DATE: February 5, 2008

REPLY TO ATTN OF: KEC-4

SUBJECT: Supplement Analysis for the Port Angeles-Juan de Fuca Transmission Project Final Environmental Impact Statement (DOE/EIS-0378/SA-01)

TO: Mark Korsness
Project Manager - TEP TPP-3

**Proposed Action:** Relocation of the marine exit hole for the horizontal directionally drilled (HDD) hole that would be drilled under the Proposed Action.

**Proposed by:** Sea Breeze Olympic Converter LP (Sea Breeze).

**Location:** Port Angeles Harbor near Port Angeles, Washington.

**Background:** As part of its proposed international transmission cable analyzed in the Port Angeles-Juan de Fuca Transmission Project EIS, Sea Breeze has proposed the drilling of a HDD hole to transition the cable from the sea bed of the Strait of Juan de Fuca to land. The HDD hole would be drilled from a drilling site located along North Liberty Street in Port Angeles. The HDD hole route would begin underground in North Liberty Street, then extend under the shoreline and into Port Angeles Harbor. The original length of the proposed HDD hole considered in the EIS was about 3,300 feet (1.0 kilometer), with the end point exiting the sea floor about 1,340 feet (408 meters [m]) offshore. The water depth at this point is about 26 to 30 feet (8 to 9 m). As a result of consultation with the National Oceanic and Atmospheric Administration (NOAA) and NOAA’s recommendation to decrease potential impacts to macroalgae habitat, Sea Breeze is proposing to extend the hole an additional 165 feet (50 m) seaward. The new proposed HDD hole end would still be located along the original cable route. With this proposed relocation, the length of the HDD hole would be about 3,465 feet (1.06 kilometer), with the end point exiting the sea floor about 1,505 feet (460 m) offshore at a water depth of about 33 feet (10 m).

**Analysis:** The original location where the HDD hole would have emerged in the Harbor has an algae density cover of about 50 percent, based on dive surveys conducted in September 2005. These dive surveys also found that algae density cover lessens to 25 percent about 165 feet (50 m) seaward of the original end hole. The analysis in the EIS determined that about 5 acres (2 hectares[ha]) of vegetation would likely be impacted due to the marine cable trenching and work around the HDD hole end point in the Harbor. Moving the HDD hole end point would lessen the area of impact slightly to 4.8 acres (1.9 ha), and because the density of macroalgae is less at this location, the amount of macroalgae habitat impacted would be less with the proposed relocation. Overall impacts to marine vegetation would still be considered low, as stated in the EIS.
Because the new end point would require that the HDD hole be longer, more drilling muds and cuttings would be generated than originally analyzed in the EIS. The amount of drilling muds that would be released into the Harbor if the borehole cannot be flushed would increase from 94 cubic yards \([\text{yards}^3 (\text{72 m}^3)]\) to 105 yards\(^3\) (80 m\(^3\)). The release of an additional 11 yards\(^3\) (8 m\(^3\)) of drilling muds would not be considered a significant change in the proposed project and would not change the moderate impact levels for water quality described in the EIS. Mitigation identified in the EIS would still apply and would serve to minimize the amount of drilling muds released.

The longer HDD hole would require about one additional day of drilling. The EIS stated that the HDD hole would take about 23 days of drilling. Extending the hole by about 165 feet (50 m) would increase the total drilling time to about 24 days. This slight extension of the proposed drilling time would be considered a minor change in the proposed action. The impacts to residents and others from the noise created by the drilling operation with the relocated marine exit hole would continue to be high, but temporary, as described in the EIS. Mitigation identified in the EIS would still apply and would serve to reduce noise levels at the HDD construction site.

**Findings:** This Supplement Analysis finds that there are no substantial changes to the proposal or significant new circumstances or information relevant to environmental concerns; therefore, a supplemental EIS is not warranted and no further NEPA documentation is required.

/s/ Stacy L. Mason
Stacy L. Mason
Environmental Protection Specialist

CONCUR:

/s/ Katherine S. Pierce           DATE: February 5, 2008
Katherine S. Pierce
NEPA Compliance Officer