore cable alignments, associated activities, and risks
  - Different types of cable and converters
  - Alternative sites for construction of the converter station
  - Implementation approaches that would minimize impacts to human health and the environment
- Why not come up Ennis Creek and right-of-way?
- Why not come up Morse Creek?

### **3. Affected Environment, Environmental Consequences, and Mitigation Measures**

- The EIS should include environmental effects and mitigation measures.
- [Including environmental effects and mitigation measures in the EIS]... would involve delineation and description of the affected environment...
- [Including environmental effects and mitigation measures in the EIS]...would involve... indication of resources that would be impacted [and]... the nature of the impacts

#### **3.1 Water Resources**

- Anticipated construction and other operational activities are likely to... result in significant impacts on water quality... [due to impacts to soils and marine environment].
- These activities [offshore construction activities, marine drilling and trenching] have the potential to stir up sediments and cause short-tem increases in turbidity in marine and freshwater areas.
- The EIS should identify the toxic constituents and additives to the drilling mud slurry.
- The EIS should also include the estimated volume of drilling mud to be disposed of and the means, methods, and locations for their proposed disposal.
- The EIS must disclose which water bodies may be impacted by the project, the nature of the potential impacts, and the specific pollutants likely to impact those waters.
- The EIS should report those water bodies potentially affected by the project that are listed on the states current 303d list.

- If WDOE has developed a water quality restoration plan or Total Maximum Daily Load (TMDL) for listed waters, EPA recommends that DOE coordinate with WDOE as the TMDL is implemented.
- If a TMDL has not been established for a 303(d) waterbody, then the EIS should demonstrate that there will be no net degradation of water quality to the 303(d) listed waters.
- The EIS should indicate how the antidegradation provisions would be met.
- If the transmission line will cross wetland and riparian areas, the EIS should identify their locations, and demonstrate that any construction and staging areas during the project operations will lie outside waters of the U.S..
- In particular, the EIS should include a detailed description of construction activities at any stream banks and Juan de Fuca water shores.
- If culverts will be installed at these sites, then the EIS should identify where culverts will be needed, state their size, and list mitigation measures to be used during their installation.
- Any construction that will impact stream banks and the Strait shores should be designed to minimize sediment loads in streams and in the Strait.
- Preventing water quality degradation is one of EPA's primary concerns.
- Offshore construction activities and marine drilling and trenching can all impact water quality.
- Construction activities will have some risk of oil spills and specific precautions should be employed to minimize risks to these sensitive waters.

### 3.2 Biological Resources

- The EIS should describe the current quality and capacity of habitat; it's us by fish and other species in the proposed project area and identify known fish and migration routes.
- If the marine habitat will be impacted as a result of the proposed project, the EIS needs to disclose those impacts and mitigation measures to minimize them (PAJ-008-4)
- During construction of the pipeline and associated structures the impacts to fragile near shore habitat, including the upland must be avoided.
- What are the benthic impacts of plow burial?
- What are the impacts of unburied or shallow-buried cable on commercial, tribal and recreational fishers?
- NOAA: Impacts on marine sanctuary.
- Anticipated construction and other operational activities are likely to disturb the...marine environment and organisms...
- Anticipated construction and other operational activities are likely to... result in significant impacts on ...fish and wildlife... [due to impacts to soils and marine environment].
- Anticipated construction and other operational activities are likely to... result in significant impacts on ...other marine resources... [due to impacts to soils and marine environment].
- People For Puget Sound is a non-profit, citizens' organization whose mission is to protect and restore Puget Sound and the Northwest Straits, including a specific goal to protect and restore the 2,000 miles of Puget Sound shoreline by 2015.
- The Puget Sound estuary and the Strait of Juan de Fuca supports over 200 species fishes...

- The Puget Sound estuary and the Strait of Juan de Fuca supports ...approximately 10 species of marine mammals...
- The Puget Sound estuary and the Strait of Juan de Fuca supports ...hundreds of species of aquatic invertebrates...
- Puget Sound estuary and the Strait of Juan de Fuca ...is critical to the survival of shorebirds, [and] waterfowl...
- Puget Sound estuary and the Strait of Juan de Fuca ...is critical to the survival of ...upland wildlife species.
- Unfortunately, critical marine habitats are quickly disappearing.
- For example, more than one-third of Puget Sound shoreline habitat has been destroyed due to bulkheads, piers, docks, and other structures.
- Throughout Puget Sound, 75% of salt marsh habitat is gone, and polluted runoff sends millions of gallons of toxic chemicals, like mercury and petroleum compounds, into the Sound.
- Puget Sound's salmon and orca whale populations are listed as endangered by the state, and in the case of salmon, also by federal government.
- Orca whale calves feed in the Puget Sound waters; their fishing, calf-rearing and travels are likely disrupted by noise from marine construction projects.
- Oil spills are a major priority for People For Puget Sound. Construction activities will have some risk of oil spills and specific precautions should be employed to minimize these risks in these sensitive waters. The recent Dalco Passage spill is a potent reminder of these risks.
- The [Lower Elwha] tribe has treaty rights to fish and shellfish in the area of the proposed project route. Resources currently being utilized by the Tribe include shellfish and other invertebrates on the bed of the Strait and harbor and intertidal areas (i.e. crab, shrimp, urchin and sea cucumber) as well as fish (salmon, halibut, and other bottomfish) which may be impacted by the project.
- The EIS should consider possible permanent habitat degradation...
- The EIS should consider ...possible barriers to mitigation routes...
- The EIS should consider ...temporary impacts during construction...
- Because the project area includes part of the Suquamish Tribe's adjudicated Usual and Accustomed Fishing areas, we are very interested in knowing more...

#### **Threatened or Endangered Species**

- Evaluation of the proposed power transmission project should identify the endangered, threatened, and candidate species under ESA, and other sensitive species within the project and surrounding areas.
- The proposed project may impact endangered, threatened or candidate species listed under the... ESA, their habitats, as well as state sensitive species.
- The EIS should describe the critical habitat for the species; identify any impacts the proposed project will have on the species and their critical habitats; and how the proposed project will meet all requirements under ESA, including consultation with the US Fish and Wildlife Service and NOAA.
- The DOE actions should promote the recovery of declining populations of species.

### **3.3 Botanical Resources**

- The Puget Sound estuary and the Strait of Juan de Fuca supports ... hundreds of species of ...plants...

### 3.4 Geology and Soils

- Does the city have rules regarding cabling? ...and the possible damage it might cause?
- How is the cable protected against backhoe digging?
- Will the project be designed to withstand seismic events?
- Will ships' dragging anchors hit the cable?
- Will the cable be designed to withstand a tsunami?
- Are there any fault lines along the cable route?
- How deep under the street will the cable be buried?
- How deep is the direct drilling into the water?
- How much damage to property will there be (children's day care on Liberty St.)?
- How deep will the cable be under the sea floor where tankers anchor?
- The marine bluff is a sensitive area.
- Anticipated construction and other operational activities are likely to disturb the soils...

### 3.5 Land Use and Visual Resources

- ...laying the DC cable along the east side of the BPA property instead of the west side would be shorter, and avoid tearing up Porter Street and less of Park Avenue.
- Traffic would not be affected nearly as much ...[by] ) ...laying the DC cable along the east side of the BPA property instead of the west side.
- If the cable is laid when Peninsula College is not in session traffic impacts would be reduced.
- The [Lower Elwha] tribe has a role in the oversight of the clean-up of the site of the former Rayonier Port Angeles Mill, which is proposed for the southerly landing of the project.
- The EIS should consider any potential effects of the project on the ongoing cleanup activities at the mill site and include provisions for notification of the tribe of any activities that will impact the cleanup.
- How much damage to property will there be (children's day care on Liberty St.)?
- Will the Liberty St. route disturb homeowners' landscaping? If so, who is liable?
- Other items which Energy may wish to have considered in the EIS are the potential for existing or historical dredge spoils disposal areas being located in the proposed route and the existence of two sewer outfall lines located near the Rayonier Mill site.
- Does the route go through an anchorage?
- How deep will the cable be under the sea floor where tankers anchor?
- Will ships' dragging anchors hit the cable?
- Will submarines be affected?

### 3.6 Socioeconomics

- How much will the project cost?
- Will this affect real estate values?
- To where will wind power be sold?
- Will the city get a percentage of profits from cable operation?
- How will this benefit Port Angeles residents?
- The proposed project should include potential impacts on low income or people of color communities.

- The EIS process should also be used as an opportunity to engage with the public in dialogue about power management project and its impact on local resources.

### 3.7 Public Services and Utilities

- Is the power for local use only?
- Would this project cause a problem with landowners' requests to bury existing distribution lines sometime in the future?
- How will this benefit Port Angeles residents?
- At some point in time a storm drain system will be needed on Porter Street, and would be easier if one less utility is buried there.
- When a fault develops on either DC cable associated with the intertie, what potential damage could result to the infrastructure in the vicinity of the fault?

### 3.8 Cultural Resources

- What if burial sites and artifacts are uncovered during construction?
- The proposed route potentially crosses a Native American burial site?
- Clallam Cemetery is under terrestrial landing in Port Angeles.
- The Seattle Times ran a four-part article on a project and tribal burial grounds nearby...
- If the proposed project will have impacts on historical or traditional cultural places of importance to Tribes in the area, then the EIS should include identification of historic resources, and assurance that the tribe's treaty rights and privileges have been addressed appropriately.
- EPA urges the DOE to work with affected tribes in the proposed project development project.
- The Lower Elwha Klallam Tribe has been contacted by the projects proponents, Sea Breeze and wishes to continue to be notified of important steps in the process.
- Provision should be made for the potential discovery of archaeological items during excavation for the proposed project between the harbor and its terminus at the BPA substation.
- The potential impacts of the proposed project on such cultural interests should be included in the EIS.
- The EIS should consider any potential effects of the project on the ongoing cleanup activities at the mill site and include provisions for notification of the tribe of any activities that will impact the cleanup.
- We have reviewed the information, and recommend you be in continued consultation with Frances G. Charles, Chairwoman for Lower Elwah Klallam Tribe.
- The Squaxin Tribe requires no further consultation on the proposed project.
- Consultation with all affected tribal governments is stipulated in the Executive Order (EO) 13175 (Consultation and Coordination with Indian Tribal Governments). This order states that the US Government will continue "to work with Indian tribes on a government- to-government basis to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights."
- For example, the remnants of an Indian village were found in the Port Angeles area after a construction project was already underway there (see The Seattle Times, May 22, 2005).
- The [Lower Elwha] Tribe has strong cultural interests in the greater Port Angeles harbor area, including archaeological deposits and burials.

- The Rayonier Port Angeles Mill site at the mouth of Ennis Creek is located on a former wealthy and fortified Klallam settlement know as Y'innis. It was occupied by about 200 Klallams in 1847. Y'innis means "good beach" in the Klallam language. Y'innis was one of more than 30 known Klallam villages. The total population of the tribe was as high as 10,000 in the early 1800's. After diseases swept through the Tribe in the 1850's, only a few residents survived.
- The Y'innis site was occupied by the Puget Sound Cooperative Colony in 1887 and some surviving Klallams continued to live on the beaches of Port Angeles harbor until the 1930's, when lands were purchased for a reservation on the Elwha River. There are know burial grounds and archaeological findings on the site of Y'innis, and tribal elders have described tribal use of nearby areas such as Ennis and White creeks.

### **3.9 Health and Safety**

- What happens if the cable faults, if the cable is damaged, if there is an explosion?
- What public health and safety issues are there?
- Will there be health affects on kids?
- The EIS should address the reduced health risks associated with burying the City of Port Angeles distribution feeder along Liberty Street.

#### **EMF**

- Will the DC magnetic field associated with this project interfere with compasses or other navigational aides in the vicinity of the project?
- Due to the relatively low voltage of the Direct Current (DC) interconnection and the relatively high capacity of the interconnection, the resulting currents will be approximately 3800 amperes based on a voltage level of 145 kV and a capacity of 550MW.
- Since the strength of a magnetic field is directly related to the amperage producing the electric field, this will result in a relatively high DC magnetic field.
- What are the health effects on humans and animals living in close proximity?
- The city of Port Angeles owns and operates a 12.5 kV alternating current overhead distribution feeder along Liberty Street in Port Angeles, Washington.
- While magnetic fields cannot be stopped, electric fields can be with proper shielding.
- What are the health effects on both humans and animals living in close proximity to these levels of DC magnetic fields?
- What are the health effects on both humans and animals living in close proximity to these levels of DC magnetic fields, AC magnetic fields and AC electric fields at the level proposed for this project?
- If any pesticides and herbicides will be used during the proposed project operations, the EIS should address any potential toxic hazards related to the application of the chemicals, and describe what actions will be taken to assure that impacts by toxic substances released to the environment will be minimized.
- What about EMF?
- What will electric and/or magnetic field strengths be?
- The proposed project may result in magnetic field impacts and increased underway noise. If significant, the EIS should indicate the extent of the impacts and their mitigation measures.

## General

- [The EIS] should include the potential environmental impacts associated with damage and future repairs to the line...
- [The EIS] should include the ... the release of any toxic substances from the line during any breaks or damage.
- The U.S. Fish & Wildlife service has no comment on the subject: NOI to prepare an EIS.
- How about monitoring measures?
- The proposed project could be designed to include an effective feed back element, including implementation and effectiveness monitoring.

## Noise

- Concerned about the additional noise that may be generated in converting the DC back to AC.
- What kind of noise will there be during drilling?
- Will the construction/ drilling comply with state noise guidelines?
- How much noise will be generated in converting the AC to DC?
- Noise is a major factor for orcas and other species.

## 4. Cumulative Impacts

- It seems to us that the EIS of the Port Angeles-Juan de Fuca project should include a preliminary estimate of the secondary environmental effects that would be produced by the further transmission expansions the project might engender.
- The project evaluation should consider the effects of the proposed project when added to other past, present and reasonably foreseeable future projects in and outside the project corridor, including those by entities not affiliated with the DOE.
- The project proposed should assess impacts over the entire area of impact.
- Only by considering all actions together can one conclude what the impacts on the environmental resources are likely to be.
- EPA has issued guidance on how we are to provide comments on the assessment of cumulative impacts, *Consideration of Cumulative Impacts in EPA review of NEPA Documents*, which can be found on EPA web site at:  
<http://www.epa.gov/compliance/resources/nepa.html>.
- Will Olympic Converter Company provide us with a description of Canadians current, past, and near future activities within the concerned region and that are likely to lead to significant impacts?

## 5. Permits

- The mill site was ranked by the EPA for cleanup under the federal CERCLA (Superfund) program but EPA involvement was deferred while the Washington State Department of Ecology oversees the cleanup under Washington's Model Toxics Cleanup Act (MTCA). The deferral agreement, signed by EPA, Ecology, and the Lower Elwha Klallam Tribe, provides the Ecology will not make cleanup decisions on the site without the concurrence of the Tribe, thus providing the Tribe an on the site role in cleanup.
- Does the city have rules regarding cabling?

- These projects (the sampling and ultimate cable placement) will require use authorizations with the Washington State Department of Natural Resources. These are proprietary documents that will need all permits approved prior to signing use documents.

## **Additional Comments**

### Technical Information Needs

- Benthic habitat information
- how hydroplow works, details
- habitat information for crossing
- location of trench and concrete pillows
- heat dissipation information and impact on water column and sediment
- HDD information – exit point discharges, frac outs
- EMF information
- acoustic study information
- air gun test information; rock fish, juvenile salmon

### Stormwater Construction Permit

- Identify how much land will be disturbed with trenching on land
- If the converter station is built on federal land, EPA is lead for construction stormwater permit.

### ESA

- Identify bald eagle nests in vicinity
- Marbled murrelet information
- Acoustics research effecting marine mammals and fish
- Bull trout

### Sequence of Federal Permits

- Department of Energy – Presidential Permit
- ACOE – 404 Clean Water Act
- Interconnection action by BPA
- Coast Guard permit?
- EPA – stormwater construction

Need to identify sequence of how the federal permits would be issued.

Section 7 and 106 consultations must be complete prior to any federal permit is issued.

## **AGENCY CONSULTATION LETTERS**



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

ENVIRONMENT, FISH AND WILDLIFE

August 2, 2005

In reply refer to: KEC-4

Dr. Rob Whitlam.  
Office of Archaeology and Historic Preservation  
P.O. Box 48343  
Olympia, WA 98504-8343

Dear Dr. Whitlam:

The Bonneville Power Administration (BPA) has received a request from Sea Breeze Power Corporation to interconnect to the Federal Columbia River Transmission System. Sea Breeze has also requested a Presidential permit from the Office of Electricity Delivery and Energy Reliability (OEDER) of the U.S. Department of Energy.

Sea Breeze is proposing to construct an underwater electrical cable across the Strait of Juan de Fuca from Vancouver Island, B.C. to Port Angeles, WA. The 550 MW line would connect into BPA's transmission system at our Port Angeles Substation. This project is known as the **Port Angeles-Juan de Fuca High Voltage Direct Current Transmission Project**.

Pursuant to federal responsibilities under Section 106 of the National Historic Preservation Act, and 36 CFR 800, BPA and OEDER have determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties, and seeks to initiate consultation with the State Historic Preservation Office.

BPA is also initiating consultation pursuant to 36 CFR 800.4(a)(4) with the Lower Elwha Klallam Tribe, Jamestown S'Klallam Tribe, Hoh Tribe, Lummi Nation, Makah Nation, Muckleshoot Indian Tribe, Quinault Indian Nation, Samish Indian Nation, Sauk-Suiattle Indian Tribe, Skokomish Tribal Nation, Snoqualmie Tribe, Squaxin Island Tribe, Shoalwater Bay Tribe, Port Gamble S'Klallam Tribe, Nisqually Indian Tribe, Nooksack Indian Tribe, Puyallup Tribe, Quileute Tribe, Suquamish Tribe, Swinomish Indian Tribe, Tulalip Tribes, Upper Skagit Tribe, and the Confederated Tribes of the Chehalis.

**Project Description** – The entire line would be about 28 miles (~45km) long. About 22 miles (~35km) of the line would be underwater cable spanning the Strait, about 6 miles (~9.5km) would be terrestrial cable in Esquimalt, B.C., and about 1.2 miles (~2km) would be terrestrial cable in Port Angeles.

The cable would enter the Strait using a directional drill to bore from the land under the foreshore and intertidal zone exiting into the water about 0.5 mile to 1 mile (1km to 1.5km) off

shore. Across the ocean floor, a towed sea plow would be used to create a trench for the cable. The trench would be about 3 feet (~1m) wide and about 2 to 4-feet (0.5 to 1m) deep. If the substrate or other cable crossings do not allow for trenching the entire route, the cable would be laid on the marine floor and concrete matting or rock would be used to cover the line. From the directional drill site to the Port Angeles substation, the cable would be laid under city streets in a trench about 6 feet (2m) deep and 3 feet (1m) wide. The trenched street would be repaved.

A converter station would be built at either end of the line, one in Esquimalt and one in Port Angeles. The converter stations would convert the electricity from direct current in the cable to alternating current as it enters the adjacent substations and transmission systems. The converter station in Port Angeles would be built adjacent to BPA's Port Angeles Substation, potentially within BPA's property boundary. The dimensions of the converter stations would be about 490 feet by 330 feet (150m by 100m).

**Area of Potential Effect** - The project's Area of Potential Effect (APE) within the United States has been determined to include the location of the converter station in Port Angeles, the terrestrial route of the line along the city streets, the directional drill location, and the corridor for the cable trenching across the Strait to the U.S.-Canadian border.

Sea Breeze has contracted with Northwest Archaeological Associates, Inc. to conduct an intensive inventory of the proposed APE. This may include tribal input for Traditional Cultural Properties if indicated as an area of concern for any of the contacted tribes. Field survey along the paved streets will not be feasible. If necessary, monitoring during construction will be used to determine presence of unknown sites. Along with a review of known marine historical properties in the vicinity of the project, Sea Breeze will be conducting sonar and acoustic surveys that should be able to identify potential objects that maybe submerged historical objects. If appropriate, seabed anomalies would be investigated with an underwater camera. All aspects of the inventory will be supervised by personnel who meet the Secretary of Interior standards. These individuals will coordinate with the BPA Archaeologist to insure that a complete, intensive, and professional inventory project is conducted.

Following the background research and field survey, a technical report will be prepared and submitted to your office and contacted tribes. In this initiation of consultation, BPA and OEDER seek your concurrence on the proposed APE discussed above. We also seek any information that you might have on known archaeological resources in the project area.

**More information** - The Sea Breeze application to DOE's OEDER, including associated maps and drawings, and also the Federal Register Notice of Feb. 18, 2005 (70 FR 8350) is available at [http://www.fossil.energy.gov/programs/electricityregulation/Pending\\_Proceedings.html](http://www.fossil.energy.gov/programs/electricityregulation/Pending_Proceedings.html); scroll down to Pending Presidential Permit Application PP-299).

Additional information is also available at [http://www.transmission.bpa.gov/PlanProj/Transmission Projcts/](http://www.transmission.bpa.gov/PlanProj/Transmission_Projcts/).. Finally, Sea Breeze maintains a project web site at <http://www.jdfcable.com/>. A copy of the “Notice of Intent to Prepare an EIS” that was published in the May 5, 2005, Vol, 70, No.86, Federal Register is enclosed for your information and reference.

If you have any questions or concerns, please do not hesitate to contact me at 503.230-5455 or by e-mail; [slmason@bpa.gov](mailto:slmason@bpa.gov). Similarly, regarding the Presidential permit process, please feel free to contact Dr. Jerry Pell at 202-586-3362 or by e-mail: [Jerry.Pell@hq.doe.gov](mailto:Jerry.Pell@hq.doe.gov).

Sincerely,

*/s/ Stacy Mason August 9, 2005*  
Stacy Mason  
Environmental Coordinator

Attachment: Vicinity Map  
NOI

cc. w/ attachments  
Dr. Jerry Pell, OEDER  
Ms. Chris Miss

bcc:

N. Stutte – KEC-4

S. Tromly – KEC-4

K. Johnston – T-DITT-2

M. Korsness

T. Noguchi

Official File - KEC (EQ-14)

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Interconnection\Cultural\WASHPO Consultation.doc)



STATE OF WASHINGTON

**Department of Archaeology and Historic Preservation**

1063 S. Capitol Way, Suite 106 • PO Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3064  
Fax Number (360) 586-3067 • <http://www.oahp.wa.gov>

August 17, 2005

Ms. Stacy Mason  
Environment, Fish & Wildlife  
Bonneville Power Administration  
PO Box 3621  
Portland, Oregon 97208-3621

Re: Port Angeles Juan de Fuca High Voltage DC Transmission Project  
Log No.: 081705-02-BPA

Dear Ms. Mason:

Thank you for contacting our department. We have reviewed the materials for the proposed Port Angeles Juan de Fuca High Voltage DC Transmission Project in Clallam County, Washington. We concur with your determination of the Area of Potential Effect (APE) as illustrated in your letter and figures. We look forward to receiving the results of your review, survey and tribal consultation efforts.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4.

We would also appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4). Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and we look forward to receiving the reports on the results of your investigations.

Sincerely,

Robert G. Whitlam, Ph.D.

State Archaeologist

(360) 586-3080

email: [rob.whitlam@dahp.wa.gov](mailto:rob.whitlam@dahp.wa.gov)

cc: S. Toteff  
S. Tromly





## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

ENVIRONMENT, FISH AND WILDLIFE

August 8, 2005

In reply refer to: KEC-4

Ms. Jamie Valadez  
Lower Elwha Community Council, Cultural Resources  
2851 Lower Elwha Road  
Port Angeles, WA 98363

Dear: Ms Valadez:

The Bonneville Power Administration (BPA) has received a request from Sea Breeze Power Corporation to interconnect to the Federal Columbia River Transmission System. Sea Breeze has also requested a Presidential permit from the Office of Electricity Delivery and Energy Reliability (OEDER) of the U.S. Department of Energy.

Sea Breeze is proposing to construct an underwater electrical cable across the Strait of Juan de Fuca from Vancouver Island, B.C. to Port Angeles, WA. The 550 MW line would connect into BPA's transmission system at our Port Angeles Substation. This project is known as the **Port Angeles-Juan de Fuca High Voltage Direct Current Transmission Project**.

Pursuant to federal responsibilities under Section 106 of the National Historic Preservation Act, and 36 CFR 800, BPA and OEDER have determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties, and seeks to initiate consultation with the State Historic Preservation Office and potentially interested tribes.

The tribes include the Lower Elwha Klallam Tribe, Jamestown S'Klallam Tribe, Hoh Tribe, Lummi Nation, Makah Nation, Muckleshoot Indian Tribe, Quinault Indian Nation, Samish Indian Nation, Sauk-Suiattle Indian Tribe, Skokomish Tribal Nation, Snoqualmie Tribe, Squaxin Island Tribe, Shoalwater Bay Tribe, Port Gamble S'Klallam Tribe, Nisqually Indian Tribe, Nooksack Indian Tribe, Puyallup Tribe, Quileute Tribe, Suquamish Tribe, Swinomish Indian Tribe, Tulalip Tribes, Upper Skagit Tribe, and the Confederated Tribes of the Chehalis.

**Project Description** – The entire line would be about 28 miles (~45km) long. About 22 miles (~35km) of the line would be underwater cable spanning the Strait, about 6 miles (~9.5km) would be terrestrial cable in Esquimalt, B.C., and about 1.2 miles (~2km) would be terrestrial cable in Port Angeles.

The cable would enter the Strait using a directional drill to bore from the land under the foreshore and intertidal zone exiting into the water about 0.5 mile to 1 mile (1km to 1.5km) off shore. Across the ocean floor, a towed sea plow would be used to create a trench for the cable.

The trench would be about 3 feet (~1m) wide and about 2 to 4-feet (0.5 to 1m) deep. If the substrate or other cable crossings do not allow for trenching the entire route, the cable would be laid on the marine floor and concrete matting or rock would be used to cover the line. From the directional drill site to the Port Angeles substation, the cable would be laid under city streets in a trench about 6 feet (2m) deep and 3 feet (1m) wide. The trenched street would be repaved.

A converter station would be built at either end of the line, one in Esquimalt and one in Port Angeles. The converter stations would convert the electricity from direct current in the cable to alternating current as it enters the adjacent substations and transmission systems. The converter station in Port Angeles would be built adjacent to BPA's Port Angeles Substation, potentially within BPA's property boundary. The dimensions of the converter stations would be about 490 feet by 330 feet (150m by 100m).

**Area of Potential Effect** - The project's Area of Potential Effect (APE) within the United States has been determined to include the location of the converter station in Port Angeles, the terrestrial route of the line along the city streets, the directional drill location, and the corridor for the cable trenching across the Strait to the U.S.-Canadian border.

Sea Breeze has contracted with Northwest Archaeological Associates, Inc. to conduct an intensive inventory of the proposed APE. This may include tribal input for Traditional Cultural Properties if indicated as an area of concern for any of the contacted tribes. Field survey along the paved streets will not be feasible. If necessary, monitoring during construction will be used to determine presence of unknown sites. Along with a review of known marine historical properties in the vicinity of the project, Sea Breeze will be conducting sonar and acoustic surveys that should be able to identify potential objects that may be submerged historical objects. If appropriate, seabed anomalies would be investigated with an underwater camera. All aspects of the inventory will be supervised by personnel who meet the Secretary of the Interior standards. These individuals will coordinate with the BPA Archaeologist to insure that a complete, intensive, and professional inventory project is conducted.

We would very much like to hear from you about any concerns or issues you may have regarding the proposed project, and any information you could share with us regarding possible cultural resource concerns, including potential mitigation measures. If available, we would welcome information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in the proposed project area. Following the background research and field survey, a technical report will be prepared and available for your review if requested.

**More information** - The Sea Breeze application to DOE's OEDER, including associated maps and drawings, and also the Federal Register Notice of Feb. 18, 2005 (70 FR 8350) is available at [http://www.fossil.energy.gov/programs/electricityregulation/Pending\\_Proceedings.html](http://www.fossil.energy.gov/programs/electricityregulation/Pending_Proceedings.html); scroll down to Pending Presidential Permit Application PP-299).

Additional information is also available at

[http://www.transmission.bpa.gov/PlanProj/Transmission\\_Projects/](http://www.transmission.bpa.gov/PlanProj/Transmission_Projects/).. Finally, Sea Breeze maintains a project web site at <http://www.jdfcable.com/>.

If you have any questions or concerns, please do not hesitate to contact me at (503) 230-5455 or by e-mail; [slmason@bpa.gov](mailto:slmason@bpa.gov). Similarly, regarding the Presidential permit process, please feel free to contact Dr. Jerry Pell at (202) 586-3362 or by e-mail: [Jerry.Pell@hq.doe.gov](mailto:Jerry.Pell@hq.doe.gov).

Sincerely,

*/s/ Stacy Mason August 9 2005*

Stacy Mason

Environmental Coordinator

Attachment: Vicinity Map

cc. w/ attachments

Dr. Jerry Pell, OEDER

***THE ABOVE LETTER WAS ALSO SENT TO:***

Ms. Jamie Valadez  
 Lower Elwha Community Council, Cultural  
 Resources  
 2851 Lower Elwha Road  
 Port Angeles, WA 98363

Ms. Kathy Duncan  
 Jamestown S' Klallam Tribe, Cultural Resources  
 1033 Old Blyn Highway  
 Sequim, WA 98392

Ms. Marla Dupuis  
 Chehalis Business Council, Cultural Resources  
 PO Box 536  
 Oakville, WA 98568

Mr. David Burnett, Chairman  
 Chehalis Business Council  
 PO Box 536  
 Oakville, Wa 98568

Ms. Mary Leitka, Chairwoman  
 Hoh Tribal Business Community  
 2464 Lower Hoh Road  
 Forks, WA 98531

Mr. Al Scott  
 Lummi Business Council, Cultural Resources  
 2616 Kwina Road  
 Bellingham, WA 98226

Ms. Janine Bowe chop  
 Makah Tribal Council, Cultural Resources  
 PO Box 115  
 Neah Bay, WA 98357

Mr. Walter Pachaco  
 Muckleshoot Tribal Council, Cultural Resources  
 39015 172nd Avenue, SE  
 Auburn, WA 98092

Ms. Pearl Capoeman Baller, Chairperson  
 Quinault Indian Nation, Cultural Resources  
 PO Box 189  
 Taholah, WA 98587

Mr. Richard Greene  
 Samish Indian Nation, Cultural Resources  
 PO Box 217  
 Anacortes, WA 98221

Mr. Ernest DeCoteau  
 Sauk-Suiattle Tribal Council, Cultural Resources  
 5318 Chief Brown Lane  
 Darrington, WA 98241

Mr. Delbert Miller  
 Skokomish Tribal Council, Cultural Resources  
 80 N. Tribal Center Rd  
 Shelton, WA 98584

Mr. Bill Sweet, Chairman  
 Snoqualmie Tribe  
 P.O. Box 280  
 Carnation, WA 98014

Ms. Rhonda Foster  
 Squaxin Island Tribal Council, Cultural  
 Resources  
 SE 70, Squaxin Lane  
 Shelton, WA 98584-9200

Mr. Tom Anderson  
 Shoalwater Bay Tribal Council, Cultural  
 Resources  
 PO Box 130  
 Tokeland, WA 98592

Ms. Marie Hebert  
 Port Gamble S' Klallam Tribe, Cultural  
 Resources  
 31912 Little Boston Road NE  
 Kingston, WA 98346

Mr. Kenneth Ross  
Nisqually Indian Community Council,  
Cultural Resources  
4820 She-Nah-Num Drive, SE  
Olympia, WA 98513

Mr. Robert Kelly  
Nooksack Indian Tribal Council, Natural  
Resources  
PO Box 157  
Deming, WA 98244

Ms. Mary Frank  
Puyallup Tribal Council, Cultural Resources  
1850 E Alexander Ave  
Tacoma, WA 98421

Ms. Katie Krueger  
Quileute Tribal Council, Cultural Resources  
PO Box 279  
LaPush, WA 98350-0279

Ms. Marilyn Jones  
Suquamish Tribal Council, Cultural Resources  
PO Box 498  
Suquamish, WA 98392

Ms. Diane Edwards  
Swinomish Indian Tribal Community,  
Cultural Resources  
PO Box 817  
LaConner, WA 98257

Mr. Hank Gobin  
Tulalip Board of Directors, Cultural Resources  
6700 Totem Beach Road  
Marysville, WA 98271

Ms. Lauren Rich  
Upper Skagit Tribal Council, Cultural Resources  
25944 Community Plaza  
Sedro Wooley, WA 98284