



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Western Washington Office
510 Desmond Drive SE, Suite 102
Lacey, Washington 98503
Phone: (360) 753-9440 Fax: (360) 753-9008

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: KELT-378
RECEIPT SEP 10 2001

SEP 04 2001

Gene Lynard
Project Environmental Lead
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

Re: Kangley-Echo Lake Transmission Line Project (FWS Reference #1-3-01-I-2032)

Dear Mr. Lynard:

This letter is in response to the final biological assessment (BA) for the Kangley-Echo Lake transmission line project and the Draft Environmental Impact Statement (DEIS). The review period for comments on the DEIS has been extended to September 4, 2001. The BA and accompanying letter requesting informal consultation was received in our office on July 23, 2001.

After reviewing the BA for this project, the U.S. Fish and Wildlife Service has concluded that we do not concur with the determination that the proposed action "may affect, but is not likely to adversely affect" the northern spotted owl.

The Service believes that the proposed action has the potential to adversely affect the northern spotted owl. The following outlines the basis for our determination:

1. The project will result in the permanent removal of mature forest habitat. The stands are currently potential foraging and roosting habitat for owls (>80 yrs old). Owls have been documented using forests of this age near the project location. Under the Seattle City Light Habitat Conservation Plan (HCP), these stands would have developed into potential nesting habitat in the near future.
2. The proposed action will degrade the quality of remaining owl habitat adjacent to the power line corridor. Widening the corridor may impact some smaller patches of forest to such an extent that they are completely affected by edge. The effects

of the proposed action on interior forest habitat may impact the amount of suitable nesting habitat in the future.

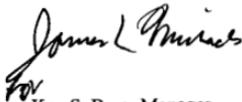
3. The project will widen the utility corridor by an additional 150 feet, effectively doubling the width of the opening along the 9 mile stretch. Research has documented that spotted owls are highly susceptible to predation by great horned owls, particularly when crossing openings.

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

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

While addressing the information needs listed above, we recommend that the Bonneville Power Administration request initiation of formal consultation for this project. When the information is received, formal consultation can be initiated. If you have any further questions, please contact Martha Jensen at (360) 753-9000 or John Grettenberger at (360) 753-6044.

Sincerely,



Ken S. Berg, Manager
Western Washington Office

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

References

- Forsman, E., S. deStephano, M. Raphael, J. Gutiérrez. 1993. Demography of the Northern Spotted Owl. *Studies in Avian Biology*, No. 17. Fort Collins, Colorado.
- Forsman, E., E.C. Meslow, H. Wight. 1984. Distribution and Biology of the Spotted Owl in Oregon. *Wildlife Monographs*. The Wildlife Society.
- Gutiérrez, J. 1994. Changes in the Distribution and Abundance of Spotted Owls During the Past Century. *Studies in Avian Biology*, No. 15:293-300. Fort Collins, Colorado.