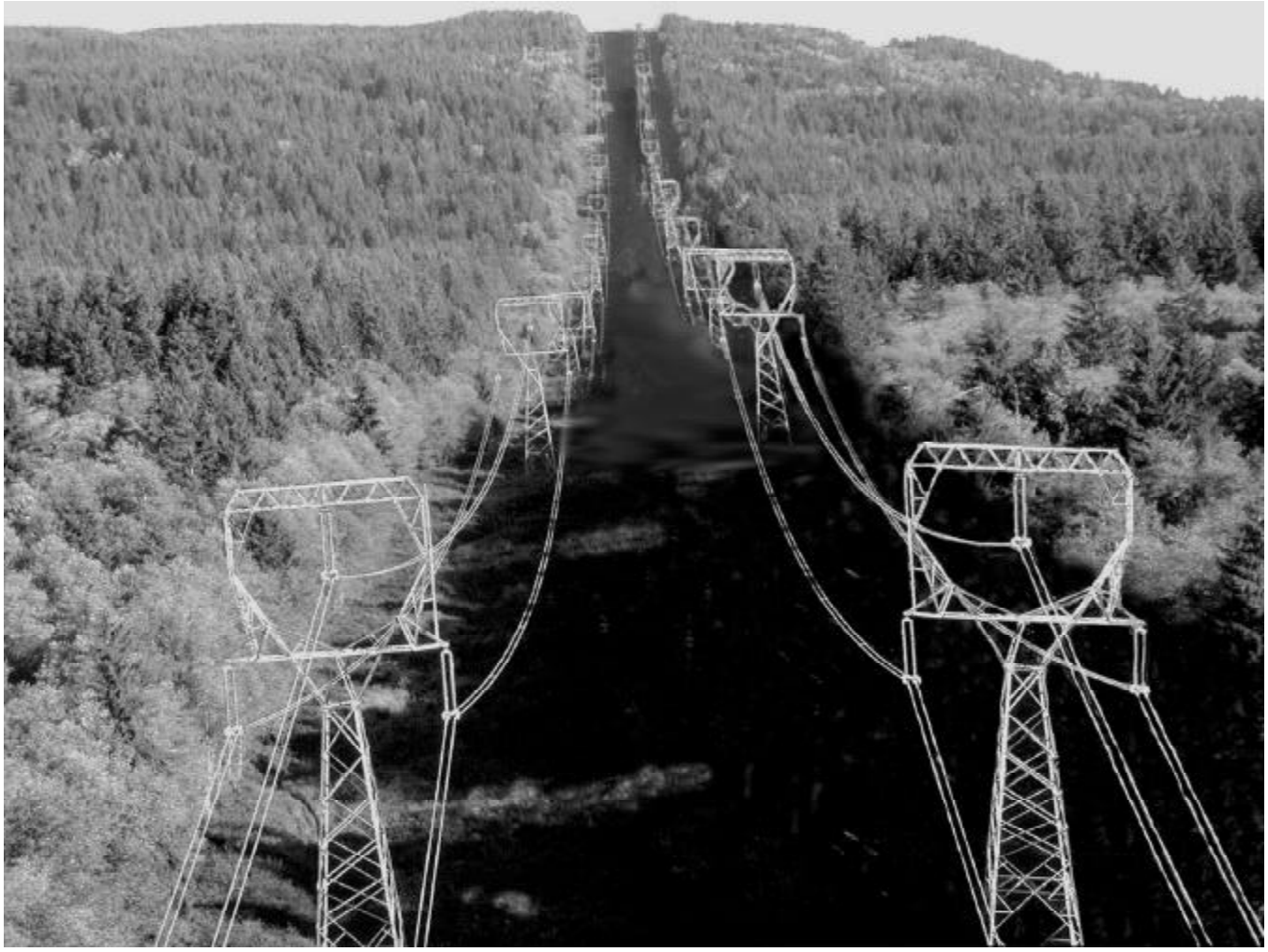
JUNE 2003

KANGLEY - ECHO LAKE TRANSMISSION LINE PROJECT

FINAL ENVIRONMENTAL IMPACT STATEMENT

DOE/EIS-0317-S1



BONNEVILLE POWER ADMINISTRATION

Kangley-Echo Lake Transmission Line Project

Final

Environmental Impact Statement

Bonneville Power Administration

June 2003

Kangley-Echo Lake Transmission Line Project

Final Environmental Impact Statement

Responsible Agency: U.S. Department of Energy, Bonneville Power Administration (BPA)

Cooperating Agency: U.S. Department of Agriculture, Forest Service (USFS)

Title of Proposed Project: Kangley-Echo Lake Transmission Line Project

State Involved: Washington

Abstract: BPA is proposing to build a new transmission line to accommodate increasing demand for electricity and ensure reliability in the Puget Sound area. The Proposed Action would construct a new line that would connect to an existing transmission line near the community of Kangley, and then connect with BPA's existing Echo Lake Substation. The major purpose of this proposal is to improve system reliability in the King County area. An outage on an existing line during times of heavy use, such as during a winter cold snap, could cause voltage instability and a loss of power in the King County area. System planners have projected total system load using normal growth in demand and determined that system instability could have developed as early as the winter of 2002-03.

Besides meeting this need for system reliability, this project would enhance the United States' delivery of power to Canada as required under the Columbia River Treaty of 1961.

BPA described and analyzed transmission route alternatives in a draft environmental impact statement (DEIS) released in June 2001 and additional transmission route alternatives and a non-transmission alternative in a supplemental draft environmental impact statement (SDEIS) released in January 2003 (the SDEIS incorporated the original DEIS and new information developed for the SDEIS). The Proposed Action and Alternatives 2, 3, 4A and 4B cross the Cedar River Municipal Watershed. Alternatives A and C are located to the west of the Cedar River Municipal Watershed boundary. Alternatives B and D are also outside the Cedar River Municipal Watershed and cross the Mt. Baker-Snoqualmie and Okanogan-Wenatchee National Forests. Under all transmission alternatives, Echo Lake Substation would be expanded about three acres to the east and new equipment to accommodate the new line would be installed. The non-transmission alternative considered several non-transmission measures to defer the need for a transmission line. BPA also analyzed a No Action Alternative.

This abbreviated final environmental impact statement (FEIS) contains the changes made to the SDEIS, comments received on the DEIS and the SDEIS, and BPA's written responses to the comments. The FEIS should be used as a companion to the SDEIS, which contains the full text of the affected environment, environmental analysis and appendices.

BPA expects to issue a Record of Decision on the proposed project in August 2003.

For additional information, contact:

Gene Lynard (KEC-4), Project Environmental Lead
Bonneville Power Administration
P. O. Box 3621
Portland, Oregon 97208
Telephone: (503) 230-3790
Email: gplynard@bpa.gov

Floyd Rogalski, Natural Resource Planner
Cle Elum Ranger District
803 W. 2nd Street
Cle Elum, WA 98922
Telephone: (509) 674-4411 ext 315
Email: frogalski@fs.fed.us

For more copies of this document, please call 1-800-622-4520 and ask for the document by name. The abbreviated FEIS and the SDEIS Summary are also available on the Internet at: www.efw.bpa.gov.

For additional information on DOE National Environmental Policy Act activities, please contact Carol Borgstrom, Director, Office of NEPA Policy and Compliance, EH-42, U. S. Department of Energy, 1000 Independence Avenue S.W., Washington D.C. 20585, phone: 1-800-472-2756.

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Chapter 1 — Summary

This is the final environmental impact statement (FEIS) for Bonneville Power Administration's (BPA) proposed Kangley-Echo Lake 500-kV Transmission Line Project. This document has been prepared as an "abbreviated" FEIS pursuant to the Council on Environmental Quality's (CEQ) National Environmental Policy Act (NEPA) regulations because there have been no substantial changes to the proposed action, alternatives, or environmental analysis presented in the Supplemental Draft EIS (SDEIS) (dated January 2003), which incorporated the original Draft EIS (DEIS), for this project. Consistent with 40 C.F.R. 1503.4(c), this abbreviated FEIS provides comments received on the DEIS and the SDEIS, agency responses to these comments, and any changes made to the SDEIS. This FEIS should be used as a companion document to the SDEIS, which contains the full text of the affected environment, environmental analyses, and appendices. For readers of this FEIS who do not already have a copy of the SDEIS, copies may be obtained by:

- Calling BPA's document request line at 1-800-622-4520; record your name, address, and which documents you would like, or
- Accessing a Summary of the SDEIS on BPA's Web site at http://www.bpa.gov/; look for environmental analysis, Active Projects, or
- Writing to Bonneville Power Administration
  Public Information Office – CGIL-1
  P. O. Box 12999
  Portland, Oregon 97212

The remainder of this summary provides an overview of the proposed action and alternatives, the lead and cooperating agencies, the comment period for the DEIS and SDEIS, and changes to the SDEIS. Chapter 2 presents comments (copies of letters, e-mails, comment forms, and public meeting comments) on the DEIS and agency responses to these comments. Chapter 3 presents comments (copies of letters, e-mails, comment forms and meeting transcripts) received on the SDEIS and agency responses to these comments.

Summary of the Proposed Action

BPA proposes to build a single-circuit 500-kV transmission line from a tap point on an existing 500-kV line near Kangley, Washington, to its Echo Lake Substation near North Bend, Washington (see Map 1). The proposed route for this line, also called Alternative 1, is about nine miles long. About five miles of the proposed route would go through the Cedar River Municipal Watershed. In addition, Echo Lake Substation would be expanded about three acres to the east and new equipment would be installed there to accommodate the new line (common to all transmission alternatives).

This alternative was proposed because it would be located immediately parallel to an existing BPA existing 500-kV transmission line, the Raver-Echo Lake Transmission Line. Locating a new line next to an existing one reduces right-of-way (ROW) clearing needed for the new line and reduces the need for additional access roads. Lattice steel transmission towers would support the 500-kV transmission line. These structures average 135 feet high, with the average span between towers of about 1,150 feet.

Summary of Alternatives

Alternative 2

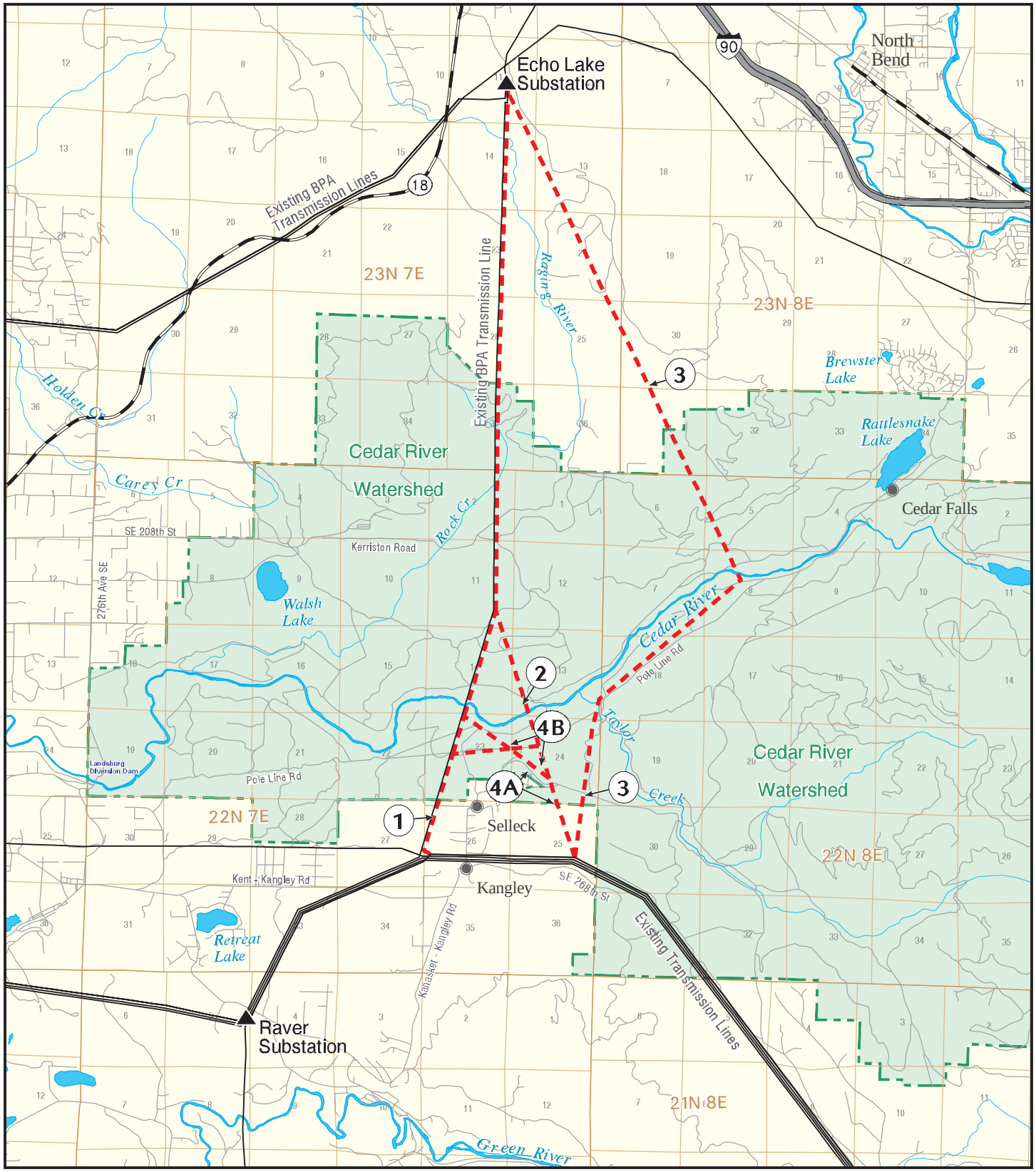
Alternative 2 would originate from a tap point about 1.5 miles east of the tap point for the Proposed Action and traverse northwest about three miles before continuing north paralleling the existing Raver-Echo Lake Transmission Line into Echo Lake Substation. (See Map 1.) This alternative would be approximately nine miles long.

Alternative 3

Alternative 3 would begin at the same tap point as Alternative 2. From this point, it would traverse northeasterly then turn north-northwesterly to Echo Lake Substation. This alternative would be about 10.2 miles long. (See Map 1.)

Alternative 4A

Alternative 4A would begin at the same tap point as Alternative 2. About one-third of the way along Alternative 2, this alternative turns northwest to connect with the Proposed Action. This alternative would be about 9.5 miles long. (See Map 1.)



PROPOSED ACTION and ALTERNATIVES on the CEDAR RIVER WATERSHED

Map 1

Existing Transmission Lines

Proposed Transmission Line Alternatives Under Consideration

BPA Substation

1 Alternative

BONNEVILLE POWER ADMINISTRATION GIS GEOGRAPHIC INFORMATION SYSTEM

May 09, 2003

0mi 1mi 2mi

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N

Alternative 4B

Alternative 4B would begin at the same tap point as Alternative 2. About half way along Alternative 2, this alternative would traverse southwest to connect with the Proposed Action. This alternative would be about 9.2 miles long. (See Map 1.)

Alternative A

Alternative A would require construction of about 20 miles of new 500-kV transmission line on mostly rural residential land, on mostly existing ROW. The alternative would use a vacant ROW between the tap point along the existing transmission line near Kangley, to a point near Covington Substation, immediately north of a portion of an existing 230-kV transmission line. Some new ROW would need to be acquired around the northeast side of Covington Substation to connect two transmission line ROWs. (See Map 2.)

BPA is considering an option for a portion of this alternative that would impact fewer homes. This option would run through Covington Substation on mostly BPA-owned land.

The existing single-circuit 230-kV line from Covington Substation to the north to a tap point on an existing double-circuit 500-kV transmission line would need to be torn down and replaced with a new double-circuit transmission line. This new transmission line would have a 230-kV line on one side and a 500-kV line on the other. The 500-kV circuit would tap an existing vacant 500-kV circuit on the existing double-circuit 500-kV line coming from the west to take the power into Echo Lake Substation.

Alternative B

For this alternative, 35.6 miles of the existing 345-kV single-circuit transmission line and towers between Stampede Pass and Echo Lake Substation would be torn down and new double-circuit towers erected to accommodate two new 500-kV lines. Using the same design as the Proposed Action, Alternative B would tap an existing 500-kV line just east of Stampede Pass and divert power to Echo Lake Substation. The new double-circuit line would operate on one side at 345-kV (like the existing line) and the other at 500-kV. This alternative crosses the Mt. Baker-Snoqualmie and Okanogan-Wenatchee National Forests. (See Map 2.)

Alternative C

Alternative C has two options, Option C1 and Option C2. Option C1 is approximately 10.1 miles long and Option C2 is approximately 10.6 miles long. (See Map 2.) Both would require new ROW away from existing transmission lines. Option C1 would begin at Raver Substation and proceed 2.5 miles west immediately north of and parallel to an existing double-circuit 500-kV transmission line on new 150-foot-wide ROW, before turning north and traveling about 7.6 miles on new 150-foot ROW through the rural residential areas of Ravensdale and Hobart. The proposed line would then tap the vacant circuit on an existing double-circuit 500-kV transmission line, west of Echo Lake Substation, just north of State Route 18. Power would be carried by this existing transmission line into Echo Lake Substation, following the completion of a short segment at Echo Lake Substation similar to that described at the north end of Alternative A.

Option C2 would begin at a tap point on an existing 500-kV double-circuit transmission line near Kangley, about 2.8 miles northeast of Raver Substation, and traverse about 4.5 miles west within a vacant transmission line ROW immediately north of a 230-kV transmission line, before turning north and continuing on the same alignment as Option C1 into Echo Lake Substation.

Alternative D

Alternative D would tap an existing 500-kV line just east of Stampede Pass and divert power to Echo Lake Substation over 35.6 miles of new single-circuit 500-kV transmission line. (See Map 2.)

Alternative D has two options, Option D1 and Option D2. Option D1 is located immediately adjacent to and south of the existing 345-kV line; Option D2 is located immediately adjacent to and north of this line. Either option would entail acquiring and clearing a new 150-foot wide ROW and building a new 500-kV single-circuit transmission line. Both options cross the Mt. Baker-Snoqualmie and Okanogan-Wenatchee National Forests.

Non-Transmission Alternative

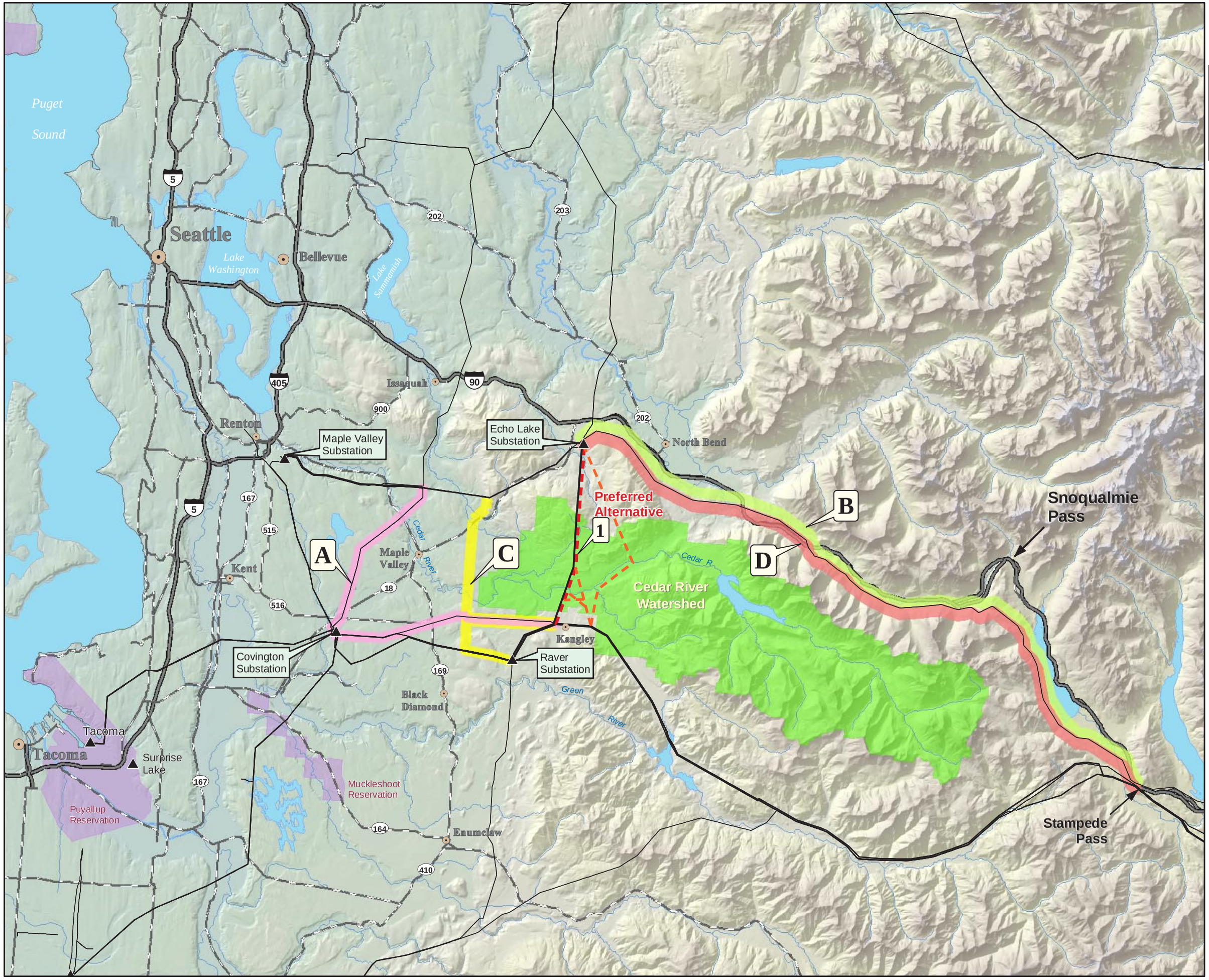
For this alternative, BPA would use a broad range of alternatives including Demand-Side Management, Distributed Generation, large scale Generation, and Demand Response and Direct Load Control that might defer the need for a new 500-kV transmission line.

No Action Alternative

No new line would be built.

Map 2

ADDITIONAL ALTERNATIVES CONSIDERED



Legend

- Existing BPA Transmission Lines
- Proposed Transmission Line Alternatives Under Consideration
- BPA Substations

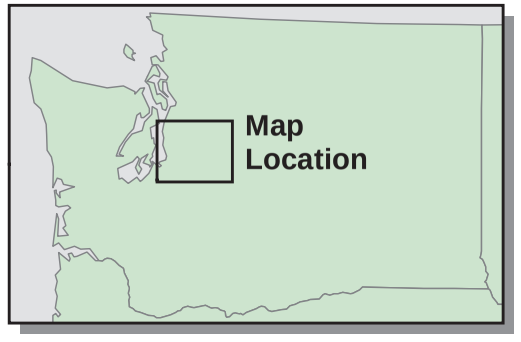
Alternatives

A Construct New Single-Circuit 500-kV Line from tap near Kangley to Covington Substation. Rebuild portion of Covington - Maple Valley 230-kV to Double-Circuit 500-kV.

B Rebuild Portion of Rocky Reach-Maple Valley 345-kV to Double-Circuit 500-kV from East of Stampede Pass to Echo Lake Substation.

C Construct New Single-Circuit 500-kV Line West of the Cedar River Watershed to the Echo Lake - Maple Valley Lines.

D Construct New Single-Circuit 500-kV Line from East of Stampede Pass Adjacent to Rocky Reach-Maple Valley Line.



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Miles

May, 2003

Lead and Cooperating Agencies

BPA is the lead federal agency on this project and supervises the preparation of the EIS. Alternatives B and D would cross land managed by the U.S. Forest Service (Mt. Baker-Snoqualmie and Okanogan-Wenatchee National Forests). The USFS has agreed to cooperate in the EIS process.

Draft and Supplemental EIS Comments

The Draft EIS was distributed to agencies, tribes, groups, individuals and libraries in June 2001. A 45-day public review period was extended until September 4, 2001 based on requests for more time to review and comment on the document. A public meeting was held on August 1, 2001 in Maple Valley, Washington to accept public comment on the draft document. During the comment period BPA received over 700 comments. Issues raised in the comments included the following: the need for the project; alternatives considered; impacts to the Cedar River Municipal Watershed and water quality; fish and wildlife; cultural resources; and other subjects. Copies of comments made on the DEIS and BPA's responses to those comments are in Chapter 2.

After reviewing the comments and refining the cost estimates associated with BPA's preferred alternative, BPA decided to prepare a SDEIS that re-evaluated four route alternatives not analyzed in detail in the DEIS. BPA also initiated a study of non-transmission line alternatives to consider.

BPA completed the SDEIS in January 2003 and released it for a 45-day comment period.

BPA hosted four public meetings during the comment period: Monday, February 3, in North Bend; Tuesday, February 4, in Seattle; Wednesday, February 5, in Maple Valley; and Thursday, February 6, in Covington. An additional meeting explaining BPA's study of a Non-Transmission Alternative for the SDEIS was held in Seattle on February 4. During the public meetings, attendees were invited to interact with BPA staff, ask questions and give comments; comments were recorded at the meetings. About 150 people attended the public meetings for the SDEIS.

BPA received over 250 comments during this comment period. Issues raised in the comments included the following: the need for the project; the alternatives considered and their costs; proposed and suggested mitigation; impacts to the Cedar River Municipal Watershed and water quality; fish and wildlife; cultural resources; impacts to

property values; and other subjects. Copies of comments made on the SDEIS and BPA's responses to those comments are in Chapter 3.

Changes to the Supplemental Draft EIS

There are no major changes to the SDEIS that was released in January 2003. The following are additions or corrections made to the SDEIS.

In the SDEIS, BPA proposed restricting ground-disturbing activities to the dry season (May through September). Construction for this project is anticipated to begin in early to mid-August 2003. Under a compressed project schedule designed to allow for transmission line energization by December 31, 2003, initial construction activities would focus on critical areas in the Cedar River Watershed. First consideration would be given to areas next to the Cedar River crossing, Rock Creek and Brew Hill. Infrastructure items constructed first would include the following: road upgrading, road building, access road removal from service, cross drain and approach culvert installation, logging activities, tower footing excavation/borings and installation, counterpoise excavation/grounding well boring and installation, tensioning/reel site establishment, and site stabilization.

After September 30, construction activities would continue in the CRW spreading focus to areas outside of the CRW, and would operate under the more stringent wet season construction requirements. Final project stabilization and restoration is not anticipated until late summer 2004, possibly longer depending on vegetation success.

At the time the SDEIS was released, BPA had not gained permission to cross the Cedar River by helicopter with any logs removed for construction. The City of Seattle has granted permission to fly over the Cedar River with logs as long as there is monitoring.

The SDEIS stated that no new bridges would be needed for this project. One temporary bridge crossing, running from upland bank to upland bank, may be needed for construction. The bridge would be removed after construction.

Addition to Appendix A, Final Fisheries Technical Report includes corrected information about streams potentially affected by Alternatives 1–4.

Appendix D, Final Wetlands Technical Report, has been changed to state that no wetlands would be filled.

In Appendix E, Table 4, the description of the width of the right-of-way was incorrect. The correct width is 150 feet.

The Appendix F included in the SDEIS was not the correct document. The correct document is now available.

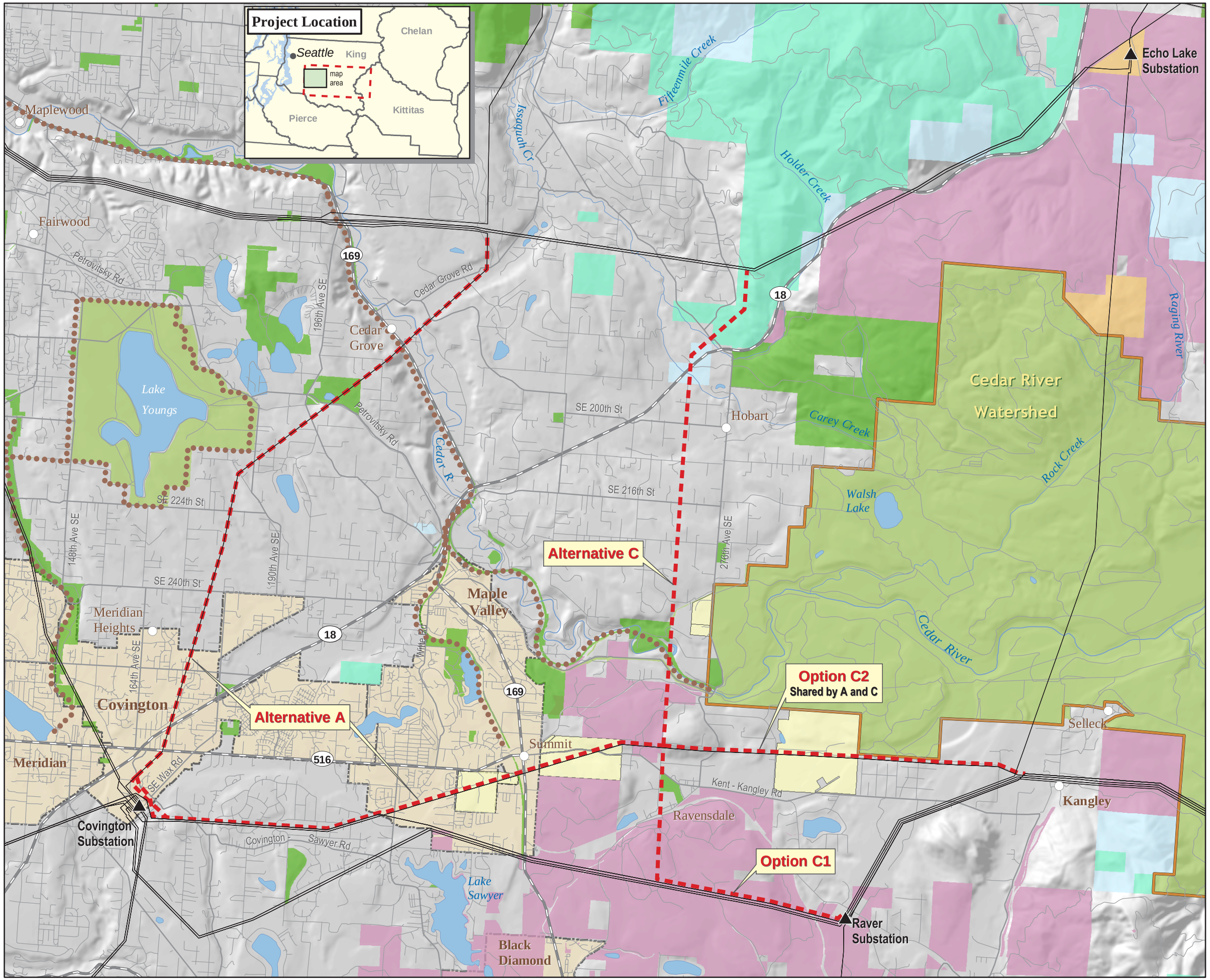
There is an addition to Appendix U. The addition is a recent letter from the National Marine Fisheries Service.

Appendix Y, Drinking Water Regulations, has been added. This appendix includes reports from Shannon and Wilson, Inc. to BPA concerning impacts to drinking water supplies in the project area.

Updated information about electromagnetic fields developed for another BPA transmission project has been added (see Appendix Z).

Appendix AA has been added. This appendix includes a recent letter from the U. S. Fish and Wildlife Service.

Map 9 has been corrected to indicate property that is owned by BPA.



Map 9

RECREATION and OWNERSHIP

Alternatives A and C

Legend

- Proposed Transmission Line Alternatives
- Existing BPA Transmission Lines
- Existing BPA Substation
- WA Dept. of Natural Resources
- State Park or Recreation Area
- Other State Lands
- Bonneville Power Administration
- City
- Other Public - City or County
- Private Timber or Other Private Land
- Other Private or Unspecified
- Cedar River Watershed Boundary
- Trail

Source: Washington DNR, King County GIS, 2000.

N

0 1 2 3

Miles

April, 2003

Chapter 2 — Comments and Responses-DEIS

In this Chapter comments from:

- Federal Agencies
- State Agencies
- Local Agencies
- Tribes
- Groups and Individuals
- Public Meetings

Bonneville Power Administration (BPA) sent the Draft EIS (DEIS) to the public for comments on the Proposed Action and alternatives. The Draft EIS was distributed to agencies, groups, individuals, and libraries in June 2001. A 45-day public review period was extended to September 4, 2001 at the request of some commenters. A public meeting was held in Maple Valley, Washington on August 1, 2001 to review and receive comments on the Draft EIS. These comments were all captured and catalogued. As a result of the comments on the DEIS, BPA decided to analyze four additional action alternatives in more detail and to more fully explore non-transmission alternatives. Six additional scoping meetings were held to gather additional issues and concerns for the new alternatives in June 2002. BPA received over 1,600 comments during this additional scoping time. Since then, BPA has completed a supplemental draft environmental impact statement (SDEIS) for the proposed Kangley-Echo Lake Transmission Line Project. The SDEIS was released to the public for a 45-day review and comment period that ended on March 1, 2003. Five public meetings were held at various locations in King County during the week of February 3-6 to gather public comments on the SDEIS.

This chapter contains the written comments from letters, e-mails, and comment sheets received during the comment period for the DEIS and BPA's responses to those comments. It also contains the oral comments from the public meeting in August 2001 and telephone calls received during the comment period. Chapter 3 contains the written and oral comments received during the comment period for the SDEIS and BPA's responses to those comments. Letters and comment sheets were given numbers in the order they were received. Separate issues in each letter were given separate codes. For example, letter 394 might have issues 394-001, 394-002, and 394-003 identified within its text. Comments from the public meeting were also numbered. BPA prepared responses to each of these individual comments.

The chapter is organized in the following sequence: comments from ***federal agencies*** are followed by comments from ***state agencies*** (page 2-13), ***local agencies*** (page 2-17), ***tribes*** (page 2-107), then ***groups and individuals*** (page 2-115). Comments from the ***public meeting*** are at the end of the chapter (page 2-205). Because we have organized comments this way and often reference responses to other comments, please use the numerical list on the back of this page for reference. A listing of related comments by issue is at the end of the chapter on page 2-218.

(Comments on the DEIS begin with BPA log #338;
earlier letters were for scoping)

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Federal Agencies

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-398
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:

398-001 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.

398-002 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

398-001, -002, and -003 The trees that would be impacted do not currently have owls in them, and the Proposed Action would minimize the impacts to the extent practicable. BPA is using approved protocols to survey for spotted owls during the nesting period for the species. No owls have been found to date.

Adding all forest impacts together, the total still represents a very small percentage (1/10 of 1 percent) of that type of habitat that will remain available for spotted owl use within the HCP. BPA would mitigate for adverse impacts. BPA has consulted with USFWS on potential effects to the northern spotted owl, and will conclude that consultation prior to project construction. Additional information on consultation is found on page 5-2 of the SDEIS. An updated description of potential impacts to the northern spotted owl is found in Sections 4.7.2 and 4.7.3 of the SDEIS.

398-002 of the proposed action on interior forest habitat may impact the amount of suitable nesting habitat in the future.

398-003 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.

398-004 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.

398-005 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.

398-006 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,

For 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.

398-004 The Biological Opinion discusses the increased risk of predation to the spotted owl, and impacts to spotted owls were determined to be unquantifiable.

398-005 See response to Comment 340-002 for information about land purchased for compensatory mitigation. Site assessments that have been completed for some parcels have been given to SPU and the USFWS.

398-006 See response to Comments 398-001, -002, and -003.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-411
RECEIPT DATE:
OCT 02 2001
00-047-BPA

Reply to
Attn. of: ECO-088

September 26, 2001

Lou Driessen, Project Manager
Bonneville Power Administration - KC-7
P.O. Box 12999
Portland, OR 97212

Dear Mr. Driessen:

The Environmental Protection Agency (BPA) has reviewed the draft Environmental Impact Statement (EIS) for the proposed **Kangley-Echo Lake Transmission Line.** We are submitting comments according to our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). Section 309 of the Clean Air Act directs the EPA to review and comment in writing on the environmental impacts of any major federal agency action.

BPA's preferred alternative proposes building a $11.5 million, 500-kilovolt (KV), nine-mile transmission line near the community of Kangley in Central King County, parallel to an existing transmission line, then connecting with the existing Echo Lake substation. The Echo Lake sub station would be expanded by three acres to accommodate the new line at a cost of $6.5 million. A total of 1.5 miles of new access roads would be built. One hundred fifty-two acres, including 84 acres of mostly Douglas fir, would be impacted by the project, which includes a 150-foot cleared right-of-way. The new line will improve system reliability in King County and enhance the delivery of power to Canada, required under the Columbia River Treaty of 1961.

BPA has said that under normal growth in demand, system instability could develop as early as the winter of 2002-2003. An outage on the existing line between Raver and Echo Lake substations could overload transformers in the Covington area during heavy use. According to the EIS, the amount of energy saved through conservation programs is not enough to defer the need for a new transmission line.

Four other alternatives (2, 3, 4A and 4B) are located east of the existing transmission line, requiring new rights-of-way and access roads. Alternative three requires the most new access roads, 6.4 miles, because the route is not next to an existing transmission line or right-of-way. All five options cross the Cedar River and the Cedar River Watershed.

411-001 Based on our review, we have rated this draft (EO-2) Environmental Objections - Insufficient Information. This rating and a summary of our comments will be published in the *Federal Register.*

411-001 Comment noted.

411-002 BPA disagrees with EPA over its assessment that the DEIS provides no information about the proposed project's impacts to the Cedar River Municipal Watershed. Chapter 4, Environmental Consequences, identifies impacts for each of the 14 resources identified, including the short-term impacts (construction), and long-term impacts (operation and maintenance). With regard to the City's newly adopted HCP, BPA disagrees with the EPA's assessment that the project "does not appear to comply" with the HCP, which allows no logging within the watershed. The City of Seattle's HCP for the Cedar River Municipal Watershed is a plan between the signatories, i.e., between the City of Seattle and the U. S. Fish and Wildlife Service and the National Marine Fisheries Service. The plan covers only actions by the City of Seattle, and does not disallow all logging within the watershed, only "commercial logging."

BPA's purpose is not to commercially log merchantable timber within the Cedar River Municipal Watershed, only to clear a right-of-way to construct a high voltage transmission line between the existing Shultz-Raver No. 2 Transmission Line near the community of Kangley and connect the line to the existing BPA Echo Lake Substation, nine miles north of the tap point. Removing trees to safely construct, operate and maintain the proposed transmission is incidental to constructing the power line. To replace the 1/10 of one percent of the forested habitat that would be converted to non-forest uses within the 90,546-acre Cedar River Municipal Watershed, BPA would acquire other lands that would be conveyed to SPU's landholdings to mitigate for this loss of forest habitat. See response to Comment 340-002. Additionally, BPA would undertake mitigation within the CRW to mitigate for altering forested wetlands and converting them to scrub/shrub wetlands.

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Major Concerns

411-002 The EPA has serious concerns about the DEIS's adequacy. The draft provides no information about the transmission line's impacts to the Cedar River Watershed, the region's major drinking water supply and a source of water to 1.3 million people. The project does not appear to comply with the city of Seattle's Habitat Conservation Plan (HCP), which allows no logging within the watershed. The HCP also addresses Endangered Species (ESA) and natural resource issues. The city of Seattle has stated in a letter to BPA that "Seattle Public Utilities (SPU) will not accept any need to modify the HCP as a consequence of BPA's activities."

411-003 The language in the draft is confusing and contradictory. As an example, (summary, page 11) "Each of the alternatives would cross some fish-bearing streams. The fish resources in the study area include resident and anadromous species." However, another statement on the same page says, "Both chinook salmon and bull trout are potentially, though not likely, present in the streams crossed by each of the action alternatives." BPA should know this information and state it in the DEIS.

Purpose and Need and Range of Alternatives

411-004 We recommend that the purpose and need statement be presented briefly, specifying the need for the project (40 CFR 1502.13). Describe the need in one or two sentences. Then, if needed, to establish a contextual setting for the project, follow the need statement with a separate, in-depth background discussion. Avoid putting a laundry list of objectives in the purpose and need statement itself. Instead, discuss these other objectives later in the purpose and need section as additional benefits to be derived from the project.

411-005 The DEIS says that BPA will use four purposes to choose among the alternatives, including maintaining environmental quality, and minimizing impacts to the human environment through site selection and transmission line design. Please explain how environmental quality can be maintained when the proposed project, as well as the four other alternatives, go through a watershed.

411-006 We are concerned with constraints on alternatives because of the Purpose and Need statement. Chapter 2, pages 17 and 18, briefly discusses alternatives considered but eliminated. One alternative was dropped because the transmission line couldn't be taken out of service long enough to be rebuilt, and two others were dropped because of costs. The range of alternatives should be expanded to include a route around the west side of the Cedar River Watershed through the communities of Hobart and Ravensdale. BPA eliminated this route due to land costs and impacts to residents.

411-007 Question 2A in NEPA's Forty Most Asked Questions states that "section 1502.14 requires the EIS to examine all reasonable alternatives to the proposal. In determining the scope

411-003 These sentences have been changed to clarify the information and additional information was included in the SDEIS.

411-004 Comment noted.

411-005 Environmental quality includes both the natural environment and the built environment, together with the human environment. To maintain the environmental quality in a region, the health of the natural environment and the built environment needs to be protected. BPA is the federal power-marketing agency that markets power generated at federal dams and a nuclear power plant in the Northwest. This power is sold to public and private utility customers and direct service industries throughout the area. Electric power is needed by all modern societies to maintain and promote economic health of an area as well as to maintain human health and safety. BPA provides this public service as required by law, while minimizing any disturbance to the natural environment and meeting all applicable federal, state and local laws and regulations.

411-006 In response to this and other comments on the range of alternatives in the DEIS, BPA analyzed four alternatives outside of the CRW and explored the non-transmission alternatives in more detail in the SDEIS. See pages 2-20 through 2-52 of the SDEIS.

411-007 See response to Comment 411-006.

411-008 The EIS does clearly say what fish are thought to use each stream, and cites a relevant authority for each. Most of these fish distribution data are based on information in published databases, which are based on surveys by WDFW, King County and Seattle biologists. However, a detailed field survey is required to conclusively identify whether a stream is or is not occupied by a given species. We believe that such surveys are unnecessary for the purposes of this analysis. This is because the analysis presented in the DEIS assumed that all salmonids potentially present in each stream were in fact present, and impacts were evaluated in accordance with that assumption. Moreover, the act of performing those surveys would itself have a potentially high impact.

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411-007 of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant."

Environmental Consequences

BPA needs to clarify several statements in the Final EIS (FEIS) in the Environmental Consequences chapter.

411-008
- The description of impacts to fisheries (Chapter 4-22) is confusing. According to the EIS, "Impacts would be greater in streams occupied by threatened, endangered, or sensitive species than if the streams were not occupied by such species." The FEIS needs to say whether these streams have these species, and, if so, discuss whether the habitat will be degraded by these impacts. Please identify which streams have salmon species.

411-009
- The proposed action would clear vegetation from more than a half mile (2,900 feet) of a potentially fish-bearing stream within the right-of-way (ROW). Please state whether this stream is fish-bearing or not, and clarify the amount of clearing to be done. Page 26 of the appendix says that the amount of clearing can't be confirmed at this time. The draft EIS (Ch. 4-36) says that impacts on stream temperatures are expected to be low because of the small area to be cleared. The EPA recommends that the FEIS include precise information on the extent of clearing necessary and discuss the cumulative impacts on soils and stream temperature (40 CFR 1508.25 (a) and (c)).

411-010
- The BPA needs to clearly state which of three sfandards it intends to follow for protection of riparian and fisheries resources. In a discussion about removal of riparian vegetation, (Ch 4-25), the EIS names three regulatory standards approved by the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service to ensure compliance with the Endangered Species Act (ESA). The standards are the Cedar River Watershed Habitat Conservation Plan (HCP) for the city of Seattle, the Washington Department of Natural Resources HCP and the Washington Forest Practices Rules. Depending on the type of stream, each standard differs on the width of buffers from streams.

411-011 Please clarify two statements about future transmission lines in the area. In the DEIS, (Chapter 2-14) says, "The No Action Alternative does not mean there would never be a need for future transmission projects, only that no line would be considered for construction in this general area in the near future." However, in Appendix D, the Final Wetlands Technical Report, Page 22 under Cumulative Impacts says, "In the future, the transmission line ROW would be a logical choice for construction of other linear projects, including additional transmission lines, fiber optic cables, or pipelines. The decision to create a new corridor in this area could increase the likelihood of such proposals."

411-009 The environmental analysis assumes that all streams that would be crossed are fish-bearing. Tall-growing vegetation would need to be cleared in the proposed right-of-way, including the riparian area of Deep Creek. Low-growing vegetation would be planted in the riparian area of Deep Creek to mitigate for the vegetation cleared to the extent possible.

411-010 In siting its transmission facilities, BPA uses information from the environmental process. It first tries to avoid sensitive resources. Where these resources cannot be avoided, the impacts are minimized. As for its purpose, BPA builds major electrical transmission facilities, i.e., high voltage power lines and substations and switching stations. Transmission lines, by necessity, are linear facilities, and as such have difficulty avoiding all sensitive resources, many of which are also linear in nature such as streams, and their associated riparian and wetland areas. BPA recognizes that local, state and federal agencies have adopted standards to protect sensitive areas, and BPA does meet these standards to the extent that it can. BPA would do so, however, only after designing its facilities to meet the National Electric Safety Code, and its own clearing criteria, so that it could safely and reliably construct, operate and maintain its electrical transmission system.

411-011 It is true that selection of the No Action Alternative at the conclusion of the environmental process does not mean that there would never be a need for future transmission projects, only that no power line would be considered in the general area in the near future. It is also true that the presence of any existing utility facility would be a logical choice for the siting of future proposals.

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411-012 Additionally, Ch.2-21 says that under the no action alternative there would be a high impact due to potential for transmission system collapse, brownouts and blackouts affecting a widespread Northwest population. It further states that a delay of the system expansion could mean higher future costs. The EPA recommends that these costs be explored and stated in the FEIS.

Protection of Listed Species and Their Habitats

411-013 Several special status species, including the threatened chinook salmon and bull trout, under the Endangered Species Act (ESA) are "potentially" present in the streams crossed by each of the action alternatives. Three other species potentially in the streams include the Pacific lamprey and the river lamprey, (USFWS species of concern), and Coho salmon, a candidate for listing. In a separate ruling, the National Marine Fisheries Service (NMFS) also designated critical habitat for the chinook salmon, including all surface water accessible to the chinook, and riparian habitats necessary to support those surface waters.

411-014 Other listed species known to occur within the project area are the northern spotted owl, northern goshawk, black swift, merlin, olive-sided flycatcher, and pileated woodpecker. Five species of bats potentially occur in the area.

411-015 Please disclose the results of biological assessments and opinions (40 CFR 1502.25 (a)) in the FEIS. By doing this, the FEIS would demonstrate that the Endangered Species Act (ESA) procedures are being followed and that any listed species is being protected.

Water Quality

According to the EIS (Ch.4-17), the transmission line will cross the Cedar River, Rock Creek and three small tributaries of Rock Creek, the Raging River and two tributaries of the Raging River. At Rock Creek and its tributaries, the right-of-way clearing may remove all trees, exposing the creek to more direct sunlight, possibly causing a slight increase in water temperature.

411-016 The antidegradation requirement under the Clean Water Act (CWA) applies to those streams where water quality standards are presently being met. These provisions prohibit degrading the water quality unless an analysis (which involves a public process) shows that important economic and social developments necessitate degrading water quality. The Washington State Department of Ecology (DOE) must be satisfied with the analysis and grant permission to lower, but not violate water quality. Please discuss how you will be in compliance with the antidegradation requirement.

Other Concerns

411-017 **Roads:** BPA states that "precise road locations have not been defined." (Ch.2 -7)

411-012 BPA simply made an observation here that facilities "in the future" generally cost more than things have in the past, and that this is generally true for such things as land, materials and labor.

411-013, -014, and -015 BPA did prepare a biological assessment (BA) and submitted the document to the USFWS and the NMFS in July 2001. The USFWS has indicated to BPA that it could not concur in BPA's finding that the Proposed Action "May affect, but is not likely to adversely affect the northern spotted owl." As a result, BPA has prepared an addendum to the BA, addressing the FWS additional request for more information and submitted this information to the FWS along with a request to enter into formal consultation with them on this issue.

In January 2002, NMFS sent a letter to BPA concurring with its effect determination of "may affect, but not likely to adversely affect" for Puget Sound chinook and their designated critical habitat. This letter notified BPA that the NMFS was concluding section 7 consultation with BPA in accordance with 50 CFR 402.14 (b)(1). See Appendix U of the SDEIS and of the FEIS for copies of letters from NMFS. BPA's BA covered the impacts of the Proposed Action on federally-listed and candidate species only; therefore, a number of species listed in your letter were not addressed. These include the Pacific lamprey, river lamprey, northern goshawk, black swift, merlin, olive-sided flycatcher the pileated woodpecker, and five species of bats.

411-016 A number of mitigation measures designed to limit potential impacts to stream water quality are described in Sections 4.4.2.1 and 4.5.3.1 of the SDEIS. For example, where the line crosses the Cedar River (a public drinking source), BPA would double circuit the towers on either side of the river. This would avoid the need to do any clearing of vegetation within about 600 feet of either bank of the river. We are also avoiding filling any waters, including wetlands. BPA firmly believes that the designated use of the streams the project crosses will retain their designated uses. We do not anticipate that a use attainability analysis, the analysis you refer to, will have to be undertaken to change the designated use or water quality criteria for any streams in the project area. In short, we believe the project would comply with the state's anti-degradation policy.

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411-017 However, the DEIS says that topographic maps, satellite images and ground reconnaissance were used to predict miles of new access roads. With these data sources, BPA should be able to define where roads will be built. The DEIS also states that new and existing access roads may cross streams, but that no bridges would be built (Ch.2-8). If not bridges, please identify in the FEIS what type of structures would cross streams and rivers.

411-018 **Cultural resources:** The FEIS should include details on tribal concerns (Muckleshoot, Snoqualmie and Sauk-Suiattle) about the impacts to cultural resources in the project area. None of the previously recorded cultural sites occur on or near (within 700 feet) of the project area, according to the DEIS. However, (Ch. 4-95) states that "there is a high probability of encountering prehistoric and historic cultural resources in the project area.

411-019 **Hazardous spills:** SPU says that no hazardous spills are acceptable in the watershed. The DEIS said that BPA would develop a spill prevention and contingency plan to avoid spills of hazardous materials in the watershed. However, that information should have been in the draft and needs to be in the FEIS.

Thank you for the opportunity to review this draft EIS. Please contact Val Varney (206) 553-1901 if you have any questions.

Sincerely,

Judith Leckrone Lee, Manager
Geographic Implementation Unit

411-017 Section 2.1.1.5 of the SDEIS was updated to include the most current information about access roads.

411-018 The commenter is correct, the DEIS does state this. Since the release of the DEIS, our cultural resources consultant completed a detailed survey of the project area. Also, the Muckleshoot Tribe Culture Committee representatives have indicated to BPA that they would like to have a cultural monitor to be present whenever any ground disturbing activities would take place associated with project activities. We will comply with this request.

411-019 BPA is working with SPU on the Storm Water Pollution Prevention Plan (SWPP). It will be completed and reviewed before construction if BPA decides to build Alternative 1. Additional information about the SWPP was included in the SDEIS.

State Agencies

WASHINGTON STATE DEPARTMENT OF
Natural Resources

DOUG SUTHERLAND
Commissioner of Public Lands

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-390
RECEIPT DATE:
SEP 04 2001

August 23, 2001

Communications
Bonneville Power Administration-KC-7
P.O. Box 12999
Portland, OR 97212

RE: Kangley-Echo Lake Transmission Line Project

Dear Sir,

Thank you for the opportunity to comment on this project. We have the following comments to the Draft Environmental Impact Report for the Kangley-Echo Lake Transmission Line project DOE/EIS-0317.

DNR state lands has the following comments:

The environmental analysis must address both existing and proposed Bonneville Power Administration (BPA) power lines:

390-001 1. Construction, maintenance, abandonment of power line roads and towers as they relate to Clean Water Act and the Endangered Species Act (ESA); must address existing conditions on all BPA facilities in the study area

390-002 2. Management of nonnative plants within power line corridors.

3. The Department requests that any public lands should be replaced, acre for acre, with additional forest lands.

DNR regulatory has the following comments:

1. A forest practice application is required.
2. The landowner(s) must sign the application.
3. Harvest and road construction on forest land, as defined in WAC 222-16-010, must comply with the Forest Practice Act WAC 222.
4. Harvest and or road construction on potentially unstable slopes as defined in WAC 222-16-050(1)(d) must include a qualified expert report as described in WAC 222-10-030.
5. Road maintenance and abandonment plan(s) may be required.

390-003

Please feel free to contact Kit Metlen concerning comments from state lands of myself concerning regulatory comments at 360-825-1631. Thank you for considering these comments. We look forward to continued participation in this project.

Sincerely,

Susan Casey

Susan Casey
Forest Practice Coordinator

c.SEPA center #020778
Kit Metlen – State Lands Assistant SPS Region

SOUTH PUGET SOUND REGION ▮ 950 FARMAN AVE N ▮ ENUMCLAW, WA 98022-9282
FAX: (360) 825-1672 ▮ TTY: (360) 825-6381 ▮ TEL: (360) 825-1631
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RECYCLED PAPER

390-001 Comment noted. The DEIS prepared for the proposed project contained Chapter 3, Affected Environment. This chapter describes the existing environment (conditions) that may be affected by the project alternatives.

390-002 Please see response to Comment 382-017.

390-003 Comment noted. Should a decision be made to build the line, BPA would purchase the land rights from the Department of Natural Resources to build that portion of the project that would cross state land, however, BPA would not replace public lands in addition to the land rights that would be acquired. The state could, if it chose, use the funds obtained from BPA to acquire the easement for the purpose of acquiring additional lands. This decision would be left to the Department of Natural Resources.

See also response to Comment 340-002.

BPA will strive to meet the substantive standards and policies of the Washington Forest Practices Act wherever possible. BPA and the Washington DNR have agreed that BPA is exempt from acquiring a FPA permit when BPA documents that its easements create federal ownership of the timber. As such, BPA will not be securing a FPA permit for this project. BPA will meet the applicable water quality standards for road construction.

Local Agencies

City of Seattle

Paul Schell, Mayor

Seattle Public Utilities
Diana Gale, Director

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-394
RECEIPT DATE: SEP 05 2001

September 4, 2001

Seattle Public Utilities
Dexter Horton Building, 10th Floor
710 Second Avenue
Seattle, Washington 98104

Lou Driessen, Project Manager
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

SUBJECT: Comments for the Draft Environmental Impact Statement (DEIS) for the Kangley-Echo Lake Transmission Project

Sent via e-mail to: comment@bpa.gov

Dear Mr. Driessen:

Seattle Public Utilities (SPU) is responsible for providing drinking water to 1.3 million customers in the urbanized areas of western King County and southern portion of Snohomish County. SPU takes approximately two-thirds of its drinking water from the Cedar River. SPU owns the 90,546-acre Cedar River Municipal Watershed (CRW) and manages its land and aquatic resources for water supply, the protection and restoration of fish and wildlife habitat, and the protection of cultural resources. SPU's companion utility, Seattle City Light, owns and operates a hydroelectric facility and associated transmission lines in the watershed. City Light will provide comments on the DEIS under separate cover.

This letter provides Seattle Public Utilities' (SPU) comments on the Draft EIS for the Kangley-Echo Lake Transmission Project. SPU provided comments during the scoping for this project in letters to BPA dated April 28 and October 2, 2000. Because the DEIS fails to address SPU's scoping comments, these are repeated in the appropriate sections of this letter. All of SPU's comments should be understood in the proper context: the CRW is a unique and vital resource for the citizens of Seattle and the region. This area is currently being managed to protect a safe, unfiltered source of drinking water and to protect numerous wildlife species and their habitat.

394-001 SPU considers this DEIS to be inadequate because it: 1) contains significant NEPA-procedural deficiencies, including what appears to be a lack of full-disclosure of environmental impacts; 2) fails to include important Endangered Species Act (ESA)-related analysis, coordination, and mitigation; 3) lacks commitments to compensatory mitigation; 4) fails to acknowledge the unique long-term habitat protection status provided by the HCP and to recognize the increasing regional biodiversity value of the habitats it proposes to impact; and 5) fails to appropriately acknowledge the significance of the CRW as the water

We are the source: Setting the standard for excellence in watershed stewardship

Watershed Management Division, 19901 Cedar Falls Rd. S.E., North Bend, WA, 98045
Tel: (206) 233-1510, Fax: (206) 233-1527
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394-001 BPA acknowledged these concerns and prepared a SDEIS, which was released in January 2003.

supply for 1.3 million people. We request that BPA issue a Supplemental DEIS (along with the associated public comment period) that corrects these serious flaws, clearly and accurately assesses the true environmental impacts of this project, and is compliant with NEPA regulations and guidance.

SPU has the following comments on the DEIS. Five separate attachments to this cover letter are included in this submittal. The first attachment contains general comments on the DEIS followed by specific comments on the DEIS. Each of the subsequent four attachments provide comments on each of the four BPA DEIS technical appendices (A, Fisheries; B, Wildlife; C, Vegetation; and D, Wetlands). Because the DEIS is largely a distillation of its technical appendices, SPU's comments on the technical appendices will also apply to the DEIS. In addition, there is much boilerplated text used in the DEIS and its appendices. To minimize redundancy, SPU has attempted to comment only once in such cases, but those comments would apply to other documents for which the comments are relevant.

If you have questions or require further information, please contact Jim Erckmann at (206) 233-1512 or Clay Antieau at (206) 233-3711. Regarding cultural resources, please contact SPU's staff archaeologist, Tom Minichillo at (206) 233-0032.

Sincerely,

SIGNATURE

Suzanne Flagor
Director
Watershed Management Division
Seattle Public Utilities

Attachments:
1) SPU comments on BPA DEIS
2) SPU comments on BPA DEIS Appendix A (Fisheries)
3) SPU comments on BPA DEIS Appendix B (Wildlife)
4) SPU comments on BPA DEIS Appendix C (Vegetation)
5) SPU comments on BPA DEIS Appendix D (Wetlands)

cc: Dennis Anderson, Muckleshoot Indian Tribe
Maria Cantwell, U.S. Senate
Craig Hansen, USFWS
Hardev Juj, Seattle City Light
Steve Landino, NMFS
Patty Murray, U.S. Senate
Seattle Mayor Paul Schell
King County Executive Ron Sims
Val Varney, EPA

Kangley-Echo Lake Transmission Line Project DEIS

Seattle Public Utilities' Response
August 30, 2001

GENERAL COMMENTS (GC)

GC-1: The "purpose and need" for the proposed project is neither substantiated nor clearly defined.

394-002 There is no explanation of the electrical transmission system serving the King County area that supports the necessity of the proposed line. Instead, the DEIS asserts without substantiation that this specific line is necessary to maintain system reliability. At a minimum, system plans or a regional analysis should be referenced, along with a description of other improvements BPA is considering in the near and distant future so the reader can understand why this specific (and relatively small) link in a much larger system is necessary. In SPU's conversations with BPA staff, it has also been unclear if the need to construct a redundant transmission line for system reliability and the relative location of that line are legal requirements or policy choices. The legal and policy contexts of the project should be clearly distinguished in the DEIS.

394-003 Furthermore, the "purpose and need" is the basis for defining alternatives. NEPA only requires that reasonable alternatives be considered. "Reasonable alternatives," however, include those alternatives that can meet the objectives (as defined by the purpose and need) of the proposal. Without a clearly defined purpose and need, the range of reasonable alternatives is very large–much larger than the range of alternatives considered in the DEIS (see General Comment 2, below).

GC-2: The range of alternatives evaluated in detail is too narrow.

394-004 The DEIS does not provide sufficient analysis of alternatives outside of the Cedar River Watershed to support their elimination without detailed evaluation. The DEIS cites impacts to "developed land and people living in the area." The potential for these impacts is obvious, but without further explanation there is no support for dismissing these alternatives just because they would have impacts. All of the alternatives included in the DEIS also have impacts, and yet they were not dropped from consideration. Without criteria and explanation, there is no justification for dropping certain alternatives and narrowly limiting the range of alternatives considered in the DEIS. The DEIS should evaluate the range of reasonable alternatives. This type of comparison of alternatives and impacts to the built and natural environments is precisely what an EIS is supposed to provide. Dropping certain alternatives due to cost concerns needs to be supported by detailed cost justifications presented in the DEIS.

394-005 Further, NEPA requires that federal agencies consider alternatives that can accomplish the objectives of the proposal, but at a lower environmental cost. This includes considering mitigation measures that could avoid or reduce impacts of the proposed action. The DEIS is silent on the most common types of mitigation measures that could address some of the high and significant impacts that would result from the proposed action (see General Comment 9).

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Watershed Management Division, 19901 Cedar Falls Rd. S.E., North Bend, WA, 98045
Tel: (206) 233-1510, Fax: (206) 233-1527
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394-002 BPA performed a regional system analysis that supported the need for the project. This joint study was coordinated with Seattle City Light, Snohomish County PUD, Tacoma City Light and Puget Sound Energy. BPA also received letters of support stating the project is the right choice from Seattle City Light, Tacoma City Light and Snohomish County PUD. The technical studies that are part of the analysis include computer simulations of projected power flow. (See SDEIS Appendix H, available on request.) The DEIS did contain the salient issues with regard to why this project is needed.

Other improvements BPA is considering in the area are: a new 230/500-kV transformer at Sno King Substation; and system additions at Bothell, Monroe, Sno King and Snohomish substations. In addition, the need for a 500-kV transmission line from Echo Lake Substation north to Monroe Substation is being studied. No decision about this project has been made. These projects are proposed in response to growing Puget Sound area load and the Treaty return to Canada. Also see Section 1.2.1 and Appendix M of the SDEIS and the response to Comment 1942-006.

394-003 The description of the purpose and need for the project is greatly expanded in Chapter 1 of the SDEIS.

394-004 See response to Comment 411-006.

394-005 Comment noted.

BPA Kangley—Echo Lake DEIS
September 4, 2001
Page 2

GC-3: The description of alternatives is insufficient to support evaluation of impacts or mitigation measures.

394-006 Several key aspects of the proposed transmission line are not described in sufficient detail to support an evaluation of impacts, even though these details may have been known at the time of the issuance of the DEIS (as evidenced by the issuance of BPA's Final Biological Assessment for this project during the public comment period for the DEIS). For example, the DEIS description of clearing requirements, tower locations, and access roads is general and vague. This information is critical to understanding potential impacts because in many aspects the alternatives are reported to have very similar impacts. For example, the difference in vegetation affected by the alternatives 1 and 2 is less than two percent. Given the uncertainty regarding the project, the difference may or may not actually exist. The importance of clearing is supported by the DEIS, which describes removal of trees on the Cedar River as "high" impact (p. 4-36).

Failure to adequately describe the project compounds the vagueness of proposed mitigation measures, making it impossible to evaluate the effectiveness of mitigation. The net result is a level of uncertainty of the proposal's impacts that significantly reduces the usefulness of the DEIS to reviewers and decision-makers. The fact that specific, known design information for the proposed action was omitted from the DEIS indicates this DEIS does not fully disclose environmental impacts. The fact that BPA issued a Final Biological Assessment (BA) for this project during the public comment period for the DEIS indicates that BPA failed to provide full-disclosure of project impacts. The BA contains specific, known design information (for the proposed action) that is not included in the DEIS. SPU does not expect a proposed action to be fully designed for purposes of environmental impact assessment. However an EIS either needs to commit to specific project details or evaluate all reasonable approaches to those components of the proposed action.

The landowner most affected by this project is the City of Seattle, and the impacts of the project are potentially greatest and certainly most complex for the Cedar River Municipal Watershed (CRW), especially considering 1) the area is the region's major drinking water supply, and 2) the land is being managed under a complex Habitat Conservation Plan (HCP) and associated legal commitments to the federal government. However, BPA's proposed actions and their impacts are described so minimally that it is not possible for the City or the public to evaluate project impacts. Simply stated, the DEIS does not fully disclose environmental impacts. In addition, the DEIS contains numerous inconsistencies among analysis assumptions, as described elsewhere in this comment letter. The reader is not able to effectively evaluate impacts of the proposed actions for all disciplines because sufficient project information is missing, the DEIS contains conflicting analysis assumptions, and BPA does not commit to specific design/construction specifications.

GC-4: Specific information related to project impacts will only be provided in the Final EIS and therefore not subject to public review and comment.

394-007 Information on clearing requirements in the CRW (p. 2-6) and access roads (p. 2-7) is not provided in the DEIS, but instead notes the information will be available for the Final EIS. This information is critical to evaluating project impacts and mitigation measures and therefore should be provided as part of the DEIS. Also, the DEIS does not describe tower locations, which would have substantial impacts. Again, the fact that specific, known design information for the Proposed Alternative was omitted from the DEIS indicates this DEIS does not fully disclose environmental impacts. Again, the Final BA for this project contains specific, known design information (for the proposed action) that is not included in the DEIS. The fact that specific, known design information for the proposed action was omitted from the DEIS indicates this DEIS does not fully disclose environmental impacts. The fact that BPA issued a Final BA

394-006 Comment noted. Information that has become available since the DEIS was published was included in the SDEIS. The Proposed Action is described in more detail in Section 2.1 of the SDEIS, including a variety of mitigation measures. Design information used for the biological assessment was not available when the DEIS was being produced. BPA typically uses site-specific information and information gained from past transmission line development to estimate and fully disclose potential impacts.

394-007 Please see response to Comment 394-006.

394-008 BPA has submitted a consistency determination under the Coastal Zone Management Act to the Washington Department of Ecology. The Department of Ecology concurred with BPA's determination that the proposed project was consistent with the Coastal Zone Management Act. See Section 5.11.2 and Appendix V of the SDEIS.

394-009 BPA intends to provide compensatory mitigation for project impacts, including permanent protection of adjoining lands. Please see response to Comment 340-002. The USFWS and NMFS have assessed the proposed project's impacts on the HCP and have concluded that the HCP will retain its value and function (see Appendix U and Appendix AA of the FEIS).

394-010 On March 16, 2001, BPA met with representatives of federal agencies with ESA jurisdiction (USFWS and NMFS) to discuss the purpose and need for the project, alternatives considered, potential impacts and NEPA and HCP processes. A SPU representative was present at this meeting. BPA prepared a biological assessment to evaluate the potential effects of the Proposed Action on listed and candidate threatened and endangered species, and designated or proposed critical habitat. The BA was prepared pursuant to the final rules for interagency cooperation under the Endangered species Act (ESA) (50 CFR 402.12; June 3, 1986). BPA initiated formal consultation with the USFWS on the northern spotted owl. NMFS has concurred with BPA's determination that there will not be any adverse impacts to federally-listed anadromous fish (see Appendix U of the SDEIS and FEIS).

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for this project during the public comment period for the DEIS suggests BPA could have provided more complete disclosure of project impacts.

GC-5: The DEIS does not discuss consistency with federal, state, and local regulations and policies.

394-008 NEPA regulations require that an EIS discuss possible conflicts between the proposed action and the objectives of federal, state, and local land use plans, policies and controls. Where inconsistency exists (as for example regarding King County's sensitive areas and Shoreline Management provisions), the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law [40 CFR 1506.2(d)].

394-009 In its scoping letter, SPU identified the need for BPA to address effects of the project on the federally sanctioned and approved HCP. BPA indicates that USFWS [and NMFS] will have to "decide if the transmission line facilities require any change to the existing Habitat Conservation Plan…." The DEIS does not discuss the proposed action's impacts on the CRW HCP. SPU is stating its position clearly: 1) SPU will not accept any need to modify the HCP as a consequence of BPA's activities; and 2) BPA must provide mitigation for any impacts that reduce the conservation value of the City's HCP that, at a minimum, compensates for that reduction in value.

394-010 BPA also failed to coordinate with federal agencies on Endangered Species Act prior to releasing the DEIS. The DEIS fails to fully assess impacts on endangered and threatened species such as Chinook salmon, coho salmon, and marbled murrelet (see specific comments elsewhere in this comment letter).

GC-6: The DEIS does not disclose whether or not impacts are significant.

394-011 The DEIS is largely silent regarding any determination of the significance of impacts. The DEIS uses the terms "low, medium, and high" to describe impacts. This assists making relative comparisons among the alternatives considered, but it avoids identifying whether or not these impacts are "significant." Based on the NEPA regulations definition of "significant," many of the impacts identified in the DEIS would qualify. However, the DEIS fails to disclose this information. Thus, the public and other agencies, as well as decision-makers, do not have adequate information to review. Because of the importance of "significant impacts" in the NEPA process, failure to disclose this information undermines the very intent of NEPA itself.

GC-7: The DEIS fails to discuss the Decision-making Process

394-012 The DEIS says very little about the decision-making process regarding this proposed action. It says almost nothing about the decision BPA has already made regarding narrowing the range of alternatives and the currently preferred alternative (including who made these decisions, when, how, and why). This is important because NEPA regulations prohibit federal agencies from limiting the choice of reasonable alternatives until a Record of Decision (ROD) has been issued [40 CFR 1506.1(a)]. The fact that specific, known design information for the Proposed Alternative has been developed (and was omitted from the DEIS) suggests that BPA has limited the choice of reasonable alternatives prior to the ROD, and indicates this DEIS does not fully disclose environmental impacts.

394-013 The DEIS also says very little about the remainder of the process. What happens after the DEIS, and what criteria will be used? For example, will BPA confirm a preferred alternative after the DEIS? Will all of the alternatives be reviewed in greater detail in the FEIS, or will it just cover the preferred alternative? When will BPA take final action? How will that decision be made?

394-011 BPA believes that presenting the extent of the potential impacts in four defined impact levels (no impacts, low impacts, moderate impacts, and high impacts) provides helpful information to the reader and the decision maker since each level is defined and specific to the resource impacted. Readers are then able to evaluate the "significance" of the impact based on the potential change to the resource.

394-012 Please see responses to Comments 411-006 and 394-006. The expanded range of alternatives in the SDEIS allows BPA to determine which course of action best meets the purpose and need described in the SDEIS. The fact that BPA chose to more fully analyze additional alternatives shows that BPA has not limited the choice of reasonable alternatives prior to the Record of Decision.

394-013 BPA disclosed its preferred alternative in the SDEIS and has included more information on the various alternatives. Alternative 1 remains BPA's preferred alternative. BPA's Administrator will make a decision on this project using the information developed during the NEPA process. The Administrator will make a final decision in a Record of Decision at least 30 days after the publication of this FEIS, as required by Council on Environmental Quality regulations. If the Administrator decides on one of the action alternatives, BPA would initiate action after the Record of Decision is signed and after all required permits and other legal obligations are met.

394-014 It was BPA's intention to respond to all scoping comments in the DEIS. Many of the comment examples raised have been addressed in more detail in the SDEIS. Please see responses to individual comments from letter 394 to determine how and where additional information on specific issues raised during scoping were addressed in the SDEIS.

394-015 Mitigation will be addressed in the appropriate detail in the Mitigation Action Plan to be prepared for this project, and in association with permitting discussions with the appropriate federal, state, and local regulatory agencies.

BPA has purchased land that could replace that lost within the Cedar River Watershed and is in the process of purchasing more

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GC-8: Scoping comments from the City of Seattle were not addressed in the DEIS.

394-014 Scoping letters from SPU and SCL (October 2, 2000) raised several specific points that are not addressed in the DEIS. These issues include the purpose and need for the project, alternatives outside of the CRW, effects on the drinking water supply during construction, and effects of the proposed transmission line on the HCP, among others. Such omission is contrary to CEQ guidance that states "Every issue that is raised as a priority matter during scoping should be addressed in some manner in the EIS, either by in-depth analysis, or at least a short explanation showing that the issue was examined, but not considered significant for one or more reasons" (CEQ 1981).

GC-9: The DEIS lacks mitigation for unavoidable impacts.

394-015 "Mitigation measures" cited in the DEIS are actually standard best management practices (BMPs) and not really project mitigation measures. That is, they do not offset, reverse, or rectify the impacts of constructing the proposed action. Mitigation measures cited in the DEIS never include proposed compensatory mitigation. If "maintaining environmental quality" (p. S-2) was, in fact, one of BPA's purposes in developing this project, then compensatory mitigation would have been integral to that purpose. For example, although the DEIS states that impacts on ESA-listed species of fish are "high," BPA fails to commit to any mitigation that would offset those impacts.

GC-10: Although impacts to cultural resources could be substantial, the DEIS describes no mitigation.

394-016 Some areas in the project area and within the CRW have a high likelihood of containing cultural resources or Traditional Cultural Properties, and thus potential for significant impacts. The DEIS omits specific results of archaeological and CMT surveys that have been conducted for this project. Survey results should have been considered in the DEIS. The technical report for this discipline should have been included in the DEIS. The DEIS should have included proposed mitigation actions for any identified sites (if any). Also, the DEIS should recognize that SPU has archaeological standards for the CRW that need to be (and were) followed.

394-017 The DEIS's assertion that impacts will be "low" for the proposed action are unsupported by the existence of substantial uncertainty regarding impacts on archaeological resources or Traditional Cultural Properties, for which no assessment has been completed. Given the location of the project, these impacts could be significant. The DEIS should explain this uncertainty, qualify the description of impacts, and provide the needed information for public review.

GC-11: The DEIS does not address regulatory requirements related to drinking water.

394-018 In general, the DEIS seems to largely ignore the fact that the Cedar River Watershed is a high quality, unfiltered source of water for 1.3 million people in the Puget Sound region. A casual reader would obtain the impression the CRW is primarily a nature reserve, with a secondary, incidental role as a municipal water supply source.

394-019 The DEIS fails to adequately describe potential impacts to the drinking water supply for 1.3 million people. Incidents such as turbidity plumes and diversion shut-downs are critical and significant events in the management of SPU's water supply systems in the CRW. The DEIS needs to address the regulatory requirements related to drinking water and the potential environmental impacts of their proposed action on the drinking water supply.

for the purpose of compensatory mitigation. Please see response to Comment 340-002.

394-016 Comment noted. The DEIS omitted the results of the cultural resource survey since the survey had not yet been completed at the time the DEIS was released. HRA performed a thorough survey of the preferred route and located a logging feature and a trench feature, neither of which appears to be eligible for the National Register of Historic Places. The contractor conducted further work at the trench feature, at the request of OAHP and the Muckleshoot Tribe. SPU protocols for cultural surveys were followed. Appendix X has standards of protection required for any new finds during construction.

394-017 The statement that impact to cultural resources is expected to be low was based on a sensitivity study of the project (DeBoer 2000). The ***Draft Cultural Resource Survey Technical Report*** (Bialas 2001), based on an intensive survey with subsurface testing, located only two cultural resources and determined both as not eligible for listing in the National Register of Historic Places.

394-018 Additional information regarding the Cedar River Watershed and its importance as a source of drinking water was included in the SDEIS.

394-019 Additional information regarding the Cedar River Watershed and the potential impacts of the proposed project to the drinking water supply was included in the SDEIS.

394-020 BPA created an extensive mailing list based on the mailing list developed for the Cedar River Watershed HCP. The purpose of the mailing list was to identify elected officials and individuals and groups who could be affected by the project. The mailing list included local, state and federally elected officials, tribes, environmental groups, landowners and others.

394-021 Please see response to Comment 382-011.

394-022 Use of existing crossings of major rivers and streams is proposed as follows:

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394-020 GC-12: BPA failed to provide public notice to that group of citizens most affected by the proposed action: the people who rely on the CRW for their drinking water.

Public notices and public meetings related to the NEPA scoping and DEIS comment periods have not been directed to the most affected group of citizens: the 1.3 million people who rely on the CRW for their drinking water. This is a violation of NEPA guidance and regulation.

SPECIFIC TECHNICAL COMMENTS ON THE DEIS

NOTE: Regarding the remaining comments in this comment letter and its attachments, SPU does not expect a proposed action to be fully designed for purposes of environmental impact assessment. However an EIS either needs to commit to specific project details or evaluate all reasonable approaches to those components of the proposed action.

SUMMARY

394-021 S.2.1.3 The DEIS is not clear why all "woody vegetation" would need to be cleared on the ROW. Also, failing to estimate the area of clearing outside the new (150-ft) ROW results in an understatement of impacts. The DEIS is also inconsistent as to the clearing zone width, as described elsewhere in SPU's comment letter. Further, in conversations with SPU, BPA said they would need to clear an average of 200 ft.

S2.1.5 See comment below under 2.1.1.8.

394-022 S2.1.4 BPA says that new roads may cross rivers and streams, but that no new bridges will be built. If a road crosses a river, a bridge would be required. For SPU and the public to evaluate potential impacts, BPA must specify which rivers and streams will be crossed and what type of structure will be constructed at each crossing.

394-023 S3.8 The DEIS consistently fails to clarify potential for impacts from vegetation clearing outside the 150 ft ROW.

394-024 S3.10.1 The DEIS should state explicitly that some of the areas in the project area and in the CRW have a high likelihood of containing cultural resources or Traditional Cultural Properties and thus a strong potential for significant impacts.

394-025 S.4.2 Transportation impacts should include the impacts of hauling timber and moving equipment and materials to and from the project area, unless those impacts are clearly addressed elsewhere, which does not seem to be the case.

394-026 S.4.6 In its DEIS scoping letter, SPU identified the need for BPA to address effects of the project on the drinking water supply. The DEIS fails to adequately discuss the risks to the drinking water supply during project construction for any of the alternatives. These risks include the risk of spills that could contaminate the water and the risk of turbidity events that could have very serious regulatory and public health consequences for SPU.

394-027 Also, the DEIS neglects to reveal potentially significant impacts on water temperature, which is inconsistent with the conclusion on page 4-30 that impacts on listed fish species would be "high" a result, in part, of unavoidable, increased water temperature in streams and wetlands.

- Rock Creek — existing county road crossing and BPA access road.
- Raging River — no access road crossings.

One temporary bridge may be needed for construction. No water-crossing culverts need to be replaced or installed for construction. BPA is in the process of pursuing permits for replacing some existing culverts to allow for fish passage. See Section 2.1.1.5 of the SDEIS.

394-023 The DEIS does clarify potential for impacts from vegetation clearing both within the 150-foot ROW and outside. In many cases, however, this is classified as vegetation clearing and not specific to whether that clearing is inside or outside the ROW. The clearing of vegetation, no matter where it occurred, would have similar impacts.

394-024 Please see response to Comment 394-017.

394-025 Construction equipment and log trucks would need to be brought into the project area, if a decision were made to build the project. These vehicles would operate under the weight requirements as identified by the State of Washington, and if those weight limitations would be exceeded, permits would need to be obtained prior to any work being undertaken.

394-026 Vehicles and other construction equipment that use diesel, gasoline and/or hydraulic systems would be used to construct the project. In addition, maintenance and refueling of the equipment would be required. Oil or fuel spills could impact the Cedar River water quality. However, substantial construction activities, such as tower placement or road construction, would not be in proximity to water bodies such that a spill, which would involve a relatively small volume (such as from a hydraulic hose breaking) would impact the water supply. A detailed Stormwater and Pollution Prevention Plan (SWPP), or similar document, such as a Water Quality Control Plan (WQCP), would include a Spill Prevention and Contingency Plan. These plans would be prepared and approved by regulating agencies, including Seattle Public Utilities (SPU) and the Washington State Department of Health (DOH) prior to project construction. BPA would also hire an

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394-028 S.4.10 The area to be cleared for the stated 150 ft ROW should be about 160 acres (for the 9-mile length), not counting trees cleared beyond the ROW, yet BPA states that 152 acres will be cleared. BPA indicates on page 2-5 that trees may be cut as far as 200 ft from the edge of the ROW. Further, BPA has informed SPU that an average of 200 ft will be cleared for the proposed action. The DEIS fails to reveal the actual amount of clearing that will occur for the project. Also, the DEIS mentions that a high impact from noxious weeds could be mitigated, but does not indicate how this will be done.

394-029 S.4.11 The DEIS concludes that impacts to wetlands would be moderate to low and that impacts to forested wetlands would be moderate are not supported. SPU disagrees. Clearing vegetation and operating equipment in wetlands will produce significant and unavoidable impacts, and clearing trees in a forested wetland destroys its normal ecological functioning. Furthermore, the DEIS proposes no compensatory mitigation, which violates the intent of state and local sensitive areas provisions (such as the King County Sensitive Areas Ordinance). The DEIS needs to correctly state that impacts to wetland resources will be significant.

394-030 S.4.16 The DEIS fails to identify potentially significant impacts on public health as a result of potential effects on the drinking water supply during construction and operation (see comments on S.4.6 above, and elsewhere in this comment letter).

PURPOSE AND NEED (Chapter 1)

394-031 *1.1 Paragraph 2: "Anticipated peak use could now exceed existing system capacity as soon as the winter of 2002-2003."*

1.3 "... a new 500-kV transmission line and other transmission equipment would be required by the 2002-2003 winter season...."

These and other statements are not substantiated by citation of data, studies, or other information. The DEIS needs to explicitly provide or cite the data and assumptions on which these claims are based.

PROPOSED ACTION AND ALTERNATIVES (Chapter 2)

394-032 Route variations described in this section warrant a detailed discussion in terms of how BPA intends to use these variations to address short-, medium-, and long-term regional power transmission needs. For example, if BPA plans to build a new 50-kV line from Stampede Pass in the future (which could serve the subject project's present-day purpose and need), the cost savings of doing so now may negate the simplistic current-dollar cost difference between that variation and the Proposed Action. In this regard, the DEIS needs to present a complete cost justification (which would include cost analyses of BPA's future transmission line projects) if cost is the main justification for distinguishing among alternatives. Such analyses should include full consideration of opportunity costs and the inflated costs of building these variations in the future. In addition, it appears BPA does not include all foreseeable or projected costs in their cost estimate of the proposed action, which biases their cost comparisons among possible alternatives. Not all project planning costs are included in this analysis, nor are costs for adequate mitigation of unavoidable adverse impacts from the proposed action. For example, there is no discussion of the nature or cost of the mitigation for stormwater runoff quality or quantity that federal agencies would likely require (under regional implementation of the ESA) for the 1.5+ mile of new impervious road surfaces BPA is proposing.

independent inspector with stop-work authority to monitor ongoing construction activities. Logging activities, which include the use of log trucks, yarding towers, and ground-based yarding equipment, have previously been allowed within portions of the Cedar River Watershed. In addition, SPU maintenance vehicles also operate within the Watershed. If SPU maintains a WQCP and/or SWPPP or similar plan regarding contingencies for spills within the Watershed, including their prevention and response, the BPA's SWPPP for the proposed project would include similar contingencies.

No substantial earth-disturbing construction projects, such as road building or tower construction, are anticipated immediately adjacent to or near water bodies that drain into the Cedar River drinking water supply. Clearing of most timber within the ROW will be required. Riparian areas would be spanned, however, some clearing would be required in riparian areas. Much of the proposed alignment is along low- to moderate-sloping ground and in soils that have a low susceptibility to surface erosion, such that there is a low potential for project-related mass wasting events and soil erosion; hence, a low probability of impacts to drinking water supplies. An Erosion and Sediment Control Plan (ESCP), or similar document, such as a WQCP, will be prepared and approved by the regulating agencies prior to project construction. The ESCP will include Best Management Practices (BMPs) that will be implemented as needed to reduce the potential for turbidity events. Where the project crosses steeper ground and/or more sensitive soils, more strict BMPs, including seasonal work restrictions and sediment barriers, can be implemented.

394-027 Section 3.4 of the revised Fisheries Technical Report (Appendix A) discusses the role of shade as a control on stream temperature in the streams that would be affected. Section 4.6.2.1 of the SDEIS discusses how stream temperature would likely be affected by construction of the transmission line. Likely effects on stream temperature are also discussed in the biological assessment for the proposed transmission line.

394-028 The length of the preferred route is just a little less than the stated 9 miles thus accounting for the 152 acres stated in the DEIS. Please see responses to Comments 366-002, 382-011 and 394-108.

2.1.1.1 Transmission Structures

394-033 To minimize impacts of tower construction, the DEIS should commit to using helicopters to the extent possible for delivering and assembling the towers.

2.1.1.4 Right-of-way Clearing

...danger trees could be taken as far as 200 ft from the ROW....

394-034 This is not consistent with Table 2-1 (page 2-6), which indicates clearing distances of 153 ft (horizontal distance) and 163 ft (slope distance) from the edge of the 150 ft ROW. Also, there is no mention of the temporary 50 ft construction easement BPA previously mentioned in conversations with SPU. The DEIS, its technical appendices, and associated permitting documents need to present a complete, accurate, and consistent description of the proposed action and its environmental impacts.

394-035 Also, based on Table 2-1, BPA would clear an additional 90 ft beyond the 150 ft ROW where trees are about 120 ft tall (as in the CRW). This calculation indicates that the DEIS significantly underestimates the acreage to be cleared. Apparently, 145 acres or more would be cleared in the CRW alone, making the total figure of 152 acres for the 9-mile ROW in the CRW impossibly low.

394-036 The DEIS refers to the possibility of developing and using different criteria for tree removal in the CRW that would reduce the number of trees to be removed, stating that the decision will be in the FEIS. The DEIS should provide information on those criteria for public comment prior to releasing the FEIS. The DEIS, its technical appendices, and associated permitting documents need to present a complete, accurate, and consistent description of the proposed action and its environmental impacts.

Also, see comments on S.4.10 above.

2.1.1.5 Access Roads

394-037 The DEIS fails to present sufficiently detailed road plans or data, making evaluation of the DEIS impossible. If such data are expected to be included in the FEIS, they should have been included in the DEIS.

"A disturbance width of 20 feet was used to calculate disturbance acreages."

394-038 Also, this section indicates new road ROWs will be 50 ft and that disturbance widths between 36 and 40 feet will be routine. Disturbance acreages in the DEIS should have been calculated using accurate and worst-case widths (i.e., 40 ft for temporary and permanent roads within and outside of the ROW, not 20 ft). Also, it is unclear from this discussion if impacts from temporary roads and permanent and temporary staging areas were considered in the analysis of impacts from access roads.

394-039 In addition, the DEIS fails to mention or assess new roads in the context of their being new impervious surfaces, which has important ESA implications. In fact, it is our understanding all new impervious surface (such as is proposed in the proposed action) inside the region of critical habitat for Chinook and coho is required to be mitigated for stormwater runoff quantity and stormwater runoff quality before the federal Services are able to consider a project such as this one to be in compliance with the ESA. The DEIS needs to discuss this situation and address the required and appropriate mitigation for new impervious surfaces, as mandated by the ESA and its regional implementation. The DEIS should assess the impacts caused by construction and operation of required mitigation facilities.

394-029 BPA disagrees that impacts would be greater than those stated in the EIS. Please see response to Comment 340-002 for information about mitigation.

394-030 BPA does not expect any major impacts to public health and the drinking water supply during construction and operation of the proposed project. Mitigation is proposed to reduce the risk of impacts. Impacts to surface water and ground water would be low.

394-031 The data used for these studies is a compilation of all customers load forecasts, the existing transmission system, expected generation condition forecasts and expected interchange of power among utilities. BPA prepares this study annually and it is also used by other Northwest utilities. For the particular study that led to this proposed project, in addition to the forecasts, these assumptions were used: extreme cold weather load in the Northwest (similar to the Arctic Express of 1989); all available thermal generation in the Puget Sound Area is running (at lower generation levels the project would be needed earlier) and Intalco Load on (Intalco presently holds a transmission contract with BPA to serve the smelter although the smelter is not currently operating. However, BPA has included the load in studies because the transmission capacity has to be available because the load could return at any time). At the time of the studies, the joint study utilities (Seattle City Light, Snohomish County PUD, Tacoma City Light and Puget Sound Energy) approved these assumptions. See Section 1.2.1 of the SDEIS.

394-032 Cost estimates have been expanded in the SDEIS. See Sections 2.1.4, 2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.2.5.12, 2.2.6.12, 2.2.7.12, and 2.2.8.12. The mitigation that would be included with each alternative and an estimate of the costs are included in these sections.

394-033 Helicopter construction techniques would be required for the proposed action if BPA decides to build a transmission line.

394-034 Table 2-1 has been expanded in the SDEIS to clarify the areas where full clearing is likely within the right-of-way, and where

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2.1.1.6 Stream Crossings

394-040 Omission of information here and in Section 4.6.2.2 renders evaluation of impacts resulting from new stream crossings impossible. This is a significant and fatal flaw in the DEIS. The DEIS should provide specific information on where new crossings will be constructed, what structures will be used, and how such construction could proceed.

2.1.1.8 Staging Areas

394-041 The DEIS refers to staging areas for construction, but does not specify where those might be located. Staging within the CRW would pose substantial risks to the drinking water supply and would have significant and complex impacts, and the magnitude and nature of those risks and impacts will depend on the location of those areas. To protect the municipal water supply, SPU has "no-tolerance" objectives for spills or leaks of hazardous materials in the CRW. Staging areas in the CRW are not consistent with these objectives.

It is unclear if the staging areas were considered in the analysis of impacts (such as the clearing analysis). The DEIS should be explicit if staging areas were included in the impact analyses.

2.1.4 Cost Estimate

394-042 The DEIS should include pertinent details of the cost estimates for the proposed project and all other alternatives (including those that were eliminated), particularly if costs were the basis for dropping certain alternatives. In addition, the DEIS should include citations of where fully detailed cost estimates and analyses may be obtained. All project alternatives (included those that were eliminated) need to be evaluated on the same projected cost bases.

2.3.2 Local Generation

394-043 The DEIS fails to mention several local hydroelectric projects that have recently connected to the power grid, or that are being built in partnership with Puget Sound Energy. These projects include Black Creek (rated 3700 kW at 1247 ft), Calligan Creek (rated 5500 kW at 1045 ft), and Hancock Creek (rated 6300 kW at 1129 ft). The DEIS needs to present a detailed discussion of how these power sources fit into regional power planning and how they were considered in the BPA decision-making process regarding the proposed project's purpose and need.

Table 2-2

394-044 SPU has the following comments on this table and related DEIS sections:

Land use: The DEIS neglects to mention effects on HCP.

Transportation: The DEIS should include discussion of access roads

Water quality: The DEIS neglects impacts during construction regarding drinking water supply (see comments above)

Fisheries: The DEIS should include assessment in Chapter 4 that impacts to listed fish species would be potentially high. Failing to mention this here fails full public disclosure.

partial clearing would be evaluated (the removal of danger trees). In the areas identified as partial clearing, the remaining trees will be protected as much as practicable. Figure 4 has also been added to the SDEIS to graphically show the difference between horizontal distance and slope distance. The range of clearing shown in Table 2-1 is an example based on the average height of trees given, of the distances from centerline to the furthermost tree to be cut as a danger tree. This is merely an example. There may be instances where the trees are taller than the average and individual trees could be removed at distances even farther than those listed in the table, but these instances would be few.

The 50-foot easement is a road easement. Please see response to Comment 382-009.

394-035 See response to Comment 394-034.

394-036 See response to Comment 340-004.

394-037 The description of the types of impacts that could be expected from constructing and maintaining access roads, and an approximation of their acreage were included, as that was the best available information BPA had in its possession. Information was updated in the SDEIS.

394-038 The 20-foot width was used for calculations because it would be closer to the average disturbed width. The 50-foot width is used for acquisition purposes outside of the purchased power line right-of-way. Many of the proposed access roads to be constructed are spur roads from existing power line or watershed system roads and would be short. This type of access road is not constructed to the same standard as a longer system access road. The road would be constructed using an in or out-slope type of design that does not require ditching. The typical disturbed width would be less than 20 feet.

Typically all temporary road and staging areas are re-vegetated. Staging areas were not included in the analysis.

394-039 BPA access roads are not impervious. While it is true that the roads have rocked surfaces, the surface is not impermeable.

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394-045 Wetlands: Impacts are much greater than stated, especially to extensive forested wetlands in the CRW.

Cultural Resources: Potential for impacts to archaeological resources or Traditional Cultural Properties are uncertain but could be substantial.

Public health and safety: The DEIS fails to mention potential public health issues associated with impacts on the drinking water supply during construction and operation.

CHAPTER 3—AFFECTED ENVIRONMENT
3.1 Land Use

394-046 The DEIS should disclose that land use impacts would be "high" in the CRW, as the proposed project would substantially reduce conservation measures in the City's HCP, which is a primary land-use commitment in the project area.

394-047 Also, the DEIS does not adequately describe project details for (and subsequently, potential impacts of) road construction and maintenance, rock source, and construction staging. Clearly, there will be impacts to the transportation system in the CRW; most CRW roads and transportation structures are not adequately constructed to carry large volumes of timber or construction equipment and materials. For example, the DEIS does not identify haul routes for rock or timber; rock source for roads; location of new access roads; location of upgrades to existing roads for bridge crossings, turning radii, width, slope (and other geometry), and surface; location of staging areas; and compensatory mitigation for unavoidable adverse impacts caused by these facilities and activities. The DEIS does not mention the new DNR rules for road BMPs. Also, the DEIS does not address who will bear the cost of on-going maintenance of new access roads and transportation structures (such as bridges and gates). Also, SPU has important safety concerns with drilling, shooting, and transport of explosives in the CRW; these proposed activities are not adequately described. The DEIS also fails to specify timber haul routes, yet selection of routes will have a major influence on the magnitude and nature of impacts both in the CRW (on habitats and species) and outside the CRW (on public roadways).

3.1.2 Cedar River Watershed

394-048 *"...Seattle owns title to all but a small portion of the Cedar River Watershed."*

This is stated ambiguously. The City of Seattle owns only that portion of the Cedar River watershed that lies upstream of Landsburg. The DEIS should state this unambiguously.

3.4.8 King County

394-049 The DEIS should acknowledge that the Taylor Mountain site (Manke Property) is used by hikers and equestrians.

NOTE: In general, most of the subsequent sections in Chapters 3 and 4 pertaining to fisheries, wildlife, vegetation, and wetlands were condensed versions of the text in the corresponding Technical Reports. Thus, all SPU comments on appendices A, B, C, and D (which see) can be considered to apply to sections in these Chapters as well. Statements from the DEIS are shown in

BPA roads are not constructed like the system roads within the CRW or tree farms in the region. Those roads are built to withstand heavy traffic while BPA access roads (unless they are to become part of a private ownership road system) are built for line construction then limited line maintenance. The roads are designed and constructed to a standard consistent with existing drainage design practices.

Existing standards are used to design erosion control measures and are employed as soon as construction begins. An erosion control plan is filed prior to start of construction.

394-040 At the time of publishing the DEIS, sufficient line design information was not available, i.e., tower locations. Some preliminary information was noted but site-specific data was not possible without the tower locations. All stream crossing information is now available and structure design has been completed. See response to Comment 394-022. The map presented in Figure 5 of the Wetlands Technical Report (revised Appendix D) shows where all the proposed towers and new roads would be located.

394-041 The location of staging areas are determined by BPA's construction contractors and are not known at this time. No staging areas will be allowed on the Cedar River Watershed. Staging areas were not included in the analysis because they will be chosen by the contractor, if a contract is awarded.

394-042 Overall cost estimates are included in the SDEIS for each alternative. The costs are based on "typical per unit" costs. Those costs are modified with any additional information available. See response to Comment 394-032.

394-043 In total these three hydroelectric plants generate 15.5 MW maximum. The total Puget Sound area load in 2003 for extra heavy cold weather is about 10,000 MW. The three plants could serve only about 0.155 percent of the total area load or in other words could serve about 8 percent of one year's load growth. These are very small generators and as such are usually netted with load near the generator. Although the generators are rated for 15.5 MW, the actual generation available during extreme winter cold weather may be much

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italics. SPU comments are shown in normal font below the subject DEIS statement (if any). Typically, SPU's comments pertain only to those lands owned and managed by the City of Seattle within the project area.

3.6.3 Groundwater

394-050 The DEIS fails to mention the groundwater influence on the lower Cedar River mainstem and its relationship to the water supply system.

3.6.4 Water Quality

394-051 The DEIS fails to address the protection of drinking water. This section also seems to imply that, because there are currently no water quality problems in the Cedar River Watershed, that some degradation of the water quality would be acceptable. This is not correct. Also, the DEIS fails to mention that Washington State classifies the Cedar River above Landsburg as being in a special category where no waste discharges are permitted. The DEIS should correct these deficiencies.

394-052 BPA may not be aware of how the regulation of drinking water supplies has increased over the last few decades. The existing BPA transmission line through CRW was constructed at a time when regulation of drinking water supplies was much less strict. This is especially true of the regulation of supplies from unfiltered surface supplies, such as at CRW. Therefore, construction of the proposed action would occur in a much different regulatory environment than existed at the time the first line was constructed.

394-053 This regulatory environment results from the federal Safe Drinking Water Act and its amendments, and is defined by detailed regulations adopted by EPA and Washington Department of Health (WDOH). Supplies with unfiltered sources must show adequate source protection through development and implementation of a Watershed Control Program (WCP) that has been approved by WDOH. To remain compliant with WDOH regulations, the WCP would have to be modified to address the construction of the proposed action. On previous construction projects in the watershed, this has been accomplished through a Water Quality Control Plan (WQCP) specific to the project.

Development and implementation of an effective WQCP for a construction project of this magnitude is not a trivial matter. It must identify detailed management practices specific to the methods, materials, and equipment likely to be used on the project, and these practices must be integrated into the plans and specifications given to the construction contractor. The dispersed nature of the construction and its relative proximity to the intake make a WQCP critically important.

394-054 The DEIS should acknowledge and discuss this regulatory environment for the protection of drinking water supplies (including Safe Drinking Water Act and Surface Water Treatment Rule). A spill contingency plan is mentioned as mitigation for fisheries on page 4-34, but such plans must expressly deal with drinking water as well.

3.7 Fisheries

394-055 The DEIS incorrectly assumes that Chinook and coho salmon will not likely be present for any of the alternatives. The Cedar River will have Chinook salmon in the future. Coho salmon are likely to be in Rock Creek in the future. The Cedar River and its tributaries in the project area are tributary to waters that do support Chinook and coho salmon. The DEIS should address this circumstance. The DEIS should also address potential impacts of permanent and temporary habitat modifications on federally listed fish species. Under the Endangered Species Act and Northwest Power Act, BPA has important

less due to freezing and reduced runoff due to the cold weather. These projects were not considered in the decision making process because there impact is minor.

394-044 and 394-045 Table 2-2 is a summary table of impacts. Table 2-2 was updated and incorporated into the SDEIS as Table 2-3. The DEIS and the SDEIS addressed these specific issues in more detail in their chapters on effects, Chapter 4.

See the list of issues and related comment numbers at the end of the chapter. This list includes comments and responses that address HCP impacts, access roads, water quality, fisheries, wetlands, and cultural resources. Additional information on fisheries is found in Appendices A, N and U of the SDEIS. Additional information for Appendix A is in the FEIS. Additional information about wetlands is in Appendix D (also revised for the FEIS), and Appendix Q of the SDEIS.

394-046 Comment noted.

394-047 At the time the DEIS was being assembled, BPA had not conducted a field review of the existing access road system including drainage structures. During the field review of the road system within the CRW, a review that included both previously-acquired system roads (roads for which BPA has acquired rights of use) and unspecified roads, road quality was evaluated. BPA concluded that with few exceptions the existing watershed system roads were capable of withstanding the travel of line construction vehicles because the roads were originally constructed for logging activities. In most cases rock depths exceeded 12 inches and all roads were ditched and drained and kept in good serviceable condition. The exceptions would be the weight limitation placed on the Cedar River Bridge east of the existing power line right-of-way and some "soft" spots on some roads that would require additional rock. Existing drainage structures were adequate; removing and or replacing them would only add to disturbance and siltation.

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394-056 responsibilities as part of the effort to protect, mitigate, and enhance regional salmon runs. However, it appears (as evidenced in the fisheries technical report and Section 2.1.15) this proposed action's adverse impacts on salmon and their habitats are not adequately mitigated. Also, the DEIS should discuss potential impacts to steelhead (an HCP species) beyond the very limited and inadequate discussion presented.

"The fish resources in the study area include resident and anadromous species."

394-057 This is a correct but imprecise statement. In the CRW, not all of the tributaries are inhabited by both resident and anadromous species. Also, neither the mainstem Cedar River nor its tributaries currently have anadromous species, but are expected to in coming years. Only basins or tributaries that do not contribute water to the water supply system currently are inhabited by anadromous species (e.g., Walsh Lake Drainage Basin).

Map 8 (and other if appropriate)

394-058 Upper Williams Creek and Steele Creek should be shown as potential anadromous fish habitat.

3.7.2.1 Proposed Action

"....cross nine fish-bearing (Type 1, 2, or 3) streams and an unknown number of non-fish-bearing (Type 4 or 5) streams."

394-059 Type 4 streams should no longer be considered non-fish-bearing unless extensive sampling has been conducted to determine if that is the case.

Segment C

394-060 The DEIS should include a discussion of steelhead trout at the end of this section along with Chinook and coho salmon.

Segment D

"...is used by cutthroat trout and, where it joins with the Walsh Lake diversion ditch,....."

394-061 This statement is incorrect and misleading. The Walsh Lake Diversion Ditch does not join Rock Creek except under emergency overflow conditions, which occur rarely during peak flow events. The relationship between Walsh Ditch and Rock Creek needs to be clarified in the DEIS; more detail for overflow conditions and operation needs to be presented in the DEIS.

"...the river and its floodplain are wide enough that the existing forest can provide only about 10 percent riparian shade, so that riparian shade is not a primary control on stream temperature in this reach." (page 3-23)

and

"...the river and its floodplain are wide enough that the existing forest can provide only about 20 percent riparian shade, so that riparian shade is not a primary control on stream temperature in this reach." (page 3-23)

BPA does not plan to construct any additional through access roads. While there will be new road construction, all roads within the CRW will be dead-ended. Most new roads will be short, accessing only one or two towers and most are being constructed because the existing route to travel along the existing right-of-way has been designated as a wetlands or wetlands buffer. Some existing routes would be closed and allowed to revegetate naturally. All material will move along designated routes approved and acquired if in private ownership by BPA. Movement of materials on public roadways is the responsibility of the construction contractor.

Rock sources have not been identified. Location and material acceptability are the responsibility of the contractor. BPA provides specifications only.

Staging areas are the responsibility of the contractor. BPA does acquire the main materials yard where steel and conductor may be picked up.

BPA bears all maintenance responsibility for roads and facilities it constructs whose sole function is construction and maintenance of the power line and right-of-way. If BPA acquires a right of easement along an existing road it will be responsible for maintenance during the construction period, and will pay for damage caused by BPA's use after construction. If BPA constructs a gate or installs a drainage structure along an existing privately owned road, BPA may accept full responsibility for maintenance of the unit depending on formal agreement with the fee owner of the property.

394-048 This sentence has been changed.

394-049 This information has been added.

394-050 In addition to surface water sources, water in the Cedar River, which provides drinking water to 1.3 million people, is also partially derived from groundwater sources. As such, contamination of the groundwater could impact the drinking water supplies. Project construction- and operation-related waste discharges, such as turbid water, spills, and project-related sanitation, would be strictly controlled. Construction and

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394-062 SPU disagrees with these unsupported statements. The DEIS should present data that support this contentions.

"Once passage around the Landsburg Diversion Dam has been established (scheduled for 2002 or 2003), it is likely..." (page 3-23 and 3-25)

394-063 This statement is incorrect. This reach will support anadromous fish now prevented from upstream migration by the Landsburg Diversion Dam, including Chinook and coho, and excepting sockeye. The environmental analysis in the DEIS needs to be based on correct assumptions.

3.7.2.3 Alternative 3

"...Taylor Creek is known to contain resident rainbow trout...."

394-064 SPU data indicate Taylor Creek has predominately cutthroat trout. Relatively small numbers of rainbow trout are also present.

3.8 Wildlife

394-065 The "project area" as defined in the DEIS is an area within 0.25 mile of the ROW. This is too small for the scale of home range sizes and dispersal capabilities of many wildlife species of concern (for example, spotted owl, pileated woodpecker, northern goshawk, marten, and fisher). Also, several wildlife species were eliminated from analysis because habitat is not currently present within 0.25 mile. This limit is arbitrary, especially considering the large home ranges of many species. The DEIS should be based on a wildlife analysis that uses larger areas such that wide-ranging species with large home ranges are included.

394-066 Also, the DEIS incorrectly states that marbled murrelet is not expected to occur in the project area. In fact, murrelets have been detected in the upper watershed, where they are possibly breeding. Murrelets are known to fly along major water courses (like the Cedar River) as they travel between marine feeding sites and their terrestrial nest sites. Murrelets can be expected to fly along the Cedar River—through the project area—to and from these areas. Thus, this species is at risk from additional power lines. The DEIS should address the impacts to this ESA-listed species.

3.8.2.1 Forest Community Dependent Species

"... merlins, pileated woodpeckers, and Vaux's swifts are also unlikely to nest within the project area (see Appendix B.)"

394-067 Pileated woodpeckers are known to forage regularly in the riparian zone of the Cedar River in the watershed. Suitable nesting habitat is also available in the riparian zone.

Table 3-7

394-068 Peregrine falcons nest in the Cedar River Watershed within approximately 5 miles of the proposed ROW corridor.

3.9.3 Vegetation Cover Types

operation of the proposed project should not result in a detectable degradation of the ground water quality. This information has been added to the SDEIS. See also Appendix Y.

394-051 Comment noted. This information is found in Section 3.6.4 of the SDEIS.

394-052 Comment noted. Every reasonable effort would be employed to avoid potential impacts from project construction and operation to the drinking water supplies.

394-053 BPA understands that this WQCP is an instrument used to modify the Watershed Control Program (WCP) that has been adopted by state and federal agencies to maintain the water quality in the Cedar River Watershed. BPA would work with the City to help prepare a modification to the WQCP.

394-054 If BPA decides to build a line, it would strive to meet the requirements of all regulations to maintain a clean and safe drinking water source. As previously stated, appropriate plans will be designed, approved and implemented to avoid impacts, such as spills and turbidity plumes, to the drinking water source.

394-055 and -056 Impacts to Chinook and coho salmon are addressed in Section 3.2.4 of the Fisheries Technical Report (Appendix A) and further detail is provided in the Biological Assessment for the proposed transmission line. The results of informal consultation with NOAA Fisheries on these species are described in Section 5.2 and Appendix U of the SDEIS. Appropriate compensatory mitigation for habitat impacts is planned. See response to Comment 340-002. Impacts to steelhead are discussed in Sections 3.0 and 4.0 of the Fisheries Technical Report.

394-057 Comment noted.

394-058 The distribution of streams providing potential anadromous fish habitat is based on maps presented in the Final Cedar River Watershed HCP (City of Seattle 2000).

394-059 Type 4 streams are defined as non-fish-bearing under the Washington Forest Practices Rules (WFPB 2000). The Final Cedar River Watershed HCP (City of Seattle 2000) does not identify any streams classified as Type 4 as being fish-bearing.

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3.9.4.1 Proposed Action

394-069 The DEIS needs to describe the age and size of affected trees in Cedar River riparian zone in the Watershed, especially the Sitka spruce and their history.

3.10.1 Regional Overview (wetlands)

"A total of 23 wetlands were identified within the ROWs of the alternatives." and "Wetland buffers were generally intact and forested."

394-070 These statements are misleading. Wetland buffers may be intact within the proposed ROW alternatives. In the existing ROW, wetland buffers are not "intact and forested."

"Wetland buffers provide....."

394-071 The DEIS needs to discuss the positive effects of intact stream and wetland buffers on water quality and the water supply, as well as a discussion of the positive effects of intact stream buffers on stream temperature, bank stability, etc., and the associated benefits for fish, amphibians, and other species.

CHAPTER 4—ENVIRONMENTAL CONSEQUENCES

4.4. Geology and Soils

394-072 DNR's Watershed Analysis procedures suggest that all alternatives go through High and Moderate Landslide Potential areas (for example, inner gorges). However, the DEIS contains no discussion about this or the ancient, deep-seated landslide in the Rock Creek/Steel Creek basins, or the project's potential for causing mass-wasting events and the associated catastrophic channel disturbances. The DEIS should include this. Also, the DEIS should include discussion or analysis of soil erodibility and soil erosion BMPs.

4.5.2 Water Quality

394-073 The DEIS fails to address the protection of drinking water. The DEIS should acknowledge this regulatory environment for the protection of drinking water supplies (see comments under Section 3.6.4). A spill contingency plan is mentioned as mitigation for fisheries on page 4-34, but such plans must expressly deal with drinking water as well.

"the City of Seattle and some surrounding water districts"

394-074 The DEIS should replace this phrase with "about 1.3 million people in the City of Seattle and 27 suburban cities and water districts."

4.5.2.1 Proposed Action

"...it is possible that surface water runoff containing fuel spills, herbicide runoff and other contaminants could reach the main stream..."

394-075 The DEIS mentions here the Proposed Action could result in herbicides entering the Cedar River. This is inconsistent with statements elsewhere in the DEIS that herbicides will not be used in the Cedar

394-060 This information has been added to the SDEIS.

394-061 The relationship between the two streams has been clarified in the SDEIS and the revised Fisheries Technical Report (Appendix A).

394-062 Methodology for analysis of riparian shade is based on that presented in revised Appendix D of the Watershed Analysis Manual, Version 4, published by the Washington Department of Natural Resources. Model predictions were further verified using program SSSHADE and SSTEMP (***Bartholow, J. 1989. Stream Segment Temperature Model (SSTEMP) Version 3.5. Temperature Model Technical Note # 2. Fort Collins, U.S. Fish and Wildlife Service***). These models show negligible temperature effects resulting from altering 10 percent shade cover on a 1,000-foot long stream reach. The data presented in the Fisheries Technical Report (revised Appendix A) support the report's conclusions. These findings are fully consistent with the most detailed analysis of the shade-temperature relationship yet performed for Washington Streams: ***Sullivan, K. J.; Tooley, J.; Doughty, K.; Caldwell, J. E. and Knudsen, P. A. 1990. Evaluation of prediction models and characterization of stream temperature regimes in Washington. TFW-WQ3-90-006. Timber Fish & Wildlife, Department of Natural Resources, Olympia, Washington***.

394-063 Comment noted.

394-064 This information has been included.

394-065 The project vicinity has been enlarged and is described along with the approach to addressing wildlife impacts in Section 3.8 of the SDEIS. In general, there are two levels at which wildlife habitat is discussed. The broad project vicinity is used to address issues related to wide-ranging species, migratory species, and species with large home ranges. The project area, defined as the area within 0.25 miles of the proposed project, is addressed in more detail because the potential impacts of the project would likely be focused within that area.

The list of species with federal or state protection status has been updated in Table 2 of the Wildlife Technical Report (Appendix

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394-076 Watershed. Also, to protect the municipal water supply, SPU has "no-tolerance" objectives for spills or leaks of hazardous materials in the CRW. The DEIS should indicate how all spills would be prevented in the CRW.

4.6 Fisheries

394-077 The DEIS needs to describe environmental impacts of long-term, repeated maintenance activities.

4.6.1 Impact Levels

"Construction, operation, and maintenance of transmission facilities could impact fish and their habitat as a result of:"

394-078 The DEIS should describe the effect of long-term and cumulative effects of maintenance activities (e.g., repeated vegetation clearing) on soil disturbance and stream temperature regimes.

4.6.2 Proposed Action

394-079 The DEIS should describe potentials for dispersal of non-native and noxious weed species.

4.6.2.1 Removal of Riparian Vegetation

"...Transmission towers are typically sited on higher ground, and they generally span drainages and associated riparian areas. This siting requirement would minimize potential impacts from riparian clearing because topography facilitates placement of structures that span drainages and increases the likelihood that conductors would be above many riparian areas and require only limited removal of danger trees. Construction of the transmission line, particularly clearing riparian vegetation, has the potential for high impacts on fish. However, BPA would prepare a clearing plan as part of the design of the project to minimize this impact. This plan would evaluate areas to be cleared and the permissible height of existing vegetation that could remain. BPA would site facilities to minimize clearing of riparian areas."

394-080 SPU believes these claims can not be made without knowing the specific tower locations and associated infrastructure. Also, this statement suggests very little clearing of riparian vegetation would occur, which is not consistent with the Fisheries Technical Report. According to that Technical Report, even the Cedar River may need riparian clearing. The DEIS needs to identify which stream crossings would span drainages and which would require vegetation removal. The DEIS, its technical appendices, and associated permitting documents need to present a complete, accurate, and consistent description of the proposed action.

4.6.2.1 Removal of Riparian Vegetation

"Construction of the transmission line,....."

394-081 SPU will require an approved vegetation removal plan for areas in the CRW. The DEIS and technical appendix should commit to ensuring all pertinent plans would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

Table 4-3

B). The decision to preclude species that were not expected to occur in the project area was based on the habitat requirements for the individual species. Species with large home ranges were excluded based on the lack of habitat within the boundaries described under project vicinity. Wording in Table 3 of Appendix B was changed to "not expected to occur in project vicinity" for these species. The remainder of the species in Table 3 are either habitat specialists or low mobility species and habitat for them does not occur in the project area or vicinity.

Potential impacts to species with large home ranges are discussed in general terms in Section 4.7.2 of the SDEIS and changes in the amount of habitat available for species in the project area are displayed in Table 4-10 of the SDEIS.

394-066 Comment noted. The project vicinity was enlarged in the SDEIS to include the upper watershed. Table 2 of the Wildlife Technical Report (Appendix B) lists marbled murrelet as "may occur in the project vicinity." The risk of bird collision with transmission lines is discussed in Section 4.7.2.4 of the SDEIS.

394-067 While signs of nesting activity were not observed during field reconnaissance surveys for this project, and the area does not meet the usual description of pileated woodpecker nesting habitat (as in Rodrick and Milner 1991), Section 4.1.2 of the Wildlife Technical Report (Appendix B) was revised to reflect the comment.

394-068 According to existing data sources (i.e., the Cedar River Watershed HCP [City of Seattle 2000] and the WDFW Priority Habitats and Species Database [WDFW 2000]) no peregrine falcon eyries occur in the Cedar River Watershed or in the project vicinity, as defined in the Wildlife Resources Report, Section 3.3.

394-069 This information was not provided in the Vegetation Technical Report (Appendix C) or the Wetlands Technical Report (revised Appendix D). However, we do not feel it is necessary to collect or present the information because it would not substantively contribute to the impact analysis, or the identification of potential significant impacts as required under the National Environmental Policy Act. Riparian vegetation at the Cedar

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394-082 Information from the HCP in this table is incorrect. Thus DEIS comments related to this table are also incorrect. The table appears to be based on the Draft HCP, not the final, but, even so, is simply wrong. For example, buffers are not an element of the Final HCP (2000). This table and any other references to the HCP should be revised, updated, and clarified throughout the DEIS and its technical appendices to reflect content of the final version of the HCP (2000).

"...features would be installed where needed in accordance with the Washington State Forest Practices Rules" (WSFPR)

394-083 SPU standards will be required if they exceed WSFPR. The DEIS and technical appendix should commit to ensuring all pertinent plans would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

4.6.2.2 Culvert Installation

394-084 SPU believes some culverts on BPA's access roads for the existing transmission line may be fish and flow passage barriers. The DEIS should disclose this situation, indicate which of those culverts are fish and flow passage barriers, and describe the methods BPA will use to correct these problem culverts as part of their construction of the proposed action. The DEIS and technical appendix should commit to ensuring all pertinent plans would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW. SPU standards will be required if these exceed WSFPR.

"....(as with a hung culvert)."

This statement should include "hung/perched" to describe a physical barrier.

"BPA would comply with guidelines for fish passage....."

394-085 SPU standards will be required if these exceed WSFPR. The DEIS and technical appendix should commit to ensuring all pertinent plans (such as all road and culvert-related plans) would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

"...and using effective sediment and erosion control methods."

394-086 The DEIS needs to specifically describe these methods.

4.6.2.6 Accidental Spills of Hazardous Materials

"BPA would prepare a Spill Prevention and Contingency Plan..."

394-087 Because of the potential effects on water quality and drinking water supply, any spill of hazardous materials in the CRW is not acceptable to SPU. The DEIS should include a discussion of how BPA proposes to avoid possibility of <u>any</u> spill. [SPU would require BPA to develop a project-specific Water Quality Control Program (WQCP) that will need to be approved by SPU and DOH.]

4.6.2.7 Species Listed and Proposed for Listing under the Endangered Species Act

*"The Proposed Action could potentially impact chinook salmon, bull trout, and coho salmon. ...The level of these potential impacts would be **high** for the following reasons. First, the loss of LWD recruitment would be permanent and would affect streams that, by and large, already contain insufficient LWD.*

River crossing will be minimally impacted by the construction of the new line. The line design includes taller, double-circuit towers on each side of the Cedar River. The tower design and location would reduce greatly the vegetation clearing required.

394-070 and -071 The discussion of wetland buffers within the Wetlands Technical Report (revised Appendix D) provides a brief overview of some of the functions provided by intact buffers. The purpose of this discussion is to outline general functional benefits from intact wetland buffers and not to detail the entire suite of buffer functions including benefits to water quality, water supply, stream temperature, bank stability, and the associated benefits for fish, amphibians, and other species. However, we do not feel it is necessary to collect or present additional information because it would not substantively contribute to the impact analysis, or the identification of potential impacts as required under the National Environmental Policy Act.

394-072 The DEIS did refer to the mapped, ancient deep-seated landslide which is on the southeastern flank of Brew Hill along the preferred Alternate 1 route (see Section 4.4.2). The DEIS also referred the reader to the technical appendix (Appendix F of the DEIS) for additional details regarding this landslide. The mapped, deep-seated landslide hazard along the Alternate 3 route in the Steele Creek basin is not referred to in the DEIS, but is discussed in the technical appendix. Evidence of recent or historical mass movement in these mapped, deep-seated landslide areas was not observed.

Several inner gorges are encountered along the alternative alignments where the alignments cross rivers or creeks. These areas are discussed as potential shallow landslide and soil erosion areas in the technical appendix. Roads and towers would not be placed on the steep slopes within these inner gorges. Instead, towers would be placed on the flatter slopes on either side of the gorges and the transmission lines would span these drainages. As a result, the potential for project-related landslides in these areas is remote.

Soil erosion is discussed in Section 4.4.1.1 of the SDEIS and in the technical appendix. Soil erosion BMPs are discussed in Section 4.4.2.1 of the SDEIS and in the technical appendix.

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Second, in view of the low project area elevation, potential thermal effects could harm fish by causing thermal stress during low flows. Third, there would be little opportunity to mitigate these impacts, although impacts would be less for some streams than for others because in some settings relatively little vegetation clearing would be required."

394-088 The DEIS concludes that the impacts are **high** but can not be mitigated. This is significant considering BPA's important responsibilities and commitments under the Endangered Species Act and Northwest Power Act to protect, mitigate, and enhance regional salmon runs. This conclusion also suggests the proposed action is unable to be compliant with the ESA and its regional implementation. The DEIS should disclose this situation and its associated consequences.

"... all streams in the project area are too warm to support bull trout spawning habitat."

394-089 The DEIS should provide data or appropriate reference to support this contention.

4.6.2.12 Cumulative Impacts

"Cumulative impacts on fish and other aquatic resources are those impacts that act not only on the local area where the impact occurs, but at every point downstream that is influenced by the impact."

394-090 This is an incorrect definition of cumulative impacts. The DEIS is describing indirect effects, not cumulative impacts. Cumulative effects are those effects from any number of sources within an area or watershed that are additive. One significant omission in this analysis, as mentioned in the review of the Fisheries Technical Report, is the lack of consideration of cumulative effects connected to the existing transmission ROW and the proposed ROW.

*"Fine Sediment Load —...The sensitivity of a watershed to the cumulative effects of additional sediment load depends on the distribution of resources sensitive to fine sediment inputs, such as spawning beds, as well as the quantity and location of fine sediment sources, soils, slopes, vegetation cover, and flow regime. If the Proposed Action were implemented, fine sediment production would continue to be **low**."*

394-091 In general, most of Chapters 3 and 4 pertaining to fisheries, wildlife, vegetation, and wetlands are condensed versions of the text in the corresponding technical reports. This DEIS statement is an example of how condensing material for the DEIS from the Fisheries Technical Report resulted in an inadequate discussion of the issue. The first sentence fragment in this citation above describes the potential generic effects; the second concludes, with no supporting analysis presented, that the effects are low. In addition, as discussed in SPU's review of the Fisheries Technical Report, the analysis of sediment impacts is deficient.

LWD Recruitment

"... (which do not spawn in such warm streams)."

394-092 The DEIS should provide data or an appropriate citation to support this contention.

Table 4-4

394-093 This table contains incorrect information. For example, based on data provided in Burton (1999), the earliest confirmed sighting of Chinook salmon in the Cedar River is August 18. Based on data in Burton (1997), the latest recorded steelhead spawning is June 11, and the latest date of completion of steelhead

394-073 See response to Comment 394-050.

394-074 Comment noted.

394-075 Since herbicides will not be used within the CRW, it is not possible for herbicides to contaminate the Cedar River. The statement in the EIS has been changed to reflect that.

394-076 A site-specific Spill Prevention and Control (SPC) Plan will be prepared that covers the project scope of work (including equipment, materials, and activities).

This SPC Plan shall address the procedures, methods and equipment to prevent discharge of oil (i.e., petroleum products) into or upon the navigable waters of the United States. This SPC plan also shall meet the requirements of the State of Washington, which specify the spill response, cleanup, and disposal requirements of oil. In addition, BPA requires that this SPC Plan be prepared to include all hazardous substances (including oil and other petroleum products) associated with the scope of work.

394-077 Section 4.2 of the Fisheries Technical Report (Appendix A) describes operations and maintenance impacts of Alternative 1 (the Proposed Action).

394-078 Cumulative impacts of vegetation clearing are described in Section 4.1.3 of the Fisheries Technical Report (Appendix A).

394-079 Please see response to Comment 382-017.

394-080 Comment noted. BPA has sited the proposed transmission towers and access/spur roads to avoid streams, wetlands and riparian areas. While none of these facilities would be located in these sensitive areas, some clearing would be required in wetlands and riparian areas particularly where those areas are found within the proposed right-of-way. Table 4-5 displays information on the amount of riparian vegetation that may be cleared. BPA would attempt to minimize the amount of clearing in riparian areas.

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394-094 spawning is August 11. The DEIS and its environmental analyses should be based on correct information on the affected natural resources. This table should be revised to include correct information. Also, this or another table should address lamprey species in the same manner. (Burton, Karl. 1997. Cedar River steelhead monitoring program annual report. Seattle Public Utilities.) (Burton, Karl. 1999. Temporal and spatial distributions of Cedar River Chinook salmon spawning activity. Seattle Public Utilities.)

Section 4.7 Wildlife
4.7.1 Impact Levels

394-095 The DEIS and its technical appendix should address impacts from changes in behavior of species (e.g., travel barriers, dispersal barriers).

4.7.2.3. Bird Collision

394-096 Though the incidence of electrocution on transmission lines is low, it should be discussed and thoroughly evaluated. The DEIS should commit to a monitoring and adaptive management program to evaluate bird mortality by both collision and electrocution. The DEIS and technical appendix should commit to ensuring all pertinent plans would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

Table 4.5
Aquatic Communities

394-097 Totals do not match the values listed. Values given for wetlands are inconsistent with the values presented in Table 5 of Appendix B. The DEIS, its technical appendices, and associated permit documents need to present a complete, accurate, coherent, and consistent description of the proposed action.

4.7.2.5 Forest Community Dependent Species

"... both band-tailed pigeon and blue grouse...."

394-098 Ruffed grouse nesting and foraging habitat would be more impacted in most of the project area at such low elevations than that of blue grouse. Elevation range use needs to be checked and clarified for these species and a correct analysis presented in the DEIS.

4.7.2.13 Mitigation

394-099 Though most of the impacts to wildlife were described as moderate, mitigation proposed was generally simply minimization of the impact. This is insufficient mitigation for moderate levels of impact. Compensatory mitigation should also be included.

Bird Collision

"Provide bird marking in known flight corridors."

394-100 The DEIS presents insufficient information for reviewers to effectively evaluate this method. The DEIS should disclose known flight corridors, and needs to add compensatory mitigation actions for mortality.

394-081 BPA is working with SPU to assure that all activities on the Watershed meet SPU standards to the extent practicable.

394-082 At the time the Fisheries Technical Report (Appendix A) was prepared in late 2000, the Final Cedar River Watershed HCP (City of Seattle 2000) was not yet available to the public, in spite of the fact that the HCP had been approved by the Seattle City Council in April 2000. The Final HCP has since become available. The findings reported in the Fisheries Technical Report were revised to be consistent with the Final HCP. Text in the SDEIS was changed to reflect these revisions.

394-083 See response to Comment 394-081.

394-084 An undetermined number of new cross drain culverts will be installed and we will be replacing other culverts of this type. BPA acknowledges that there are problems associated with some of its existing culverts on its access roads on the Raver-Echo Lake right-of-way within the Cedar River Watershed. BPA is committed to addressing these problems with SPU, the landowner, and the Washington State Department of Fish and Wildlife.

394-085 See response to Comment 394-081.

394-086 See response to Comment 394-081.

394-087 Comment noted. Please see response to Comment 394-076.

394-088 BPA has included more information concerning potential impacts to endangered species in the SDEIS. The commenter states that the DEIS concludes that the impacts are high but cannot be mitigated. BPA respectfully disagrees with the commenter's interpretation. The DEIS makes it clear that two of the three waterways which may potentially provide habitat to listed fish in the future (once the proposed downstream fish ladder is completed thereby opening up the Cedar and Raging rivers to migration), would have low impacts. A third waterway, the Cedar River, may have high impacts if large conifers were cut and removed, but this would not be needed. There are currently no listed fish in the project's action area, and during construction no trees will be cut near the Cedar River.

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394-101 Several raptor species utilize ROW corridors. The DEIS should commit to the use of all available types of structural modification(s) for lines and towers that prevent and/or minimize negative impacts to any avian species over the full extent of the ROW (inside and outside of the CRW).

Forest Community Dependent Species

394-102 The DEIS should commit to including snag-creation mitigation along the edges of the cleared ROW to create nesting and foraging habitat for snag-dependent forest species.

Riparian Community Dependent Species

"Span riparian corridors to the extent possible..."

394-103 The DEIS should identify streams on which this is possible, so reviewers can evaluate potential impacts.

4.7.2.14 Cumulative Impacts

394-104 The DEIS classifies cumulative impacts as "low," with little or no data to support this conclusion. The DEIS should present data and a complete analysis of cumulative impacts.

"The HCP also outlines plans to close certain roads within the CRW, ..."

394-105 It is inappropriate for BPA to be allowed "mitigation credit" for road decommissioning contained in the HCP and accomplished by the City of Seattle. See additional comments elsewhere in this comment letter.

4.8 Vegetation

"BPA is collecting data and analyzing the feasibility of using a different clearing criteria within the CRW that would take fewer trees..."

394-106 This evaluation should be completed and included within the DEIS so reviewers can evaluate the actual impacts of tree removal and habitat conversion within CRW, rather than simply in the final EIS. . Further, the criteria used for evaluation should be made explicit so that review of how tree removal would occur could be technically evaluated.

Tables 4-6 and 4-7

394-107 The relationship between the acreage shown in these tables is not clear. For example, mid-seral was defined as in the range of 15 to 35 years, but the total mid-seral acreage for the proposed action in Table 4-7 (26 ac), is not equivalent to the 10-35 year age category in table 4-6 (0 ac). The DEIS, its technical appendices, and associated permit documents need to present a complete, accurate, coherent, and consistent description of the proposed action and its impacts.

4.8.2.3 Operation and Maintenance Impacts

"This is a low impact because it could be mitigated."

394-108 The DEIS should describe how this impact will be mitigated.

Concerning the comments on the ESA, BPA fully intends to fully comply with its obligations under the Endangered Species Act. After submitting a biological assessment to the U.S. Fish and Wildlife Service, FWS concurred with BPA's "not likely to adversely affect" determination on the bull trout, marbled murrelet, bald eagle, grizzly bear, gray wolf, and Canada lynx and did not identify any other federally-listed endangered species that would be adversely affected by the project. Consultation on the spotted owl will be completed prior to construction.

With respect to the NMFS, we received letters from them stating that they expect the effects of the Proposed Action to be discountable or insignificant. Their letters announce the conclusion of our informal consultation with them in accordance with 50 CFR 402.14(b)(1) (see Appendix U of the SDEIS and FEIS).

394-089 No bull trout spawning areas have been identified in western Washington at elevations of less than 2,000 feet (King County Department of Natural Resources, 2000). See Section 4.1.3.1 of the revised Fisheries Technical Report (Appendix A).

394-090 The analysis of cumulative impacts has been changed in the SDEIS. The beginning of Chapter 4 includes the definition of cumulative impacts and lists the foreseeable future actions that were considered in estimating cumulative impacts to individual resources.

394-091 The Fisheries Technical Report (Appendix A) was included as an appendix to the DEIS because the EIS is written, according to CEQ regulations, in plain language the public and decision-makers can understand. The full findings of the analysis are in the technical report so that reviewers interested in the details of the analysis can read them. The DEIS contained sufficient information to assess the potential impacts of the Proposed Action in accordance with NEPA requirements.

394-092 See response to Comment 394-089.

394-093 and -094 Table 5 of the Fisheries Technical Report (Appendix A) has been revised to include this information. Information on the lamprey is outside the scope of this project.

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4.8.2.4 Mitigation

"BPA would consult with the DNR, SPU, and other ...."

394-109 This list should include the U.S. Forest Service.

"Management practices regarding noxious weed control... have been defined in the BPA Transmission System Vegetation Management Program."

394-110 Given that the DEIS acknowledges the current ROW has extensive invasion and occupation by noxious weeds, the current policies and procedures appear to be inadequate. See additional comments on noxious weed management elsewhere in this comment letter.

"Areas would be maintained using a combination of manual methods and herbicides.... No herbicides would be used in the CRW."

The DEIS should present much more detail on how BPA intends to eradicate noxious weeds in CRW. See additional comments on noxious weed management elsewhere in this comment letter. Data on the success or failure of the proposed methods in other areas should be included so reviewers can adequately evaluate the proposal and its likelihood of success.

"The Muckleshoot Tribe would like the opportunity to salvage or relocate plants before construction."

394-111 Is this a commitment to allowing the Muckleshoot Tribe to do this? What, if any, limitations would be placed on this? Would entire trees be given to the tribe? What input would the landowner have? The DEIS should explicitly describe these activities.

"These are also measures that the Muckleshoot Tribe would like in included as mitigation:"

394-112 Is this a commitment to include these proposals as mitigation? The DEIS should explicitly describe these measures and be clear regarding BPA's commitment to use them as mitigation.

Section 4.9 Wetlands

4.9.2 Proposed Action

"BPA would avoid crossing wetlands where possible, and where impacts are unavoidable, BPA would use best management practices to minimize destruction or denigration of the wetland to the maximum extent practicable."

394-113 This is a misleading statement. The alternatives were not chosen to avoid wetlands, and any wetlands in the path of these ROWs could not reasonably be avoided. The DEIS should acknowledge that this was the case, and should properly evaluate realistic potentials for avoiding wetlands and riparian zones. The DEIS statement that BMPs would be used to minimize wetland impacts is not adequate for effective evaluation of the proposed action.

394-095 Section 4.1 of the Wildlife Technical Report (Appendix B) was revised to include a more detailed analysis about the issues of travel or dispersal barriers and how it affects the behavior of animals. More information was added to the SDEIS.

394-096 Section 4.1 of the Wildlife Technical Report (Appendix B) was revised to include a more detailed analysis about the issues of collision and electrocution. Additional information has been added to the SDEIS. Electrocutions associated with high voltage transmission lines are extremely rare. BPA is currently helping to develop improved technology for monitoring bird collisions in cooperation with the Edison Electric Institute. BPA is providing funding and expertise in a study to test a bird strike indicator, a device clipped onto overhead ground wires to monitor and store impacts with the wire. Some of these devices are being tested in areas of known bird strikes that have been previously studied in the Audubon Wildlife Refuge in North Dakota. If they prove to be a useful tool, these devices will be placed for monitoring in the areas identified as having the highest need.

394-097 Tables were double-checked, totals verified, and changes were made as needed.

394-098 Although ruffed grouse are likely to be present in the project area given the habitat types available, they do not meet any of the criteria for inclusion in the analysis, as described in Section 3.3.2 of the Wildlife Technical Report (Appendix B), and so were not included in the analysis. Blue grouse do meet the criteria, as a species of local concern, and because the habitat modeled for this species by Smith et al. (1997) for the Washington State Gap Analysis included mixed and coniferous forest habitats at all elevations, this species was included as potentially occurring in the project area.

394-099 Comment noted. Please see response to Comment 340-002.

394-100 BPA knows of no mortality issues involving avian species with its existing Raver-Echo Lake power line in the project area; however, the existing line has no overhead ground wire, and the proposed line would contain an overhead ground wire over the length of the project. To mitigate for the potential for collision

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Table 4-10

394-114 Acres in this table do not agree with those in the corresponding Table 2 in the Wetlands Technical Report. The DEIS, its technical appendices, and associated permitting documents need to present a complete, accurate, coherent, and consistent description of the proposed action.

"Construction would include clearing shrubs, trees, and herbaceous vegetation from wetlands and wetland buffers."

394-115 The DEIS should describe the justification and/or reason for clearing all shrubs and herbaceous vegetation from wetlands and wetland buffers, as is indicated by this statement.

*"Wetland Vegetation Impacts —Overall impact on wetland vegetation would be **moderate**."*

394-116 As pointed out in the SPU comments on the Wetlands Technical Report, conversion of forested wetlands to scrub-shrub or emergent wetlands constitutes a **high** impact, according to definitions used for analysis (impairment of ecological integrity). The DEIS and its analysis should be corrected to reflect this.

Wildlife Impacts

394-117 The DEIS should address impacts to amphibians.

4.9.2.4 Mitigation

"Standard mitigation measures to minimize wetland impacts include the following:"

394-118 That is a true statement, but the DEIS should commit to implementing even these minimal mitigation measures. These measures alone cannot mitigate for the unavoidable impacts to wetlands that will occur.

4.12 Cultural Resources

394-119 Some areas in the project area and within the CRW have a high likelihood of containing cultural resources or Traditional Cultural Properties, and thus potential for significant impacts. The DEIS omits specific results of archaeological and CMT surveys that have been conducted for this project. Survey results should have been considered in the DEIS. The technical report for this discipline should have been included in the DEIS. The DEIS should have included proposed mitigation actions for any identified sites (if any). Also, the DEIS should recognize that SPU has archaeological standards for the CRW that need to be (and were) followed.

The DEIS's assertion that impacts will be "low" for the proposed action are unsupported by the existence of substantial uncertainty regarding impacts on archaeological resources or Traditional Cultural Properties, for which no assessment has been completed. Given the location of the project, these impacts could be significant. The DEIS should explain this uncertainty, qualify the description of impacts, and provide the needed information for public review.

4.13 Noise, Public Health, and Safety

394-120 The DEIS does not address the impact of anticipated increases in noise on wildlife populations. Also, the DEIS needs to discuss how the new transmission line will interfere with CRW staff radio usage and reception.

with the overhead ground wire, BPA would install bird flight diverters over the Cedar and Raging rivers as a part of the project. This apparatus should allow any birds using these wildlife corridors to see the overhead ground wire and avoid the potential for bird strike. BPA believes avoiding the potential for mortality is preferable to offering compensatory mitigation for its occurrence.

394-101 With the exception of installing bird flight diverters on the overhead ground wire over the riparian areas of the Cedar and Raging rivers, no alterations would be made to the proposed structures or line configurations to prevent and/or minimize negative impacts to any avian species in the area since none would be necessary. Since the proposed conductors would be spaced a minimum of 21 feet apart, it would be unlikely that any bird could come in contact with two conductors at the same time, thus avoiding any potential for electrocution. And raptor collisions with power lines are relatively rare. For more information, please see Section 4.1.1 of the revised Final Wildlife Technical Report, entitled "Impacts common to All Transmission Line Alternatives" in Appendix B.

394-102 The details about these mitigation measures will be included in the Mitigation Action Plan for this project. We will include leaving existing snags and the creation of new snags to both preserve existing habitat and the creation of new wildlife habitat, where possible.

394-103 The location of towers and access roads have been developed to help reduce the amount of riparian vegetation impacted.

394-104 The cumulative effects analysis was updated in the SDEIS. Section 4.7.2.11 discusses cumulative effects associated with the Proposed Action. Table 4-9 in the SDEIS displays potential cumulative impacts for each of the alternatives. Although BPA would require additional access roads, SPU is planning on obliterating some of its current access roads. BPA has acquired a 352-acre parcel of land north of the CRMW to prevent future development (except for the Proposed Action and future transmission lines) as mitigation for the forestland that would be impacted by the Proposed Action. See also response to

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394-121 In its scoping letter, SPU identified the need for BPA to address effects of the project on the drinking water supply. The DEIS completely fails to discuss the risks to the drinking water supply during project construction for any of the alternatives. These risks include the risk of spills that could contaminate the water and the risk of turbidity events that could have serious regulatory and public health consequences for SPU. See also SPU's comment under Environmental Consultation, Review, and Permit Requirements, immediately below.

CHAPTER 5—CONSULTATION, REVIEW AND PERMIT REQUIREMENTS

394-122 The DEIS should include a new section on the Washington Department of Health (DOH) Rules for Group A Public Water System (246-290 WAC). This section would summarize the federal Safe Drinking Water Act and subsequent regulations that require a high level of protection for a source of unfiltered drinking water such as the Cedar River. Because SPU's Cedar River source is unfiltered, SPU is required to control the watershed in accordance with a DOH-approved control program. Obviously, the currently approved control program does not address BPA's proposed project. For previous construction by SPU and SCL in the watershed, SPU required development of a project-specific Water Quality Control Program (WQCP) that could be approved by DOH as a supplement to the permanent control program. Typically, the program was prepared by a specialty sub-consultant in the consultant design team. SPU would require BPA to produce a WQCP for this project that would be acceptable to SPU and DOH.

5.2.1 Federal list

394-123 The DEIS incorrectly states that marbled murrelet is not expected to occur in the project area. Murrelets have been detected in the upper watershed, where they are possibly breeding, and can be expected to fly along the Cedar River to these areas. Thus, this species is at risk of colliding with power lines in the CRW. The DEIS should acknowledge this and provide a suitable analysis of impacts.

5.4 Heritage Conservation

394-124 The DEIS states that no culturally modified trees were found in the project area, but SPU believes that the Muckleshoot Tribe may have observed some of these in the project area. [*Contact Tom Minichillo.*]

5.5 Federal, State, Areawide, and Local Plan and Program Consistency

394-125 As previously mentioned, the DEIS fails to mention how BPA intends to meet the intent of local sensitive areas regulation such as King County Sensitive Areas Ordinance. BPA is required to meet the standards in this ordinance, which would not occur under measures describe in the DEIS. The DEIS should acknowledge this requirement and indicate how it will so meet the intent of such local and state regulations.

5.5.9 City of Seattle Cedar River Watershed Habitat Conservation Plan

394-126 The DEIS should acknowledge this proposed action is not a "covered activity" under the HCP (the primary land management document/direction in the project area) and then commit to not diminishing the conservation commitments in the HCP. The DEIS should explicitly describe how it intends to avoid diminishing HCP conservation commitments (for example, by committing to providing appropriate and effective compensatory mitigation).

5.17 Underground Injection Permits under the Safe Drinking Water Act

Comment 340-002. For these reasons, the cumulative impact of the Proposed Action is low to moderate.

394-105 Comment noted. BPA agrees.

394-106 See response to 366-002. We will be using a stable tree criteria.

394-107 Table 4-6 from the DEIS has been deleted. See Table 4-10 in the SDEIS.

394-108 Mitigation for soil disturbance and the possibility of introduction of noxious weeds would include any or all of the following:

- Reseeding disturbed areas with a seed mix acceptable by BPA and SPU;
- Washing of construction and maintenance vehicles to prevent spread of seed from one source to another;
- Treatment of known noxious weeds through manual or mechanical measures.

394-109 Comment noted. The statement has been revised in the SDEIS.

394-110 See response to Comment 382-017.

394-111 BPA has been meeting with the Muckleshoot Culture Committee on the proposed project since early 2000. One of the Tribe's chief concerns is what impact the proposed project would have on cultural resources important to the Tribe. BPA is working with the committee to site the proposed project with the least impact on cultural resources.

If BPA were to decide to construct the proposed project, BPA would obtain land rights from the property owners to do so, including Seattle Public Utilities. BPA obtains easement rights to construct, operate and maintain its transmission facilities; however, the land within the right-of-way remains in fee ownership of the property owner. Although BPA has offered to move its facilities, given certain constraints, to avoid cultural resources, the Tribe needs to work with the landowner regarding harvesting any resources important to the Tribe.

394-112 BPA would commit to these mitigation measures. With respect to the noxious weed issue, BPA is willing to work with the

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"none of the alternatives would...adversely affect any surface water supplies"

394-127 This statement ignores the role of CRW in providing drinking water for 1.3 million people. The DEIS should correct this section to reflect this reality.

landowner in controlling noxious weeds on BPA's existing right-of-way attributable to BPA's actions or inactions, as well as to prevent the proliferation of noxious weeds on the proposed right-of-way within the CRW that would also be attributable to BPA actions or inactions. Preventing the spread of noxious weeds is an ongoing maintenance objective of BPA, but it must be undertaken in concert with landowner help, particularly where the noxious weed problem exists adjacent to BPA's rights-of-way as well.

394-113 BPA has sited all of its facilities, tower sites, access roads and substation expansion to avoid filling any jurisdictional wetlands. Although approximately 14 acres of forested wetlands would be converted from forested wetlands to scrub/shrub wetlands, this clearing would be undertaken by hand clearing only. No mechanized land-clearing equipment would be allowed in these wetlands. BPA believes in avoidance first, minimization next and then providing compensatory mitigation where necessary.

394-114 Additional information was developed for the draft EIS after the Wetlands Technical Report was prepared. The most recent information was included in the SDEIS.

394-115 The sentence was changed.

394-116 Please see response to Comment 394-029.

394-117 Impacts to amphibian habitat are described in Section 4.1.2 of the Wildlife Technical Report (Appendix B), with habitat loss expected to be the major potential impact for these species.

394-118 Please see response to Comment 340-002.

394-119 Please see response to Comment 394-016.

394-120 With respect to construction noise, the Muckleshoot Culture Committee has expressed a concern about construction noise impacts on fawning and calving by the deer and elk populations within the CRW. By the time BPA would initiate construction activities (in August), the deer and elk-birthing season would have ended. Our understanding is that fawning and calving are usually completed by June 15th. BPA will do its

best to honor this request while still trying to have the line energized when it would be needed. The construction noise would be considered short-term and intermittent, and would occur only in specific locations until the project would be completed.

Regarding operation noise, Section 4.13.1 of the DEIS entitled "Predicted Audible Noise Levels" stated that the incremental noise contributed by the proposed line adjacent to the existing Raver-Echo Lake 500-kV line would only be about 1 dBA at the edge of the proposed right-of-way and would not be discernible. Wildlife such as deer and elk commonly use BPA rights-of-way to browse, and do not appear to be affected by the corona-generated audible noise.

With respect to the concern as to the potential effect of the new transmission line on CRW staff radio usage and reception, the DEIS, Section 4.13.5 entitled "Radio Interference" stated that the project's overall radio interference is expected to be minimal.

394-121 Please see responses to Comments 394-051, 052, 053, and 054.

394-122 Information has been added to Chapter 5.

394-123 See response to Comments 394-096 and 394-066. The preferred power line route does not affect suitable nesting habitat for the marbled murrelet and will parallel the existing corridor, which substantially lessens any increase in risk associated with the new line. No noise disturbance associated with this project would be conducted within 0.25 miles of suitable or occupied habitat. Therefore, the project is not expected to increase the potential for incidental take.

394-124 A survey for culturally modified trees was conducted on and off the Cedar River Watershed. No culturally modified trees were found.

394-125 BPA intends to abide by the King County Sensitive Areas Ordinance including providing compensatory mitigation for altering forested wetlands within the proposed right-of-way. However, BPA disagrees with the commenter's statement that

BPA is required to meet the standards in this ordinance. See also responses to Comments 395-018, -019, and -020.

394-126 The DEIS states (on Page 5-16) that the HCP covers only actions by the City of Seattle and activities undertaken by other agencies (such as BPA) within the CRW are not addressed by the HCP, and therefore, require separate review by USFWS and NMFS. The DEIS also stated "The BPA is consulting with both the FWS and NMFS to ensure compliance with the HCP." See also Appendix U in the SDEIS and FEIS, and Appendix AA of the FEIS for the agencies' opinions that the proposed project would not adversely affect the HCP.

Furthermore, BPA has purchased land to be used a compensatory mitigation to replace that which would be lost should BPA acquire land rights to site its transmission line through the CRW. Additional mitigation is under negotiations.

394-127 Construction and operation of the proposed BPA transmission line would not require the underground injection of water or wastes. BPA would comply with applicable regulations of federal, state and local agencies to protect drinking water supplies, in particular, Seattle Public Utilities, Washington State DOH, and the Cedar River Watershed, which provides drinking water to 1.3 million people.

Kangley-Echo Lake Transmission Line Project DEIS
Appendix A – Final Fisheries Technical Report

Summary of Major Comments to Appendix A – Final Fisheries Technical Report
Seattle Public Utilities
September 4, 2001

GENERAL COMMENTS

1. The analysis in the DEIS and technical appendix is inadequate due to:
   - lack of assessment of Type 4 and 5 streams;
   - factual errors
   - lack of thorough erosion assessment
   - scant site-specific information on streams and no quantification of impacts by stream crossing
   - lack of disclosure as to the extent of clearing in riparian areas, which effectively precludes an evaluation of project effects
2. The DEIS and technical appendix should commit to compensatory mitigation in acknowledgment of the project's moderate to high impacts to fish habitat.
3. The DEIS and technical appendix should thoroughly address cumulative effects of creating additional ROW adjacent to the existing ROW.
4. The DEIS and technical appendix should discuss steelhead trout in greater detail throughout.

SPECIFIC COMMENTS
***DEIS Appendix citations in italics*; SPU comments in normal font.**

1.0 Executive Summary

"This report describes the existing conditions and potential impacts on vegetation ....."

394-128 This is the fisheries technical report.

"This report serves as the primary basis for the vegetation ...."

This is the fisheries technical report.

1.1.1.2 Clearing

"Non-merchantable timber may or may not be burned ...."

394-129 This statement conflicts with the project's Biological Assessment (BA), which claims there will be no burning. The DEIS, its technical appendices, and associated permitting documents need to present a complete and consistent description of the proposed action.

This activity, if allowed within Cedar River Watershed (CRW), would be with the approval of SPU relative to scheduling and methods. The DEIS and technical appendix should commit to ensuring all methods proposed in this section would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

"... (BMPs) for timberland would also be used."

394-128 This change has been made in Section 1.0 of the Fisheries Technical Report (revised Appendix A).

394-129 Because the Biological Assessment was prepared after the Fisheries Technical Report (Appendix A), it included mitigation actions such as avoidance of burning. The Fisheries Technical Report has been changed to reflect this new information. Because of the proximity of the adjacent 500-KV line that would remain energized during project construction, no burning would be allowed on the proposed right-of-way.

Additionally, burning would not occur at this project because the project is close to the Seattle-Tacoma CO maintenance area and the King County urban growth boundary. The state of Washington forbids burning in non-attainment and maintenance areas, and within the urban growth boundary. Additionally, the state forbids burning in any other area of the state when a reasonable alternative to burning is found to exist (WAC 173-425-040). According to the state, reasonable alternatives include chipping, woodwaste recycling, and landfilling. Rather than burn, BPA would pursue these alternatives. BPA typically does not burn slash and tries to avoid such practices not only for air quality reasons, but because soot from fires can cause flashovers from one transmission line to another, resulting in outages. This information was included in Section 4.14, Air Quality, of the DEIS.

394-130 BPA is committed to using Best Management Practices. See response to Comment 394-081.

394-131 See responses to Comments 366-002 and 382-009.

394-132 Section 5.15 of the SDEIS describes how BPA intends to meet Clean Water Act requirements. The Stormwater Pollution Prevention Plan (SWPP) will describe in detail actions that will be taken to limit erosion impacts. Section 4.6.2.10 describes specific mitigation that will be undertaken to lessen impacts to fisheries. BMPs would include silt fences and hay bales and other such means that the contractor would use to keep sediments from reaching surface waters. The contractor is responsible for identifying which specific BMPs would be used to meet resource protection goals.

394-130 The DEIS and technical appendix should commit to ensuring all methods proposed in this section would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

"Trees would be cleared within the ROW as well as outside of the ROW to prevent trees from falling on the lines."

394-131 SPU is unable to comment effectively without more specific tree removal plans. Also, there is no mention of the temporary 50 ft construction easement BPA previously mentioned in this technical appendix (but which is not mentioned in the DEIS). The DEIS and technical appendices need to speak consistently on the nature of project features.

"Additional BMPs for timberland would also be used."

394-132 What BMPs will be used? The DEIS and the technical appendices need to present a complete and accurate analysis of fisheries and potential impacts, which is related, in part to the disclosure of the BMPs to be used.

"Total amount of clearing [for towers] for this project is unknown at this time."
"An additional amount of land would be cleared for roads that are needed off the ROW and for roads to be in poor condition and requiring upgrading by BPA"

394-133 SPU can not comment effectively without more specific information about grading plans. As evidenced by information presented in the project's BA, BPA has identified locations for towers and new roads and so should be able (in the DEIS and its technical appendices) to estimate the total amount of clearing for the proposed action. The DEIS and the technical appendices need to present a complete and accurate environmental analysis, which includes the disclosure of such known project characteristics. Also, The DEIS and technical appendices should commit to ensuring all methods proposed in this section would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

1.1.1.3 Access Road Construction and Improvement

394-134 The DEIS and technical appendix should commit to ensuring all methods proposed in this section would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

"Access roads would be 16 ft wide, with additional road widths of up to 20 ft for curves."

394-135 SPU believes these road widths are excessive. The DEIS should explain and justify these road prism dimensions. SPU can not comment effectively without more specific information about road plans. As evidenced by information presented in the project's BA, BPA has identified locations for new roads and so should be able (in the DEIS and its technical appendices) to firmly estimate the total amount of clearing/ road-building for the proposed action.

394-136 The DEIS and the technical appendix fail to present a complete and accurate environmental analysis because they fail to disclose such known project characteristics as location and kinds of roads. Road locations depicted in the BA are often distant from the proposed action. The DEIS and technical appendix should explain and justify the location of these roads. The DEIS and the technical appendix should acknowledge that all road plans affecting the CRW would be subject to SPU review and approvals.

"...roads would be constructed and used outside the ROW."
"Where temporary roads are used...."

394-137 SPU can not comment effectively without more specific information on road plans. As evidenced by information presented in the project's BA, BPA has identified locations for towers and new permanent and temporary roads and so should be able to firmly estimate the total amount of clearing for the proposed action.

394-133 Information not available when the DEIS was published has been added to the SDEIS.

394-134 Comment noted. See response to Comment 394-081.

394-135 and -136 BPA has committed to helicopter construction to reduce the standard of road needed for construction. Access road design in the CRW is described in Section 2.1.1.5 of the SDEIS.

394-137 See responses to Comments 394-135 and 136.

394-138 See responses to Comments 394-135 and 136.

394-139 When establishing hazardous materials, equipment, and fueling staging areas, consideration will be given to minimizing the removal of existing trees and minimizing compaction of native soils except as needed. Staging areas will not be located adjacent to sensitive areas, buffers, and waterways. After consultation with SPU, major hazardous materials and fueling staging areas will be located outside of the CRW. Mobile fueling pads will be used sparingly within the CRW and only as absolutely necessary to proceed with work in a safe and efficient manner.

Hazardous Material Staging Area. Drums of diesel and gasoline, and small containers of diesel, gasoline, oils, hydraulic fluid, and decontamination/cleaning solutions will be stored on weather-resistant (i.e., hooded) spill containment pallets or specifically constructed spill containment sheds. Spill containment pallets or shed containment will be able to contain 110 percent of the largest container. Hazardous materials and chemicals shall be clearly labeled and segregated based on compatibility. Hazardous materials and fuel storage areas shall be designed in a manner that these areas can be secured and/or locked at the end of each workday. Only authorized personnel will be permitted to enter these areas. All products shall be clearly labeled and lids securely fastened. All storage tanks shall be kept off of the ground.

Fueling Staging Area. The fueling staging area shall consist of a spill pad and fuel tanks (diesel and gasoline). Temporary barriers will be used to prevent heavy equipment from damaging/

394-138 The DEIS and the technical appendix need to present a complete and accurate environmental analysis, which includes the disclosure of such known project characteristics as location and types of roads.

1.1.1.4 Storage, Assembly, and Refueling Areas

394-139 The DEIS and technical appendix should address the locations for these facilities as well as related clearing/land-disturbance impacts, their adjacency to sensitive areas, and containment and fire safety design. The DEIS provides no descriptions or specifications for refueling or hazardous materials storage areas, which prevents effective review of the proposed action.

All refueling and hazardous material usage/storage facilities would be required by SPU to be outside the CRW boundary. To protect the municipal water supply, SPU has "no-tolerance" objectives for spills or leaks of hazardous materials in the CRW. The DEIS and technical appendix should indicate how all spills would be prevented in the CRW.

1.1.1.5 Tower Site Preparation

"BMPs would be used during clearing and construction to reduce impacts."

394-140 The DEIS and technical appendix should describe what these BMPs include. The DEIS and technical appendix should commit to ensuring all methods proposed in this section would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

"An average area of 30,000 sq. ft would be disturbed at each tower site. Additional areas that could be disturbed could include the site where the conductor is strung and pulled. These disturbances could be as large as 370 ft radius from the tower center."

394-141 The DEIS and technical appendix should disclose estimates of where grading will occur and how much area will be graded. The DEIS, its technical appendices, and associated permitting documents need to present a complete and consistent description of the proposed action.

"...construction crews would remove selected trees in a 50 to 60 ft wide area on each side of the ROW. (i.e. to compensate for or anticipate resulting blowdown after initial ROW clearing"

394-142 The DEIS and technical appendix should describe volume or number estimates for tree removal in this 50 to 60 ft zone. The DEIS and its technical appendix need to present a complete description of the proposed action.

"...four footings been placed in holes that have been excavated, augured, or blasted."

394-143 Use of blasting is a concern in the CRW. The DEIS and technical appendix should describe the likely blasting plan and evaluate the impacts of blasting on stream and fish resources. The DEIS and its technical appendix need to present a complete description of the proposed action.

"Noise and dust would be generated...."

394-144 The DEIS and its technical appendix need to evaluate the impact of noise and dust generation on the affected fish populations. The DEIS needs to present a complete description of the proposed action.

rupturing these tanks. The fueling pad shall be designed with impervious secondary containment capable of capturing any spills that may occur during fueling operations.

The bulk fuel storage area shall be designed with a temporary cover that also provides wind protection, and will have an impervious berm around the perimeter of the storage area. The bermed area should have a storage capacity of at least 110 percent of the largest container. The storage area shall be lined with a double layer of plastic sheeting or similar material.

Mobile equipment fueling pads. Construction equipment fueling on the ROW would use pickups with saddle-mounted tanks in their beds over portable chemically compatible secondary containment systems. Sorbent materials shall be used to protect the fueling nozzle as it is transferred to and from the fueling cradle and the vehicle being fueled. Pickup beds will be sealed to prevent any leakage. Fueling will only occur in designated fueling areas. Fuel tanks are not allowed to be topped off. All equipment fueling operations shall use pumps and funnels and absorbent pads. All fueling vehicles would leave the CRW daily. All fueling operations personnel shall be trained in SPCC procedures.

Hand-carried Equipment. Fueling of hand-carried equipment shall only take place in a mobile secondary containment system consisting of a covered truck with a sealed bed and lined with an appropriate chemically impervious material. All gas cans would be stored and hand-carried equipment fueled in this area. The transfer of fuel into portable hand-carried equipment would be performed using a funnel and/or hand pump. The fueling system and transport cans would be inspected daily. All fuel storage containers would be stored in a manner that reduces the possibility of spills. Gas cans would not be allowed outside of the secondary containment area. All hand-carried equipment fueling vehicles would be removed from the CRW at the end of each day.

Spill Prevention. Spill response kits will be located in the fueling area for easy access. The spill response kits at a minimum will include chemical resistant "zip-seal" storage bags, plastic sheeting, plastic drum liners, sorbent sheets, sorbent

1.1.1.9 Site Restoration and Clean-up

"..... pull site locations would be reshaped and ... "

394-145 The DEIS and technical appendix should describe what "reshaping" will include. Reshaping should include considerations for proper drainage.

".... Access roads would be repaired."

394-146 The DEIS and technical appendix should describe what "repair" means.

"... reseeded with grass or an appropriate seed mixture ... "

394-147 The DEIS and technical appendix should commit to ensuring all methods proposed in this section would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW. Seed mixes should be composed of native seed species (i.e., grasses and shrubs) and meet SPU approval.

1.1.2.6 No Action Alternative

394-148 The DEIS and technical appendix should provide data and/or references documenting how this conclusion was reached.

1.2 Key Issues for Fisheries

394-149 The DEIS and technical appendix should address adverse impacts on habitat for coho salmon.

"Under the HCP, all forest clearing is prohibited except for purposes of habitat restoration."

394-150 This statement is incorrect. The DEIS and technical appendix should restate and clarify this concept relative to the final version of the HCP (2000).

1.3 Major Conclusions

"All action alternatives would have similar impacts to fish and their habitat. All action alternatives would require removal of riparian forest vegetation in an area where such activity has previously been determined to cause adverse effects to fish species listed as threatened under the ESA. Although some measures could be taken to minimize vegetation clearing in riparian areas, the residual impacts would persist throughout the life of the project."

394-151 This comment and the statement on page 23 (paragraph 5) of the technical appendix indicate impacts to ESA-listed fish species would be high. Despite these adverse impacts to listed fish, the DEIS and its technical appendix contain no substantive commitment to compensatory mitigation. Is BPA's conclusion, then, that there are no mitigation actions available that would reduce adverse effects of riparian vegetation clearing on ESA-listed fish to negligible levels? The DEIS and technical appendix should fully disclose this conclusion.

The DEIS and technical appendix should define what measures *"could be taken"* and what *"methods are available."*

2.1 Data Sources and Study Methods

"The CRW HCP (City of Seattle 1998)"

booms/socks, granular oil sorbent, shovels, and overpack/salvage drums. Any spills shall be cleaned up immediately and the contaminated material properly disposed of. Accumulated storm water in secondary containment vessels shall be collected and disposed of properly. Additionally sediments and sediment-laden water containing oil on the construction site shall be captured and managed properly.

Additional spill prevention procedures will include daily and weekly inspections to ensure that spill controls are in place and remain effective. Any leaks from a fuel tank, equipment seal, or hydraulic line will be contained within a spill pad placed beneath potential leak sources. An undetected leak from parked equipment will be contained within the equipment staging area and cleaned up upon discovery. In addition to inspections, employees shall be trained on spill source and receptor recognition, spill prevention planning, spill prevention techniques, spill response measures, and spill reporting protocol. All employees are responsible for spill prevention and will respond to a leak as appropriate based on their level of training, or if a spill has occurred, they will assume a defensive posture and immediately notify the designated person responsible for assessing spills, implementing the SPC plan, and contacting regulatory agencies. Should the on-site personnel not have the training, equipment, or materials to clean up spills, a spill response contractor will be used.

Fire Safety. Fire extinguishers shall be located adjacent to spill kits in the material, equipment, and fueling staging areas. Smoking will not be allowed in construction and fuel staging areas and during re-fueling procedures. Smoking will only be allowed in designated areas. The Contractor must comply with forest fire laws, rules and regulations of the State of Washington (e.g., RCW 76.04 and WAC 332-24 and WAC 332-24-405 Spark Emitting Equipment Regulations). Construction operations are subject to daily state fire precaution levels (FPL). The Contractor will need to check the level each day. The operators also need radio or telephone communications to report a fire. Vehicles will be equipped with fire extinguishers and spark arrestors. The local fire department is responsible for emergency containment procedures when called to the site. The fire department takes measures necessary to prevent fire

394-152 In section 1.2 above, City of Seattle 2000 is referenced, but it is not included in this list. This section and any other references to the HCP should be revised, updated, and clarified throughout the DEIS and its technical appendices to reflect content of the final version of the HCP (2000).

"The impact assessment for this analysis relied upon remote methods to identify potential fish-bearing streams…."

394-153 The known distribution of fish in the project area should be used in the analysis wherever it confirms a greater distribution than the remotely sensed data indicates. Some stream reaches that contain fish are not indicated as such in the analysis. Consultation with SPU Cedar Falls biologists may be beneficial. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

"The GIS database was not found to include any non-fish-bearing streams, so these streams were not inventoried. It is assumed that the project area contains at least twice as many non-fish-bearing streams as fish-bearing streams."

394-154 It is well-known that non-fish bearing streams (Types 4 and 5) have a water quality impact on downstream reaches that are fish-bearing. The CRW HCP has a standard of 150 ft buffer for clearing on Type 4 and 100 ft for Type 5. Lack of inventory of Type 4 and 5 streams and lack of impact analysis on these streams are significant deficiencies in the DEIS and this technical appendix. The DEIS and technical appendix should inventory Type 4 and 5 streams and consider the potential impacts of the proposed action on these stream and fish resources. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

"Color aerial photographs were reviewed to collect information about the size and species composition of riparian vegetation, and the existing riparian shade, along all potentially affected streams. This review used methods established for watershed analysis in Washington (WFPB 1998). Field studies were undertaken to visit representative examples of fish-bearing streams, observe channel geomorphology and fish habitat, and ground-truth the aerial photograph assessment."

394-155 Color aerial photographs were 1:24,000 scale. It is questionable whether this scale is adequate for Washington Watershed Analysis methodology. The DEIS and technical appendix should describe what Washington watershed methodologies were used (that is, which modules were used).

"For the impact assessment, it was assumed that the action alternatives would require clearing vegetation over a 150 ft wide corridor along the entire project area. This assumption is conservative because BPA would seek to minimize vegetation clearing in riparian areas by not placing towers in riparian areas."

394-156 The statement conflicts with other statements in the DEIS and its technical appendices. The ROW would be 150 ft with or without towers; the DEIS indicates that clearing could occur in an area as wide as 400 ft. The DEIS and technical appendices need to speak consistently on the nature of project features (number location, width, etc.) of the proposed action.

"…it was assumed that the action alternative would require clearing vegetation over a 150 ft wide corridor…."

394-157 This assumption is incorrect based on conflicting information provided in sections 1.1.1.2 and 1.1.1.5. The DEIS and technical appendices need to speak consistently on the nature of features of the proposed action.

3.2.1 Cedar River Watershed Habitat Conservation Plan

394-158 Any reference to "ecological reserve" in this or any other section of the DEIS or its technical appendices is incorrect. The "ecological reserve" as a "conservation strategy" is not included in the final signed version of

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and explosion, and to protect people and property in the event of a fire or explosion.

394-140 See response to Comment 394-132.

394-141 BPA is proposing using a special footing design, micropiles, so that impacts would be reduced. No grading would be necessary except for the spur roads to each tower site and limited grading at tower sites on very steep slopes for micropile drilling equipment. The location of stringing sites are determined by BPA's construction contractors and are unknown at this time. It is likely that there would be one stringing site where there is an angle structure in the CRW. Other sites would likely be outside the CRW.

394-142 See response to Comment 382-011.

394-143 Blasting will not take place next to fish bearing streams.

394-144 Noise, particularly noise derived from activities not performed underwater, has not been shown to have any impact on salmonid fishes. The potential impacts of fine sediment (such as dust) on fish habitat are described in Section 4.6.2.3 of the SDEIS.

394-145 Locations would be restored to their original preconstruction condition to the extent practicable.

394-146 Restored to previous condition without changing the character of the road, if necessary.

394-147 Disturbed areas are to be reseeded with native seed mix as soon as construction is completed in that area. However, in many cases, locally adapted native plant materials are not available. Many native species available for restoration are actually from other areas, representing different genetics than existing vegetation. BPA would consult with the DNR, SPU, other agencies and Tribes about the appropriate seed mixtures to use.

394-148 BPA system planners are constantly studying the transmission system. BPA is proposing the Proposed Action since the capacity of the present system is near the limits of its capability. If the limit would be exceeded during time of peak demand (during the

394-159 the HCP (2000). This section and any other references to the HCP should be revised, updated, and clarified throughout the DEIS and its technical appendices to reflect content of the final version of the HCP (2000).

3.2.1 CRW HCP

"...principal water supply for the City of Seattle..."

394-160 The Cedar River Watershed is not the principal water supply just for the citizens of Seattle, but numerous other communities as well (27 additional purveyors and communities), totaling 1.3 million people. The DEIS and technical appendix should accurately describe the role of the Cedar River Watershed.

3.4.1 Alternative 1

394-161 The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts. Several errors in this section suggest the environmental analysis for the CRW portion of the proposed action was not thorough. These errors include:

Segment C –
"...the floodplain (of the Cedar River) is not confined... (where it crosses the proposed ROW)"

394-162 The river is actually moderately confined within a glacial fluvial terrace.

"Currently, this reach of the Cedar River supports rainbow and cutthroat trout."

394-163 The Cedar River also contains non-salmonid species.

"Currently, this reach of the Cedar River supports rainbow and cutthroat trout."

394-164 Although this statement is true, it is misleading insofar as these two species occur in a ratio of approximately 99 to 1 (rainbow to cutthroat). The DEIS and technical appendix should state this clearly so as to not be misleading. The same clarification should be made in all other sections where similar statements occur.

"Once passage around the Landsburg Diversion Dam has been established (in September 2002), it is likely that this reach would support all anadromous species now prevented from upstream migration by the Landsburg Diversion Dam, including chinook, coho salmon, and steelhead."

394-165 Sockeye will be prevented from passage beyond Landsburg even with the new passage facility. The DEIS and technical appendix should correct this statement in all sections in which it occurs in error.

Segment D –
"The affected streams have a pool-riffle morphology..."

394-166 As described in the paragraph above, many streams in this segment flow down relatively steep slopes (20 to 40 percent). Stream gradients on these slopes are generally too high to support pool-riffle morphology and are more commonly step-pool or cascade channel types.

"Rock Creek, downstream of this segment, is known to be used by cutthroat trout and, where it joins with the Walsh Lake diversion ditch, by coho salmon and Walsh Lake kokanee."

394-167 Rock Creek does not join with the Walsh Lake diversion ditch. It flows directly to the Cedar River and is not connected to the ditch. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

coldest days of the winter season) and a major BPA line were to go out in the area, this scenario could develop. See BPA's expanded discussion on need for the project in Chapter 1 of the SDEIS.

394-149 An analysis of impacts to coho salmon habitat is presented in Section 4.0 of the Fisheries Technical Report (revised Appendix A) and is further detailed in the biological assessment for the proposed transmission line.

394-150 See response to Comment 394-082.

394-151 Please see response to Comment 340-002.

394-152 Please see response to Comment 394-150.

394-153 The inventory of fish-bearing streams used in the analysis was based on the inventory of such streams presented in the Draft Cedar River Watershed HCP (City of Seattle 1998). The Draft HCP was used because the Final HCP (City of Seattle 2000) was not available for public review at the time the Fisheries Technical Report (Appendix A) was being prepared. Figure 3 and revised Appendix A of the Fisheries Technical Report includes the inventory of fish-bearing streams presented in the Final Cedar River Watershed HCP.

394-154 Data do not indicate that detailed analysis of Type 4 and 5 streams would substantively alter the findings of the analysis. The effects of the Proposed Action on such streams would be approximately the same as the effects on Type 3 fish-bearing streams, and those effects are detailed in Section 4.0 of the Fisheries Technical Report (revised Appendix A).

394-155 The module used was Appendix D, Riparian Function (WFPB 1998), which is the only module that describes methods for assessing riparian vegetation. A skilled aerial photograph interpreter has little difficulty interpreting stand structure using the quality of aerial photographs available for this analysis. Moreover, results were field-verified and, for that portion of the project within the Cedar River Watershed, were corroborated by vegetation structure maps provided in the Draft Cedar River Watershed HCP (City of Seattle 1998).

3.4.2 Alternative 2
Segment G

"Currently, this reach of the Cedar River supports rainbow and cutthroat trout."

394-168 Non-salmonid species are also present there. See comment re: ratio in comment above. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

"Once passage around the Landsburg Diversion Dam has been established in September 2002, it is likely that this reach would support all anadromous species now prevented from upstream migration by the dam, including chinook, coho and sockeye salmon, and steelhead."

394-169 Not all anadromous species will be allowed passage. See comments above. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

3.4.3 Alternative 3

394-170 Another error/omission: Taylor Creek also has resident cutthroat trout. See the more detailed comment in SPU's review of the DEIS. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

Segment J

"Within the project area, Taylor Creek is known to contain resident rainbow trout, but a natural falls near its mouth renders the stream inaccessible to anadromous fish."

394-171 Non-salmonid species are also present. SPU data indicate that Taylor Creek has predominately cutthroat trout and perhaps relatively small numbers of rainbow trout. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

"Currently, this reach of the Cedar River supports rainbow and cutthroat trout."

394-172 Non-salmonid species are also present. See previous comment on ratio. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

3.5 Access Roads

"All new access roads would that have the potential to affect fish-bearing streams would be situated within the alternative ROW's...."

394-173 This statement appears to be inconsistent with information provided in Section 1.1.1.3. Also, it appears the effects of temporary roads and construction of the 50 ft temporary construction easement previously mentioned by BPA (but not mentioned in the DEIS) are not considered at all in this environmental analysis.

4.0 Environmental Consequences

"All of these are recognized as common impacts to fish populations and habitat as a result of timber harvest and associated activities in mountainous terrain in the Pacific Northwest (WFPB 1998, City of Seattle 1998). It is largely incidental that timber harvest would be followed by installation of a transmission line for the proposed project."

394-174 This statement appears to suggest: "the proposed action is no different than a timber harvest, it just happens that BPA will be putting in a transmission line after the trees are cut." This statement obscures the point that

394-156 Not all trees in the ROW would be removed. Transmission towers are typically sited on higher ground, and they generally span drainages and associated riparian areas. Siting towers in this manner would increase the likelihood that the conductors may be above riparian areas and may require less removal of vegetation. BPA would also leave/protect low-growing vegetation where possible.

394-157 The proposed right-of-way would be 150-feet wide. The right-of-way would cross riparian areas and ravines where some of this vegetation would not need to be taken. BPA tries to remove tall-growing woody vegetation from its rights-of-way and establish low-growing vegetation to maximize cost-effectiveness and minimize the environmental damage by having to continually revisit the rights-of-way to remove tall-growing species.

394-158 and -159 Comment noted. The technical appendices and the SDEIS have been revised to reflect this comment. BPA appreciates the clarification provided.

394-160 Comment noted. Changes were made in the technical study reports and the SDEIS to reflect this comment.

394-161 Comment noted.

394-162 Comment noted.

394-163 Section 3.4.1 of the Fisheries Technical Report (Appendix A) has been revised to clarify this point.

394-164 Section 3.4.1 of the Fisheries Technical Report (Appendix A) has been revised to clarify this point.

394-165 Section 3.4.1 of the Fisheries Technical Report (Appendix A) has been revised to clarify this point.

394-166 The ***affected*** streams have a much lower gradient. Streams with 20-40 percent gradient are generally regarded as non-fish-bearing and moreover are much less vulnerable to the types of impact discussed in the Fisheries Technical Report (Appendix A) than are pool-riffle streams, especially fish-bearing ones.

timber harvest would not happen if the transmission line was not constructed. It also fails to acknowledge the notion that impacts of the proposed vegetation clearing in the ROW would be long-term and on-going—much longer and more disruptive than a timber harvest. The DEIS and the technical appendix need to present an accurate description of the proposed action. More importantly, the CRW HCP provides long-term protection status to forests in the CRW. Thus, these forests will continue to age and provide increasingly unique, low elevation conifer forest habitats in the rapidly developing Puget Sound region. The DEIS and technical appendix should acknowledge the unique long-term forest protection status provided by the HCP. BPA's environmental analysis should be conducted recognizing the increasing regional biodiversity value of the forest it proposes to permanently clearcut.

"...or toxicity or deterioration of water quality from accidental spills of hazardous materials."

394-175 The DEIS and technical appendix should evaluate the potential of leaching of metals from the towers or lines, and the associated risks to water quality.

4.1 Construction Impacts
4.1.1 Impacts Common to All Action Alternatives
4.1.1.1 Impacts

Disturbance to Fish Habitat from Removal of Riparian Vegetation

"Riparian trees protect fish habitat by filtering runoff before it reaches the stream, shading the stream and reducing mid-summer temperatures, providing LWD to streams which increases habitat complexity, and providing organic matter to the stream which increases productivity in the aquatic food chain".

394-176 Riparian trees and vegetation also provide soil stability, shoreline stabilization, and insects as food.

"BPA would prepare a clearing plan ..."

All methods proposed in this plan would have to meet and be conducted by SPU standards and with SPU approval for all areas within CRW.

394-177 *"... drainage features would be installed where needed in accordance with the Washington Forest Practices Rules* (WSFPR).

SPU standards would have to be followed if they exceed WSFPR and would be subject to SPU approval for areas in CRW.

Culvert or Bridge Installation—

"Some fish in the streams along the proposed transmission line ROW, including sensitive species such as bull trout, steelhead, and salmon, migrate upstream to spawn."

394-178 Although it is mentioned elsewhere in the report that bull trout are not likely to be found in the project area due to warm stream temperatures, it is implied that they are here. The CRW HCP presents strong evidence that bull trout are not resident in the lower Cedar River system, but this source is not cited in this technical appendix. The DEIS and technical appendix need to present a complete and consistent analysis of fisheries and potential impacts.

"BPA would comply with guidelines for fish passage in the design ....."

394-179 The DEIS and technical appendix should commit to ensuring all pertinent plans would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

394-167 The relationship between the two streams has been clarified in Section 3.4.1 of the revised Fisheries Technical Report (Appendix A).

394-168 Comment noted.

394-169 Section 3.4.2 of the Fisheries Technical Report (Appendix A) has been revised to clarify this point.

394-170 Section 3.4.3 of the Fisheries Technical Report (Appendix A) has been revised to clarify this point.

394-171 Section 3.4.3 of the Fisheries Technical Report (Appendix A) has been revised to clarify this point.

394-172 Comment noted.

394-173 There is no inconsistency. New access roads outside the ROW would be distant from fish-bearing streams and have no potential to cause impacts to them. Temporary roads may be needed by the construction contractor for clearing trees and for access to pulling and reeling sites. Temporary roads would be located within the existing or new ROW in upland areas. One temporary bridge crossing, running from upland bank to upland bank, may be needed for construction. The bridge would be removed after construction. Temporary roads would be abandoned and the disturbed area would be reseeded.

394-174 Comment noted.

394-175 No toxic materials have been identified leaching from Bonneville Power Administration (BPA) lines or towers. BPA has reviewed the processes by which the steel to be used for towers in the CRW would be prepared to determine if hazardous materials could leach from the steel. The protective coating on these towers will be hot-dipped galvanization. This is a Zinc coating that fuses with the steel as well as coats it. This is the same process used to galvanize steel pipes for potable water transmission.

The galvanized steel is then dulled by dipping into acid. This gives the steel a darker appearance. The acid is rinsed off completely by dipping into a water bath.

Fine Sediment Delivery to Streams—

"Clearing of the transmission line ROW, grading and placement of tower footings, and construction of new access roads and their associated stream crossing structures would expose soil to the erosive forces of wind, rain, and surface runoff during construction and until sites were revegetated. Such erosion would deliver fine sediment into streams....Construction of the transmission line would cause low impacts to fish and their habitat as a result of erosion and sedimentation... BMPs that would minimize potential impacts to fish from turbidity and sedimentation."

394-180 This analysis of potential erosion effects does not mention that the types of soils the ROW passes through on the south slope of Brew Hill are poorly consolidated glacial sediments that easily erode. SPU has observed active erosion in the existing ROW where Rock Creek is incised into a narrow ravine. Although a note in this report mentions the existing ROW offers a good basis for predicting effects of the proposed ROW, impacts of the existing ROW to streams (such as erosion) are rarely mentioned in the analysis. Rather than acknowledging that such erosion could be an ongoing problem, the analysis states that revegetation and BMPs will readily eliminate erosional effects. This is questionable considering BPA's present level of management of its existing ROW. The DEIS and the technical appendix need to present a complete and accurate analysis of fisheries and potential impacts.

"BPA has constructed transmission lines using a number of standard construction practices and BMPs that would minimize ...."

394-181 The DEIS and technical appendix should commit to ensuring all pertinent plans would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

Adverse Effects to Fish from Accidental Spills of Hazardous Materials --

"Spill Prevention and Contingency Plan..."

The DEIS and technical appendix should commit to ensuring all pertinent plans would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

Impacts to Species Listed and Proposed for Listing under the Endangered Species Act—

394-182 Impacts of reduced LWD input and increased stream temperatures are described as possible impacts to listed or proposed listed species. Sedimentation, as described just above, is also a potential impact.

"Other streams in the project area are too narrow and steep to support chinook salmon spawning habitat, and all streams in the project area are too warm to support bull trout spawning habitat."

394-183 This is likely untrue for Steele Creek and lower Taylor Creek. The DEIS and technical appendix need to present a complete and consistent analysis of fisheries and potential impacts.

"... all streams in the project area are too warm to support bull trout."

394-184 The DEIS and technical appendix should provide data or appropriate references to support this contention. The DEIS and technical appendix need to present a complete and consistent analysis of fisheries and potential impacts.

4.1.1.2 Mitigation

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The last step in the coating process is to apply a white rust inhibitor (keeps white rust from forming while in transit). This is accomplished by dipping the steel into a solution of Sodium Dichromate, that when applied, fuses to the metal becoming Zinc Dichromate. This last step is optional and will be foregone for material entering the CRW.

The fasteners (bolts) are galvanized in the same process as indicated above. A lubricating wax is utilized as dictated by the ASTM A325 and ASTM A563 standards.

The aluminum conductors (lines) are essentially pure aluminum (99.4% Al) with galvanized steel cores. The aluminum (line) is essentially inert as it is coated with a layer of aluminum oxide NOTE: Aluminum oxide is one of the most stable ceramics known. There are no oxidation inhibitors applied to ACSR conductors. The galvanizing on the steel core is sacrificial, as is the standard scheme with any galvanizing.

Insulators are essentially an inert entity being of porcelain/ galvanized steel or EPDM polymer/galvanized steel. Either insulator type carries no corrosion inhibitor nor do they leach any compounds in significant quantities (if at all).

394-176 Section 4.1.1.1 of the Fisheries Technical Report (Appendix A) has been revised to note this point.

394-177 When the DEIS was written, not all information was available. The term "clearing plan" is not a plan per se — it is a clearing advisory based on topography and location of the conductor (sag and swing) that gives "safe" heights, i.e., heights that could be allowed given a few years growth at various distances from centerline. This advisory, in conjunction with other tools, aids in the selection of danger trees and retention of vegetation within the ROW. BPA will be preparing a clearing plan specific to the CRW with assistance from SPU staff.

See response to Comment 394-081.

394-178 The Proposed Action does not only affect the Cedar River Watershed. Bull trout may be present in the Raging River Watershed. The Fisheries Technical Report (Appendix A) does not say that bull trout are likely to spawn in the project area.

394-185 The term "mitigation" as used here appears to refer to methods for minimizing impacts, not actions to replace lost function. One of the most serious deficiencies in the DEIS and all of its technical appendices is the lack of compensatory mitigation for the unavoidable impacts that would occur. Impacts to fish populations and habitat (including listed species) are acknowledged in the DEIS and its technical appendices, yet no compensatory mitigation is recommended to compensate for these impacts. The DEIS and technical appendices should commit to compensatory mitigation for unavoidable impacts.

394-186 BPA is obligated to acknowledge and meet the intent of local regulations, including sensitive areas provisions. For example, King County requires other public utilities such as Puget Sound Energy to compensatorally mitigate every tree removed from wetland and riparian habitats during operation and maintenance of their transmission system. The DEIS and technical appendix should commit to similar or other adequate and appropriate compensatory mitigation to meet the intent of local sensitive areas provisions.

The DEIS and technical appendix should acknowledge that all pertinent plans, BMPs, and methods mentioned in this section would meet SPU standards and be subject to SPU approval for all areas within CRW.

"To minimize potential impacts to fisheries habitat from clearing of vegetation:
BPA would site the transmission line to minimize clearing of riparian vegetation..."

394-187 Locating the proposed transmission line ROW alternatives appear to be relatively fixed. Information presented in the BA on the location of project facilities for the proposed action also suggests these features are relatively fixed. Therefore, siting the line to minimize clearing of riparian vegetation is unlikely. The DEIS, its technical appendices, and associated permitting documents need to present a complete and consistent description of the proposed action.

"Culverted crossings in areas where fish are present would be designed to achieve appropriate flow and depth for fish passage and would be large enough to prevent clogging with debris."

394-188 How large would these be? It seems unlikely that absolute prevention of debris clogging would be achieved. What about maintenance of culverts? The DEIS and technical appendix should describe the process for determining the size and location of culverts, and should disclose who will be responsible for maintaining roads and culverts. The DEIS and technical appendix need to present a complete and consistent analysis of fisheries and potential impacts.

To minimize the potential for increases in fine sediment delivery to streams:
"...In areas that could be susceptible to erosion, BPA would stabilize the site or road using a variety of methods, which may include riprapping or mulching."

394-189 Mulching is not likely to stabilize the site or road, although it could provide some temporary reduction in sedimentation. Riprapping along waterbodies is generally not a desirable form of bank stabilization, except where absolutely necessary to protect built structures. In such cases, King County has required compensatory mitigation for the use of riprap. The DEIS and technical appendix should describe the compensatory mitigation to be implemented should riprap be used.

"BPA would site towers and roads appropriately, use sediment and erosion control methods during construction, and minimize clearing of riparian vegetation."

394-190 The DEIS and technical appendix should describe these project components. Information provided in the BA suggests that BPA has conducted sufficient design engineering for the proposed action as to be able to describe these components in detail. The DEIS' s "trust us"approach is not satisfactory for this proposed action.

They are not, due to (relatively) warm waters throughout the Raging River Watershed. However, the U.S. Fish and Wildlife Service does not regard the absence of high-quality bull trout habitat as proof of their absence from the Watershed; for example, it is conceivable that an anadromous individual could ascend the Raging River to the project area, in spite of the absence of suitable spawning habitat in the Raging River headwaters. These and related considerations are discussed in greater detail in the Biological Assessment for the proposed project. The USFWS did conclude that the project would not affect bull trout (U.S. Fish and Wildlife Service, February 23, 2002).

394-179 See response to Comment 394-081.

394-180 Areas of soil erosion would be expected along steep banks of a high-energy stream that is incising, such as was described for a section of Rock Creek. All but one of the soil units mapped along the southern and eastern flanks of Brew Hill, which Alternative 1 would cross, are indicated by the US Soil Conservation Service (presently referred to as the Natural Resource Conservation Service) to have a slight erosion hazard. An area of moderate soil erosion hazard is mapped in the headwaters of Rock Creek (soil unit 274, Welcome Loam, Figure 5, Sheet 2 of 3, Geology, Soil, Climate, and Hydrology Technical Report). For more information, see Appendix F of the FEIS.

394-181 Please see response to Comment 394-179.

394-182 Sedimentation is recognized as an effect in many parts of the Fisheries Technical Report (revised Appendix A) and is discussed at length in Section 4.1.1, Impacts Common to all Alternatives.

394-183 Thank you for your comment. However, in the absence of supporting data, this information is not sufficiently credible to be incorporated into the technical analysis.

394-184 No bull trout spawning areas have been identified in western Washington at elevations of less than 2,000 feet. Section 4.1.1.1 of the revised Fisheries Technical Report (Appendix A) provides an appropriate citation.

"BPA uses several standard methods to minimize erosion and sedimentation associated with transmission line construction."

394-191 The DEIS and technical appendix should describe these "standard methods."

"Except at stream crossings, roads would be constructed outside of the riparian corridors of streams,"

394-192 Does this mean the HCP 300 ft buffer? The DEIS and technical appendix should define what is intended by "riparian corridors."

"BPA would comply with the standards and guidelines established in the Record of Decision (ROD) for vegetation management (BPA 2000)."

394-193 The DEIS and technical appendix should include a summary. It is not reasonable for readers to obtain and read the ROD.

"To avoid potential impacts to fish from acoustic shock"

394-194 Specifically, "working within WDFW windows" is missing.

4.1.1.3 Cumulative Impacts

394-195 There is no mention of cumulative impacts relative to the existing transmission line ROW. Clearing of the existing ROW has resulted in loss of LWD recruitment, reduced shading to streams, and probably increased erosion. Yet the analysis in this report does not address the cumulative effects that the proposed transmission ROW would have to these already existing impacts. This comment applies to all the Cumulative Impacts assessments in the DEIS and its technical documents.

4.1.1.4 Unavoidable Effects, Irreversible, or Irretrievable Commitment of Resources
"Even with BMPs to control erosion, road construction would likely cause some fine sediment to enter nearby streams. This effect could be minimized by consistent monitoring, especially during storm events, and by proper maintenance of road and stream crossings."

394-196 No monitoring program is described anywhere in the DEIS or this technical appendix that would address sediment input to streams. Unless BPA is committed to implementing such a monitoring program, this reference should be eliminated and BPA's intent to do no such monitoring should be disclosed. However, the DEIS and technical appendix should describe commitments to avoiding, minimizing, and correcting erosion problems.

"This effect could be minimized by consistent monitoring, especially during storm events, and by proper maintenance of road and stream crossings."

394-197 Is BPA committing to such monitoring and maintenance?

"..... because water temperatures are generally too high to support bull trout ..."

394-198 The DEIS and technical appendix need to provide data or appropriate reference to support these conclusions.

4.1.3 Alternative Transmission Line Impacts
4.1.3.1 Alternative 1
Impacts—

394-185 Please see response to Comment 340-002.

394-186 Please see responses to Comments 340-002 and 394-081.

394-187 See response to Comment 394-103.

394-188 See response to Comment 394-084. Sizing and design of drainage culverts is also described in Section 4.6.2.2 of the SDEIS. Section 4.4.2.1 also contains design guidelines for culverts.

394-189 The only riprap that would be used would be 6-inch light riprap as ditch lining associated with access road construction. The road where it would be used is located outside of any delineated wetlands and is not along a stream.

394-190 The SDEIS includes more design information. BPA knows of no mortality issues involving avian species with its existing Raver-Echo Lake power line in the project. All proposed facilities (towers, access roads and substation expansion) have been sited in uplands, and BPA would prepare an erosion and sediment control plan as required by the National Pollutant Discharge Elimination System, to control stormwater runoff until the site has become 70 percent stabilized, as required by the permit. BPA would file the stormwater permit with EPA, and also file a notice of termination at the time the temporary stormwater erosion control devices would be removed. BPA would also try to minimize the removal of any riparian vegetation.

394-191 Section 4.4.2.1 of the SDEIS describes a variety of mitigation measures that will be imposed to control erosion during and after construction.

394-192 Section 9.0 of the Fisheries Technical Report (Appendix A) includes a glossary that defines technical terms such as "riparian."

394-193 The Vegetation Management ROD is available upon request and can also be found on the internet at ***www.efw.bpa.gov/cgi-bin/PSA/NEPA/SUMMARIES/VegetationManagement_EIS0285.*** It is not difficult to obtain.

"Construction of Alternative 1 would result in the clearing of 33 ac. within 300 ft. of potentially fish-bearing streams, and 12 ac. within 100 ft. of potentially fish-bearing streams. About 2,900 ft. of stream would be within the cleared ROW."

394-199 This generalized accounting of clearing includes no site-specific information. There is no information presented about how much clearing is associated with what stream crossing. The DEIS and technical appendix need to present a complete and consistent analysis of fisheries and potential impacts.

Cumulative Impacts—
Stream Temperature:
"Proposed vegetation clearing would not comply with riparian shade protections called for by either the Washington Forest Practices Rules or the CRW HCP, and may result in local peak stream temperatures exceeding metabolic optima for salmonids. In streams only utilized by resident salmonids, this would constitute a moderate impact. In the three streams potentially utilized by threatened salmonid species (Cedar River, Raging River, and Rock Creek), this could constitute a high impact...The third stream, Rock Creek, would be crossed in a headwaters area and would be very unlikely to be utilized by chinook salmon (which avoid such narrow, high-gradient streams) or bull trout (which do not spawn in such warm streams). These considerations may result in a low impact to threatened species, but this conclusion cannot be confirmed until the extent of clearing needed in the affected areas is known."

394-200 This section needs to disclose that Rock Creek will likely have coho salmon, a species proposed for listing. It should receive protection equivalent to listed species, and therefore rates as a **high** impact. Also, this environmental analysis is not clear with regard to the extent of clearing. The results of this analysis can not be evaluated. The DEIS and technical appendix need to assume a specific level, presumably a maximum level, of clearing for a review of the analysis to be possible. The DEIS and technical appendix need to present a complete and consistent analysis of fisheries and potential impacts.

LWD Recruitment:

"Currently, LWD recruitment is protected by provisions of the Washington Forest Practices Act and the Cedar River and WDNR HCPs that ensure retention of riparian forest buffers 100 to 300 ft. wide. Proposed vegetation clearing would not comply with those protections and may result in reduced LWD recruitment and resulting adverse impacts to in-stream fish habitat."

394-201 No attempt is made to quantify how much stream would be affected by clearing of these buffer areas. SPU has estimated that approximately 1,800 ft of Rock Creek is within 300 ft of the cleared right of way. Streams that run parallel to the ROW will have more impact. The DEIS and technical appendix need to present a complete and consistent analysis of fisheries and potential impacts.

"Because no herbicides would be used in vegetation control within 400 ft. of streams and none would be used in the CRW, cumulative effects of toxic substances from the power line would be unlikely even when combined with other sources in the watersheds."

394-202 Again, are there any toxics (metals) leaching off the lines or towers? The DEIS and technical appendix should evaluate the potential for such leaching, and the associated risks to water quality.

4.1.3.2 Alternative 2
Impacts—

The Alternative 2 ROW would be 9 mi. long and cross 11 fish-bearing (Type 1, 2, or 3) streams and an unknown number of non-fish-bearing (Type 4 or 5) streams.

394-194 As noted in Section 4.1.1.2 of the Fisheries Technical Report (Appendix A), impacts due to acoustic shock would be avoided by doing any required blasting when vulnerable life history stages are not present.

394-195 The existing transmission line was considered in the cumulative effects evaluation. The cumulative effects evaluation in Section 4.0 of the Fisheries Technical Report (Appendix A) was revised to make this clear.

394-196 BPA intends to conduct a water turbidity monitoring program of the Cedar River, prior to, during, and following the completion of construction activities. Although the details of the monitoring program have not been worked out, the landowner's input (SPU) would be sought in how such a monitoring program would be conducted.

394-197 BPA is committed to conducting water turbidity monitoring to assure that its activities would not affect the water quality of the Cedar River Municipal Watershed; although the terms of such a monitoring program has not yet been determined.

With respect to maintenance activities, BPA tries to maintain all of its facilities on an as needed basis and has developed a long-term maintenance agreement with SPU for access road maintenance in the CRMW.

394-198 Section 4.1.1.4 of the revised Fisheries Technical Report (Appendix A) provides an appropriate citation.

394-199 Areas potentially affected by clearing at stream crossings are all identified in Figure 3 of the Fisheries Technical Report (Appendix A). Areas potentially affected by clearing of riparian forest are listed in Table 4 of the report. BPA was unable to obtain access to the CRW to gather site-specific clearing information, so that data was unavailable.

394-200 The revised Fisheries Technical Report (Appendix A) acknowledges that potential coho salmon use of Rock Creek. However, coho salmon is not a listed species under the ESA and NMFS has found that listing is "not warranted." Therefore, it is

394-203 Descriptions of segments E, F, and G (the difference from Alternative 1) only identify the Cedar River – yet 2 additional stream crossings are numbered here compared to Alternative 1. The DEIS and technical appendix need to present a complete and consistent analysis of fisheries and potential impacts.

"New roads would cross two fish-bearing streams, requiring that culverts or bridges be built."

394-204 Where would these features be located? Previous sections have not identified them. Reviewers are unable to assess environmental impacts without knowing where these new crossings would be.

4.1.3.3 Alternative 3
Cumulative Impacts—
Stream Temperature:
"The one stream potentially utilized by threatened salmonid species, the Cedar River, runs in a relatively deep canyon where little vegetation clearing may be required—in this case, a low impact would be expected for threatened species. If extensive clearing were required, however, this would result in a high impact."

394-205 As mentioned above, the DEIS and technical appendix need to be specific about anticipated environmental impacts. Reviewers need to know if this extensive clearing will or will not occur to be able to assess the impacts of the proposed action.

Table 5

394-206 This table contains incorrect information. For example, based on data provided in Burton (1999), the earliest confirmed sighting of Chinook salmon in the Cedar River is August 18. Based on data in Burton (1997), the latest recorded steelhead spawning is June 11, and the latest date of completion of steelhead spawning is August 11. The DEIS and its environmental analyses should be based on correct information on the affected natural resources. This table should be revised to include correct information. (Burton, Karl. 1997. Cedar River steelhead monitoring program annual report. Seattle Public Utilities.) (Burton, Karl. 1999. Temporal and spatial distributions of Cedar River Chinook salmon spawning activity. Seattle Public Utilities.)

Also, this or another table should address lamprey species in the same manner.

4.1.3.6 Access Roads
Cumulative Impacts*—Because all roads in the project area are currently managed to avoid delivery of fine sediment to fish-bearing streams, cumulative impacts due to roads would be low under each of the action alternatives.*

394-207 This statement is unclear. Not all roads in the project area are currently designed or managed to avoid delivery of fine sediment to streams. Also, it is SPU's opinion that BPA currently does not manage the roads it uses in the CRW such that delivery of fine sediment to fish-bearing streams is avoided. Roads in the CRW are the most significant sources of sediment to streams. Adding more than 1.5 mi of new roadway and impervious surface is a clear and significant cumulative impact. The DEIS and technical appendix need to state clearly what is meant by this statement and acknowledge the significant role of roads in contributing sediment to streams. SPU believes the cumulative impacts of adding such new roads are greater than "low."

4.2 Operation and Maintenance Impacts
4.2.1 Impacts Common to All Action Alternatives
4.2.1.1 Impacts

"... routine monitoring of the transmission line."

394-208 In addition, BPA should be "on call" for response if notified of a problem or need for maintenance at any time by SPU.

not evaluated as "equivalent to listed species." Further details on potential effects to chinook and coho salmon, and bull trout, are available in the biological assessment for the Proposed Action. Because detailed designs have not been prepared, information on the planned extent of riparian clearing is not available.

394-201 See response to Comment 394-199. BPA assumed that the maximum potential amount of clearing would be necessary, and impacts were evaluated on the basis of this assumption.

394-202 See response to Comment 394-175.

394-203 Potential impacts to streams resulting from the Proposed Action are detailed in Section 4.0 of the Fisheries Technical Report (Appendix A).

394-204 As is shown in Figure 3 of the Fisheries Technical Report (Appendix A), the two new roads are located at crossings "9" and "10" in Segment "E." Segment E is a part of Alternative 2, not the Proposed Action. BPA has designed its access road system to avoid constructing any new roads across fish-bearing streams.

394-205 All streams would be spanned. BPA is proposing a double-circuit option at the Cedar River crossing to reduce clearing.

394-206 Section 4.1.3.3 of the Fisheries Technical Report (Appendix A) has been revised to include this information. Details about potential impacts to lamprey species is presented in the Biological Assessment for the Proposed Action.

394-207 BPA would design and maintain all roads to avoid or minimize fine sediment delivery to streams. It is true that some roads may occur in the project area that are neither used nor maintained by BPA. Such roads represent existing conditions and their future use or maintenance was not evaluated as part of the Proposed Action. As noted in the Fisheries Technical Report (Appendix A), the new roads would be constructed in accordance with a number of mitigation measures and would have a "low" impact. It is agreed that in the absence of such mitigation measures, the impact of the new roads might not be "low."

"During routine maintenance, BPA would also inspect roads, identify potential erosion problems, and correct any erosion problems identified."

394-209 An earlier section suggested that inspections would need to be done after storms.

5.3.1 CRW HCP

394-210 The DEIS and technical appendix should clearly acknowledge that the proposed action does not comply with riparian and stream protection provisions specified in the City's HCP.

394-208 BPA personnel are readily available to address any problem or need for maintenance.

394-209 The Fisheries Technical Report (revised Appendix A) does not contain any references to road inspection after storms.

394-210 Section 4.1.1.1 of the Fisheries Technical Report (revised Appendix A) states that vegetation clearing that is not performed in accordance with established regulatory standards is assumed to have a moderate or high impact on fish resources. As noted in the text, three different regulatory standards may apply. One of these is the Cedar River Watershed HCP (City of Seattle 2000). On other lands within the project area, the WDNR HCP (1997) or Washington Forest Practices Rules (WFPB 2000) may apply.

Kangley-Echo Lake Transmission Line Project DEIS
Appendix B – Final Wildlife Technical Report

Comments from Seattle Public Utilities
September 4, 2001

***DEIS Appendix citations in italics*; SPU comments in normal font.**

394-211 The term "conversion" rather than "alteration" is traditionally preferred when referring to converting one habitat type to another, either permanently or temporarily.

1.1.1.2 Clearing

"A clearing advisory would be generated..."

394-212 An example of how the clearing advisory would work is essential to understanding how variable the area of clearing outside the ROW will be.

"Merchantable timber purchased from private owners would be marketed and non-merchantable timber would be left lopped and scattered, piled, chipped, or would be taken off-site. Non-merchantable timber may or may not be burned because of air quality constraints... Additional best management practices (BMPs) for timberland would also be used... The total amount of clearing required for this project is unknown at this time... An additional amount of land would be cleared for roads that are needed off the ROW and for roads determined to be in poor condition and requiring upgrading by BPA."

394-213 SPU is not able to comment on this effectively because insufficient information is presented. How will the merchantable timber be valued, especially in light of the goals of the Cedar River Watershed (CRW) Habitat Conservation Plan (HCP)? That is, the value of the trees to SPU is not so much in their value as timber but in the habitat and water quality functions they provide. The DEIS and technical appendix should indicate how SPU will be compensated for the habitat and water quality values of the harvested trees and the associated opportunity costs that SPU will incur for this lost habitat over the lifespan of BPA's constructed proposed action. The DEIS and its technical appendices need to present a complete and consistent description of the proposed action.

394-214 Also, the DEIS and technical appendix need to commit to regarding the disposition of non-merchantable: is it going to be left or taken, burned or not? The DEIS and technical appendix should describe the BMPs that will be implemented.

394-215 The DEIS and technical appendix should present firm estimates of the amount of land to be cleared and where clearing will occur. As evidenced by information presented in the project's BA, BPA has sufficiently engineered the proposed action such that locations for towers and new roads have been identified. BPA should thus be able (in the DEIS and its technical appendices) to firmly estimate the total amount of clearing for the proposed action. The DEIS and the technical appendix need to present a complete and accurate environmental analysis, which includes the disclosure of such known project characteristics.

394-216 Also, the DEIS and technical appendix should state that merchantable timber would be purchased from landowners, subject to landowner approval, and should not be stated as an absolute. Some landowners may wish to retain the logs.

"... all trees, bush and snags would be felled and stumps over 22" would be removed, including their root systems."

394-211 Comment noted.

394-212 BPA would gladly share the data within the clearing advisory and show SPU personnel how that data is used to aid in the selection of danger trees and retention of vegetation within the ROW.

394-213 There are but a few ways to value merchantable timber. The method most accepted within the appraisal industry is to value that timber through the Cost Approach — delivered prices less costs. There is mitigation proposed to replace any potential lost value of the CRW.

394-214 Burning will not be allowed. See response to Comment 394-129. Disposal of nonmerchantable timber is usually part of negotiations with landowners. On some property nonmerchantable timber is treated as slash and will be disposed of through a number of possible ways including lop and scatter, chipping, mulching, piling, etc. Some landowners prefer that the timber be left for their use. In wetlands, the trees cut would be left in the wetland, or removed by helicopter.

394-215 Some of the information needed to pinpoint the quantity of clearing needed along the streams throughout the Proposed Action area is not available at this time. More field work needs to be done to fully determine the amount of clearing that would be required.

394-216 Comment noted. These details would be worked out with each individual landowner at the time the land rights would be acquired.

394-217 BPA is proposing to use a new type of tower footing (micropiles) to reduce the amount of disturbance at and near each tower site. Please see Section 2.1.1.1.

394-218 The road surface (crown) of the roads designed to accommodate cranes and track hoes normally used to construct BPA's 500-kV towers, typically would be designed to be 16-feet wide for the linear portions of the roads and wider at turns to accommodate turning movements of the longer vehicles, such as the crane and log trucks. BPA roads typically range in width from 12 to 16 feet.

394-219 See response to Comment 394-147.

394-217 The DEIS and technical appendix should describe how far beyond the footprint of the tower will this extensive clearing extend.

1.1.1.3 Access Road Construction

"Clearing and construction activities for new access roads would disturb an area about 20' wide…"

394-218 If the road itself is 20 feet wide, the disturbed area will extend beyond this. The DEIS and technical appendix should clearly indicate if this 20' is in addition to the road itself.

"…the roadbed would be repaired and reseeded as necessary."

394-219 The DEIS and technical appendix should specify that only native species wiould be used for revegetation activities in the CRW.

1.1.1.3 Storage, Assembly, and Refueling Areas

"…establish storage areas…"

394-220 The DEIS and technical appendix should address the locations for these facilities as well as related clearing/land-disturbance impacts, their adjacency to sensitive areas, and containment and fire safety design. The DEIS provides no descriptions or specifications for refueling or hazardous materials storage areas, which prevents effective review of the proposed action.

All refueling and hazardous material usage/storage facilities would be required by SPU to be outside CRW boundary. To protect the municipal water supply, SPU has "no-tolerance" objectives for spills or leaks of hazardous materials in the CRW. The DEIS and technical appendix should indicate how all spills would be prevented in the CRW.

1.1.1.5 Tower Site Preparation

"These disturbances could be as large as 370 ft radius…"

394-221 It is confusing to switch from an average reported total area of 30,000 square feet to a maximum radius of 370 ft, which is equivalent to 430,085 square feet. Total area should be reported in all cases so reviewers can effectively evaluate the actual impact.

"…remove selected trees in a 50-60 foot wide area on each side of the ROW."

394-222 This is inconsistent with the statements in Appendix C that a 75 ft removal zone would be used. The DEIS and its technical appendices need to present a complete and consistent description of the proposed action.

1.1.1.6 Tower Construction

"… helicopter tower erection could be used if access was not available or if sensitive resources would be encountered."

394-223 The DEIS and the technical appendix should define "sensitive resources." Is this the same as sensitive species?

1.1.1.9 Site Restoration and Clean-up

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394-220 See response to Comment 394-139.

394-221 BPA proposes using a new footing design for the proposed project. The new footing design would use what are known as micropiles instead of the standard footing design. See Section 2.1.1.1 of the SDEIS.

BPA would likely need to locate what is called a stringing or pull site within the CRW. These areas are selected by the contractor and would need to be agreed to by the landowner prior to their use in stringing conductors through the towers. These sites are typically about 1 acre, although they could be larger. Please see response to Comment 394-141.

394-222 The Final Wildlife Technical Report has been revised, as has the other technical study reports, to remove this statement that construction crews would remove selected trees in a 50 to 60 foot-wide area on each side of the proposed right-of-way. BPA would remove so-called "danger trees" off of the right-of-way that would pose a threat to the safe construction, operation and maintenance of the line. However, these trees would need to be identified on an individual basis and could be as far as 200 feet from the proposed right-of-way. See also response to Comment 394-217.

394-223 Sensitive resources include both sensitive species and habitats. This was clarified in Section 1.1.1.6 of the Wildlife Technical Report (Appendix B).

394-224 See response to Comment 394-147.

394-225 See response to Comment 394-147.

394-226 Analysis of potential impacts from habitat fragmentation within the Cedar River Watershed was expanded in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B). Habitat loss is analyzed in Section 4.1.2, and is discussed by alternative.

394-227 This discussion refers specifically to listed species. This was clarified in Section 1.3 of the Wildlife Technical Report

"Disturbed areas would be reseeded with grass or an appropriate seed mixture to prevent erosion."

394-224 The DEIS and technical appendix should commit to using seed mixtures free of non-native and noxious species.

"The seed mixture would include native plant species and would be free of noxious weeds."

394-225 The DEIS and technical appendix should commit to using mixtures made entirely of native plant species, not an unspecified proportion of native species.

1.2.2 Habitat Fragmentation

"Construction of the proposed project would require varying amounts of vegetation clearing, depending upon the alternative selected. This would result in the removal of habitat or potential habitat for many species, potential alteration of habitat conditions for wildlife species, and possibly habitat fragmentation, increasing the amount of edge habitat within the project area."

394-226 Habitat fragmentation is only a part of habitat loss, which is generally ignored by this section (1.2 Key Issues for Wildlife). The preferred alternative will generally result in little increase in habitat fragmentation, but will result in significant habitat loss. The DEIS and technical appendix need to distinguish those components of the project that will cause habitat loss (ROW clearing; substation construction, road-building, etc.) from those that will cause habitat fragmentation (road-building, etc.) and firmly estimate the areas of habitat loss and level of new habitat fragmentation.

1.3 Major Conclusions

"Because the project area is not known to be a high use area for listed species, the probability of mortality of listed species from collision or electrocution should be low."

394-227 The DEIS and technical appendix fail to supply data or references to support this statement. The project area (within 0.25 mile of ROW) is not an appropriate size to measure impacts to most raptor species, which typically have large home ranges. An unvalidated sighting of a northern spotted owl recently occurred near Rattlesnake Ridge, which also provides nesting habitat for peregrine falcons. The DEIS and technical report should provide data that supports this statement.

2.1 Date Sources and Study Methods

"Field visits occurred on…"

394-228 The DEIS and technical appendix should describe the field methodology, including what data were collected.

2.2 Agencies Contacted

394-229 None of the private landowners along the ROW were contacted.

3.2 Regional Context

"The CRW is owned by the City of Seattle and is subject to Washington State law and the policies of the Seattle City Council, as well as provisions for managing lands in the watershed acquired from the federal government. An HCP has recently been signed that governs the management of the watershed for the next 50 years."

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(Appendix B) to mean species listed under the Endangered Species Act, including northern spotted owl, bald eagle, and marbled murrelets. The project vicinity is not a known high use area for any of these species, and given the habitat conditions in the project area, high use by these species is not likely, as described in Section 3.3.2 of the Wildlife Technical Report (Appendix B) and supported by available data including WDFW PHS data (2000) and in Section 3.5 of the HCP for the Cedar River Watershed (City of Seattle 2000).

As described in Section 3.2, Study Area and Approach, of the Wildlife Technical Report (Appendix B), there are two landscape levels at which impacts are analyzed. The first is defined as the project vicinity, is a large area encompassed by Kent-Kangley Road, to the south, Highway 18 to the west, Interstate 90 and Rattlesnake Ridge to the north, and the boundary between the lower and upper Cedar River Watershed, as defined in Map 6 of the Cedar River Watershed HCP (City of Seattle 2000), to the east. The second is a smaller area, 0.25 mile from the centerline of the project, and was chosen because the potential impacts of the project are expected to be focused within that area.

Potential impacts to species with large home ranges are discussed in general terms in Section 4.1.1.1 and changes in the amount of habitat available for species in the project area are discussed in Section 4.1.1.2. Impacts are presented as both a total acreage amount and as a percentage of the amount of that habitat type available within 0.25 mile on either side of the ROW project area. This latter number is provided as an index to the significance of the habitat removal, to give an understanding of how much is being removed compared to the availability in the immediate area.

Data concerning an unvalidated report of a spotted owl near Rattlesnake Ridge was not available to the authors and, given that it is unvalidated, would not change the analysis. Although Rattlesnake Ridge could provide suitable nesting habitat for peregrines, according to recent available information, specifically in the Cedar River Watershed HCP (City of Seattle 2000) and WDFW PHS data (2000), they are not known to nest there.

394-230 The DEIS and technical appendix fail to mention that the primary management goal of the CRW is water quality and water production for the City of Seattle. The DEIS and technical appendix should explicitly state that the proposed action is inconsistent with the CRW HCP.

3.3 Study Area and Approach

"Wildlife species and their habitats…are discussed at two levels…"

394-231 The DEIS and technical appendix state that the broad project vicinity will be discussed to address issues related to wide-ranging species, migratory species, and species with large home ranges. However, other than a general description of the area, there was no discussion of the impacts of the project on wide-ranging species, migratory species, and species with large home ranges and their habitats. The DEIS and technical appendix should include this analysis.

"The project area addressed in a more focused manner includes only the area within 0.25 mi. of the proposed transmission line ROWs."

394-232 A project area of 0.25 mile from the ROW is too small for the scale of home range sizes and dispersal capabilities of many wildlife species of concern (e.g. spotted owl, pileated woodpecker, northern goshawk, marten, fisher…). The DEIS and technical appendix should include a discussion of the fact that edge effects from the ROW will extend into the surrounding forest for at least 200 m. This should be considered in mitigation for removal of late successional habitat.

"Within the ROWs, the predominant vegetation type is early seral in mid to late coniferous forest."

394-233 The DEIS and technical appendix should describe what this means.

3.3.1 Wildlife Habitats Within the Project Area

"Coniferous forest – late… CFL… Late seral second- or third-growth coniferous forest. Reaching a mature stage but not considered late-successional habitat."

394-234 The DEIS and technical appendix should describe the difference between seral and successional. There is 50-80 year old coniferous forest along much of the ROW in the CRW, which could be defined as mid-seral, mid-successional, or mature.

3.3.2 Species to be Analyzed

"For the purpose of this document, species that are federally-listed as threatened or endangered; federal species of concern; and Washington State listed threatened, endangered, sensitive or monitor species with the potential to occur on the west side of the Cascade Mountains were selected for analysis."

394-235 The DEIS and technical appendix should address all species listed in the CRW HCP.

3.3.2.1 Forest Community Dependent Species

"An historic spotted owl sighting occurred on lands owned by the Weyerhaeuser Company. This single owl reported in 1993 was over 0.5 mi. from the proposed Alternative 3 ROW and, therefore, was not within the project area."

394-236 Spotted owls have designated home ranges in the northwest Cascade province of 1.8 miles from an activity center. The 0.5 mile threshold specified here is not appropriate. An unvalidated but reliable spotted owl sighting also occurred near Rattlesnake Lake in early 2001.

394-228 Section 2.1 of the Wildlife Technical Report (Appendix B) was revised to include a description of the field methodology and data collection.

394-229 Comment noted.

394-230 BPA does not agree that the project is inconsistent with the HCP. See Appendix U of the SDEIS and FEIS and Appendix AA.

394-231 Potential impacts to species with large home ranges are discussed in general terms in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B), with the greatest impact expected to be habitat fragmentation. This analysis was expanded in the section to focus on changes in habitat for these species.

394-232 Please see response to Comment 394-227.

Analysis of potential impacts from habitat fragmentation within the Cedar River Watershed was expanded in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B) to include an analysis on increased edge affect. Habitat loss is analyzed in Section 4.1.2, and is discussed by alternative.

394-233 This is a typographical error and the text has been revised.

394-234 As stated in Section 3.3.1 of the Wildlife Technical Report (Appendix B), these terms are defined in the Vegetation Technical Report (Appendix C), specifically Section 3.4.

394-235 Species that were not included in the analysis were those not expected to occur in the project vicinity, as described in Section 3.3.2 of the Wildlife Technical Report (Appendix B). Inclusion of species that are not expected to occur in the vicinity was deemed unnecessary.

394-236 The spotted owl sighting in the project vicinity was of a single bird and did not have the status of residential single (WDFW 2000) and, therefore, would not be considered a site center around which a home range territory would be established. The 0.5-mile figure was provided as a reference to the proximity of the historic sighting to the project area only. Additionally, habitat for spotted owls in the location of the sighting is no longer present.

"Northern goshawks, ...pileated woodpeckers, and Vaux's swifts are also unlikely to nest within the project area."

394-237 Though these species are known to nest in late-seral forest, specific habitat requirements for these species may occur in the proposed ROW. Goshawks are known to nest in stands with >15' dbh trees; pileated woodpeckers nest in snags >20" dbh; and swifts nest in hollow trees >20" dbh. There are likely trees/stands with these characteristics along the ROW. The DEIS and technical appendix should include an analysis that considers there will be nesting habitat in CRW in the project area in the future, and that the ROW project will significantly impact that habitat.

"Bats...associated with LS or OG forest, this habitat type is not expected to occur in the project area."

394-238 This habitat will occur in CRW in the project area under the HCP; the DEIS and technical appendix need to acknowledge and consider this circumstance.

"...project area does not contain suitable nesting habitat for bald eagles."

394-239 The DEIS and technical appendix should acknowledge suitable habitat will develop in the CRW under the HCP, and should discuss the possibility.

Table 3. Species with Federal or State Status Not Expected to Occur within the Proposed Project Area

394-240 Habitats for the marbled murrelet, Canada lynx, Johnson's hairstreak, grizzly bear, and gray wolf (along with many other species) may occur in the project area in the CRW in the future.

Table 3: Peregrine falcon is not expected to occur in project area because of lack of suitable nesting and foraging habitat.

394-241 There is suitable nesting habitat for peregrine falcon within the lower CRW, and the project area is within the home range and would provide foraging habitat. This wide-ranging species with a large home range should be included in the DEIS and technical appendix discussions, especially considering the issue of raptors and electrocution on powerlines.

Table 3: Golden eagle is not expected to occur in project area (no reason given)

394-242 The DEIS quotes a reference which states that eagles have been observed foraging in clearcuts at moderate elevation west of the Cascade crest, so it is unclear why they eliminated this species from consideration. Further data should be provided, or the species should be included in the analysis.

"Because these characteristics are usually associated with late-successional or old-growth forest, this habitat type is not expected to occur in the project area."

394-243 Facilitation of these habitats is a primary goal of the CRW HCP. Though these conditions do not currently exist along the ROW, they likely will in the future. The DEIS and technical appendix should consider this.

3.3.2.3 Aquatic Community Dependent Species

"Cascades frog is found... above 2,600 ft in elevation..."

394-244 This species was found as low as 1,600 ft. elevation in the CRW. The DEIS and technical appendix analysis should be adjusted accordingly.

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Data concerning an unvalidated report of a spotted owl near Rattlesnake Ridge was not available to the authors and, given that it is unvalidated, would not change the analysis. Although Rattlesnake Ridge could provide suitable nesting habitat for peregrines, they are not currently known to nest there (i.e., in the Cedar River Watershed HCP [City of Seattle 2000] and WDFW PHS data [2000]).

394-237 Section 3.3.2.1 of the Wildlife Technical Report (Appendix B) recognizes that the project area may contain suitable foraging and dispersal habitat for these species. According to the Cedar River Watershed HCP (City of Seattle 2000), nesting habitat for Goshawk may occur in the lower Cedar River Watershed, although potential nesting stands listed did not include the types found within the ROW. The HCP also identified pileated woodpecker and Vaux's swift nesting habitat as occurring primarily in the upper watershed. The discussion of impacts was revised to include loss of recruitment habitat for forest dependent species.

394-238 The discussion of impacts was revised to include loss of recruitment habitat for forest dependent species.

394-239 See response to Comment 394-238.

394-240 The discussion of impacts was revised to include loss of recruitment habitat for forest dependent species. This would include marbled murrelets and Johnson's hairstreak. The lower Cedar River Watershed (the project vicinity as defined in Section 3.3 of the Wildlife Technical Report) is not likely to provide habitat for lynx in the future because of the low elevation of the area and the known association of lynx with high elevation subalpine fir/spruce forests (Ruediger, et al. 2000). Future potential development of suitable habitat for gray wolf and grizzly bear is also questionable given the amount of ongoing human activity in and around the watershed.

394-241 A discussion about peregrine falcons was added to Section 3.3.2, Species to be Analyzed, of the Wildlife Technical Report (Appendix B). The Cedar River Watershed HCP (City of Seattle 2000) does not identify potentially suitable habitat within the lower Cedar River Watershed. However, because Rattlesnake Ledge is within the described project vicinity and could

4.1.1 Alternative Transmission Line Impacts

...assuming that a 150 ft ROW is cleared....

394-245 This assumption is inconsistent with information provided in sections 1.1.1.2 and 1.1.1.5. This analysis also fails to consider impacts associated with clearing new (temporary and permanent) roads and staging areas, as well as short- and long-term impacts of the 50 ft temporary construction easement previously mentioned by BPA (but not mentioned in the DEIS) . SPU believes Table 5 significantly underestimates habitat impacts. The DEIS, its technical appendices, and associated permitting documents need to present a complete, accurate, and consistent description of the proposed action.

4.1.1.1 Impacts

394-246 The DEIS and technical appendix should include a discussion of the impact of exposure to electric and magnetic fields (EMF) and the risk of decreased immune response for limited-mobility species, especially amphibians.

"Disturbance of Wildlife – Noise from blasting would...result in a low-level impact."

394-247 Blasting could result in moderate level impact if blasting is done during breeding season near a nest or den site. The DEIS and technical appendix need to discuss the impacts of blasting and other construction activity (and resulting noise and dust).

"Habitat Fragmentation—Under all of the alternatives, the amount of habitat fragmentation within the project vicinity would increase, resulting in a moderate-level impact. Fragmentation would lead to an increased amount of edge habitat in the area."

394-248 Habitat fragmentation is included here, when it should be a subset of habitat loss. Additional forest fragmentation under the preferred alternative would be small; however, habitat loss would be significant.

4.1.1.2 Mitigation Common to all Alternatives

394-249 The DEIS and technical appendix should consider all species included in the CRW HCP and should commit to compensatory mitigation designed to offset habitat loss for these species.

Most impacts were described in Section 4.1.1.1 as moderate or high, yet the mitigation proposals are primarily minimizations of impact. This is not adequate mitigation for the moderate/high impacts of permanent loss of habitat, permanent habitat fragmentation, mortality, and disturbance. The DEIS and technical appendix should acknowledge this and commit to mitigation actions that include compensatory mitigation, such as creation and protection of equivalent quality habitat of greater area than that lost due to construction of the proposed action. This needs to be habitat that would not already have occurred and/or been protected.

394-250 The fact that high quality low elevation late successional (LS) habitat will be created in CRW under HCP, and that the ROW will permanently fragment this large block of habitat needs to be addressed by the DEIS and technical appendix. Mitigation such as leaving corridors of trees maintained at a specified height through the ROW should be addressed.

Impacts on Threatened, Endangered and other Sensitive Species

394-251 Proposed mitigation would appear to be ineffective for mitigating impacts to species associated with forested and wetland/riparian habitats. Anticipated impacts will only benefit early seral-associated species.

potentially be used by peregrine falcons for nesting, the Wildlife Technical Report was revised.

394-242 Because the project is located at low elevation, it does not meet the definitions given for golden eagle habitat and so golden eagle was not included in the analysis in Section 3.3.2 of the Wildlife Technical Report (Appendix B).

394-243 The discussion about impacts was revised to include loss of recruitment habitat for late successional forest dependent species.

394-244 Elevations for Cascades frog occurrences were not included in the Cedar River Watershed HCP (City of Seattle 2000), therefore this information was not available to the author. Section 3.3.2.3 of the Wildlife Technical Report (Appendix B) was revised to show that Cascades frogs occur at these elevations in the Cedar River Watershed.

394-245 The 150-foot clearing was based on information available when the report was first prepared in late 2000. Section 4.1.2 of the Wildlife Technical Report (Appendix B) has now been revised to reflect currently available data on clearing.

394-246 Information about the electromagnetic effects of transmission lines on limited -mobility species, such as amphibians is not readily available, and the detailed discussion that would be required to address this issue would be outside of the scope of this EIS, therefore BPA will not be undertaking such a study during the environmental review.

394-247 The "low level" impact was derived from the expectation that blasting would be infrequent and that disturbance from blasting would be of short duration. This analysis was expanded in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B).

394-248 Habitat loss is discussed in Section 4.1.2 of the Wildlife Technical Report (Appendix B), and is discussed at the species level by alternative. Habitat loss was added to the list of major issues and also discussed at the broader scale, in Section 4.1.1 of the Wildlife Technical Report.

394-252 The DEIS and technical appendix fail to include creating and leaving snags of acceptable height in cleared zones of forested riparian and wetland areas. The DEIS and technical appendix should commit to ensuring all pertinent plans would meet and be conducted by SPU standards and approval for those portions of the project constructed in the CRW.

394-253 Minimizing forest vegetation clearing is not adequate mitigation for forest habitat conversion to early successional habitat. The DEIS and technical appendix should acknowledge this and commit to compensatory mitigation that effectively offsets habitat conversion.

394-254 Commercial (or ecological) thinning will also need to be conducted. The DEIS needs to include specifics on how this would be accomplished. For example, will BPA pay for thinning on adjacent lands? How many acres? Located where?

394-255 Reviewers of the DEIS and this technical appendix need targets for coarse woody debris density (including diameter and decay class) to effectively evaluate the efficacy of this proposal. The species for which this will provide mitigation need to be included in the DEIS and technical appendix.

Habitat Fragmentation

394-256 Clearing only as much vegetation as necessary does not compensate for the habitat fragmentation created by construction of new ROW, roads, and substation—especially considering the major fragmentation the ROW will create in low elevation late successional forest in CRW in the future. The DEIS and technical appendix should acknowledge this and commit to appropriate compensatory mitigation.

394-257 Leaving coarse woody debris is unlikely to address connectivity issues for most species. Even for those species that use coarse woody debris, the microclimatic differences between a closed canopy forest environment and an open environment may prevent use. The DEIS needs to add specifics as to exactly which species will be helped by this proposal.

394-258 Leaving some areas intact will be inadequate to mitigate for the fragmentation the proposed action will create. Specific compensatory mitigation to offset this fragmentation need to be added to the DEIS and technical appendix.

Bird Collision or Electrocution

"...guidelines described in ...1981 report..."

394-259 The guidelines BPA will use need to be described in the DEIS in sufficient detail for reviewers to evaluate their effectiveness. Also, more current techniques than from 1981 need to be reviewed and used to hazard-proof the lines from collision and electrocution, especially by raptors. A complete discussion of this issue needs to be included in the DEIS and technical appendix so reviewers can evaluate whether the methods will be effective.

A discussion of the possibility of placing perches in safe locations and barriers to perches in unsafe location on the towers should be included in the DEIS and technical appendix.

A complete discussion of proposed methods to minimize bird collision with ground cables should be included in the DEIS and technical appendix.

A monitoring program to evaluate the effectiveness and longevity of the techniques to minimize/avoid both electrocution and collision should be included in the DEIS and technical appendix, with adaptive management provisions to change the procedures in case of a pre-determined level of mortality.

394-249 See responses to Comments 340-002 and 394-235. The details about these mitigation measures will also be included in the Mitigation Action Plan to be subsequently developed for this project.

394-250 The discussion about impacts in Section 4.1.2 in the Wildlife Technical Report (Appendix B) was revised to include discussion about the loss of recruitment habitat for late successional forest dependent species. See response to Comment 340-002 for a discussion of mitigation.

394-251 See response to Comment 394-249 above.

394-252 Information has been added to Section 4.7.2.10 of the SDEIS to address creating and leaving snags where appropriate. Also information has been added to address replanting tree species in areas impacted outside the ROW. Creation of snags and replantings will be done in cooperation with SPU to meet goals as set forth in their HCP.

394-253 See response to Comment 340-002.

394-254 On lands north of the CRW, BPA would be conducting some pre-commercial thinning. With the exception of a few places, much of the timbered acreage north of the CRW (not counting the plantations) is composed of trees that are about 25 years old. Stable Douglas fir is a species BPA would prefer next to its lines. The 25-year-old stands are currently overstocked with trees. By taking out the smaller, weaker, deformed trees along with the hardwoods and the Western Hemlock, a strong, stable stand of Douglas fir will be left next to BPA's line.

394-255 Section 4.1.1.2 of the Wildlife Technical Report (Appendix B) was revised to include information about species that would benefit from leaving course woody debris in the project area.

394-256 See response to Comment 340-002.

394-257 See response to Comment 394-255.

394-258 See response to Comment 340-002.

394-259 Section of 4.1.1.2 of the Wildlife Technical Report (Appendix B) was revised to reflect more current recommendations and describes techniques that are available.

Disturbance of Wildlife

"Prior to construction, verify that no new bald eagle nests have been constructed in the project area. If any are found, avoid construction within 2,600 feet of the nest during the nesting period."

394-260 The project area, defined as only that area within 0.25 mile, or 1,320 feet, of the ROW, is insufficient to guarantee that no eagle nests will be disturbed by construction. A minimum of 2,600 ft on either side of the ROW will need to be surveyed for nests. The survey methodology needs to be included in the DEIS and technical report.

394-261 Nests of other species should also be considered in the DEIS and technical appendix..

"Plan flight paths for helicopters..... do not fly over potential nesting habitat for either northern spotted owls or marbled murrelets in the project vicinity..."

394-262 "Project vicinity" needs to be defined in the DEIS and technical appendix.. Also, species other than the three mentioned also need to be considered in this section.

4.1.2.1. Alternative 1

"...Alternative 1 would result in low-level impacts on forest community dependent species."

394-263 Low elevation late successional habitat is extremely uncommon in the entire Puget lowlands. 86 acres of the 120 forested acres to be cut is in the "conifer forest – late" class, i.e., 18 –36 inch dbh trees. These habitat patches in CRW will likely develop late successional habitat characteristics over the term of the HCP, which will make this functional habitat for late successional/old growth dependent species. Given the paucity of late successional habitat at low elevation, this proposed habitat conversion will have a significant future impact. The impact cannot be dismissed as low-level. The DEIS and technical appendix should acknowledge this and reclassify this impact as moderate and commit to appropriate and effective compensatory mitigation.

"Because this vegetation removal could result in a loss of productivity in adjacent aquatic habitat but could also be largely mitigated by spanning riparian corridors, this would represent a moderate to low level impact."

394-264 This paragraph is inherently contradictory. It states that 10 ac of forested riparian habitat will be removed, yet it also says that this removal is mitigated by spanning riparian corridors. The removal of 10 ac of riparian habitat is a permanent habitat loss, for which compensatory mitigation should be required. Simply not removing all riparian vegetation is not adequate mitigation. The DEIS and technical appendix should acknowledge this and commit to effective compensatory mitigation.

Mitigation

394-265 It is confusing that most of the mitigation proposals listed here are simply a repeat of those already listed in 4.1.1.2 as common to all alternatives. It would be clearer if the DEIS and technical appendix listed only additional mitigation specific to each alternative.

"Minimize soil disturbance within or adjacent to wetlands and stream banks to the extent possible."

394-266 The term "extent possible" should be quantified in the DEIS and technical appendix, and should include methods for minimizing soil disturbance described. In areas where soil disturbance cannot be minimized, adequate compensation mitigation should be provided and described.

The details about these mitigation measures will be included in the Mitigation Action Plan to be subsequently developed for this project.

Section 4.1.1.2 of the Wildlife Technical Report (Appendix B) was revised to include information about methods to minimize bird collisions.

394-260 See response to Comment 394-227. As stated in the Mitigation Measures, Section 4.1.1.2, a distance of 2,600 feet will be the standard for bald eagle nests. The bald eagle nest surveys will be conducted via aerial survey methods using a helicopter to fly above and to the side of potential bald eagle nesting habitat and visually searching for nests. These surveys will be conducted by a qualified biologist and the method has been approved by the WDFW and USFWS.

394-261 The Wildlife Technical Report, Appendix B and Section 4.7.2.10 of the SDEIS have been revised to add mitigation measures to avoid impacting raptor nests.

394-262 The project vicinity is described in Section 3.3, paragraph 1 of the Wildlife Technical Report (Appendix B).

394-263 The finding of a low level impact was based on the definitions given in Section 4.0 of the Wildlife Technical Report (Appendix B), reduction of a habitat type that is very common in the project vicinity. Within the defined project area (0.25 mile either side of the proposed center line), forest removal under Alternative 1 would represent 5 percent of the habitat that is available. In the lower Cedar River Watershed, the HCP identifies 12,255 acres of second growth forest, of which 120 acres of forest clearing would represent 0.98 percent of the habitat that is available.

394-264 See response to Comment 340-002. Section 4.1.2.1 of the Wildlife Technical Report (Appendix B) was revised so that spanning riparian reserves was no longer termed mitigation. The details about mitigation measures will be included in the Mitigation Action Plan to be developed for this project.

394-265 Comment noted.

"Mitigation measures to minimize or reduce potential impacts to species dependent upon early seral habitats: Create snags along edges…"

394-267 How many snags will be created? What diameter and height of trees will be used? What methods will be used to create the snags? The DEIS and technical appendices need to provide these specifics so reviewers can adequately evaluate the efficacy of the proposal.

4.1.3.1 Access Roads Impacts

"A portion of this clearing would coincide with clearing for the transmission ROW and so is not additive."

394-268 Reviewers need to know exactly how many acres will coincide with clearing the ROW and how many will be additional in order to evaluate the impact of total cleared area. In addition, habitat converted to road (impervious surface, no vegetation) is not equivalent to habitat converted to grass/forb/shrub, so needs to be compensatorally mitigated separately.

4.1.3.2 Mitigation

"Avoid building new roads within or adjacent to wetlands."

394-269 Is this a firm commitment to building no roads in wetlands or their buffers? If so, the DEIS and technical appendix should clarify this commitment and define buffer width. If this is not a commitment, then the area of road estimated to be built in wetlands, which wetlands will be impacted, and the appropriate compensation mitigation should be included in the DEIS and technical appendix.

4.1.5 Cumulative Impacts

"Within the CRW, vegetation removal and thus habitat alteration is expected to be minimal, as described in the HCP (City of Seattle 1998, 2000). For this reason, clearing associated with the proposed project would be the greatest foreseeable impact in this portion of the project area. The HCP also outlines plans to close certain roads within the CRW, which could potentially mitigate impacts from proposed new access roads that would be constructed in conjunction with the proposed project."

394-270 Habitat is dynamic and is constantly changing. The DEIS does not consider how the habitat in the CRW will change over time. The road decommissioning program in the CRW HCP can be viewed as mitigation for past road-building projects in the CRW, and should not be used as mitigation for a BPA project. BPA must mitigate for their own impacts, and cannot use commitments of landowners in parts of the project area as mitigation for BPA's actions. The DEIS and technical appendix should explicitly acknowledge this circumstance and should omit this statement.

5.3.2 Cedar River Watershed Habitat Conservation Plan

"The CRW HCP (City of Seattle 1998, 2000) was prepared by SPU to establish a comprehensive management plan for long-term management of the CRW. The HCP includes numerous provisions intended to maintain the quality of wildlife habitat and the health of wildlife populations in the CRW. Objectives of the HCP include meeting the legal requirements of the ESA, contributing to the conservation of unlisted species as appropriate, providing a net benefit over current conditions to both listed and unlisted species, and developing conservation strategies for at-risk species and their habitats."

394-271 The DEIS and technical appendix should explicitly acknowledge the CRW HCP regulating agencies (e.g. USFWS, NMFS) and the fact that the proposed action not a "covered activity" under the HCP.

394-266 See response to Comment 340-002.

394-267 See response to Comment 394-252.

394-268 Section 4.1.3 of the Wildlife Technical Report was revised to address currently available data about construction of access roads. The details about these mitigation measures will be included in the Mitigation Action Plan to be developed for this project. BPA is proposing to add approximately 1.4 miles of new roads within the CRW, and abandon approximately 0.6 mile of existing roads. The net total of new access roads would be about 0.8 mile, encompassing an area of approximately 2 acres.

394-269 No roads would be built in wetlands. Some new roads would be built in buffers.

394-270 Section 4.1.5 of the Wildlife Technical Report (Appendix B) was revised so that it does not appear that road removal by others is being considered mitigation for the project. Road closures by the City of Seattle were included in this discussion on the basis of the definition of cumulative impacts, which is to include reasonably foreseeable actions in the project area.

394-271 BPA acknowledges that the transmission project was not specifically contemplated by the HCP. The HCP was undertaken by the city to include activities carried out or authorized by the City of Seattle, and not for BPA. The HCP did recognize, however, that new rights-of-way may need to be given. See, for example, Chapter 4.2-73.

Kangley-Echo Lake Transmission Line Project DEIS
Appendix C – Final Vegetation Technical Report

Comments from Seattle Public Utilities
September 4, 2001

***DEIS Appendix Citations in italics*; SPU comments in normal font.**

1.2.3 Removal of Forest within the Cedar River Watershed

"The HCP for the CRW proposes strict limitation of logging and other forest conversion within the watershed."

394-272 The proposed action is not a "covered activity" under the Cedar River Watershed (CRW) Habitat Conservation Plan (HCP). The DEIS and technical appendix should clearly disclose that the proposed action is not a "covered activity" and provide an evaluation of this circumstance.

1.3.1 Uniformity of Vegetation Communities Between Alternatives

"Because most of the project area is second-growth forest that has been actively managed since around 1920, the existing forest stands are more or less uniform, with only slight variation in age and size classes between stands."

394-273 Though forests in the project area have been harvested in the past, existing forest communities provide a high diversity of habitats for forest-dwelling species. More importantly, the CRW HCP provides long-term protection status to forests in the CRW. Thus, these forests will continue to age and provide increasingly unique, low elevation conifer forest habitats in the rapidly developing Puget Sound region. The DEIS and technical appendix should acknowledge the unique long-term forest protection status provided by the HCP. BPA's environmental analysis should be conducted recognizing the increasing regional biodiversity value of the forest it proposes to permanently clearcut.

2.1 Data Sources and Study Methods

"Washington Department of Natural Resources (WDNR) Natural Heritage Program (NHP) lists of threatened, endangered, and other special-status plant species."

394-274 Though this database is an important resource, it relies on contributed information and should only be used as a crude guide to species distributions.

"It was also assumed…that vegetation in an additional 75 ft zone on either side of the cleared area would be partially cleared …"

394-275 This is inconsistent with the statement in Appendix B *and* information provided in Section 1.1.1.5 of this report that indicate 50 to 60 ft would be partially cleared. The DEIS, its technical appendices, and associated permitting documents need to present a complete and consistent description of the proposed action. Such inconsistencies make this DEIS difficult to review and evaluate. In any case, if this approach applies to Alternative 1, as the text suggests, does this means that both sides of the 300 ft total ROW will be treated in this way, resulting in a 450 ft wide managed ROW? The DEIS and technical appendage should be explicit about this.

394-276 This analysis also apparently fails to describe impacts associated with clearing new (temporary and permanent) roads and staging areas, as well as short- and long-term impacts of the 50 ft temporary

394-272 See response to Comment 394-271.

394-273 Comment noted.

394-274 Comment noted.

394-275 The distance used was changed from 60 feet to 75 feet. Partial clearing within the additional 75-foot zone (on the east side of the ROW) would be focused in those trees with sufficient height to strike the transmission line and/or towers in the event of a fall.

394-276 Approximately 2 acres would be cleared to accommodate the new access roads within the CRW, all of which would be located within the new or existing right -of-way. No impacts have been ascribed to any staging areas, since it is not known at this time where those areas would be located. Typically, BPA's construction contractors select the necessary staging areas and arrange their use in concert with the property owner. No staging areas would be located within the CRW at the request of the landowner.

construction easement previously mentioned verbally by BPA to CRW staff (but not mentioned in the DEIS). The DEIS and its technical appendices should explicitly discuss impacts associated with temporarily disturbed areas. SPU believes Table 5 underestimates habitat impacts.

2.2 Agencies Contacted

394-277 No private landowners were contacted.

3.1 Regional Overview

"The project area lies almost entirely within second-growth forests that have been maintained in timber production for most of the last 150 years."

This is true. However, there is no mention that the CRW HCP effectively places CRW forests in long-term protection status. The DEIS and technical appendix should acknowledge the unique long-term forest protection status provided by the HCP. BPA's environmental analysis for this project should be conducted recognizing the increasing regional biodiversity value of the forest it proposes to permanently clearcut.

394-278 The DEIS and technical appendix indicate the most prevalent plant communities in the project area are TSHE/POMU and TSHE/TITR communities. However, paragraph 4 of this section indicates vegetation in the project area is dominated by PSME (Douglas-fir). The DEIS and technical appendix need to present a complete and accurate analysis of vegetation and potential impacts.

3.2 Regulations, Standards, and Guidelines

"The CRW HCP outlines proposed regulation of activities within the watershed."

394-279 Again, there is no mention that the CRW-HCP effectively places forests in the CRW in protection status and that forest management activities in the CRW are for restoration purposes. The DEIS and technical appendix should acknowledge the unique long-term forest protection status provided by the HCP. BPA's environmental analysis for this project should be conducted recognizing the increasing regional biodiversity value of the forest it proposes to permanently clearcut.

3.3 Project Area and Approach

"The project area for vegetation is a 0.5 mi. corridor centered on the ROWs of the proposed alternatives."

394-280 The definition of project area is inconsistent with Final Wildlife Technical Report, which describes the project area as being within 0.25 mile of the ROW. The DEIS and technical appendices need to indicate why the study area or project area for this environmental analysis varies among disciplines.

3.4 Transmission Line Alternatives

"Twelve major vegetation cover types were defined and mapped for this project (Figure 3). Their relative areas are shown in Figure 4. The 12 cover types are described below:
- ***Coniferous forested, early seral*** *...generally less than 20 years old...*
- ***Coniferous forested, mid-seral*** *...range in size from 12 to 20 in. DBH and ... generally in the range of 15 to 35 years...*
- ***Coniferous forested, late seral*** *...tends to be 36 to 75 years old... range in size from 18 to over 36 in..."*

394-281 These definitions of seral classes are not accurate. While many variables are involved in the identification of seral class, most professionals in this field would not consider a 40- or 60-year-old west-Cascadian Douglas-fir forest as late-seral. The DEIS and technical appendix should use standard definitions of seral class.

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394-277 Comment noted.

394-278 The plant associations given in the report are correct. TSHE/POMU, TSHE/TITR and other ***Tsuga heterophylla*** associations are frequently dominated by Douglas fir ***(Pseudotsuga menziesii)***. Plant associations are based on regeneration and climax communities, not on current dominance. True Douglas fir plant associations in the Pacific Northwest are much drier than the Cedar River Watershed sites. A true PSME (Douglas fir) plant association in the west Cascade low forests is extremely uncommon, and is not found within the project area.

394-279 Comment noted.

394-280 A "0.5-mile [wide] corridor centered on the ROW" and an area "within 0.25 miles [extending from each side the centerline] of the ROW" are descriptions about an equivalent area.

394-281 The definitions of "seral" and specific class labels are detailed within the text. While the terms used may not fall within standard forestry practice, that does not preclude the use of the words. The definition and explanation of the terms' use provide a clear understanding of the intended meaning.

"Forested communities within the project area have been further sorted into one of four age classes. Due to the history of timber management in the project area, the age classes chosen reflect typical rotation and/or thinning intervals in timber production."

394-282 Timber production schedules are no longer relevant in CRW. The DEIS and technical appendix should acknowledge the unique long-term forest protection status provided by the HCP. BPA's environmental analysis for this project should be conducted recognizing the increasing regional biodiversity value of the forest it proposes to permanently clearcut, not on typical rotation or thinning intervals for timber production.

394-283 The DEIS and technical appendix fail to distinguish the distinct, regenerated forest habitat that lies in a strip adjacent to and west of the preferred option. This narrow strip of forest appears to have been cleared of vegetation during construction of the original ROW, but has been allowed to regenerate. As a result, there is an approximately 50 ft band of younger mixed forest (approximately 30 to 50 years old) immediately adjacent to roughly 60 percent of the existing ROW in the CRW. SPU can provide maps delineating this strip. This forest strip coincides with the location of the proposed preferred alternative. The forest outside this strip is generally approximately 60 to 80 years old. The DEIS and technical appendix fail to accurately describe existing conditions. BPA's environmental analysis for this project should be conducted using accurate observations of the forest resources it proposes to permanently clearcut.

3.7.2 Survey and Manage Species

"Therefore, Survey and Manage requirements are not applicable to this project."

394-284 This is not clear. IF BPA owns land "in fee," then that land is federally owned and managed. The DEIS and technical appendix should clarify why such ownership allows BPA to avoid Survey and Manage requirements?

3.8 Noxious Weeds…

"Scotch broom commonly occurs in the highly disturbed areas of clear-cuts, as well as along the existing transmission line…"

394-285 This statement suggests BPA has actively allowed noxious weeds to invade and persist in their existing ROWs. In fact, this is the case along BPA ROW in the CRW. The DEIS and technical appendix should recognize and explain this existing management approach, and then describe exactly how BPA proposes to manage its existing and proposed ROWs for noxious weeds in the future. If BPA intends to neglect active and effective management of noxious weeds in its ROW, as it does now, then the DEIS and technical appendix need to disclose this information.

The DEIS and technical report should acknowledge that two new noxious weeds have been located in the lower portion of the CRW: yellow hawkweed (*Hieracium caespitosum*) and spotted knapweed (*Centaurea maculosa*). The environmental analysis should take these species into consideration.

4.0 Environmental Consequences and Mitigation

"Table 3" and "Table 4"

394-286 These tables include redundant information; the numbers contained therein do not correlate between tables. The DEIS and technical appendix need to present pertinent data clearly.

4.1.1.1 Impacts

"We have used 75 ft on either side of the ROW as an assumption for the analysis."

394-282 With regard to the first point, commercial logging in the Cedar River Watershed HCP is now strictly limited; however, the age distribution of trees within the project area still reflects logging practices in the recent past. The characterization of the present-day stands is based on past practice, with no implication or inference for future management practices.

394-283 The reviewer agrees with your comment and the age-class mapping of the referenced area was reevaluated.

394-284 A revision is not required because Survey and Manage requirements apply to USDA/U.S. Forest Service and USDI/ Bureau of Land Management lands only (see ***Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl, USDA/USFS and USDI, BLM, April 1994***).

394-285 See response to Comment 394-193.

394-286 The reviewer agrees with your comment and reevaluated data collected for Table 3 to make the acreage totals in that table consistent with acreage totals elsewhere in the document.

394-287 This number is not consistent through the DEIS. In 4.1.3.1 of this technical appendix the width is 45 ft; 50 ft was widely referenced in the DEIS. The environmental analysis used in the DEIS and its technical appendices needs to be based on complete and consistent description of the proposed action.

"In some cases, forested stands, even within the maintained ROW, would not require clearing."

394-288 The DEIS and technical appendix should specify where these cases occur in the CRW, especially relative to the Cedar River.

This section also fails to mention that an acre or less of wetland habitat will be permanently converted due to filling, as is described in the Final Wetland Technical Report.

4.1.1.2 Mitigation

394-289 The DEIS and technical appendix make no commitment to mitigate for the loss of forest habitat, or other vegetated habitat. While the feasibility of meaningfully mitigating for the loss of forest habitat is debatable, BPA should commit to mitigating the permanent loss of the 150 to 200 acres of long-term forest it proposes to clearcut.

"Develop and implement aggressive vegetation management programs to limit colonization by non-native species and eradicate noxious weeds within the transmission line ROW."

394-290 The DEIS and technical appendix should describe methods for maintaining native plants and managing noxious weed species without the use of herbicides (which are not allowed in the CRW) so reviewers can evaluate their potential efficacy. Statements indicating "an aggressive vegetation management program" will be developed and implemented are inadequate and not able to be evaluated by reviewers. The DEIS and technical appendix should describe the noxious weed management program (without herbicides) that will be implemented. A monitoring program (including adaptive management) needs to be part of that program.

Also, this statement implies BPA implements active and effective noxious weed management programs. In fact, however, the BPA ROW in (and outside of) the CRW is a significant avenue of dispersal and location of infestation for noxious weeds. The DEIS and technical appendix should recognize and explain this existing management approach, and then describe exactly how BPA proposes to manage its existing and proposed ROWs for noxious weeds in the future. If BPA intends to neglect active and effective management of noxious weeds in its ROW, as it does now, then the DEIS and technical appendix need to disclose this information.

"Use only certified weed-free straw..."

394-291 Weed-free straw will typically have been treated with herbicides. The DEIS and technical appendix need to address this situation, including the specific herbicides and their quantities that would be introduced to the CRW. The DEIS and technical appendix need to evaluate such contamination and the associated risks to water quality as part of this environmental analysis. Also, SPU is aware that certified weed-free straw is difficult to obtain locally. The DEIS and technical appendix should describe exactly what "certification" means in this case, who certifies that straw, and under what conditions that straw will need to have been grown to be certified.

4.1.3.1 Alternative 1 Mitigation

394-292 BPA proposes to permanently convert 118 ac of forest to early successional habitat. This forest would otherwise have been managed to achieve late successional characteristics in CRW. The DEIS and technical appendix should commit to compensatory mitigation for such conversion.

394-287 The 75-foot width is the appropriate figure for identification of trees with potential to fall across the centerline of a 150-foot corridor. Section 4.1.3.1 does not mention use of a 45-foot width.

394-288 Riparian habitat will be spanned. No wetlands will be filled.

394-289 See response to Comment 340-002.

394-290 See response to Comment 349-005.

394-291 Certified weed-free straw is typically not available in the local area and comes from farms within eastern Washington. WSDT has a list of sources of certified weed-free straw. Before purchasing any straw from these farmers, BPA would verify with the local noxious weed board that the field, and the straw, are indeed weed-free and would require proof of any herbicide used on that field from the farmer.

394-292 See response to Comment 340-002.

394-293 Consistently throughout the DEIS and its technical appendices, there is no acknowledgement that the CRW HCP effectively places forests in the CRW in protection status and that forest management activities in the CRW are for restoration purposes. The DEIS and technical appendix should acknowledge the unique long-term forest protection status provided by the HCP. BPA's environmental analysis for this project should be conducted recognizing the increasing regional biodiversity value of the forest it proposes to permanently clearcut.

4.1.3.6 Access Roads

"For the purposes of assessing new access road impacts, a 20-ft road cross section was assumed. Existing access roads are generally 24 ft across, and the actual new access road width would be 16 ft."

394-294 This information is not consistent within the DEIS. In Chapter 2 (2.1.1.5), new roads outside of the ROW would require a 50 ft easement, which includes 16-22 ft of road surface and 10 ft of drainage ditches on either side. The environmental analysis in the DEIS and its technical appendices should be based on consistent dimensions of the project features. The DEIS and technical appendices should commit to compensatory mitigation for permanently converting forest and other vegetated habitats to impervious road surfaces. The DEIS and technical appendix should also evaluate the impacts of constructing mitigation (such as stormwater ponds) for water quality and quantity that will likely be required by the National Marine Fisheries Service for constructing 1 to 2 miles of new impervious surface in basins tributary to waters that support threatened species such as Chinook and coho salmon. Also, in this section, the DEIS and technical appendix should specifically consider BMPs for preventing erosion and protecting water quality. This section also fails to discuss or account for temporary roads and staging areas.

4.1.3.7 Cumulative Impacts

394-295 Cumulative impacts are incompletely evaluated. The DEIS and technical appendix should present a complete evaluation of cumulative impacts. Commitments to compensatory mitigation should be included in that evaluation.

4.2.2.1 Impacts

"Any such spills or leaks could kill or injure vegetation in the immediate vicinity of the spill."

394-296 To protect the municipal water supply, SPU has "no-tolerance" objectives for spills or leaks of hazardous materials in the CRW. The DEIS and technical appendix should indicate how all spills will be prevented in the CRW.

4.2.1.2 Operation and Maintenance Mitigation

"Mitigation .... would follow policies and procedures adopted by BPA..."

394-297 These policies and procedures should be summarized. It is not reasonable to expect reviewers to obtain and review the EIS referenced here, especially considering the short duration of the public comment period.

4.2.2.1 Access Roads Impacts

394-298 Impacts of potential spills of hazardous materials were considered to be low to adjacent vegetation. However, any spill of a toxic substance in CRW should be considered a high impact because of the risks to water quality. To protect the municipal water supply, SPU has "no-tolerance" objectives for spills or leaks of hazardous materials in the CRW. The DEIS and technical appendix should indicate how all spills will be prevented in the CRW.

394-293 Comment noted.

394-294 Road information has been updated in the SDEIS. See Sections 2.1.1.5 and 4.4.2.1 of the SDEIS. See response to Comment 340-002.

394-295 See response to Comment 340-002.

394-296 See response to Comment 394-139.

394-297 See response to Comment 394-193.

394-298 See response to Comment 394-139.

5.6.1 Cedar River Watershed Habitat Conservation Plan

"The CRW HCP (City of Seattle 1998, 2000) was prepared by SPU to establish a comprehensive plan for long-term management of the CRW. The HCP includes numerous provisions intended to maintain the quality of fish habitat and the health of fish populations in the CRW. Many of these provisions apply to management procedures such as fish hatchery operation or manipulation of instream flows and thus are not directly relevant to this analysis. Other provisions address the effects on fish and their habitat that can result from forest removal and forest road construction and maintenance."

394-299 With regard to forest resources, the proposed action is inconsistent with the CRW HCP. The DEIS and technical appendix should disclose that the proposed action is not consistent with the CRW HCP.

5.6.4 Washington Department of Natural Resources Forest Practices Rules

"The WDNR Forest Practices Rules (WAC 222) describe the types of forest practices allowed under the State of Washington Forest Practices Act (RCW 76.09). They divide forest practices into four classes, based on potential impact to public resources, and outline the processes for permitting of each class."

394-300 The DEIS and technical appendix should describe riparian buffer requirements as contained in the Forest Practice Rules.

6.0 Individuals and Agencies Contacted

394-301 This section is redundant with Section 2.2. of this technical appendix.

394-299 Please see response to Comment 394-230.

394-300 You are correct in identifying that this information was not provided in the Vegetation Technical Report (Appendix C). However, we do not feel it is necessary to collect or present the information because it would not substantively contribute to the impact analysis, or the identification of potential significant impacts as required under the National Environmental Policy Act.

394-301 Comment noted.

Kangley-Echo Lake Transmission Line Project DEIS
APPENDIX D Final Wetlands Technical Report

Comments from Seattle Public Utilities
September 4, 2001

***DEIS Appendix Citations in italics*; comments in normal font.**

1.1.1.9 Site Restoration and Clean-up

"Disturbed areas would be reseeded with grass or an appropriate seed mixture to prevent erosion. The seed mixture would include native plant species and would be free of noxious weeds."

394-302 The DEIS needs to be more specific regarding "restoration." Restoration is more than just reseeding with an "appropriate" seed mixture. The DEIS and technical appendix should commit to restoring the native plant communities disturbed by the construction and operations. The plantings and seed mixtures should include only native plants.

1.3 Major Conclusions

"Potential fill and excavation impacts from the construction of towers and roads would be avoided by strategically locating towers and roads outside of wetland areas where possible and by spanning wetlands."

394-303 The DEIS should provide more detailed description of these project features. Impacts to wetlands can not be evaluated until location of towers and roads are specified. Given this lack of detail and considering other constraints on tower locations (e.g., staggered location with existing towers, stream crossings, topographic constraints, spacing), it appears that placement of towers in wetlands is probable. However, as evidenced by information presented in the project's biological assessment (BA), BPA has identified locations for towers and new roads and so should be able (in the DEIS and its technical appendices) to estimate such impacts. The DEIS and the technical appendix need to present a complete and accurate environmental analysis, which includes the disclosure of such known project characteristics. The DEIS should discuss these fill impacts and the compensatory mitigation BPA proposes.

2.0 Study Scope and Methodology
2.1 Data Sources and Study Methods

"A basemap of potential wetland locations was created by superimposing the transmission alternatives over the wetlands location data provided by the aforementioned data sources. This map was used to aid the field survey of wetlands within the ROWs. The wetland reconnaissance survey focused on field-verifying selected areas of the wetland basemap that may be impacted. The approximate wetland boundaries were then field-mapped on the orthophotos provided by BPA. Due to the size of the wetlands and their readily apparent signature on the aerial photographs, the boundaries were sketched on 1:24,000-scale aerial photographs and subsequently digitized..."

394-304 This methodology fails to mention what criteria were used to identify and delineate wetlands. Presumably, Section 404 jurisdictional wetlands are the subject of interest, but this is not clear. Additionally, the remote sensing approach to wetland identification and the scale at which they were mapped (1:24,000) indicates this exercise resulted in crude approximations of wetland boundaries, not jurisdictional wetland delineations. Also, an important source of wetland information, the SCS soil survey, was not listed as one of the data sources. In contrast, SPU observed flags delineating more precise wetland boundaries in the proposed corridors, but these flags are not mentioned in the methodology and the delineated boundaries do not conform

394-302 See response to Comment 394-147.

394-303 A detailed description of potential impacts to wetlands associated with Alternative 1 is provided in Section 4.9.2 of the Supplemental Draft EIS. Following the release of the draft EIS, BPA conducted a wetland delineation of the wetlands within the proposed right-of-way and substation expansion area. Although a total of 35.63 acres of wetlands and 20,277 linear feet of streams were delineated in the project area, no permanent fill material would be placed within waters of the United States, including wetlands, during construction of the proposed project.

See also response to Comment 340-002.

394-304 and -305 Additional information regarding methods used to identify wetlands has been added to the Wetlands Technical Report (Appendix D) in Section 2.1, Data Sources and Study Methods. For the purposes of preparing the initial Wetland Technical Appendix, no waters of the United States were "delineated;" subsequently no jurisdictional wetland boundaries were established for the purposes of the DEIS. Wetland biologists located wetlands, including waters of the United States within the 500-foot survey corridor as regulated by the U.S. Army Corps of Engineers (Section 404), the Washington State Department of Ecology, and King County. Methods used for identifying and locating waters of the U.S. are listed in Section 2.1, Data Sources and Study Methods, of the Wetland Technical Report (Appendix D).

Wetland and stream boundary flags observed by SPU were established in April 2001 for the purposes of guiding the placement of tower and access road locations, and to minimize the potential for wetland and stream impacts due to road and tower construction. The wetland and stream boundaries flagged in April 2001 occurred after the drafting of the Wetlands Technical Report (Appendix D) in late 2000. These boundaries were a reconnaissance of approximate jurisdictional wetland and stream boundaries, using the 1997 Washington State Wetlands Identification and Delineation Manual, the 1987 U.S. Army Corps of Engineers Wetlands Delineation Manual, and King County's Environmentally Sensitive Areas Ordinance (King County Code, Chapter 21A.24). Official wetland boundaries

394-305 to those presented in the technical appendix. SPU is also skeptical that signatures on the 1:24,000 aerial photographs were adequate to delineate wetland boundaries. Red alder-dominated wetlands could be evident, but conifer- (e.g., redcedar) dominated boundaries are likely to be obscurely evident. The DEIS and its technical appendix need to discuss these methodological short-comings and provide a complete discussion of the wetland methodology used to support the environmental analysis.

3.3 Study Area and Approach

394-306 This section is primarily a summary of the results. This technical appendix should better describe the vegetation, soils, and hydrology of all wetlands. For example, it is never clear if PFO-dominated wetlands are dominated by deciduous or coniferous species. This technical appendix also needs to describe buffer habitats and anticipated impacts to buffers. There is no analysis or table showing impacts to wetland and buffer habitats, where temporary and permanent impacts are examined by habitat class for each alternative. The DEIS and the technical appendix need to present a complete analysis of wetlands and potential impacts.

Table 1. Summary of Wetlands Present within the 150 ft ROW by Transmission Line Alternative

394-307 Wetlands tributary to waters bearing Chinook and/or coho would be classified as Class 1 wetlands, not Class 2, as per the King County wetland rating system, Criterion 1a. Thus, essentially all such tributary wetlands in the project area would be considered Class 1 wetlands. Also, wetlands should be rated using the Washington State Department of Ecology Wetland Rating scheme. Rating forms should be appended to the technical appendix, and this rating added as a new column in Table 1. The "Total Acres" column in Table 1, as well as the entirety of Table 2, are not informative. Rather, the total wetland acreage that will be impacted by the proposed action is of interest; this should be broken out by temporary and permanent impacts, by Cowardin habitat class, by King County rating, and by Ecology rating—for each alternative. The DEIS and technical report need to present an organized, clear analysis of existing conditions and potential impacts to wetland habitats and their buffers.

"Commonly these wetlands were associated with depressional areas that receive water from overland runoff and precipitation."

394-308 This is an incorrect assumption. Many wetlands in the project area have hydrology supported by groundwater discharge. For example, most of the wetlands on the south side of Brew Hill are supported by groundwater discharge, rather than overland flow and precipitation. Pertinent environmental analyses (as should be contained in the DEIS and its technical appendix) are based on accurate field observations rather than on speculation or assumption. Sound information on natural resources in the CRW is easily obtained through consultation with SPU Cedar Falls biologists.

3.4 Transmission Line Alternatives
3.4.1 Alternative 1

"Species diversity is low within the overstory and understory. The depressional wetlands occupying the south bench area of Brew Hill provide flood storage and flood flow moderation functions and wildlife habitat."

394-309 The standard underlying this conclusion is not stated. Species diversity is low relative to what standard? SPU observations of the wetlands in and near the ROW in the CRW indicate there is considerable diversity in these wetland areas. These wetlands also provide significant water quality and quantity functions to Rock Creek. Wetlands in the riparian area along the Cedar River are not identified in Figure 3 or in the report. The DEIS and its technical appendix present such scant site-specific information for the individual wetlands that accurate review and evaluation of BPA's conclusions is not possible. Also, the map scale is too small to verify boundaries. The DEIS and its technical appendix should contain sufficient site-specific information and specific boundary information such that an accurate and pertinent environmental analysis is possible.

4.0 Environmental Consequences

were not "delineated" during this reconnaissance. See response to Comment 394-303.

The 1:24,000-scale orthophotos were used as an aid for the creation of a base map of approximate wetland locations. This field map was then used in the field by wetland biologists to guide the reconnaissance of approximate wetlands locations. The map was then altered to reflect wetland boundaries as observed in the field. The orthophotos were not used to determine the vegetation community composition of wetlands; this was determined through a ground reconnaissance.

394-306 Brief descriptions about wetland community types and buffer habitats have added the information to the Wetlands Technical Report (revised Appendix D), Section 3.3, Study Area. See also response to Comment 394-303.

394-307 King County Environmentally Sensitive Areas (Chapter 21A.06.1415 A.1.) states that Class 1 wetlands are those "which have present species listed by the federal or state government as endangered or threatened or outstanding actual habitat for those species." Concerning fisheries, the Landsburg Diversion Dam on the Cedar River currently presents a passage barrier to all anadromous fish species including bull trout (Coastal/Puget Sound DPS [Threatened]), chinook salmon (Puget Sound ESU [Threatened]), and coho salmon (Puget Sound/Strait of Georgia ESU [Candidate]). (Please refer to the Final Biological Assessment for the Kangley-Echo Lake Transmission Line Project 2001 for more information). Thus, no wetlands within the Cedar River Watershed and within the Alternative 1 construction corridor meet provision 21A.06.1415 A.1 as presumed by your comment. We understand that a fish ladder at the dam is being constructed and these species may be present in the future. Wetlands located within the Raging River Watershed may provide riparian habitat for threatened anadromous fish species.

To ensure proper rating and protection of wetlands, prior to permitting and construction all wetlands will be delineated and rated using both King County's Environmentally Sensitive Areas Ordinance (King County Code, Chapter 21A.24) and the Department of Ecology's ***Washington State Wetlands Rating System for Western Washington, Second Editions, August 1993,***

"...clearing vegetation within the 150 ft wide ROW..."

394-310 This assumption is inconsistent with information provided in sections 1.1.1.2 and 1.1.1.5. This analysis also fails to consider impacts associated with clearing new (temporary and permanent) roads, as well as short- and long-term impacts of the 50 ft temporary construction easement previously mentioned by BPA (but not mentioned in the DEIS). There is no table that describes areal impacts for all these (and other) potential disturbance activities.

4.1 Construction Impacts
4.1.1 Impacts Common to All Action Alternatives
4.1.1.1 Impacts
Wetland Impact Avoidance and Minimization—

"....Criteria used by BPA to select the alternative ROW included avoiding known high-quality natural resources such as wetlands and streams. Any wetlands identified along the selected transmission line ROW would be avoided where feasible. Feasibility would be determined by land ownership, road configuration, spanning to avoid wetlands, construction costs, reducing sharp angles and bends in the ROW, and access."

394-311 According to Chapter 2 of the DEIS, avoidance of wetlands was not a factor in selecting the alternative ROWs, although Alternative 1 does have less clearing. Given the constraints in locating a high-voltage transmission line within any of these alternatives, flexibility in location to avoid wetlands is unlikely. Careful siting of transmission towers is perhaps one way to minimize wetland impacts, but neither the DEIS or technical appendix has sufficient information to determine if this is feasible or was evaluated in the environmental analysis. The DEIS and technical appendix should have sufficient information to be able to assess the feasibility of minimizing wetland impacts by siting towers outside of wetlands.

Vegetation Impacts

394-312 This document fails to mention that these permanent alterations would be considered a **moderate** impact to wetlands, using criteria presented in Section 4.0.

Hydrology Impacts and Wildlife Impacts

394-313 The DEIS and technical appendix should describe the level of intensity characterizing these impacts, using criteria presented in Section 4.0.

4.1.1.1 Mitigation

394-314 This list of best management practices is meaningless in terms of mitigating impacts. What is BPA really committing to here? There is no discussion of compensatory mitigation.

4.1.1.2 Mitigation

394-315 This laundry list of "standard" mitigation measures is relatively meaningless, and even conflicting. What is BPA really committing to here? As with other mitigation measures recommended for this project, there is no compensatory mitigation mentioned, despite a range of impacts identified in Section 4.1.1.1. The DEIS and technical appendix should describe meaningful mitigation actions, including compensatory mitigation that will offset unavoidable impacts to wetlands and their buffers.

- *Delineate wetlands before final design and flag for avoidance during construction.*

394-316 Wetlands need to be delineated for the DEIS to assess potential impacts. Delineation of wetlands is not a mitigation measure.

Publication 93-74. While this information will be used for the impacts analysis and compensatory mitigation planning, we do not feel it is necessary to collect or present the additional ratings information at this time because it would not substantively contribute to the impact analysis, or the identification of potential significant impacts as required under the National Environmental Policy Act. However, additional information concerning potential impacts to wetlands from the construction of the transmission line corridor has been provided in Section 4.1, Construction Impacts, of the Wetlands Technical Report (revised Appendix D). (Please also see response to Comment 394-303.)

394-308 Comment noted.

394-309 You are correct in identifying that this information was not provided in the Wetlands Technical Report (Appendix D). However, we do not feel it is necessary to collect or present the information because it would not substantively contribute to the impact analysis, or the identification of potential significant impacts as required under the National Environmental Policy Act. See response to Comment 394-303.

394-310 Please see response to Comment 394-303.

394-311 You are correct in identifying that specific tower sites were not provided in the Wetlands Technical Report for Alternatives 2-4B (revised Appendix D). However, we do not feel it is necessary to present the information because it would not substantively contribute to the impact analysis, or the identification of potential significant impacts as required under the National Environmental Policy Act. See response to Comment 394-303. A detailed description of potential impacts to wetlands associated with Alternative 1 (the Proposed Action) is provided in Section 4.1, Construction Impacts, of the Wetlands Technical Report (revised Appendix D). This approximation of wetland impacts was made using the wetlands reconnaissance information and BPA's current roads and tower siting plan (Figure 5 in the Wetland Technical Report).

394-312 Please see response to Comment 394-303.

- *Ensure noxious weed infestations do not become a problem in wetlands by washing all construction vehicles and conducting a weed inventory one year after construction to verify that weeds have not been introduced.*

394-317 How will BPA respond if weeds are introduced? There is no weed management plan or commitment in the DEIS. Herbicides are not allowed in the CRW, which makes weed management in the CRW particularly challenging. Considering that BPA's existing ROW is a major present-day corridor for weed dispersal and location of infestation in the CRW, SPU is obviously concerned that new or expanded weed infestations will go unchecked—as is the situation with current weed infestations in the BPA ROW.

4.1.1.3 Cumulative Impacts

"Filling or adverse modification of wetlands.... This could be offset through mitigation and restoration of degraded wetlands within the affected watersheds."

394-318 Because there are no unacceptably degraded or filled wetlands, there are essentially no significant opportunities for wetland creation, restoration, or enhancement in the subbasins of the CRW.

4.1.3 Alternative Transmission Line Impacts
4.1.3.1 Alternative 1
Impacts—

"The 150-ft. wide cleared ROW would impact a total of 25 ac. of wetlands (Table 2). Wetlands surveyed within the Alternative 1 ROW consisted primarily of palustrine scrub-shrub and palustrine forested types. The majority of wetlands were low-gradient, depressional wetlands. Major streams and rivers associated with wetlands within the Alternative 1 ROW include the Raging River, Rock Creek, and Cedar River.

Clearing would cause a moderate-level impact to forested wetlands and their buffers. Wildlife habitat, flood flow and flood storage, and water quality functions could be degraded. Scrub-shrub and open water wetlands would experience moderate, low, or no impact assuming the wetlands could be avoided or spanned and that soils, hydrology, and vegetation were maintained."

394-319 There is no site-specific information regarding wetland impacts in this section or those for the other alternatives, thus this impact evaluation is inadequate. Using definitions presented in the introduction to Section 4, clearing of forested wetlands would constitute a high—not a moderate—impact (impairing the ecological integrity of a wetland). These comments apply to the description of impacts for all alternatives. The DEIS and technical appendix should have a meaningful evaluation of potential impacts that is based on sufficient real information.

Mitigation*—Mitigation measures specific to the wetland resources along Alternative 1 would include: "Minimize road construction and strategically site towers to avoid wetlands 1-3 and 1-4 to minimize impacts to wetlands within the headwaters of Rock Creek."*

394-320 Wetlands 1-1 and 1-2 are also in Rock Creek headwaters and impacts to these wetlands would need to be compensatorally mitigated. Potential clearing in riparian wetlands along the Cedar River would be a significant impact, but these wetlands were not identified. However, in text two paragraphs above this section this technical appendix states: *"Major streams and rivers associated with wetlands within the Alternative 1 ROW include the ...Cedar River."* The DEIS and its technical appendices need to present a complete and consistent description of the proposed action. Also, this section lacks mention of compensatory mitigation. The DEIS and technical appendix should contain a discussion of compensatory mitigation to which BPA would commit.

4.2 Operation and Maintenance Impacts

394-313 Please see response to Comment 394-303.

394-314 Please see response to Comment 340-002.

394-315 Please see response to Comment 340-002.

394-316 Please see response to Comment 394-303.

394-317 See response to Comment 382-017.

394-318 Comment noted.

394-319 See response to Comment 394-303.

394-320 Please see response to Comment 340-002.

4.2.1 Impacts Common to All Action Alternatives
4.2.1.1 Impacts

"Moderate-level wetland impacts would also occur where the forest cover was removed and permanently maintained as scrub-shrub or emergent vegetation."

394-321 This statement conflicts with previous statements. Conversion of forested to scrub-shrub or emergent wetlands constitutes a high wetland impact, according to definitions presented at beginning of Section 4.0.

Mitigation

394-322 As King County requires of other public utilities, such as Puget Sound Enery, BPA should commit to compensatorally mitigating every tree removed from wetland and riparian habitats during operation and maintenance activities.

5.1.3 Section 404

"This project, with mitigation measures as stated, would meet the standards outlined by the CWA."

394-323 This is an incorrect statement. Without compensatory mitigation "mitigation measures as stated" would not meet the standards currently used by the Army Corps of Engineers, or by King County, in mitigating for unavoidable wetland impacts. However, due to a lack of site-specific information and the subsequent inadequate impact analysis no firm conclusions can be obtained regarding where or how much wetland would be filled or otherwise impacted by any alternative. The DEIS and technical appendix should contain sufficient information about potentially impacted wetlands such that a meaningful impact analysis can be conducted, at which point these documents can then realistically evaluate the required compensatory mitigation and the project's ability to comply with federal, state, and local wetland regulations.

5.2 Other Standards and Guidelines
5.2.1 Cedar River Watershed Habitat Conservation Plan
"Specifically, the HCP allows timber harvest and road construction within wetlands and wetland buffers only in limited circumstances. For activities in wetlands and their buffers, the City of Seattle would consult with the state and federal agencies regarding measures to minimize and mitigate the impacts."

394-324 These statements are wrong. The HCP does not allow timber harvest or road construction in wetlands. The City of Seattle would not be responsible for mitigating impacts to wetlands and their buffers due to construction of BPA's project, nor for any consultation or financial obligation necessary thereto.

394-321 See response to Comment 394-303.

394-322 Please see response to Comment 340-002.

394-323 Your comment regarding mitigation is noted and will be addressed in the appropriate detail in the Mitigation Action Plan to be prepared for this project, and in association with permitting discussions with the appropriate federal, state, and local regulatory agencies. Please see responses to Comments 340-002 and 394-303.

394-324 A revision is not required because though the HCP (April 2000) has committed to not harvest timber within aquatic and riparian ecosystem components, this does not prevent the City from conducting operations and activities associated with watershed management. The restriction alluded to by your comment only applies to the commitment not to harvest timber for "commercial purposes." (Cedar River Watershed HCP, April 2000: pages 4.2 6–7 and 4.2 45–46). BPA did not intend to imply that the City of Seattle would be responsible for any impacts created as a result of the proposed project.

DDES
King County
Department of Development
and Environmental Services
900 Oakesdale Avenue Southwest
Renton, WA 98055-1219

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-395
RECEIPT DATE:
SEP 05 2001

September 4, 2001

Communications
Bonneville Power Administration – KC-7
P.O. Box 12999
Portland, OR 97212

Re: Kangley – Echo Lake Transmission Line Project
KEC – 4

Dear Sir/Madam:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the proposed Kangley-Echo Lake Transmission Line Project. The comments that are enclosed focus on whether this proposed project is consistent with King County's Comprehensive Land Use Policies and zoning and related regulations affecting development within environmentally sensitive areas.

King County has developed its Comprehensive Plan land use policies pursuant to Article 11, Section 11 of the Washington State Constitution and the Washington State Growth Management Act (GMA), R.C.W. 36.70A. The King County Comprehensive Plan is the principle planning document used by King County for the orderly physical development of the county. Policies set forth in the County's Comprehensive Plan are implemented through County land use regulations including, but not limited to, the King County Zoning Code, KCC Title 21A (including limitations upon development within environmentally sensitive areas); Surface Water Management Code, KCC Title 9 (including provisions for the protection of surface and groundwater); Building and Construction Standards Code, KCC Title 16 (including general clearing and grading standards) and Shoreline Management Code, KCC Title 25 (including restrictions upon development within designated shorelines). Each of these land use regulations was likewise adopted pursuant to authority of Article 11, Section of the Washington State Constitution and the Washington State Growth Management Act.

The proposed transmission corridor crosses two general zone classifications within unincorporated King County. These are the Forest and Rural Residential Zones. Utility facilities are permitted uses within these zone classifications but only to the extent that

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these facilities comply with all applicable provisions of the zoning code, including the development standards for environmentally sensitive areas. The DEIS does not evaluate whether this project complies with these regulations but concludes on page 5-15 that by complying with the Endangered Species Act, Section 404 of the Clean Water Act, Coastal Zone Management Act, et. al., the project will comply with the substantive intent of these regulations. As noted in Section 5.11.2 of the DEIS, BPA will be providing information to the Department of Development and Environmental Services for later review to determine consistency with the County' s Shoreline Master Program. This review covers a very small portion of the project route and there is no similar evaluation of how these other federal statutes meet or exceed the other applicable local regulations. In addition, the DEIS does not include the level of detailed technical analyses or design detail to determine this project's compliance with applicable King County Policies or adopted zoning or development regulations. For these reasons and others that are discussed in more detail in the attached comments, we do not agree with the DEIS conclusion relative to whether the proposed Kanasket-Echo Lake Transmission Project complies with applicable County policies or codes.

Thank you again for the opportunity to comment.

Sincerely,

Randy M. Sandin, Supervisor
Site Development Services Section

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Wetlands, Streams, Wildlife, and Shorelines

1.0 Wetlands/Streams and Rivers

1.1 Wetlands

395-001 According to the DEIS, a total 10 wetlands, totaling 242 acre, were identified within the 500-ft transmission line study corridor under the proposed alternative. Most wetlands were low-gradient, depressional forested wetlands. Major streams and rivers associated with wetlands within the ROWS include the Raging River, Rock Creek, and Cedar River. According to the Draft Environmental Impact Statement (DEIS), establishment of the cleared ROW would impact a total of 16 acres of wetland (please note that the wetland Appendix identified 25 acres of impact, under the proposed alternative-please clarify). The majority of wetlands that may be effected are associated with forested habitats that would be permanently altered, by the removal of trees, with construction of the transmission line. Impacts would include clearing shrubs, trees, and herbaceous vegetation from wetlands and wetland buffers. Direct and indirect impacts that could occur within or outside of the cleared ROW include, vegetation alteration, water quality degradation, sedimentation, introduction of invasive species, wildlife impacts, and changes in wetland hydrology. Permanent impacts on wetlands, buffers, and their functions and values may occur from fill associated with road access or widening for tower construction. New access roads would be sited to avoid wetland impacts where possible, however, road construction and use could carry sediment into wetlands, affecting water quality and biological productivity. Expansion of the substation is expected to impact less than 1/10 acre of wetland. Operation and maintenance of the ROW (vegetation removal) would include periodic impacts on wetlands and their buffers.

The following Comprehensive Plan policies apply to the siting of facilities in and around wetlands:

395-002 Wetlands are valuable natural resources in King County. They include shallow or deep marshes, bogs, ponds, wet meadows, forested and scrub-shrub communities and other lands supporting a prevalence of vegetation adapted to saturated soils. Many of the larger wetlands in King County are mapped in the County's Sensitive Areas Map Folio, and their vegetation, hydrology and wildlife are briefly described in the King County Wetlands Inventory.

E- 130 King County shall use as minimum standards, the Washington State Wetlands Identification and Delineation Manual, 1997 or its successor which is adopted by the King County Council and is the scientifically accepted replacement methodology based on better technical criteria and field indicators.

Wetlands are productive biological systems, providing habitat for fish and wildlife. They may serve as outdoor classrooms for scientific study. Some are used for hiking, hunting,

395-001 At the time the wetland technical study report was prepared, the amount of wetlands was estimated to be 25 acres within the proposed right-of-way. Further refinement of the amount of wetland impacts was made for the DEIS which stated 16 acres of wetland impact. Additional refinement of the level of wetland impact contained in the SDEIS is 14 acres. For more information please see the revised Appendix D.

395-002 BPA recognizes the value that wetlands contribute to the environment, and agrees with King County that these areas are productive biological systems, providing habitat for fish and wildlife. BPA also recognizes that King County allows alteration of wetlands for utility development (King County Comprehensive Plan Policy E-139), as included in the comments provided by King County, provided that all wetland functions are evaluated, the least harmful and reasonable alternatives are pursued, affected significant functions are appropriately mitigated and mitigation sites are provided with monitoring. BPA is committed to complying with this King County Comprehensive Plan policy, as well as other applicable King County policies.

BPA has selected Alternative 1 as its Preferred Alternative. It parallels an existing high voltage transmission line and takes advantage of the existing clearing that has already taken place, the existing access road system, avoids a separate crossing of the Cedar River downstream of the existing crossing, and also avoids paralleling the Cedar River as Alternatives 4A and 3 would do. Furthermore, BPA has sited its substation expansion, transmission towers and access roads in uplands to avoid filling any wetlands.

BPA proposes to provide compensatory mitigation to satisfy King County regulations to mitigate for the 14 acres of forested wetlands that would be converted to scrub/shrub wetlands within the proposed transmission line right-of-way. See response to Comment 340-002.

and fishing. Wetlands also store flood waters and control runoff, thereby reducing flooding, downstream erosion and other damage. Further, wetlands protect water quality by trapping sediments and absorbing pollutants. They discharge ground water, making it available to plants and animals. Wetlands store peak flows and discharge to streams in dry periods, thus enabling fish and other riparian animal populations to survive. These wetland functions need consideration from a watershed perspective.

395-003

E- 132 King County's overall goal for the protection of wetlands is no net loss of wetland functions within each drainage basin. Acquisition, enhancement, regulations, and incentive programs shall be used independently or in combination with one another to protect and enhance wetland functions.

E- 133 Development adjacent to wetlands shall be sited such that wetland functions are protected, an adequate buffer around the wetlands is provided, and significant adverse impacts to wetlands are prevented.

The functions and values of a wetland will change as land use surrounding the wetland changes. Fragmentation of habitat is considered the greatest threat to native biodiversity. Protecting native species biodiversity depends upon maintaining biological linkages and preventing fragmentation of wetland habitats. Small wetlands strategically located between other wetlands may provide important biological links between other, higher quality wetlands. Wetlands adjacent to habitat networks also are especially critical to wildlife functions and should receive special consideration in planning land use.

395-004

E- 134 Areas of native vegetation that connect wetland systems should be protected. Whenever effective, incentive programs such as buffer averaging, density credit transfers, or appropriate non-regulatory mechanisms shall be used.

E- 135 The unique hydrologic cycles, soil and water chemistries, and vegetation communities of bogs and fens shall be protected through the use of incentives, acquisition, Best Management Practices, and implementation of the King County Surface Water Design Manual to control and/or treat stormwater within the wetland watershed.

E- 138 Enhancement or restoration of degraded wetlands may be allowed to maintain or improve wetland functions provided that all wetland functions are evaluated in a wetland management plan, and adequate monitoring, code enforcement and evaluation is provided and assured by responsible parties. Restoration or enhancement must result in a net improvement to the functions of the wetland system. Technical assistance to small property owners should be considered.

E- 139 Alterations to wetlands may be allowed to:
a. Accomplish a public agency or utility development;
b. Provide necessary utility, stormwater tightline and road crossings; or
c. Avoid a denial of all reasonable use of the property, provided all wetland functions are evaluated, the least harmful and reasonable alternatives are pursued, affected significant functions are appropriately mitigated, and mitigation sites are provided with monitoring.

395-003 BPA understands that King County's goal is "no net loss of wetlands." BPA will work with King County to develop acceptable mitigation that meets both agencies' needs.

BPA would use best management practices when constructing its facilities so that wetland functions are protected, buffers are protected to the extent practicable and significant adverse impacts to wetlands are prevented.

395-004 BPA understands that the King County Code provides for the alteration to wetlands to accomplish a public agency or utility development such as the proposed project, provided that all wetland functions are evaluated, the least harmful and reasonable alternatives are pursued, the affected significant functions are appropriately mitigated and mitigation sites are provided with monitoring.

BPA has prepared a wetland report that it has submitted to the King County Department of Development and Environmental Services in compliance with King County requirements, and also intends to provide compensatory mitigation to mitigate for the alteration of forested wetlands to scrub/shrub wetlands that would be necessary to construct the project.

Please see the revised Appendix D and the Wetland Delineation Report (sent to the County under separate cover).

395-005 BPA understands that when adverse impacts cannot be avoided, such as hand clearing of tall-growing vegetation in forested wetlands in the proposed transmission line right-of-way, compensatory mitigation may be allowed. See response to Comments 395-003 and 395-002.

395-006 BPA understands that King County zoning guidelines prohibit development from occurring within wetlands except where the minimum requirements are satisfied, and when there are no

395-005 When adverse impacts cannot be avoided, compensatory mitigation may be allowed. This means the replacement of project-induced losses of wetland functions and values will be permitted through wetland creation, restoration or enhancement.

E- 141 Mitigation sites should replace or augment the functions to be lost as a result of the project proposal. Wetland mitigation proposals should be approved if they would result in improved overall wetland functions within a drainage basin. All wetland functions should be considered. Mitigation sites should be located strategically to alleviate habitat fragmentation, and avoid impacts to and prevent loss of farmable land within Agricultural Production Districts.

E- 142 Mitigation projects should contribute to an existing wetland system or restore an area that was historically a wetland. The goal for these mitigation projects is no net loss of wetland functions per drainage basin.

E- 143 Land used for wetland mitigation should be preserved in perpetuity. Monitoring and maintenance in conformance with King County standards should be provided by the project proponent until the success of the site is established.

The foregoing Comprehensive Plan provisions for evaluating proposed uses within wetlands are implemented by pertinent zoning code provisions paraphrased below. King County zoning guidelines prohibit development from occurring within wetland except where these minimum requirements area satisfied.

KCC 21A.24.320-Wetland Development standards defined.

KCC 21A.24.330- (B), (E), and (N)

(B) –Special study required (see KCC 21A.24.100, 110, and 120)

(E)- Utilities may be allowed in wetland buffers if no practical alternative location is available and the utility corridor meets any additional requirements set forth in administrative rules.

395-006 (N)-Wetland road crossings

KCC 21A.24.130 Mitigation required: mitigation, maintenance, monitoring, and contingency.

KCC 21A.06.750 Mitigation defined. In descending order of preference, avoidance, minimization, rectification, reduction or elimination over time, compensation by replacing, enhancement, etc., and monitoring.

KCC 21A.24.340 (C) Replacement is required when a wetland or buffer is altered. Restoration of wetland shall be met by replacement.

direct impacts to jurisdictional wetlands as a result of the proposed project. BPA has sited all of the proposed facilities, e.g., transmission towers, access/spur roads and the substation expansion, on uplands.

BPA intends to satisfy the minimum standards as identified in King County's comments to the DEIS. To wit:

KCC 21A.24.320 Wetlands — Development Standards. BPA recognizes that all wetlands within King County are protected by buffers from 25 feet to 100 feet, and that the buffer widths are dependent on the classification of their associated wetland. BPA also understands that buffer widths can be increased by King County when necessary to protect wetlands.

KCC 21A.24.330 (B) — BPA understands that King County allows alterations to wetlands and wetland buffers pursuant to K.C.C 21A.24.075 or if the proposed development will (a) protect, restore or enhance the wildlife habitat, natural drainage or other valuable functions of the wetland resulting in a net improvement to the functions of the wetland system; (b) develop a plan for its design, implementation, maintenance and monitoring prepared by a civil engineer and a qualified biologist; (c) perform the restoration or enhancement under the direction of a qualified biologist; and (d) will otherwise be consistent with the purposes of this chapter. BPA also understands that to establish baseline conditions, detailed studies "may be required," such special studies, should they be required, shall include specific recommendations for mitigation which may be required as a condition of any development proposal (approval); and that these recommendations (if made) may include specific design and construction techniques.

In complying with the King County Code, BPA has prepared a wetland delineation report that identifies the direct and indirect impacts to the sensitive areas, and how they can be reduced. Additionally, BPA agrees to provide compensatory mitigation to offset the unavoidable impacts to the sensitive areas as a result of the proposed project.

While BPA has successfully cited all of its proposed facilities in uplands, some buffer areas would be affected. BPA

KCC 21A.24.340 (D) Enhancement may be allowed, but the wetland biologic and or hydrologic functions shall be improved.

KCC 21A.24.340(F)- Off site mitigation allowed if within the same sub-basin, and greater hydrologic and biologic functions are achieved.

395-007 KCC 21A.24.070- Exceptions to the wetlands standards are allowed if no practical alternative exists with less impact on the sensitive area and the proposal minimizes impacts on sensitive areas.

1.2 Streams/Rivers

395-008 The DEIS sated that the preferred transmission line alternative would cross nine fish-bearing streams and an unknown number of non-fish-bearing streams. Impacts on stream resources from the proposed action would include the clearing of 12 acres within 100 feet of potentially fish-bearing streams and 33 acres within 300 feet of potentially fish bearing streams. Approximately 2,900 feet of stream would be within the cleared ROW. Clearing within 100 feet of the stream could reduce riparian shading and bank reinforcement by roots, and increase fine litter contributions to the stream. Clearing within 300 feet of the steam could affect LWD recruitment to the stream and stream microclimate. It is also possible that during construction, surface water runoff containing sediment, fuel spills, herbicide runoff and other contaminants could impact streams.

395-009 During the construction of the transmission line, the DEIS identifies that the BPA may need to install some culverts to provide or upgrade stream crossings for access roads. Improper culvert installation may impact stream hydrology, increase sediment delivery to streams, increase peak flows, and/or create a fish passage barrier. Road construction and road use could cause sediment delivery to streams.

395-010 Although specific locations have not been determined yet, it is stated that the BPA would need to blast bedrock to install some tower footings. Detonating explosives in or adjacent to fish habitat could cause disturbance, injury, or death to fish and destruction or alteration of their habitat.

Operation and maintenance activities in of the ROW (vegetation removal) would include periodic impacts on streams and riparian areas. It is stated that the BPA has prepared a programmatic EIS for its vegetation management program associated with transmission lines, roads, and related facilities.

395-011 Comprehensive Plan policies apply to the siting of facilities in and around streams are identified below and in the Comprehensive Plan policies identified Under Fish and Wildlife and Shoreline sections in this letter.

Our use and modification of water resources and the surrounding terrestrial environment affects how the hydrologic cycle functions and can cause unintended detrimental impacts such as flooding, erosion, degradation of water quality, loss of fish and wildlife habitat,

understands that this section of the King County Code allows for utilities such as transmission lines to be located in wetland buffer areas "if no practical alternative location is available and the utility corridor meets the additional requirements set forth in the administrative rules." The rules say that utilities may be allowed if: (1) King County determines that no practical alternative location is available, and (2) the utility corridor meets any additional requirements set forth in the administrative rules including, but not limited to, requirements for installation, replacement of vegetation and maintenance.

BPA has undertaken an environmental review of the Proposed Action and several alternatives, including the No Action Alternative, under the National Environmental Policy Act of 1969, as amended. BPA has reviewed a range of alternatives that included alternatives that circumvented the Cedar River Municipal Watershed as well as those that crossed the Watershed and non-transmission alternatives. Alternative 1 was selected as the proposed action since it would create the least impacts to the human environment, which includes both the social environment as well as the natural environment. It avoided a second separate crossing of the Cedar River, which is protected under the Washington State Shoreline Management Act; would avoid clearing riparian habitat along the Cedar River; was the least likely to affect cultural resources; would require the least amount of clearing in that it would be located immediately adjacent to BPA's existing 500-kV transmission line, and would also require the least amount of new access/spur roads. Additionally, the alternative was the one that the King County Comprehensive Plan (ET-203) suggests should be looked at first when attempting to site additional utility lines, and that is in existing utility corridors. The Proposed Action was the shortest line under review, and therefore would have the least line losses. It also is the least costly to construct, including material, land and mitigation costs.

Two alternatives, Alternatives 3 and C, would likely impact fewer wetlands than the Proposed Action. Implementation of these alternatives, however, would create many other impacts to other environmental resources. Both alternatives would require more clearing and more access roads and have a higher risk of impacting cultural resources and scenic quality. Alternative 3

and loss of archeological and traditional cultural resources that depend upon but do not damage natural resources. In order to minimize adverse impacts on the water resources of King County and ensure our continued ability to receive the benefits they provide we need to promote responsible land and water resource planning and use.

E- 116 King County shall use incentives, regulations and programs to manage its water resources (Puget Sound, rivers, streams, lakes, freshwater and marine wetlands and ground water) and to protect and enhance their multiple beneficial uses-including fish and wildlife habitat, flood and erosion control, water quality control and sediment transport, water supply, energy production, transportation, recreational opportunities and scenic beauty. Use of water resources for one purpose should, to the fullest extent practicable, preserve opportunities for other uses.

395-012 **E- 117 Development shall support continued ecological and hydrologic functioning of water resources and should not have a significant adverse impact on water quality or water quantity, or sediment transport and should maintain base flows, natural water level fluctuations, ground water recharge in Critical Aquifer Recharge Areas and fish and wildlife habitat.**

395-013 **E- 126 Stormwater runoff shall be managed through a variety of methods, with the goal of limiting impacts to aquatic resources, protecting and enhancing the viability of agricultural lands and promoting groundwater recharge. Methods of stormwater management shall include temporary erosion and sediment control, flow control facilities, water quality facilities as required by the Surface Water Design Manual, and Best Management Practices as described in the Stormwater Pollution Control Manual. Runoff caused by development shall be managed to prevent adverse impacts to water resources and farmable lands. Regulations shall be developed for lands outside of the Urban Areas that favor non-structural stormwater control measures when feasible including: vegetation retention and management; seasonal clearing limits; limits on impervious surface; and limits on soil disturbance.**

395-014 **E- 128 River and stream channels, stream outlets, headwater areas, and riparian corridors should be preserved, protected and enhanced for their hydraulic, hydrologic, ecological and aesthetic functions, including their functions in providing woody debris sources to salmonid-bearing streams.**

The foregoing King County Comprehensive Plan stream policies are implemented by the zoning code provisions paraphrased below. King county zoning precludes development from occurring within rivers, streams and associated buffers unless these minimum requirements area satisfied.

KCC 21A.24.360-Zoning Code (SAO) Development Standards for Streams.

KCC 2A.24.370: (A), (D), (G), and (J)

(A)- Special study required (see KCC 21A.24.100; 110; and 120.

395-015 (D)- Utilities allowed in stream buffers if no practical alternatives exist and provisions of KCC 21A.24.220 are met.

would require a separate right-of-way through the Watershed and a separate crossing of the Cedar River at a point where the river would have shorter banks, requiring riparian vegetation to be cleared. Alternative C would impact a large number of residences outside of the Watershed and wells on private lands. These impacts seriously handicap these alternatives when compared to the Proposed Action.

Since BPA is prepared to meet any additional requirements set forth in administrative rules including requirements for installation, replacement of vegetation and maintenance, so long as these requirements would allow BPA to meet NESC (National Electric Safety Code) requirements and its own maintenance standards for safe operation and maintenance of the line, BPA believes that it complies with the King County Code.

BPA understands that Section KCC 21A.24.330 (N) of the King County Code allows constructing roads in wetlands as long as certain conditions are met.

Since BPA has sited all of its facilities in uplands, no roads would be constructed in wetlands.

All jurisdictional wetlands would be avoided as a result of BPA's proposal to construct the transmission line using a helicopter instead of a boom as much as possible. Doing so eliminates the need to construct 16-foot wide access roads to reach the proposed tower sites and the need to fill wetland areas.

BPA has submitted a wetlands report to King County that addressed the impacts that its facilities would have on the storage capacities of the wetlands, if any, and the degree that the proposed project would impact the hydrology of these sensitive areas as well. The agency agrees to mitigate the effects of these impacts on these sensitive areas, as required by the King County Code.

BPA understands that (as determined by King County) mitigation, maintenance and monitoring measures shall be in place to protect sensitive areas and (their) buffers from alterations occurring on the development proposal site.

(G)- Stream crossings

(J) Stream channels may be stabilized if stream movement threatens an existing structure, does not impact the floodplain, and consistent with the Guidelines for Stream Bank Stabilization.

KCC 21A.24.130- Mitigation required.

KCC 21A.06.750-Mitigation defined.

KCC 21A.24.380(D) Replacement or enhancement is required when a stream or buffer is altered. Replacement or enhancement shall result in no net loss of stream functions and result in no impact to streams.

395-016 KCC 21A.24.380 (F)- Mitigation shall be on site and in-kind unless on site mitigation is not possible, mitigation occurs within the same sub-basin and greater biologic and hydrologic functions are achieved.

395-017 KCC 21A.24.070- Exceptions to the stream standards are allowed if no practical alternative exists with less impact on the sensitive area and the proposal minimizes impacts on sensitive areas.

1.3 Proposed projects consistency with King County's land use land use plans and zoning regulations for wetlands and streams/rivers

395-018 Upon review of the DEIS, King County has determined that the proposed project is not consistent with King County's land use plans and zoning regulations affecting streams and wetlands. Provisions are available in King County's zoning regulations to deviate from certain of its sensitive area development standards if an applicant can demonstrate that through an alternative evaluation there are no practical project alternatives or locations (21A-24-005 D.) to the proposal that would minimize and mitigate impacts on sensitive areas (Public Rules 21A-24-025). There are practical alternatives and mitigation that have not been evaluated in the DEIS that are available and that may preclude use of such and exemption or which would further reduce project impacts to sensitive areas to the point that an exemption could be granted.
The alternative analysis in the DEIS does not demonstrate that there are no practical alternatives to the proposal that would minimize impacts on sensitive areas. The development of alternative appears to be primarily driven by cost, residence and subdivision avoidance, and WSCC reliability criteria. An alternatives evaluation will need to be performed that demonstrates avoidance, or where avoidance is not feasible, minimization of impacts to stream and wetland resources.

Section 4.9.2.4 of the DDES identifies standard mitigation measures to minimize wetland impacts and Section 4.5.21 and Section 4.6.2.11 of the DDES identifies standard mitigation measures to minimize impacts on streams and associated fish resources.

BPA will be complying with EPA's National Pollutant Discharge Elimination System in developing a storm water pollution permit and filing the permit with EPA prior to the onset of construction activities. BPA also will be initiating water turbidity monitoring before, during and following its construction activities to ensure that no adverse impacts would be created to sensitive areas and their buffers, including Seattle Public Utilities drinking water.

King County requires that mitigation be offered in the following order of preference: Avoidance, minimization, rectification, reduction or elimination over time, compensation by replacing, enhancement, etc., and monitoring.

BPA has successfully avoided the need to fill any wetlands. However, some forested wetlands within the proposed right-of-way would need to be cleared of tall-growing vegetation. BPA would minimize this impact by removing that vegetation that would be a hazard to the safe construction, operation or maintenance of the line. Additionally, BPA would work with King County and anticipates that it can provide the appropriate level of compensatory mitigation to satisfy King County requirements.

Section KCC 21A.24.340 of the King County Code states that restoration shall be required when a wetland or its buffer is altered in violation of law or without any specific permission or approval by King County. BPA understands this section of the King County Code, and does not anticipate any activities that would be found to be a violation of law, or that would be found to be out of compliance with King County regulations.

Section KCC 21A. 24.340 of the King County Code states that replacement shall be required when a buffer is altered pursuant to an approved development proposal or a wetland is used for a regional flow facility or other approved use. Requirements for the restoration of wetlands may be met by replacement wetlands.

BPA intends to avoid all wetland and stream buffers where it can (avoidance) and minimize any disturbance where it cannot (minimization). Where impacts cannot be avoided, BPA will work with the County to develop acceptable mitigation that meets both agencies' needs.

395-019 Although these mitigation measures do identify measure to minimize impacts on stream and wetland resources, they are not comprehensive and do not identify specific steps that will be taken to avoid, reduce, or mitigate impacts on sensitive areas. Per King County zoning codes KCC 21A.06.750 and the Public Rules 21A-24.031, the proposed project must demonstrate all impacts on streams and associated buffers are avoided or reduced through mitigation. The following mitigation actions are listed in descending order of preference: 1) avoiding the impact by not taking a certain action, 2) minimizing the impact by limiting the degree or magnitude of the action by using appropriate technology or by taking affirmative steps to avoid or reduce the impact, 3) rectifying the impact by repairing, rehabilitating or restoring the affected sensitive area or buffer, 4) reducing or eliminating the impact over time by preservation or maintenance operations during the life of the development proposal, 5) compensating for the impact by replacing, enhancing or providing substitute sensitive areas and environments, and 6) monitoring the impact and taking appropriate corrective measures. Mitigation should include site specific analysis of each sensitive area that would be affected by the proposed project. Specific project siting alternatives should then be developed to avoid or minimize impacts on sensitive areas (specifically, avoiding all impacts on Class 1 and 2 wetlands and streams). This should include identifying all sensitive areas where impacts could be avoided or reduced through alternative siting methods such as using existing topography to span sensitive areas that would alleviate the need to remove existing vegetation. The analysis should also include identifying locations along the proposed ROW where the proposed utility corridor or roads and other associated facilities could be shifted to avoid impacting sensitive areas.

395-020 A sensitive area clearing plan should also be prepared as part of the design of the project to minimize vegetation impacts on wetlands, streams, and associated buffers. The plan should identify and evaluate specific sensitive areas that could not be avoided through the siting alternatives evaluation, and determine the permissible height of existing vegetation that could remain at these locations.

395-021 As stated above, enhancement, restoration, or creation will be required for all unavoidable wetland, stream, and buffer impacts. The DDIS did not identify sufficient mitigation measure to rectify sensitive area impacts by repairing, rehabilitating or restoring the affected sensitive areas. The mitigation should include compensating for the impacts by creating substitute sensitive areas or enhancing sensitive areas. This will include mitigation for all temporary construction-related sensitive area, and permanent sensitive area impacts, such as modifying forested wetlands to other vegetation types, will require replacement of the functions of those sensitive areas through enhancement, restoration, or creation of altered sensitive area resources. Monitoring must also be competed and remedial actions should be identified to assure enhancement, restoration, or creation mitigation measures are successful. Mitigation sites should be on land that is owned either by the BPA, King County, or other ownership acceptable to King County, and shall be permanently protected from future development or alteration.

The following bulleted items identify additional wetland and stream zoning code non-consistency issues that should be addressed within the final EIS.

BPA understands Section KCC 21A 24.340 (D) of the King County Code. Enhancement may be allowed, but the wetland biologic and or hydrologic functions shall be improved.

KCC 21A.24340 (F) — Replacement or enhancement off site may be allowed if the applicant demonstrates to the satisfaction of King County that the off-site location is in the same drainage subbasin as the affected wetland and that greater biologic and hydrologic functions would be achieved. BPA understands this section of the King County Code, and intends to provide compensatory mitigation.

395-007 ***KCC 21A.24.070*** — Exceptions to the wetland standards are allowed if no practical alternative exists with less impact on the sensitive area and the proposal minimizes impacts on sensitive areas.

BPA understands this section of the King County Code. As mentioned above, BPA believes there is no practical alternative to the Proposed Action with fewer environmental impacts, and the Proposed Action is designed to minimize impacts to the sensitive areas that could not be avoided.

395-008 BPA did identify these impacts in the DEIS and also identified mitigation measures that would reduce these impacts. Please see Section 4.6.2.11 of the DEIS and Section 4.6.2.10 of the SDEIS.

395-009 Please see response to Comments 394-084, 394-188 and 394-132.

395-010 Potential blasting impacts are detailed in Section 4.1.1.1 of the Fisheries Technical Report (Appendix A). That discussion also states that no in-water blasting would occur, and that blasting within 400 feet of fish-bearing streams would not occur when sensitive life history stages of fish are present in the blasting area.

395-011 Comment noted. BPA understands that King County precludes development from occurring within rivers, streams and associated buffer areas unless minimum requirements are satisfied. BPA has sited its proposed facilities to avoid all of these sensitive areas, and agrees to provide compensatory mitigation to offset impacts where they could not be avoided.

Wetlands

395-022 • All wetland sites within or outside of the proposed ROW that may be impacted by project activities would need to be delineated using methodology outlined Ecology's State of Washington Wetland Identification and Delineation Manual (1997).

395-023 • All wetlands would need to be classified per 21A.06.1415 (A-C).

395-024 • Per the KCC 21A.24.320, all class 1 wetlands shall have a 100-foot buffer, Class 2 wetlands shall have 50-foot buffers, and Class 3 shall have 25-foot buffers. Buildings and other structures shall be setback 15-feet from the wetland buffer (21A.24.200).

395-025 • Sensitive area buffers are mandated for the purpose of protecting wetlands. Buffers of native vegetation help wetlands to maintain both hydrological and biological functions and values. These include storm water conveyance and food chain support, as well as flood prevention and salmon production. In order for buffers to perform these duties they must remain in an undisturbed condition as a "setback area" in which native plants are allowed to grow: non-native species are not allowed to be introduced into this area (KCC21A.24.330).

395-026 • Utilities and/or removal of vegetation for a proposed utility corridor may be allowed within established wetland buffers only if the development would protect, restore or enhance the wildlife habitat, natural drainage or other valuable functions of the wetland resulting in a net improvement to the functions of the wetland system (21A.24.330 E).

395-027 • The filling of non-isolated wetlands for construction of structures is not permitted under King County code. Alteration of isolated wetlands (21A.06.1410) may be permitted under some circumstances (21A.24.330 K).

395-028 • Alteration to wetlands and wetland buffers from road crossings must be mitigated (21A.24.330 (A.2) and N). Additionally, crossings must not change the overall wetland hydrology, must minimize wetland impacts, and must be constructed during summer low water periods. Alterations of wetlands shall be replaced or enhanced on the site or within the same drainage basin using the following formulas: Class 1 and 2 wetlands on a 2:1 basis and class 3 wetlands on a 1:1 basis with equivalent or greater biologic functions including, but not limited to, habitat functions and with equivalent hydrologic functions including, but not limited to, storage capacity (21A.24.340 C., D., and E). Replacement or enhancement off the

395-012 Chapter 4 and Appendices A, C, and D of the SDEIS describe the potential effects and mitigation for the Proposed Action regarding water quality, fish habitat, and wildlife habitat.

See response to Comment 394-044 for a reference to response to comments with additional information on impacts to water quality, fisheries, and wetlands.

See response to Comments 394-062, 394-088, 394-096, 394-098, 394-100, 394-101, 394-102, 394-227, 394-236, 394-237, 394-240, 394-241, 394-242, 394-247, and 395-006 for additional information on impacts to wildlife.

395-013 The BPA, as specified under the EPA rules pertaining to stormwater discharges into surface water bodies (40 CFR 122–124), shall obtain an National Pollutant Discharge Elimination System (NPDES) permit for construction activities, including clearing, grading, and excavation, that disturbs one or more acres of land. Under Section 402 of the Clean Water Act, federal facilities (or projects) are subject to these permitting requirements; administration of this program has been delegated to the state, however, for federal projects, EPA administers this program. BPA, as a federal agency, will obtain a general NPDES permit from EPA Region 10. BPA will prepare a project specific Storm Water Pollution Prevention (SWPP) Plan. This plan helps ensure that erosion control measures would be implemented and maintained during construction. It also addresses best management practices for stabilization, stormwater management, and other controls. Additionally the SWPP plan contains a site-specific Spill Prevention and Control (SPC) Plan that covers the project scope of work (including equipment, materials, and activities).

395-014 Comment noted. See response to Comment 395-011.

395-015, -016 and -017 ***KCC 21A.24.360 Streams: Development Standards —*** BPA recognizes that King County has adopted development standards for sites near streams, and that the streams have buffers depending on how they are classified. Class 1 streams have 100-foot buffers, Class 2 streams containing salmonids also have 100-foot buffers, Class 2 streams (without salmonids) have 50-foot buffers, and Class 3 streams have 25-

395-028 site may be allowed if the applicant demonstrates that the off-site location is in the same drainage sub-basin as the original wetland and that greater biologic and hydrologic functions will be achieved.

395-029 • The use of herbicides in wetlands and buffers will not permitted (KCC 21A.24.320 D).

Streams

395-030 • Site specific analysis of all proposed streams to be crossed would need to be performed to identify and evaluate streams for the presence of fish (KCC 21A.24.100; 110; and 120) and classify the streams. As noted within the DEIS Fisheries Appendix, the DEIS relied upon remote methods to identify potential fish-bearing streams.

395-031 • Per the KCC21A.24.360, Class 1 streams and Class 2 stream used by salmonids shall have 100-foot buffers. Non-fish bearing Class 2 streams shall have a 50-foot buffer and Class 3 streams (ephemeral) shall have a 25-foot buffer. Alteration, such as vegetation clearing, is typically not permitted within stream buffers.

395-032 • Sensitive area buffers are mandated for the purpose of protecting streams and rivers. Buffers must remain in an undisturbed condition as a "setback area" in which native plants are allowed to grow: non-native species are not allowed to be introduced into this area (KCC21A.24.330).

395-033 • Utilities may be allowed in stream buffers if no practical alternative is available and the utility corridor meets any additional requirements set forth in administrative rules including, but not limited to, requirements for installation, replacement of vegetation and maintenance (21A.24.330 E.).

395-034 • Crossings of streams and encroachment on the otherwise required stream buffer may be allowed if all crossings use bridges or other construction techniques which do not disturb the stream bed or bank, except that bottomless culverts or other appropriate methods demonstrated to provide fisheries protection may be used for Class 2 or 3 streams if the applicant demonstrates that such methods and their implementation will pose no harm to the stream or inhibit migration of fish (21A.24.370 G). All crossings must be constructed during the summer low flow and be timed to avoid stream disturbance during periods when use is critical to salmonids. Crossings can not occur over salmonid spawning areas unless King County determines that no other possible crossing site exists. Bridge piers or abutments are not placed within the FEMA floodway or the ordinary high water mark. Crossings do not diminish the flood-carrying capacity of the stream.

foot buffers. BPA also understands that King County can increase buffer widths when necessary to protect streams.

KCC A.24.370 Streams: Permitted Alterations — (A) Alterations may only be permitted if based on a special study see KCC 21A.24.100; 110; and 120.

BPA has sited its proposed transmission facilities to avoid sensitive areas like streams and wetlands and their associated buffer areas. While all streams would be spanned, tall-growing vegetation would likely need to be removed in buffer areas to comply with the National Electric Safety Code.

KCC 2A.24.370 D — This section of the King County Code allows utilities to be located within stream buffers if:

1. No practical alternative exists; and
2. The utility corridor meets any additional requirements set forth in the administrative rules including, but not limited to, requirements for installation, replacement of vegetation and maintenance.

BPA is undertaking this environmental review to determine the best alternative to meet the purpose and need of the proposed project. The Proposed Action was selected as the preferred alternative because it meets the project's purpose and need, creates the least environmental impact, is technically superior to the other alternatives and has the least cost. The Proposed Action would parallel an existing transmission line, therefore taking advantage of an existing access road system, minimize the amount of clearing that would be required (because of the adjacent transmission line right-of-way), require the least amount of new conductor, and avoid a second separate crossing of the Cedar River.

With respect to meeting the additional requirements set forth in the administrative rules, BPA could not comment without knowing what these additional "requirements" would be. In building, operating and maintaining its high voltage system, BPA must conform to the National Electric Safety Code to construct, operate and maintain its facilities in a safe and reliable manner.

395-035

- The use of herbicides in stream buffers will not permitted (KCC 21A.24.360 D).

2.0 Fish and Wildlife

A number of wildlife species, including invertebrates, were identified as potentially occurring within the project area. Species that are federally-listed as threatened or endangered; federal species of concern; and Washington State-listed threatened, endangered, sensitive or monitor species with the potential to occur on the west-side of the Cascade Mountains were selected for the BPAs analysis. Species were sorted by their primary habitat associations, defined as forest communities, aquatic communities, riparian communities, early seral communities, and special or unique habitats.

395-036

Two wildlife habitat corridors designated as wildlife Network in the King County Comprehensive Plan occur within the project area. One of the wildlife corridors follows the Cedar River and another traverses the project area to the north of the river. Two wildlife corridors converge west of Rattlesnake Lake. Both corridors would be crossed by the project alternatives.

395-037

Impacts on wildlife species associated with the preferred alternative include physical loss of habitat, or disturbance of wildlife from the construction activities or ongoing facility use and maintenance. Temporary construction impacts would be associated with noise and human presence.

395-038

The proposed action could potentially impact three federally listed salmon species, the Chinook salmon, bull trout, and Coho salmon. Bull trout and Chinook salmon have not been recorded to use streams in the project area of any of the proposed alternative, however, all stream accessible to anadromous fish in the project area are regarded by the USFWS and NMFS as having potential to support Chinook salmon an bull trout. Chinook salmon have been recorded in the Raging River less than one mile downstream of the Segment D crossing, and their apparent absence in the project area may only be due to inadequate surveying. The Cedar River contains suitable Chinook salmon spawning habitat and such use is expected to occur after the Landsburg Dam fish ladder is completed. Reduced LWD recruitment potential and impacts on stream thermal regime were identified to be the primary issues of concern.

The following Comprehensive Plan policies and those identified under streams/rivers, Wetlands, and the Shoreline section of this letter apply to the siting of facilities in sensitive fish and wildlife species:

It is King County's goal to conserve fish and wildlife resources in the County and to maintain countywide biodiversity. This goal may be achieved through implementation of several broad policy directions that form an integrated vision for the future. Each of the pieces is necessary for the whole to be successful. The policy objectives are to 1) identify

KCC 2A.24.370 G — Stream crossings may be allowed and may encroach on the otherwise required stream buffer if:

1. All crossings use bridges or other construction techniques which do not disturb the stream bed or bank, except that bottomless culverts or other appropriate methods to provide fisheries protection may be used for class 2 or 3 streams if the applicant demonstrates that such methods and their implementation will pose no harm to the stream or inhibit migration of fish;
2. All crossings are constructed during the summer low flow and are timed to avoid stream disturbance during periods when use is critical to salmonids;
3. Crossings do not occur over salmonids spawning areas unless King County determines that no other possible crossing site exists;
4. Bridge piers or abutments are not placed within FEMA floodway or the ordinary high watermark;
5. Crossings do not diminish the flood-carrying capacity of the stream;
6. Underground utility crossings are laterally drilled and located at a depth of four feet below the maximum depth of scour for the base flood predicted by a civil engineer licensed by the State of Washington; and
7. Crossings are minimized and serve multiple purposes and properties whenever possible.

BPA understands these conditions. No new stream crossings are proposed. BPA would use its existing access/spur road system to cross any streams associated with the proposed project.

KCC 2A.24.370 J — A stream channel may be stabilized if: (1) Movement of the stream channel threatens existing residential or commercial structures, public facilities or improvements, unique natural resources or the only existing access to property; and (2) the stabilization is done in compliance with the requirements of the King County Code 21A.24.230 through 21A.24.270 and administrative rules promulgated pursuant to this chapter.

and protect critical fish and wildlife habitat conservation areas, 2) link those critical habitat areas and other protected lands through a network system, and 3) integrate fish and wildlife habitat and conservation goals into new and existing developments. Conservation of biodiversity is necessary if wildlife benefits currently enjoyed by residents of the County are to be enjoyed by future generations.

E- 165 The County shall strive to maintain the existing diversity of species and habitats in the County. The County should maximize wildlife diversity in the Rural Area.

E- 166 Fish and wildlife should be maintained through conservation and enhancement of terrestrial, air, and aquatic habitats.

E- 167 Habitats for species which have been identified as endangered, threatened, or sensitive by the state or federal government shall not be reduced and should be preserved. In the Rural Area and Natural Resource Lands, habitats for candidate species identified by the county, as well as species identified as endangered, threatened, or sensitive by the state or federal government shall not be reduced and should be preserved.

The Growth Management Act requires jurisdictions to designate Fish and Wildlife Habitat Conservation Areas for protection. The Washington Administrative Code (WAC) sets out guidelines that jurisdictions must consider when designating these areas. As set forth in the WAC guidelines, Fish and Wildlife Habitat Conservation Areas include:

a) Areas with which endangered, threatened, and sensitive species have a primary association;
b) Habitats and species of local importance;
c) Commercial and recreational shellfish areas;
d) Kelp and eel grass beds; herring and smelt spawning areas;
e) Naturally occurring ponds under 20 acres and their submerged aquatic beds that provide fish or wildlife habitat;
f) Waters of the state;
g) Lakes, ponds, streams, and rivers planted with game fish by a governmental or tribal entity; or
h) State natural area preserves and natural resource conservation areas.

It is important to note that for some species, mere presence is not considered significant. Significant habitats, for some species, are those areas that may be limited during some time of the year or stage of the species life cycle. King County has reviewed these guidelines and has developed policies E-168 through E-172 that address the various species included in the WAC guidelines. These policies recognize the tiered listing of these species and their habitats as defined by the United States Fish and Wildlife Service and the Washington State Department of Fish and Wildlife. These policies also recognize the need to regularly review the information developed on species and habitats and amend the tiered listing as appropriate.

E- 168 King County shall designate and protect, through measures such as regulations,

Comment noted. BPA does not anticipate the need to stabilize any stream channels associated with the Proposed Action.

KCC 21A.24.130 — As determined by King County, mitigation, maintenance and monitoring shall be in place to protect sensitive areas and buffers from alterations occurring on the development site.

BPA has identified the environmental impact of the proposed project along with a list of mitigation measures that are designed to eliminate, or at least minimize, the resulting environmental impacts. BPA proposes to undertake monitoring activities to ensure that any impacts are minimized.

With respect to maintenance activities, BPA would maintain the proposed transmission line and related facilities to ensure safe and reliable transmission of high voltage electric power over the life of the facility, and also to comply with the easement BPA would have with the underlying landowners.

KCC 21A.06.750 — Mitigation defined.

KCC 21A.24.380 (D) — Replacement or enhancement is required when a stream or buffer is altered. Replacement or enhancement shall result in no net loss of stream functions and result in no impact to streams.

BPA anticipates no alteration to streams as a result of the proposed project, however, stream buffers would be affected. Approximately 14 acres of wetland buffers and stream buffers would be affected by the Proposed Action (see revised Appendix D).

KCC21A.24.380 (F) — Mitigation shall be on site and in-kind unless on site mitigation is not possible, mitigation occurs within the same subbasin and greater biologic and hydrologic functions are achieved.

BPA understands this King County ordinance and will work with the County to develop acceptable mitigation that meets both agencies' needs.

incentives, capital projects or purchase, the following Fish and Wildlife Habitat Conservation Areas found in King County:

a) Habitat for federal or state listed Endangered, Threatened or Sensitive species.
b) Habitat for Salmonids of Local Importance: kokanee/sockeye/red salmon, chum salmon, coho/silver salmon, pink salmon, coastal resident/searun cutthroat, rainbow trout/steelhead, bull trout, Dolly Varden, and pygmy whitefish, including juvenile feeding and migration corridors in marine waters;
c) Habitat for Raptors and Herons of Local Importance: red-tailed hawk, osprey, black-crowned night heron, and great blue heron;
d) Commercial and recreational shellfish areas;
e) Kelp and eelgrass beds;
f) Herring, sand lance and smelt spawning areas;
g) Wildlife habitat networks designated by the County, and
h) Riparian corridors.

King County shall also protect the habitat for candidate species, as listed by the Washington Department of Fish and Wildlife, found in King County outside of the Urban Growth Area.

E- 169 King County should protect the following species of local importance, as listed by the Washington Department of Fish and Wildlife and listed by King County, on lands outside of the Urban Growth Area, where they are likely to be most successful. Protection should be accomplished through regulations, incentives or purchase.
Species of local importance are:

a) mollusks - Geoduck clam and Pacific oyster;
b) crustaceans - Dungeness crab and Pandalid shrimp;
c) echinoderms- Red urchin;
d) fish - white sturgeon, Pacific herring, channel catfish, longfin smelt, surfsmelt, Pacific cod, Pacific whiting, black rockfish, copper rockfish, quillback rockfish, yelloweye rockfish, lingcod, Pacific sand lance, English sole, and rock sole;
e) birds - Trumpeter swan, Tundra swan, Snow goose, Band-tailed pigeon, Brant, Harlequin duck, Blue grouse, Mountain quail, and Western bluebird;
f) mammals - marten, mink, Columbian black-tailed deer, elk, and mountain goat.

E- 170 King County should protect the following priority habitats listed by the Washington Department of Fish and Wildlife that are not otherwise protected by policies and codes. Protection should be accomplished through regulations, incentives or purchase. Priority habitats are: caves, cliffs, consolidated marine/estuarine shorelines, estuary, old growth/mature forest, unconsolidated marine/estuarine shorelines, snag-rich areas, and talus slopes.

E- 171 Development proposals should be assessed for the presence of species of local importance. A comprehensive assessment should follow a standard procedure or guidelines and shall occur one time during the development review process.

Existing buffer requirements for streams and wetlands are not intended to, and do not, always adequately protect wildlife resources in those sensitive areas. Areas with critical wildlife resources may need larger buffers to protect the resource.

E- 173 Stream and wetland buffer requirements may be increased to protect species of local importance, as listed in this chapter, and their habitats, as appropriate. Whenever possible, density transfers and/or buffer averaging should be allowed.

***KCC 21A.24.070* —** Exceptions to the stream standards are allowed if no practical alternative exists with less impact on the sensitive area and the proposal minimizes impacts on sensitive areas.

BPA understands this exception to the stream standard, adopted by King County Code.

395-018, -019, and -020 Comments noted. At the time the DEIS was released, BPA had not yet designed the proposed project. BPA routinely uses the environmental process to design its facilities. If BPA were to complete the design of its facilities prior to initiating the environmental review, the affected/interested publics could not provide meaningful and timely input into BPA's decision-making process. Therefore, the design of a project typically parallels the environmental process, with the environmental review out front.

BPA has now delineated all of the sensitive areas within the proposed right-of-way and has sited all of its facilities (substation expansion, tower sites and access/spur roads) on uplands. No wetlands would be filled as a result of the project. To do so, BPA would implement extraordinary measures to construct the project, including requiring the contractor to construct most towers with a helicopter instead of a truck mounted boom. Doing so would reduce the road width normally needed. Additionally, BPA would be using a new footing design (micropiles) to reduce the disturbance area at each tower site. See Section 2.1.1.1 of the SDEIS.

BPA disagrees with the County's evaluation of its proposed project being inconsistent with its land use plans and zoning ordinance. In designing its projects, BPA tries to be consistent with all federal, state and local plans and programs to the extent practicable, while still meeting the National Electric Safety Code requirements, and its own right-of-way maintenance criteria for safe construction, operation and maintenance of its facilities. While BPA is not an "applicant" here, since it is a federal agency and Congress has not waived federal supremacy, it tries to meet or exceed state and local plans and programs to the extent practicable.

Salmon are particularly important because of their significance to local and regional character, federally recognized tribes and the fisheries industry. Several salmon stocks within King County and other areas of Puget Sound are in a serious state of decline. Several salmon stocks within King County have been or are about to be listed under the Endangered Species Act. The most effective way to protect and enhance native fish populations is through protection of those river and stream channels, riparian corridors, lakes, wetlands, headwaters and watersheds that provide or impact spawning and rearing habitat, food resources and fish passage. Intermittent streams also can be critical to native fish populations. Fish enhancement facilities currently are still critical to the maintenance of salmon stocks and the fisheries industry.

E- 174 King County should protect salmonid habitats by ensuring that land use and facility plans (transportation, water, sewer, electricity, gas) include riparian and stream habitat conservation measures developed by the County, cities, federally-recognized tribes, service providers, and/or state and federal agencies. Development within basins that contain fish enhancement facilities should consider significant adverse impacts to those facilities.

Protection of isolated blocks of habitat will not adequately protect wildlife in King County. Critical wildlife habitats and refuges need to be connected across the landscape through a system of habitat networks. Some areas may be important because they connect other areas together.

Network width is related to requirements of desired wildlife species, length of network segment and other desired uses within the network. Wider corridors will be required for larger species if the distance between refuges is great or if multiple uses, such as public access and trails, are desired. Since it may not be possible to protect wide corridors in the Urban Growth Area, it may not be possible to accommodate larger wildlife species in all areas. Networks will address some of the problems of habitat fragmentation for smaller species within the Urban Growth Area.

Potential linkages are identified on the Wildlife Network and Public Ownership Map. Open spaces set aside during subdivision of land should be located to make connections with larger off-site systems. This approach will also benefit other open space goals.

E- 175 Dedicated open spaces and designated sensitive areas help provide wildlife habitat. Habitat networks for Threatened, Endangered and Priority species of local importance, as listed in this chapter shall be designated and mapped. Habitat networks for other Priority Species in the Rural Area should be designated and mapped. Planning should be coordinated to ensure that connections are made with adjacent segments of the network. King County should provide incentives for new development within the networks to incorporate design techniques that protect and enhance wildlife habitat values.

King County shall also protect the habitat for candidate species, as listed by the Washington Department of Fish and Wildlife, found in King County outside of the Urban Growth Area.

See response to Comment 395-006.

Having proposed extraordinary measures to avoid sensitive areas and mitigate potential impacts, BPA believes that the proposed project is consistent with the King County's land use plans and zoning regulations to the maximum extent practicable.

Construction specifications would be developed before construction that would show sensitive areas and clearing required.

395-021 Comment noted. BPA agrees to provide the appropriate level of compensatory mitigation for all unavoidable impacts to sensitive areas, as provided by the King County Code.

395-022 through -028 BPA has prepared a wetland report (see revised Appendix D) and a Wetlands Delineation Report (sent under separate cover). These reports identify the location of the sensitive areas, the measures BPA has taken to avoid the sensitive areas to the extent that it can, and what measures would be taken to reduce impacts to the maximum extent practicable.

395-029 Herbicides would not be used anywhere on the Cedar River Watershed. Outside the Watershed, it is unlikely herbicides would be used in wetlands and wetland buffers.

395-030 through -034 Please see responses to Comments 394-022, 395-009, -014, -015, -016, and -017.

395-035 See response to Comment 395-029.

395-036 Potential impacts to these corridors are discussed in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B).

395-037 This source of disturbance is included in construction activities and is described in Section 4.1 of the Wildlife Technical Report (Appendix B).

395-038 Impacts to these species are analyzed in the Fisheries Technical Report (revised Appendix A) and Wildlife Technical Report (Appendix B).

The foregoing King County Comprehensive Plan stream and shoreline policies are implemented by the zoning code provisions paraphrased below and as outlined within the Wetland and Streams/Rivers Sections of this letter. King county zoning precludes development from occurring within wildlife corridors unless these minimum requirements area satisfied.

21A.14.260- Wildlife habitat corridors-applicability.

21A.14.270-Wildlife habitat corridors- Design standards.

(A) The wildlife corridor shall be meet the following conditions:

1. Forms on contiguous tract that enters and exits the property at the points the designated wildlife habitat network crosses the property boundary
2. Maintains a width, wherever possible of 300 feet. The network width shall not be less than 150 feet wide at any point.
3. Be contiguous with and may include sensitive area tracts and their buffers, and where feasible, the corridor shall connect isolated sensitive areas or habitat and connect with wildlife habitat corridors, open space tracts or wooded areas on adjacent properties.

The Washington Administrative Code (WAC) 197-11 includes the State Environmental Policy Act (SEPA) regulations. WAC 197-11-660 states that local government shall base mitigation measures on policies, plans, rules or regulations formally designated by the appropriate legislative body. King County's Comprehensive Plan is substantive authority under the SEPA rules. The policies to protect wildlife habitat are found in Section VI, A and B, of the Natural Environment chapter. To protect this habitat, King County must adequately condition development permits.

395-039

In order to implement Policy E-175, a draft set of Wildlife Study Guidelines was prepared in August 1993. Wildlife studies prepared by consultants and submitted with permit applications are expected to follow these Guidelines.

Under the King County Wildlife Study Guidelines, projects that are greater than 5 acres located within the rural area and having no special wildlife criteria present, at a minimum, will require a habitat survey. If areas contain special wildlife criteria, additional studies may be required. Special wildlife criteria in rural developments include the presence of threatened or endangered species, site location within a wildlife management area (WMA), or the presence of priority habitats and/or species.

Specific surveys may include a habitat survey, wildlife survey, and threatened or endangered species report for the proposal, as described in the 1993 "Wildlife Study

395-039 and -040 Comment noted.

395-040 Guidelines for SEPA", Draft by King County Resource Planning. The proposed project must assess impacts on raptors and other King county Priority avian species including eagle and red-tailed hawks, great blue heron and pileated woodpecker. Include nesting and habitat impacts, as well as flightway disruptions and perch safety. Additionally, per the King County Code, site specific special study may be required to evaluate impacts on salmonids of local importance as specified in the Comprehensive plan, as well as bull trout and Chinook salmon (see Streams/Rivers).

2.1 Proposed projects consistency with King County's land use land use plans and zoning regulations for Fish and Wildlife

395-041 Based on the information obtained in the required studies and reports, additional fish and wildlife studies/evaluations and mitigation will be required to assure that significant impacts do not occur to priority King County Species or Habitats (also see wetlands and streams/Rivers) and that the project is consistent with King County land use and policy regulations.

395-042 As noted within Appendix B, Wildlife Technical Report, of the DEIS, wildlife species and their habitats occurring or potentially occurring within the project area were discussed at two levels. The first was a very general discussion of a broad project area. The second included a more specific discussion of species and habitats within 0.25 mile of the proposed transmission line ROWs. The information used to identify potentially occurring species or habitats within this study area relied on the WDFW priority habitats database, the HCP for the Cedar River Watershed, other literature, habitat types identified through aerial photography interpretation, and limited habitat field reconnaissance. Based on the proposed project description, the 0.25 mile evaluation corridor on either side of the proposed ROW does not appear to be a sufficient width to accurately evaluate potential impacts to wildlife species. For example, the blasting of bedrock to install tower footings has the potential to effect wildlife species within 1 mile of these activities. Nesting pairs of bald eagles (and wintering populations), spotted owls, northern goshawks, red-tailed hawks, great blue heron colonies, and other avian species could be impacted by the noise disturbance. To more accurately identify species, potential impacts, and associated mitigation measures, the remote habitat evaluations and databases and other literature should be used to identify where sensitive species (federally listed and King County Priority species) occur or are likely to occur within 1 mile of the ROW. Standard or modified survey protocols for sensitive species should be conducted in potentially effected habitats (habitats associated with sensitive species) or areas where significant noise disturbance would occur (blasting) to determine species presence. The location of surveys, size of the survey areas, and survey intensities should be determined/justified based off of the proposed project activity and associated habitats and species sensitivity to project disturbances. Habitat removal, noise disturbance, habitat fragmentation, and bird collision potential (description of flyway needed and nearby high bird concentration areas) with towers should all be considered in identifying species to be surveyed. In areas where species are determined to be present that could be significantly effected/adversely effected by project activities, mitigation measures should be developed

395-041 Appendix B and Section 4.9 of the SDEIS have been expanded to provide additional information on impacts to wildlife. BPA has been in formal consultation with the U.S. Fish and Wildlife Service and has completed informal consultation with NOAA Fisheries (see Appendix U).

See response to Comments 394-062, 394-088, 394-096, 394-098, 394-100, 394-101, 394-102, 394-227, 394-236, 394-237, 394-240, 394-241, 394-242, 394-247, and 395-006 for additional information on impacts to wildlife.

395-042 to avoid or reduce impacting these species (e.g. seasonal construction restrictions, ROW siting modification or/or facility siting modification, etc.). King County typically relies on management recommendations outlined in the Washington Department of Fish and Wildlife Management Recommendations for Washington's Priority Habitats and Species and other internal documents to identify mitigation for sensitive species.

395-043 Per King County land use plans and zoning regulations, wildlife corridor networks must maintain a width, wherever possible of 300 feet. The network width shall not be less than 150 feet wide at any point. Clearing of the two wildlife corridors would therefore not be consistent with King County land use plans and zoning regulations. The proposed project would need to demonstrate that the wildlife corridors would be maintained in their existing conditions. The project should evaluate the use of alternative ROW siting or transmission line spanning techniques to avoid impacting existing wildlife corridors. If it is found that the wildlife corridors cannot be maintained at their existing locations, an analysis should be performed to determine if alternative and appropriate habitat corridors could be established in the immediate vicinity. The corridors would need to meet the design standards in KCC 21A.14.270.

395-044 As stated within Appendix A, Final Fisheries Technical Report, of the DEIS, the impact assessment for the analysis relied upon remote methods to identify potential fish-bearing streams. As identified in Section 1.3 of this letter under Wetlands and Streams/Rivers, to be consistent with King County land use plans and zoning regulations, site specific stream analyses will need to be performed to accurately identify and classify all streams that occur within the identified ROW. For all steams that may be directly effected by ROW crossing, a Level 1 stream survey should be conducted. The survey must include two reaches equal to 20 times the average stream width both up and downstream of the crossing. For all Class 1 and 2 stream crossings that would require work within the OHWM (roads, culverts, other faculties), a Level II analysis may need to be completed. This would include 1) a list of all fish, including their life histories, that are know to inhabit the stream, 2) spanner counts for all anadromous salmonids that use the particular stream where the crossing occurs (WDF format), 3) redd surveys for all anadromous salmonids that use the streams, 4) electrofish the crossing sites during April and May to determine juvenile rearing use.

Mitigation including an alternative evaluation (see Wetlands and Streams/Rivers) would need to be identified for potentially impacted streams and rivers.

Shorelines

395-045 King County's Shoreline Management Master Program (Title 25 of the King County Code) is a functional plan developed in compliance with the Washington State Shoreline Management Act of 1971. The Master Program protects streams with a mean annual flow of 20 cubic feet or more per second, lakes that are 20 acres or more in size, the marine shoreline of Puget Sound and wetlands associated with these systems.

E- 124 Development within designated Shoreline Environments shall preserve the resources

395-042 See response to Comment 394-065. In addition, the potential for noise disturbance outside of the 0.25-mile corridor is recognized and discussed in Section 4.7.2.5 and mitigation described in Section 4.7.2.10 of the SDEIS.

395-043 As mentioned in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B), the proposed transmission line would span the Cedar River and so it is expected that the corridor in that area would remain largely intact. The other corridor would likely be impacted. See response to Comment 340-002 for information about compensatory mitigation.

395-044 Please see response to Comment 394-022. All streams would be spanned.

395-045 and -046 Comments noted. BPA's proposed project would cross over two Class 1 Streams (the Cedar and Raging rivers), however, the proposed project would not involve any ground disturbing activities within 200 feet of these streams; therefore, BPA would not be considered to be directly affecting the coastal zone, and no substantial development permit from King County is needed.

and ecology of the water and shorelines, avoid natural hazards, promote visual and physical access to the water, protect ESA listed species and their critical habitat, and preserve archeological, traditional cultural resources, shellfish resources, and navigation rights. Protection of critical areas shall take priority over visual values and physical access.

- **Utility construction should be encouraged to locate where water quality will be maintained or improved.**
- **Utility corridors should be encouraged to consolidate or share rights of way.**
- **Public access should be encouraged.**
- **Utility routes should be designed to minimize visual impact from the water and upland areas.**
- **Utility facilities and rights of way should be selected to preserve the natural landscape and minimize conflicts with present and future land uses.**
- **Utility facilities and rights of way sho8uld be selected to preserve the natural landscape and minimize conflicts with present and future land uses.**
- **Utility facilities should be located to not require extensive shoreline protection nor to restrict water flow, circulation or navigation.**

The shoreline policies and Comprehensive Plan policies referenced above are both implemented through code provisions paraphrased below.

KCC 25.04.030 Scope. (A) and (C).

> (A) No development shall be undertaken by any person on the shorelines of the state unless such development is consistent with the provisions of this title and the goals, policies and objectives of the master program.
>
> (C) Development proposed on property adjacent to water bodies or wetlands under the jurisdiction of the Shoreline Management Act shall be evaluated in terms of the goals, policies and objectives of the master program. (Ord. 3688 § 103, 1978).

KCC 25.04.050 Relationship to other King County programs. A. When provisions of this chapter conflict with the sensitive areas code, K.C.C. Chapter 21A.54, that which provides more protection to the sensitive area shall apply.

KCC 25.20.110 Utilities. Utility facilities may be permitted in the rural environment subject to the utilities requirements (Section 25.16.160) of the urban environment and the general requirements (Section 25.20.030) of this chapter. (Ord. 3688 § 511, 1978).

25.20.030 General requirements. (A), (C), (D), (E), (F), and (G)

> (A) Nonwater related and residential development shall not be permitted waterward of the ordinary high water mark.

(C) All development shall be required to comply with K.C.C. chapter 9.04 to control runoff and to provide adequate surface water and erosion and sediment control during the construction period.

D. Development shall maintain the first fifty feet of property abutting a natural environment as required open space.

E. Parking facilities except parking facilities associated with detached single-family and agricultural development shall retain existing vegetation or be planted in conformance with the landscape standards enumerated in the general requirements (K.C.C. 25.16.030) of the urban environment.

F. Water quality treatment in compliance with K.C.C. chapter 9.04 shall be required where stormwater runoff would materially degrade or add to the pollution of recipient waters or adjacent properties.

G. The regulations of this chapter have been categorized in a number of sections; regardless of the categorization of the various regulations, all development must comply with all applicable regulations.

25.20.140 Excavation, dredging and filling. (A) Excavation, dredging and filling may be permitted in the rural environment subject to the provisions of K.C.C. 25.16.190.

25.24.030 General requirements (A), (C), (D), and (G).

(A). Nonwater related, water related and residential development shall not be permitted waterward of the ordinary high water mark.

(C) All development shall be required to comply with K.C.C. chapter 9.04 to control runoff and to provide adequate surface water and erosion and sediment control during the construction period.

(D). Development shall maintain the first fifty feet of property abutting a natural environment.

(G). The regulations of this chapter have been categorized in a number of sections; regardless of the categorization of the various regulations, all development must comply with all applicable regulations.

25.24.140 Excavation, dredging and filling.

A. Excavation below the OHWM is allowed in the conservancy environment only to mitigate public safety concerns and fisheries impacts.

C. Excavation or dredging of marshes, swamps or bogs shall not be permitted

25.16.160 Utilities. Utility facilities may be permitted in the urban environment subject provided that:

A. Utility and transmission facilities shall:

1. Avoid disturbance of unique and fragile areas;

2. Avoid disturbance of wildlife spawning, nesting and rearing areas;
3. Overhead utility facilities shall not be permitted in public parks, monuments, scenic recreation or historic areas.

B. Utility distribution and transmission facilities shall be designed so as to:
1. Minimize visual impact;
2. Harmonize with or enhance the surroundings;
3. Not create a need for shoreline protection;
4. Utilize to the greatest extent possible natural screening.

C. The construction and maintenance of utility facilities shall be done in such a way so as to:
1. Maximize the preservation of natural beauty and the conservation of resources;
2. Minimize scarring of the landscape;
3. Minimize siltation and erosion;
4. Protect trees, shrubs, grasses, natural features and topsoil from drainage;
5. Avoid disruption of critical aquatic and wildlife stages.

D. Rehabilitation of areas disturbed by the construction and/or maintenance of utility facilities shall:
1. Be accomplished as rapidly as possible to minimize soil erosion and to maintain plant and wildlife habitats;
2. Utilize plantings compatible with the native vegetation.

E. Solid waste transfer stations shall not be permitted within the shorelines of the state.

395-046 "Shorelines of the State" which appear to be associated with the preferred alternative include the Cedar River, Raging River, and other streams with flows of more than 20 cfs, and their associated wetlands. Since the proposed alternative appears to cross several shorelines of the state and constitutes a substantial development, a shoreline substantial development permit from King County would be required. Therefore, to be consistent with King County Comp Plan policies and zoning regulations, the BPA would need to submit information that demonstrates the project is consistent with the King County Shoreline Master Program as outlined above.

King County Executive
RON SIMS

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RECEIPT DATE SEP 27 2001

September 10, 2001

Lou Driessen, Project Manager
Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208

Dear Mr. Driessen:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Kangley-Echo Lake Transmission Line Project. Ample and reliable electrical power service is of course necessary for our region; however, locating and constructing new transmission lines inevitably creates substantial impacts. For this reason, the EIS must clearly demonstrate why a new transmission line corridor is necessary to ensure system reliability and, if so, include thorough analysis of potential impacts and adequate mitigation for those identified impacts.

The foothills of the Cascades are a high value forest resource. The Cedar River Watershed encompasses a unique lowland forest that will be protected in perpetuity, thanks to the City of Seattle's vision and commitment. Together, the Cedar River Watershed and the Raging River valley form a critical ecological connection between the Cascade Mountains, Tiger Mountain State Forest, Taylor Mountain and Rattlesnake Ridge, providing a crucial wildlife corridor between the foothills and the higher elevation forests of the Cascades. King County has been making tough choices to ensure compliance with the Endangered Species Act, and has been implementing a variety of programs to maintain the forest land base for its economic and habitat values. The City of Seattle is working to implement their Habitat Conservation Plan for the Cedar River Watershed. A new transmission line through the forest lands of the Raging River valley and the Cedar River Watershed will affect these efforts, and we anticipate that as a public agency, BPA will seek to work cooperatively with us and with the City of Seattle to make sure our efforts are not diminished. 409-001

National Environmental Policy Act regulations require that an EIS discuss possible conflicts between the proposed action and local land use plans and policies. The 2000 King County Comprehensive Plan includes policies encouraging energy conservation and calling for the use of existing transmission corridors first:

KING COUNTY COURTHOUSE 516 THIRD AVENUE, ROOM 400 SEATTLE, WA 98104-3271
(206) 296-4040 296-0194 FAX 296-0200 TDD E-mail: ron.sims@metrokc.gov

King County is an Equal Opportunity/Affirmative Action Employer and complies with the Americans with Disabilities Act

409-001 Comment noted.

F-303 Efficient energy consumption, conservation, the use of renewable technologies, and energy responsible land use decisions should be a priority in King County. King County promotes the maximum use of energy conservation and renewable energy resources now, while leaving options for increasing conservation and renewable technologies in the future.

F-310 When new, expanded or upgraded transmission is required, use of existing corridors that have above-ground utilities should be evaluated first. King County should facilitate appropriate corridor sharing among different utility types and owners.

409-002 The EIS should include a more in-depth analysis of how the proposal complies with these policies. Specifically, the EIS should include an explanation of the electrical transmission system serving the King County area, and an analysis that shows the current situation, how conservation could alleviate future needs and other improvements BPA is considering in the future. The analysis should demonstrate why an increase in service is necessary.

409-003 Further, it appears possible to double service by rebuilding the existing transmission towers within the current corridor to accommodate two sets of circuits, but the DEIS dismisses this alternative as too difficult in the short term. A broader analysis of the regional system should be included in the EIS to demonstrate whether or not the system has sufficient flexibility to allow for this alternative, which best meets policy F-310, above. Constructing a new transmission line adjacent to the existing corridor as proposed is less disruptive than the other alternatives and therefore preferred, but should only be considered if rebuilding in the existing corridor is clearly demonstrated to be unworkable.

409-004 The 2000 King County Comprehensive Plan also includes a body of policies addressing protection of forest resources and environmental features that have not been considered in the DEIS. Transmission lines have had substantial impacts on forests, related wildlife, streams and wetlands. The proposal would result in further loss and fragmentation of active forest land and wildlife habitat, and the impacts of construction and operation could adversely affect compliance with the Endangered Species Act and diminish efforts to recover salmon and other listed species. The proposal also brings added risks to protecting water quality in a watershed that supplies drinking water for much of the county. These impacts are significantly downplayed in the DEIS, and the proposed mitigation measures are inadequate to offset the impacts.

409-005 If use of the existing corridor proves to be unworkable, the proposal will be a substantial project consisting of nine miles of new 500kV transmission line, with a cleared swath at least 150 feet wide through mature forest and crossing rivers, streams and wetlands. It also includes construction of at least a mile and a half of new road, three staging areas of undetermined size and location, plus a three-acre expansion of an existing substation. None the less, the project is described as affecting only "…relatively small areas…" and resulting in "…only a low impact." The DEIS also fails to discuss the cumulative impacts of transmission lines criss-crossing the forests of this region, rating the impact of forest loss as low.

409-002 and -003 Please see response to Comment 349-001 for more information about conservation. Please see the response to Comment 340-003. A new alternative discussing potential non-transmission alternatives was added to the SDEIS to fully disclose current non-transmission options. Additional information about the purpose and need for the project have been added to Chapter 1 of the SDEIS. Alternative actions that were considered but dropped, including double-circuiting in the existing right-of-way through the Cedar River Watershed, are described in Section 2.3 of the SDEIS.

409-004 See response to Comment 340-002.

409-005 See response to Comment 340-002.

409-006 As a partner in the region, we expect an earnest analysis of the impacts of the proposal on forest resources, habitat and water resources, and look forward to working with BPA to identify appropriate mitigation. The most reasonable mitigation for any permanent damage or loss of forest land and habitat is replacement. Within King County, any lost wetland habitat must be replaced at a 2:1 ratio. King County has worked to assemble blocks of forest land in the vicinity of the project; there are several parcels adjacent to King County's assembled lands and the City's Watershed, as well as parcels in the upper Rock Creek valley and along the Green River that would be excellent candidates for forest land and habitat replacement for land lost through the project.

409-007 Further, the Raging and Cedar River riparian areas provide especially important habitat for terrestrial species. As the forest in the Cedar River Watershed grows, this area could provide significant habitat for spotted owls and marbled murrelets, and murrelets may be using the upper Watershed today. Transmission lines crossing the Raging and Cedar Rivers should be high enough to allow coniferous forests to grow to maturity in the riparian zone of the river and adjacent slopes.

408-008 At this time, the EIS inadequately addresses the need to construct a parallel transmission line, the full range of impacts of the preferred alternative, conflicts with King County policy and the appropriate mitigations for the full range of impacts. We look forward to working with you to resolve these deficiencies, and to help you select replacement lands for lost forest resources and habitat. For assistance, please contact Lori Grant, King County Office of Regional Policy and Planning, at 206-296-3458.

Sincerely,

Ron Sims
King County Executive

cc: Pam Bissonnette, Director, Department of Natural Resources
Stephanie Warden, Director, Office of Regional Policy and Planning
ATTN: Lori Grant, Office of Regional Policy and Planning

409-006 See response to Comment 340-002.

409-007 Comment noted.

409-008 Comment noted.

King County
Rural Forest Commission
201 S Jackson Street, Suite 600
Seattle, WA 98104
Phone (206) 296-7805
FAX 296-0516

RECEIVED BY BPA
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RECEIPT DATE: OCT 15 2001

Doug McClelland
Chair
Washington State Department of Natural Resources

Ken Konigsmark
Vice Chair
Open Space/Trails Advocate

Jean Bouffard
Rural Cities Representative

Gordon Bradley
University of Washington College of Forest Resources

Rudy Edwards
Mt. Baker/Snoqualmie National Forest

Louis Kahn
Landowner

Steven H. Ketz
Weyerhaeuser Company

Bill Kombol
Forest Landowner

Matt Mattson
Snoqualmie Tribe

Fred C. McCarty
Forest Landowner

Andrew W. Schwarz
Forest Landowner

David Warren
Pacific Forest Trust

October 5, 2001

Lou Driessen, Project Manager
Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208

Dear Mr. Driessen:

On behalf of the King County Rural Forest Commission, I would like to comment on the proposed Kangley-Echo Lake Transmission Line Project. The Rural Forest Commission is an advisory body appointed by the King County Executive and Council to make recommendations on issues pertaining to forestland and forestry in the County. As such, our comments are limited to the issue of the project's impact on forestland in King County.

413-001 While we understand the need to provide the region with an adequate and reliable supply of electrical power, we have serious concerns about the impacts on forestland of the proposed alternative outlined in the Draft Environmental Impact Statement for this project. The forests of the Cascade foothills are a very valuable resource to this region. They are ecologically different from the higher elevation forests of the Cascades and provide habitat for a large variety of wildlife and fish species. They provide us with a source of clean drinking water, and they help clean the air. Much of the privately owned forestland also supports timber production as well as any forestland in the world.

This valuable resource is extremely threatened by encroaching development, and King County has allocated substantial resources to keeping the forest landscape forested and to establishing a critical ecological connection between the Cascade Mountains, Tiger Mountain State Forest, Taylor Mountain, Rattlesnake Ridge, and the Cedar River Watershed. The City of Seattle has also invested in the future of the region's forest landscape by ensuring the preservation of the Cedar River Watershed and developing a Habitat Conservation Plan that will restore old growth forests to the watershed that provides 1.5 million people with their drinking water.

413-001 Comment noted.

Lou Driessen, Project Manager
October 4, 2001
Page 2

The National Environmental Policy Act requires that an EIS address possible conflicts with local land use plans and policies. The King County Comprehensive Plan outlines the following policies focused on the conservation of forestland:

R- 506 Land uses, utilities and transportation facilities adjacent to Designated Agriculture and Forest Production Districts and Designated Mineral Resource Sites, shall be sited and designed to ensure compatibility with resource management.

R- 523 Structures within the Forest Production District should be sited to maintain the productivity of the district. Site plan requirements should limit impervious surface, provide for fire control, protect domestic water supply and prevent conflicts with forest management.

R- 531 King County promotes forest management that achieves long-term forest health, protection of watersheds, sensitive areas and habitat to support fish and wildlife populations, protection of threatened and endangered species, and preservation and economic viability of working forests.

413-002 The DEIS does not adequately address how the proposed alternative complies with these policies. The expansion of the existing power line will result in the elimination of as much as 300 acres of forestland to accommodate the right-of-way, the expansion of the sub-station, and the staging areas. This clearing not only results in lost forestland, but also contributes to the fragmentation of the landscape. The DEIS states that the impact to forestland would be low, but we believe the loss of those acres in a forest ecosystem as threatened as this one is not an insignificant impact. Indeed, it is quite significant and is not in line with the King County policies outlined above.

413-003 The DEIS also fails to explain the need for an additional power line or account for the cumulative impact of BPA's power lines throughout the region. BPA power lines have resulted in the loss of a substantial amount of forestland in eastern King County, and we question not only whether this line is necessary, but also how it fits with BPA's future plans to address the growing population in the County. The DEIS needs to evaluate the impact of this project in the larger scope of BPA's work Countywide.

Based on the above concerns, the Rural Forest Commission makes the following recommendations:

413-004
- BPA needs to publish a supplemental DEIS that addresses the true impact of clearing up to 300 acres of forestland and how that contradicts policies laid out in King County's 2000 Comprehensive Plan. The supplemental DEIS should also address the cumulative impacts on forestland of BPA's projects throughout the County and better explain the need for this project.

413-005
- BPA should give more serious consideration to other alternatives, including rebuilding the existing transmission towers and adding a second circuit within the current corridor. While this alternative may be more costly in the short term, we question whether it may in fact be more appropriate when the long term cost of lost forestland is taken into account.

413-002 Please see responses to Comment Letter 395.

413-003 Please see response to Comment 339-001.

413-004 See response to Comments 411-006, 349-001, and 394-090.

413-005 Please see the response to Comment 340-003.

413-006

- If Alternative 1 does prove to be the best alternative after a more thorough analysis, then we suggest that BPA mitigate the loss of forestland by acquiring and protecting similar forest land in the vicinity that is threatened with conversion to non-forest uses. Such mitigation is similar to the county's requirements for mitigating development of wetlands. If mature forests such as those that would be impacted in the Cedar River Watershed cannot be found, then the agency's mitigation should be discounted, or additional acreage should be acquired to offset the reduced quality of the forest. As mentioned, the forests in King County's foothills are a threatened resource, and the County is working hard to prevent the conversion of this forestland to non-forest use. There are several parcels adjacent to the Cedar River Watershed, on Taylor Mountain, and in the Rock Creek Watershed that are quite threatened, and it would be very appropriate for BPA to mitigate the impact caused by this project by conserving forest in these areas.

413-007

- Finally, BPA needs to better address the management of the land within its power line right-of-ways. While we do not condone the loss of forestland, the impact of BPA corridors on the ecological health of the region, and on the species that thrive in the foothills, could be lessened by managing the right-of-ways to control noxious weeds and planting native species that contribute to the health of the landscape.

We thank you for considering these comments, and we look forward to working with BPA and King County in efforts to develop a constructive solution.

Sincerely,

Doug McClelland
Chair, King County Rural Forest Commission

cc: Ron Sims, King County Executive
Larry Phillips, King County Councilmember
David Irons, King County Councilmember
Suzanne Flagor, Seattle Public Utilities, Watershed Management Division
Lori Grant, Executive Office
Pam Bissonnette, Director, Department of Natural Resources
Benj Wadsworth, Forestry Program Analyst

413-006 See response to Comment 340-002.

413-007 Please see response to Comment 382-017.

Tribes

MUCKLESHOOT
CULTURAL RESOURCES PROGRAM
39015 172nd Avenue S.E. • Auburn, Washington 98092-9763
Phone: (360) 802-2202 • FAX: (360) 802-2242

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SEP 13 2001

September 4, 2001

Communications
Bonneville Power Administration, KC-7
P.O. Box 12999
Portland, OR. 97212

Dear Mr. Driessen,

405-001 The Muckleshoot Wildlife and Cultural Resources Programs appreciates the opportunity to comment on the "Kangley - Echo Lake Transmission Line Project, Draft Environmental Impact Statement" ("DEIS"). The proposed project may result in harm to resources that are value to the Muckleshoot Indian Tribe within the Cedar River Watershed, an especially important traditional cultural and treaty use area. In general, the DEIS fails to acknowledge or take into account the Tribe's present and historic interests in, and utilization of resources in the Watershed that may be adversely affected by the project. As we previously noted in our letter of 2-16-2001, reasonable alternatives outside the Watershed were not fully evaluated. The preferred DEIS Alternative may have the least impact on the environment of the four alternatives evaluated, but not necessarily the least impact, over the long term, of all the alternatives that should have been considered.

The Tribe's comments relating to wildlife, cultural resources, and vegetation management are discussed below. Potential effects on fisheries and water resources of importance to the Muckleshoot Tribe are not addressed here. The views of Muckleshoot Fisheries are not represented, nor does the Tribe waive the right to comment on issues or resources other than those specifically addressed here.

Alternatives development (Section 1.4 page 1-5)

405-002 The DEIS reference BPA "long range" studies looking 5-10 years into the future in order to develop the alternatives under discussion. (These studies, with completion or publication dates, should be cited and included in the literature References). The studies seem to address an extremely short-range time frame. Please explain why you consider this long range planning rather than an interim response to a perceived potential shortage, and how this project provides long-term solutions for the area.

405-003 Part of the rationale for the preferred alternative through the Watershed is that a ROW already exists there. It is logical to assume that within BPA's long range plans, the location of this additional ROW through the Watershed could lead to future additional ROW's, or "loading"

1

405-001 Please see response to Comment 411-006.

BPA has sited the transmission towers to avoid sensitive natural areas such as streams, wetlands and riparian areas adjacent to streams and wetlands. After selecting these tower sites and the proposed access/spur road locations, BPA gave the Cultural Committee the opportunity to suggest that BPA move any of its facilities, with the exception of angle structures, either ahead on line or back on line, if any cultural materials could neither be harvested or relocated.

If BPA were to decide to build the project, it would inform the Culture Committee as soon as the decision is made, so that the Committee could either harvest or relocate these resources with the permission of the landowners. As mentioned to the Committee in recent correspondence, in many BPA rights-of-way, tribal members routinely harvest berries, roots, and medicinal plants under the transmission lines annually. BPA would work with the Muckleshoot Tribe as with other tribes to identify and take extra caution with vegetation management practices to avoid contaminating gathering sites.

405-002 Prior to deregulation of the electric utility industry, utilities could plan new resources such as new generation, 10 or more years out in the future. Since deregulation, new generation and additional loads can be added over a 5-10 year time frame. So, while in the past long-range planning studies were done over a longer period of time, often 20 years in the future, current planning requirements have changed the time frame considered long term.

The existing line through the CRW was built over 30 years ago. BPA's conservative estimate is that a new line and additional lines added to the infrastructure would serve loads for at least another 30 years. Please also see responses to Comments 382-004 and 382-005 and Appendix H (available on request).

405-003 It is true that the presence of any existing utility facility would be a logical choice for the siting of future proposals. BPA has no plans for additional lines at this time.

of the existing ROW's with taller transmission lines of greater capacity, or other additional construction simply because the infrastructure already exists. Such long term and cumulative effects must be considered in this document, especially considering public benefits of the ecological commitments Seattle has made for the Watershed.

405-004 Within a mid- to long range (10-25) years horizon please develop your discussion of the Canadian Entitlement, how BPA intends to address it, and how this project will provide a long-term solution.

ROW Clearing and Maintenance (Sections 2.1.1.4 and 2.1.5 pages 2-5, 2-11)

405-005 The ROW clearing and maintenance plans should be developed and disclosed in this document in order to evaluate adverse effects and mitigation of effects.

Access Roads (Section 2.1.15 page 2-7)

405-006 The EIS states that "**access road locations have not been defined".** Access routes and required stream crossings should be identified in this document in order to evaluate potential adverse effects and mitigation of effects.

Summary of Impacts Table 2-2 page 2-19

405-007 This table should be modified to reflect the information reflected in MIT's comments, especially as regards Tribal usage of the Watershed and its resources, including the Land Use, Wildlife, Visual Resources, Cultural Resources, Health and Safety, etc).

Land Use: Section 3.4.9 page 3-12**:**

405-008 The City of Seattle and SPU acknowledge treaty rights and support traditional cultural activities of local Tribes in the Watershed, and are presently working to cooperatively identify and enhance such special uses. The statements in this Section should also acknowledge the Watershed as a special resource area utilized by tribal members, as is acknowledged in Section 3-13 on page 3-65. Other similarly affected sections include Visual Resources (3.11); Socio-economics (3.12) and Noise, Public Health, and Safety (3.14).

Visual Resources: Section 3.11:

405-009 Tribal members have used the area known as the Cedar River Watershed for generations specifically for it's rich resources that have provided sustenance. The land was also used for religious and spiritual purposes as it continues to be today. The document overlooks the fact that there is use within the Watershed boundaries beyond recreation. Evaluation of visual resources, through the view of a Tribal member wishing to practice a scared tradition, was not considered.

Section 3.8 and 4.7 Wildlife:

2

405-004 More information has been added about the Canadian Entitlement. Please see Appendix I.

405-005 Additional information about clearing and maintenance has been included in the SDEIS.

405-006 Additional information about access roads and stream crossings has been included in the SDEIS.

405-007 BPA has prepared Table 2-3 "Summary of Impacts from Alternatives," by taking the information presented in Section (Chapter) 4 "Environmental Consequences" of the SDEIS and attempting to quantify the level of impact for each resource area as low, moderate, high, or no impacts.

405-008 Comment noted.

405-009 We concur that there is use within the Cedar River Municipal Watershed beyond recreation. The DEIS stated that the Cedar River Municipal Watershed is managed as an ecological reserve (Page 3-3). The document also states that the primary use of the watershed (CRMW) is to provide a reliable, high-quality supply of (drinking) water to the region. And in addition to supplying drinking water, the CRMW is also managed for generation of electric power, for education purposes, and also for recreation i.e., swimming at Rattlesnake Lake.

Although the document did not evaluate the visual impact of a tribal member practicing a sacred tradition within the CRMW, the proposed line would be located immediately adjacent to the existing Raver-Echo Lake 500-kV Transmission Line; therefore, the proposed line would add only slight incremental visual impacts. If the impact of a transmission line would interfere with the aforementioned sacred tradition, then we would assume that such tradition would be practiced elsewhere in the CRMW where no line currently exists.

405-010 Comment noted. However, BPA disagrees with the premise that existing and proposed rights-of-way would negatively impact

405-010 The Proposed Alternative, as well as the three other alternatives considered, have the potential to negatively impact deer and elk herds of importance to the Tribe. Specifically, the disruption of the existing ROW and creation of a new one could decrease the amount of forage available. As is mentioned in the document, there is a high potential for introduction of non-native species thorough ROW ground disturbance, which are toxic to deer and elk. The ROW maintenance schedule should be included within the document, and specific proposed methods of clearing unwanted vegetation should be discussed in the document.

405-011

405-012 The Muckleshoot Tribe has offered comments relating to potential mitigation which are mentioned within the EIS. We are concerned, however, of the lack of commitment to actually implement these measures, specifically planting of forbs and grasses as ungulate habitat within the ROW after construction. We request that BPA assist in funding the already ongoing deer and elk studies within the Watershed monitor those areas that are proposed to be cleared. Clarification and specificity regarding development and implementation of aggressive vegetation management programs on page 4-67 is needed. Noxious weed controls have already been defined within the "BPA Transmission System Vegetation Management Program". An explanation as to whether to the proposed program will follow existing recommendations, or whether a new management program is required. If new programs are needed, they should be disclosed in order to evaluate impacts.

Finally, we would like BPA to commit to minimize disturbance to deer and elk within the area by preventing construction during fawning and calving periods.

Section 3.9 and 4.8 Vegetation:

405-013 In the "Final Vegetation Technical Report" located within the Appendices, operation and maintenance impacts for all the alternatives are considered to be low despite the concern over colonization from non-native or noxious plant species. The report argues that the stated low-level impact is warranted because invasion could be mitigated. This is contrary to what we have experienced regarding invasive species, including scotch broom. It is very difficult to eradicate these species without the use of chemical sprays, which are prohibited within the Watershed boundaries. The commitment to mitigation may not be feasible without chemicals. The report also states the cumulative effects of the project would include "loss of forested area within CRW, additional road construction, and increased colonization of non-native plants" (Tech Report pg. 36), and that "the project has a potentially high impact for spreading noxious weeds" (4-64). Invasion of noxious weeds has been identified within the document, but we feel that adequate measures to prevent and a plan to deal with introduction of these species have not been seriously considered in sufficient detail. As we have stated in previous meetings with BPA, we are very concerned about the possibility of the ROW becoming invaded with these species and prohibiting the growth of forage for animals and plants that are sacred to Muckleshoot people.

405-014 The proposed removal of riparian vegetation to construct the corridor at stream crossings could potentially destroy medicines and plants important to the Tribe. This has not been evaluated. (See Section 4.7.2.6 page 4-47). We are requesting consultation on location of stream crossings and an opportunity to identify and possibly remove plants before construction or

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deer and elk herds in the area. With the removal of the over story in the forested environment and the establishment of low-growing vegetation within the cleared right-of-way, more feed would be made available for ungulates such as deer and elk, instead of less. Deer and elk need both feed and cover to survive and be healthy.

405-011 Please see response to Comment 349-005.

405-012 BPA would plant native seed to revegetate disturbed areas within the Cedar River Watershed created by the project. Doing so would minimize the potential for erosion, provide feed for ungulates such as the deer and elk, and minimize the potential for noxious weeds to sprout, or spread where they are already present.

If BPA decides to build the project this year, construction would not begin until after the Record of Decision, now scheduled for August 2003. It is our understanding that the calving and fawning period for deer and elk normally begins in March and typically ends in late spring, around the middle of June. Most, if not all, of the calving and fawning will have already taken place prior to the onset of construction activities.

405-013 Please see responses to Comments 382-017 and 394-108.

405-014 Comment noted. At the time BPA released the DEIS, the proposed transmission line had not been designed. BPA uses the environmental process to help design its projects. After identifying survey points in the field, BPA conducted a wetland and stream determination, tying the location of these sensitive resources to centerline of the proposed transmission line, and then selected tower sites in upland areas to avoid impacting wetlands and streams and their associated wetland areas. While forested wetlands would be converted to nonforested wetlands, BPA would not fill any jurisdictional wetlands as a result of the Proposed Action.

Any trees removed from the forested wetlands would be cut by hand-held equipment (chain saws) and portions of this vegetation would be left in the wetland areas for use as wildlife habitat or removed by helicopter. No mechanical clearing

vegetation removal begins. Assistance with salvage and potential enhancement of other suitable sites if required should be discussed as appropriate mitigation.

405-015 The Stable Tree Criteria is mentioned within the document, but not specifically and stated that it will be worked on more at a later time. The survey and number of trees that will be removed in all areas should have been defined within the document. Impacts on the availability of cover for deer and elk, as well as the stability of the trees left standing should have been addressed.

405-016 A suggested source of mitigation from the Muckleshoot Cultural Resources Program would be to cultivate and maintain huckleberry patches adjacent to the existing ROW and next to the chosen alternative if it is decided to move forward with this project. Many of the plants that traditionally supported native people's of the area, including huckleberries, were destroyed or do not exist within the Watershed because of past land use practices.

Sections 3.13 and 4.12 Cultural Resources:

405-017 The discussion on cultural resources is severely lacking in substance. The DEIS acknowledges that BPA is subject to Section 106 of the National Historic Preservation Act (NHPA) for this federal undertaking. (Section 5.4, page 5-5). Under the NHPA, the agency is responsible to identify archaeological, historic and traditional cultural resources that may be directly or indirectly adversely affected by a project; and determine appropriate strategies for mitigating adverse effects. Where the Muckleshoot Tribe has traditional use and interests within the area of potential effects for an undertaking, it must be consulted throughout the Section 106 process. The DEIS acknowledges that the project is an undertaking subject to NHPA, that cultural resources including traditional cultural properties (TCP's) have a high probability of being present and affected, and that surveys are required. However, it does not discuss the area of potential effect (APE) for the undertaking, which is an important step necessary to determine the proper scope of surveys. Audio, visual, and direct effects of ground disturbance including access roads, staging areas, borrow pits, are all factors to be taken into account when defining the APE.

405-018 The DEIS states that there is a high probability of encountering prehistoric and historic cultural resources within the project area (4-95), but the proposed action states that there is a low impact on cultural resources and contains the least number of culturally sensitive areas and no cultural resource sites within the ROW. (4-96). This document was printed before most cultural resources surveys or appropriate studies, including any TCP studies involving Tribal informants, were designed or undertaken or results made available for any of the project alternatives. The statement is made, however, that the impact to cultural resources will be low for the proposed action, based upon archival research. This is not sufficient "reasonable effort" to evidence NHPA compliance or support this conclusion. The studies must be undertaken prior to making any determination of presence, significance, eligibility, or appropriate mitigation strategies.

It is troubling that BPA is willing to make this statement well before surveys or TCP studies were completed considering that the proposed action is to effect 152 acres directly within the ROW, and over half older stands that may support cultural resources and culturally modified

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would be undertaken in wetland areas. See also response to Comment 405-001.

405-015 Impacts of the Proposed Action would occur in Douglas fir dominated stands that are 36 to 75 years of age. Due to the height of the trees, additional cutting would be needed at various locations beyond the 150-foot ROW to remove danger trees. This additional cutting would be required whenever the height of trees, in combination with the topography, location and swing of the conductor, wind direction, lean, evidence of high water table, past tree failures, overall health of the tree, etc., could represent a danger to electrical transmission line reliability. Selective danger tree cutting could occur as far away as 200 feet from the edge of the ROW, but most would occur within 75 feet from the edge of the ROW.

405-016 If the landowners agrees to planting the species and the species does not grow too tall, it could be planted under the line.

405-017 The project's Area of Potential Effects (APE) is discussed in the ***Draft Cultural Resource Survey Technical Report*** (Bialas 2001). It consists of a 300-foot (91-meter)-wide corridor containing the 150-foot (45.5-foot)-wide construction corridor and a 150-foot (45.5-meter)-wide danger tree removal zone. Some facilities, such as the Echo Lake Substation expansion area, extend beyond the construction corridor. Access roads and staging areas also would be used but their precise locations have not yet been defined.

405-018 The statement on page 4-96 that impact to cultural resources is expected to be low was based on a sensitivity study of the project (DeBoer 2000). The ***Draft Cultural Resource Survey Technical Report*** (Bialas 2001), based on an intensive survey with subsurface testing, located only two cultural resources and recommended both as not eligible for listing in the National Register of Historic Places.

BPA will continue consulting with the Muckleshoot Tribe to request the Tribe's concerns about potential project impacts and mitigation measures. We believe that the environmental analysis, including cultural and social impacts, can be completed.

trees. Nor does this acreage take into account areas of visual, audial, and indirect effects of the project, which extend the APE. In addition, the locations of access roads has yet to be determined, and will not be available until the FEIS is published. Cultural surveys must be completed for road corridors, for stream crossings, for substation and staging areas and borrow pits, with the Tribe consulted on the locations beforehand to identify and cultural concerns. We question whether in light of these omissions, the full environmental analysis including cultural and social impacts, can be completed.

405-019 We are pleased to see BPA's commitment to work with the Tribe and to avoid sensitive areas if the proposed project is built. Such commitments would be appropriately documented in an MOA evidencing the project NHPA compliance. We feel that to provide comments concerning protection of cultural resources would be premature, as most necessary surveys and studies, including ethnohistoric or TCP studies, have not yet been undertaken or their proper scope discussed by BPA with Cultural Resource Program staff.

Other Matters:

405-020 The expansion of Echo Lake Substation was not mentioned as being part of the transmission line proposal during scoping meetings with the Muckleshoot Tribe. We would like to recommend that the area for expansion, as well as all access roads, stream crossings, and proposed staging areas, be surveyed for cultural resources before construction.

405-021 The Tribe has made repeated requests for BPA assistance in obtaining timber cleared from the ROW, including a written request dated 2-16-01. Additionally, a copy of the timber cruise for the proposed project was requested, and was promised to the Tribe in a letter dated 3/8/01. At this time we have not received the requested information. Please forward these documents to myself as soon as possible.

405-022 In conclusion, this DEIS seems premature and insufficient in a number of subject areas, where locations of elements of the project are not yet established or management or mitigation plans are not in place so that environmental impacts cannot be properly analyzed. At this time, we recommend the "No Action Alternative" until such a time that we may fully evaluate all the necessary studies to determine the impact to the resources within the proposed project area. Until that time, we would like to continue consultation and propose a meeting within the next month. Please call me at your earliest convenience to schedule a time with the Culture Committee and staff.

Sincerely,

Melissa Calvert

Melissa Calvert, Director
Muckelshoot Wildlife and Cultural Resources Programs

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405-019 BPA will be pleased to enter into a Memorandum of Agreement (MOA) regarding National Historic Preservation Act (NHPA) compliance, if continued analysis and consultation determines that the project would affect one or more National Register of Historic Places properties and avoidance or mitigation is needed. BPA looks forward to receiving any information the Muckleshoot Tribe may have on traditional cultural properties or uses of the project area.

405-020 The Proposed Action calls for construction of nine miles of transmission line and the expansion of Echo Lake Substation by approximately three acres for the purpose of constructing a new bay to accommodate the additional transmission line. BPA regrets this oversight if it was not mentioned during the scoping meeting with representatives of the Muckleshoot and Snoqualmie tribes. With respect to surveying these areas for cultural resources, BPA cultural resource contractor, HRA Inc., surveyed the substation expansion area at the time the line was surveyed during summer 2001. Although the proposed substation expansion area was surveyed, no survey was undertaken for any staging areas because they were unknown at the time. Any area where ground disturbing activities would take place would be surveyed for cultural resources before construction.

405-021 Once BPA has a timber cruise, we would be willing to share that information with the tribe.

405-022 Comment noted. BPA received many requests for more information as a result of the review of the draft EIS and decided to publish a SDEIS to respond to the comments.

Groups and Individuals

Kuehn, Ginny -KC-7

From: randy kram [rlruger44@uswest.net]
Sent: Sunday, July 08, 2001 5:13 AM
To: comment@bpa.gov
Subject: Powelines through the watershed

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-338
RECEIPT DATE: JUL 09 2001

338-001 I believe that the current proposal to run a new line through the watershed east of Maple Valley is the best choice. It impacts the smallest number of homes and will have little impact on the surrounding area. With the lines in the watershed there will also be greater control over the construction and future maintenance. Also, less chance of vandalism due to the fact its in a restricted area. A very good choice to help us with our energy needs.

Thank You
Randal Kram
Covington, WA

338-001 Comment noted.

Kangley-Echo Lake Transmission Line

Telephone comment by Ginny Kuehn
7/9/01

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-339
RECEIPT DATE: JUL 09 2001

Greg Meeks
360-886-7334

339-001 Greg called regarding the Cedar River Watershed. His comment was really a bad idea. A lot of money. He would like a call back to explain the reasoning of this project.

Lou Driessen called Greg Meeks on 7/9/01. He does not want the project. He is against growth and thinks this project would promote growth. He also does not want this project to affect wildlife, including E&M field impacts. He knows that this project would only benefit California and was not concerned about local needs for they have not had a black/brown out. He was all in favor of the No Action Alternative.

339-001 Additional information has been added to the SDEIS to address this comment. Please see Chapter 1. The purpose of the project is to meet the level of reliability that will reasonably insure that all customers in the region have electrical power available when it is needed.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
KELT-340
RECEIPT DATE: JUL 12 2001

From: Konigsmark, Kenneth D [Kenneth.Konigsmark@PSS.Boeing.com]
Sent: Wednesday, July 11, 2001 3:49 PM
To: 'comment@bpa.gov'
Subject: Kangley-Echo Lake Expansion DEIS comments

Dear Mr. Driessen,

While I can't possibly adequately review all 348 pages of the DEIS, I do wish to comment on what I did read and what I know of the project's intentions.

These comments are submitted as an individual, not representing any organization, and as a resident living nearby in the Preston area. I do work for the Mountains to Sound Greenway Trust and am, thus, very familiar with the area, land use issues, and all of the intense efforts that have gone into helping conserve and protect the project area from inappropriate development and impacts.

340-001 I'm concerned immediately when I read the project "purposes" on p. 18. These reflect minimizing any impacts to humans, but do not reflect this same sentiment for impacts to the environment. While it state's "protect environmental quality," what does this mean, and how can this possibly be done with a project that would create a new 150', permanently cleared corridor through what is now valuable forestland? I believe one of your purposes should clearly state: "Minimize all environmental impacts through careful planning and implementation and fully mitigate the impacts of the new corridor."

340-002 What do I mean by "mitigate?" It's incumbent on BPA to mitigate the permanent loss of forestland that will occur as a result of your proposed project. 150' x 9 miles = 164 acres of permanently lost forestland through an area that has gone to extensive lengths specifically to preserve and protect long-term forests. In an era of salmon listings, new measures being taken to protect native vegetative cover, and heightened sensitivity to the importance of forests for wildlife habitat, water quality and quantity, recreation, scenic values, air quality and carbon sequestration, and more, it is incumbent on BPA to permanently replace the 164 acres of forest lost to clearing and "development" with an offsetting minimum of 164 acres elsewhere. This should be factored into the project costs and be accomplished via a conservation easement or fee acquisition.

340-003 While I'm pleased none of the other alternatives are proposed because of their broader environmental impacts, I'm still not satisfied with the proposal selected. Why is a parallel line necessary? Why can't the new line be added to the existing towers? The environmental "savings" would be huge if this were done, and I suspect the financial savings would be significant as well. I'm certain there are ways to temporarily keep power flowing in the existing line even while attaching a new line to the towers. If the issue is redundancy, it really wouldn't matter if the line were parallel to the existing line or on the same towers; an incident would likely affect them the same way in either case. I strongly urge you to not build a parallel line but to instead locate the new line on existing towers. Not only does this save 164 acres of forest and prevent a widened corridor, it also precludes the costly need for BPA to acquire easements, install towers, etc.

340-004 "Danger trees" is another issue of concern. In the "old days" this might have been the way things were done, but cutting down anything that MIGHT have a future impact is not acceptable today. Just as the Watershed is not allowing this approach, BPA must take a similar approach along the entire 9-mile length. An open approach to cutting all danger trees is not acceptable and this must be changed in your approach so that the "stable tree" approach is utilized everywhere.

340-005 I must mention that this portion of the I-90 corridor is a National Scenic Byway that merits special scenic and visual impact concern. Once the line crosses to the north face of Taylor Mountain it is within the viewscape of I-90 travelers, who now enjoy a forested basin view. A widened powerline corridor will likely detract from this, which presents another reason for locating the line on existing towers.

340-006 NEPA requires BPA to "protect, restore, and enhance the environment." While I didn't read the entire DEIS, I didn't see any measures that accomplish this goal. What I did see was an intent to permanently clear a 9-mile, 150' wide corridor and erect 40 towers plus a new line. Thus, I again emphasize that BPA must develop an appropriate mitigation proposal that offsets the environmental damage occuring via this loss of forestland.

Thank you for the opportunity to comment.

Ken Konigsmark
(425) 957-5094
FAX: (425) 957-5048

(NOTICE: Contents of this message should not be construed as representing any official position of either the Boeing Company or the Mountains to Sound Greenway Trust unless specifically stated as such)

340-001 Our reference to the "human environment" includes both the social environment as well as the natural environment, and our EIS looks at impacts to both. We do not put one above the other, but analyze all impacts in our environmental documents. With respect to what we mean by the project purpose "Maintain environmental quality," we mean that it is our intention to build, operate and maintain the proposed transmission facilities in an environmentally-responsible manner, should BPA make a decision to build the project.

340-002 Your comment regarding mitigation is noted and will be addressed in the appropriate detail in the Mitigation Action Plan to be subsequently prepared for this project, and in association with permitting discussions with the King County Department of Development and Environmental Services.

BPA has purchased 350 acres in the Raging River Basin immediately adjacent to the Cedar River Watershed. One hundred ten acres would be turned over to the city of Seattle with the remaining acreage sold with a conservation easement or deed restriction such that no commercial or residential construction could take place. BPA may also purchase or fund the purchase of other properties that could be used for compensatory mitigation. Portions that will not be turned over to the city of Seattle would be sold with a conservation easement or deed restriction such that no commercial or residential construction could take place. These properties would more than offset any impacts the project may cause to the Cedar River Watershed and its HCP and impacts to wetlands inside and outside the watershed.

In addition to this compensatory mitigation measure, BPA has designed mitigation measures into the proposed project. It has avoided impacts to jurisdictional wetlands by avoiding filling any wetlands, using a small footprint for tower footings to minimize ground disturbance, planting low-growing vegetation in forested wetlands that would be changed to shrub-scrub wetlands and planting low-growing vegetation on other disturbed ground to rehabilitate it, requiring helicopter/sky crane construction be used to minimize new road construction, and using existing access roads to the extent possible.

With respect to the proposed conversion of forested wetlands to scrub/shrub wetlands, BPA would only use hand clearing techniques to remove tall-growing woody vegetation, and either leave all vegetation taken in the wetland areas or would remove vegetation by use of helicopter/sky crane. Additionally, BPA would provide the appropriate level of compensatory mitigation as recommended by King County for altering these wetlands.

340-003 See Section 2.3.8 of the SDEIS.

340-004 Danger trees would be identified using a combination of information – topography, location and swing of the conductor, wind direction, lean, evidence of high water table, past tree failures, overall health of the tree, etc. See Section 2.1.1.4 of the SDEIS.

340-005 The proposed line would not cross the north face of the Taylor Mountain, and would not be visible to travelers on I-90. The line would terminate at Echo Lake Substation, more that a mile south of I-90.

340-006 Please see the response to Comment 340-002.

Philip L. Howard
Post Office Box 440
Hobart, WA 98025-0440

PUBLIC INVOLVEMENT
LOG#: KELT-341
RECEIPT DATE:
JUL 18 2001

July 15, 2001

Mr. Gene Lynard (KECN-4)
Project Environmental Lead
Bonneville Power Administration
Post Office Box 3621
Portland, OR 97208

Dear Mr. Lynard:

Re: Kangley – Echo Lake Transmission Line Project
Specifically impact on the Gray Wolf, Black Bear, Cougar

Thank you for the copy of the Kangley – Echo Lake Transmission Line Project environmental impact study. I found the information quite enlightening and very thorough and informative.

341-001 However, as late as July 4, 2001 I have personally observed a Gray Wolf not more than 200 yards east of the present transmission lines where they cross Kerriston Road – whereas you report indicated 'No known to occur in the CRW' and 'Not expected to occur in the project area'. I would have to tell you that where I saw the wolf was pretty damn close to your project area.

341-002 Further, I did not see any listing of the Black Bear or Cougar, which also do occur within all the areas listed for your project. What information has been established for these two species?

341-003 Aside from these three species of animals I was very pleased with the extensive work done by Bonneville Power Administration, et al.

Cordially,

Philip L. Howard

Philip L. Howard

Cc: Bonneville Power Administration file

341-001 Section 3.3.2 and Table 2 of the Wildlife Technical Report (Appendix B) were revised to indicate that wolves are highly mobile species and could be observed in a variety of habitats, including the project area. However, the finding that the project area does not provide suitable denning or rendezvous habitat is still accurate. BPA believes that the proposed project would have no effect on the gray wolf, a federally-listed endangered species, and the USFWS has concurred with this determination in their February 23, 2002 letter to BPA.

341-002 Section 3.3.2 of the Wildlife Technical Report (Appendix B) describes the process used to select species for inclusion in the analysis. Species included are those that are federally-listed as threatened or endangered; federal species of concern; listed by the state of Washington as threatened, endangered, sensitive, or monitor species; identified in the King County Comprehensive Plan as being of local concern; and are expected to occur on the west side of the Cascades. One additional species, the black-tailed deer, was also included as a result of comments made during public scoping for the project. Because neither black bear nor cougar fit these criteria, they were not included.

341-003 Comment noted.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-342
RECEIPT DATE: JUL 30 2001

From: dstolsig@juno.com
Sent: Saturday, July 28, 2001 7:39 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake New Line

Re: Online EIS Chapter 2.1.1.5 Access Roads

342-001 We would like to suggest that any access road leading to the South (Kangley) end of the project be placed in accordance with Figure 23, page 79, DEIS Kangley Site, Sand and Gravel Operation Proposed Rezone, May 1987. King County Department of Planning and Community Development. (Riverwood Land Co./Stoneway Concrete, Inc.)

To wit: In Section 27, Township 22N, Range 7E, WM; S/2 of NE/4 of SE/4 the new Tower Access Roads are shown to extend from 336th Ave SE (private road) NE along the Grand Coulee - Raver No. 1 & 2 line to a point 100' from our property line (description below), then running North along that 100' setback line to the Tacoma - Grand Coulee Line easement. Using this route, access to the Number 1 tower of the Kangley - Echo Lake Line could be achieved by extending that road Easterly along the North side of our property directly to the new tower and easement, thereby negating crossing our pastures with a new road and achieving the installation of the roads called for in the aforementioned DEIS. This new road would be level from 336th Ave SE to the new tower.

We will be unable to attend the August 1, 2001 Public Meeting at the Maple Valley Community Center, but will be happy to discuss this proposal, on site, with your planners after Aug 7, 2001.

Thank you,

Richard J. and Patricia L. Stolsig
26616 336th Ave. SE
P. O. Box 135
Ravensdale, WA 98051
SE/4 of NE/4 of SE/4, Sec 27, TWP 22 N, R 7 E, WM
(360) 886-2713
dstolsig@juno.com

342-001 The route suggested was field reviewed on two occasions. The route is not level and would require additional acquisition from private owners, and more new construction.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-343
RECEIPT DATE:
AUG 07 2001

-----Original Message-----
From: gail vaden [mailto:xlax99_1999@yahoo.com]
Sent: Monday, August 06, 2001 4:33 PM
To: lcdriessen@bpa.gov
Subject: Kangley-Echo Lake Transmission Project

Lou Driessen, Project Manager, Bonneville Power Administration

Mr. Driessen,

The BPA is proposing construction of 9 miles of new 500 kV power transmission line to be known as Kangley-Echo Lake Transmission Project in King County. The powerline would cut through both the Raging River watershed and the Cedar River watershed (a primary source of Seattle's drinking water and is currently protected from logging.

If constructed, this line would involve clear-cutting a swath from 150' to 275' wide through the forest plus construction of 1.5 miles of new roads and three construction staging areas of undisclosed size.

343-001 We believe the BPA should be held responsible for full mitigation for this project by replacing the habitat, including forest and wetlands, damaged or degraded by this project with equivalent habitat type and quality in the vicinity. Mitigation of damaged or degraded habitat is standard practice in other industries and the BPA should not be exempt.

Please require that the BPA fully mitigate the environmental impact of this project.

Gail and Geary Vaden

343-001 Please see the response to Comment 340-002.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# KELT-344
RECEIVED:
AUG 20 2001

-----Original Message-----
From: Michael & Donna Brathovde [mailto:mdbrathv@concentric.net]
Sent: Wednesday, August 15, 2001 10:38 AM
To: Driessen, Lou
Cc: Murray, Senator Patty Murray; Cantwell, Senator Maria; Dunn, Jennifer; Schell, Seattle Mayor Paul Schell; Sims, Ron; Flagor, Suzanne
Subject: BPA Kangley-Echo Lake Mitigation

Michael A. and Donna L. Brathovde
29009 SE Kent-Kangley Road
P. O. Box 8
Ravensdale, Washington 98051
Phone: (425) 432-3237

Lou Driessen, Project Manager
Bonneville Power Administration
P. O. Box 3621
Portland, OR 97208

Dear Sir:

The Bonneville Power Administration (BPA) is proposing construction of nine miles of new 500 kV power transmission line to be known as the Kangley-Echo Lake Transmission Project in King County,
Washington. This powerline would cut through both the Raging River watershed and the

Cedar River
Watershed (a primary source of the City of Seattle's drinking water and currently protected from logging).

If constructed, this line would involve clear-cutting a swath from 150' to 275' wide through the forest plus
construction of 1.5 miles of new roads and three construction staging areas of undisclosed size.

344-001 We do not oppose the construction of the line but we do believe that the BPA should be held responsible for full mitigation for the environmental impact of this project by replacing the habitat, including forest and wetlands, damaged or degraded by the project with equivalent habitat type
and quality in the vicinity. Mitigation of damaged or degraded habitat is standard practice in other
industries and the BPA should not be exempt.

Please, require that the BPA fully mitigate the environmental impacts of this project.

Sincerely,
Michael and Donna Brathovde

cc: Senator Patty Murray
Senator Maria Cantwell
Representative Jennifer Dunn
Seattle Mayor Paul Schell
King County Executive Ron Sims
Suzanne Flagor, Cedar River Watershed Manager

344-001 Please see the response to Comment 340-002.

Kangley-Echo Lake Transmission Line Project

Telephone comment by Ginny Kuehn
8/21/01

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-345
RECEIPT DATE:
AUG 21 2001

Bonnie Scott
Ravensdale, WA

345-001 I am calling because I am concerned about the new Kangley-Echo Lake line that you want to put in and I think you want to put it into some of the watersheds. I am just hoping that if you do that, that it will wreck a lot of habitat for wildlife and fish. I hope that you will mitigate that and find some other good habitat that you will be willing to buy or add habitat to it to make up for the loss that you will cause. Thank you very much. Goodbye.

345-001 Please see the response to Comment 340-002.

MARCY JOHNSON GOLDE
4407 52nd Ave. NE, Seattle, WA 98105
Tel: (206) 527-6350 – Fax: (206) 523-[illegible]
E-mail: mgolde@home.com

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-346
RECEIPT DATE:
AUG 27 2001

August 17, 2001

Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208

RE: Proposed Raging Cedar Powerline

346-001 Please do not authorize additional power lines in these watershed, before ascertaining a real need for additional capacity that cannot be met in other ways. If you determine that the additional capacity must be provided, then add additional circuits to the towers in the existing corridor. The public has recently acquired many of these forest lands for wildlife and water quality protection. Creating a new powerline and right-of-way will disrupt and fragment the forest and wildlife habitat and stream and water quality. Building new roads is even more damaging.

346-002

346-003

346-004 If in a few places you must take new forest land or damage wetlands, they must be replaced. A full 6 to 1 mitigation should be provided for the wetlands, as required by the Department of Ecology guidelines.

Thank you for your attention,

Marcy J. Golde

Marcy Golde

346-001 Comment noted.

346-002 Please see response to Comment 340-003.

346-003 Comment noted. We understand that the City of Seattle has acquired most of the land above Landsburg Dam within the Cedar River Watershed to protect water quality and wildlife. We also understand that the City of Seattle has "negotiated a conservation plan with the secretaries of the Interior and Commerce to minimize and mitigate any impact to endangered species while conducting otherwise lawful activities." HCP's are a long-term plan authorized under Section 10 of the Endangered Species Act (16 U.S.C. 1539). (HCP, Page 1.1-3).

As a federal agency, BPA is not subject to Section 10 of the ESA, but is subject to Section 7. BPA has initiated formal consultation with the U.S. Fish and Wildlife Service (FWS) and has concluded informal consultation with the National Marine Fisheries Service (NMFS).

346-004 BPA tries to first avoid environmentally sensitive areas, such as wetlands, in siting its transmission facilities. Where it cannot, these areas are spanned. Where they cannot be spanned, the

impact is minimized. For the Proposed Action, BPA finds that no wetlands would need to be filled; however, approximately 14 acres of wetlands would be altered from forested wetlands to scrub/shrub wetlands.

The proposed project would change some forestland to managed grass/forb/shrub habitat, and change some forested wetlands to scrub/shrub wetlands. BPA would provide compensatory mitigation for these impacts as described in Response to Comment 340-002 above; however, such wetland mitigation would be determined by King County regulations and not the Washington State Department of Ecology. Since no wetlands would be filled as a part of the proposed action, no permit would be sought from either the Army Corps of Engineers or the Department of Ecology.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Friday, August 24, 2001 12:49 PM
To: Kuehn, Ginny -KC-7
Subject: FW: Raging Cedar Powerline DEIS

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-347
RECEIVED:
AUG 27 2001

Kangley - Echo Lake
-----Original Message-----
From: Jim Chapman [mailto:jlchap@gte.net]
Sent: Thursday, August 23, 2001 2:31 PM
To: lcdriessen@bpa.gov
Subject: Raging Cedar Powerline DEIS

August 23, 2001

Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208

Dear Sir/Madam:

I have just learned that BPA intends to built nine miles of a new 500kV transmission line through the Cedar and Raging River watersheds in King County, Washington. This would include 1.5 miles of new road construction and a clearcut a swath from 150' to 285' wide through the forest, including Seattle's watershed, which is now protected from logging.

A Draft EIS on the transmission line is apparently available for comment.

347-001 BPA needs to consider adding circuits to the towers in the existing corridor or explain why that is not possible.

347-002 If a new and separate line is necessary, then any forest or wetlands that are damaged by it must be mitigated, i.e., replaced.

347-003 A new EIS should be written which includes information needed to reach an informed decision, a substantive cumulative effects analysis and additional alternatives (including conservation).

Sincerely,

James L. Chapman
23321 75th Ave. W.
Edmonds, WA 98026

347-001 Please see the response to Comment 340-003.

347-002 Please see the response to Comment 340-002.

347-003 Please see response to Comments 411-006 and 394-090.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Friday, August 24, 2001 12:48 PM
To: Kuehn, Ginny -KC-7
Subject: FW: Transmission Project in King County

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-348
RECEI: E:
AUG 27 2001

Kangley - Echo Lake
-----Original Message-----
From: Nukilldragr@aol.com [mailto:Nukilldragr@aol.com]
Sent: Saturday, August 11, 2001 9:29 AM
To: lcdriessen@bpa.gov
Subject: Transmission Project in King County

Dear Lou;

The Bonneville Power Administration (BPA) is proposing construction of nine miles of new 500 kV power transmission line to be known as the Kangley-Echo Lake Transmission Project in King County, Washington. This powerline would cut through both the Raging River watershed and the Cedar River Watershed (a primary source of the City of Seattle's drinking water and currently protected from logging).

If constructed, this line would involve clear-cutting a swath from 150' to 275' wide through the forest plus construction of 1.5 miles of new roads and three construction staging areas of undisclosed size.

348-001 We believe that the BPA should be held responsible for full mitigation for this project by replacing the habitat, including forest and wetlands, damaged or degraded by this project with equivalent habitat type and quality in the vicinity. Mitigation of damaged or degraded habitat is standard practice in other industries and the BPA should not be exempt.

348-002 Please, require that the BPA fully mitigate the environmental impacts of this project.

Sincerely,

Dave & Karin Ambur

348-001 Comment noted. Please see response to Comment 340-002.

348-002 Please see response to Comment 340-002.

August 22, 2001

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-349
RECEIVED:
AUG 27 2001

Lou Driessen, Project Manager
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208

Re: Raging Cedar Power Line / Kangley Eco Lake Transmission Line Project

Dear Mr. Driessen:

The Mountaineers is one the oldest and one of the largest environmental and recreation organizations in the Northwest, with about 15,000 members. We have commented on many BPA projects over the years and numerous energy projects by various agencies. The Mountaineers was very active in supporting the City of Seattle Cedar River Watershed Project and was instrumental in passage of the Cedar River HCP.

349-001 The Mountaineers has very serious reservations about the necessity of the proposed Raging Cedar Power Line and strong objections to many features of this project. In particular, we believe that the Draft EIS did not adequately consider increased energy conservation, which could negate the need for the additional power lines. The City of Seattle has a strong history of energy conservation, and other utilities in this area also have strong conservation programs. Increased energy conservation saves the individual ratepayers utility costs and could eliminate the capital cost of this project and the environmental damage that results from this project.

349-002 Further, in the event that additional transmission lines are required, we believe that BPA should take a much harder look at placing additional lines on the existing towers. BPA asserts that new transmission lines are required because of the possibility of damage to the existing towers. However, in our judgment, that possibility is negligible. Certainly the cost of reinforcing and strengthening the existing towers in various ways would be substantially less than the cost of the proposed project.

349-003 The Draft EIS does not adequately consider the very serious environmental effects from this project. The project would require 1.5 miles of new road construction through the Cedar River Watershed and the Raging River Watershed. New roads are very likely to cause soil erosion and resulting damage to water quality and fisheries resources. Additional roads also cause fragmentation and have severe impacts on wildlife in these watersheds. Although the DEIS Summary seems to infer that the roads right of way would only require clearing for about 75 feet, in fact, cutting of trees can be as far as 200 feet from the power line (DEIS pages 2-5). Further, the roads would impact several wetlands. In light of the enormous amounts of money that the City of Seattle and many state and federal agencies are spending to protect

349-001 Conservation was studied as an alternative to the transmission line. BPA is actively involved in conservation programs as noted in the EIS, but BPA plans the transmission system on the basis of the loads supplied by its customers. BPA's customers (Seattle City Light, Snohomish County PUD, Puget Sound Energy, etc.) encourage conservation and have a closer relationship to end users of electricity. At the same time, local utilities have requested transmission service from BPA sufficient to serve their expected load. BPA is obliged to maintain and construct a system that can meet those contracted needs. Conservation cannot provide the level of reliability and capacity needed. See Section 2.2.9 and Appendix J of the SDEIS.

349-002 Please see Section 2.3.8 of the SDEIS.

349-003 The proposed transmission line requires access to each tower site for the purposes of construction, maintenance and continuous operation of the line. BPA has selected the Proposed Action as its preferred alternative, in part, due to its minimal impact on the environment of all of the action alternatives under consideration. Since the Proposed Action would parallel an existing BPA 500-kV line, BPA would take advantage of an existing access road system. Because an existing access road system is already in place, BPA would need to build about 2.9 miles of additional access/spur roads to construct, operate and maintain the proposed transmission line.

wetlands and salmon habitat, this additional road construction is unwise as well as unnecessary.

349-004 Further, the DEIS does not adequately consider BPA's duty to mitigate if the project proceeds with the Preferred Alternative. Lowland forests are a critical ecological element in the Western Cascades. The Cedar River Watershed contains an unusually large block of old growth. It also contains second growth that now has the possibility of maturing into old growth as a result of the Cedar River HCP. This project, with a right of way up to 200 feet from the power line, would cause serious fragmentation through this forest ecosystem. Mitigation should include replacement habitat, including forests and wetlands, which should be in close proximity to the area that is disturbed. To the extent that local areas are not used for mitigation, the area of mitigation should be increased as the mitigation moves in distance. If mitigation is employed, the BPA should look at several close by areas in Green River, Raging River, near Selleck, and upper Rock Creek Valley.

349-005 As a further critical mitigation factor, the BPA should commit itself not to use herbicides in the Raging River Watershed, which contains important salmon runs.

We look forward to seeing these concerns addressed in the final EIS.

Sincerely,

The Mountaineers

Edward M. Henderson, Jr.
President

EMH/kle

349-004 Please see the response to Comment 340-002.

349-005 BPA has prepared a programmatic EIS for its vegetation management program associated with transmission lines, roads, and related facilities. The EIS identifies appropriate measures to protect the environment while minimizing danger tree risks and maintaining the ROW within safe, reliable conditions. These guidelines provide for protecting water resources by using herbicide buffer zones. BPA would comply with the standards and guidelines established in this EIS and the Record of Decision for vegetation management (BPA 2000). See Appendix K of the SDEIS for more information. See also response to Comment 394-193. BPA would discuss the use of herbicides with individual landowners. Herbicides would not be used in the Raging River Watershed if landowners object.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-350
RECEI... E:
AUG 29 2001

-----Original Message-----
From: Phil Sheffer [mailto:shefferp@home.com]
Sent: Tuesday, September 04, 2001 11:34 AM
To: lcdriessen@bpa.gov
Subject: New Power lines

Dear Sir,

I am writing to express my concern about plans to build new power lines in the Ceadar and Raging River Watersheds. These areas are protected for many reasons and water quality is just one of them. There are crucial wildlife habitats within these areas that must not be disturbed! The public has spoken on this issue in the past and our opinions have not changed. I urge you to add circuts to the existing towers rather than cutting down portions of the protected forests to build new towers. The construction of additional roads is a big step backwards in our work to restore the watershed to it's optimum ecological efficiency. If there are forests and wetlands that are destroyed, disturbed or damaged, they must be replaced! I would also ask for a new EIS that includes a substantive cumulative effects analysis and additional alternatives (including conservation). Thank you for your time, I hope to hear of a more ecologicaly sensitive alternative plan.

350-001
350-002
350-003

Sincerely,

Philip Sheffer
3033 NE 90Th St
Seattle, WA 98115
shefferp@home.com

350-001 Please see the response to Comment 340-003.

350-002 Please see the response to Comment 340-002.

350-003 Comment noted. Please see response to Comments 411-006, 349-001, and 394-090.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-351
RECEI... E:
AUG 29 2001

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Wednesday, August 29, 2001 1:30 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Please don't run power lines through watersheds!

351-001

It said nothing other than the heading.

Lou

-----Original Message-----
From: Clark Nicholson [mailto:clarkn@windows.microsoft.com]
Sent: Tuesday, August 28, 2001 1:09 PM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: Please don't run power lines through watersheds!

351-001 Comment noted.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-352
RECD: AUG 2 8 2001

-----Original Message-----
From: Richard Champlin [mailto:boobooc2000@hotmail.com]
Sent: Tuesday, August 28, 2001 11:21 AM
To: lcdriessen@bpa.gov
Subject: Power lines in the Cedar River Watershed

Dear Mr. Driessen:

I received some alarming news this morning. I understand the Bonneville Power Administration is proposing to clearcut a large swath of low elevation forest in the Cedar River Watershed, which provides water for the City of Seattle, which is protected forest, and which is home to several streams and creeks in which several threatened stocks of salmon live.

352-001 I cannot be more clear: There is absolutely no reason to be building new power lines in this watershed. There are existing towers to which lines can
352-002 be added. The loss of lowland forest in the State of Washington has been enormous, and the threat of extinction for several species of salmon, as
352-003 well as some birds and mammals, is very real.

I strongly suggest you rethink this idea. Just because we now have a President who wholeheartedly supports the elimination of environmental regulations and concerns does not make it right. The City of Seattle has protected this watershed for a number of reasons. The majority of the citizens of King County support this protection. And as a reminder, the President I speak of was not elected by the majority of voters. He does not have a mandate to ignore the will of the majority of citizens.

If the BPA is doing this because of what some are calling an "energy crisis", then it has been sold down the river, or indeed, it is selling the citizens of this state and BPA's own customers down the river.

352-004 The "energy crisis" so often invoked by Bush and Cheney is simply a fabrication to cover the fraud perpetrated upon the energy users of this country by the suppliers of electricity, all in the name of deregulation.

352-005 Again, let me state this clearly: You must not clearcut in our watershed.

I intend to express my concerns to my congressional delegation as well.

Sincerely yours,
Richard P. Champlin
22831 30th Ave. S, #204
Des Moines, Washington 98198
206-769-5097

352-001 Please see the response to Comment 339-001.

352-002 Please see the response to Comment 340-003.

352-003 Comment noted.

352-004 Comment noted.

352-005 Not all trees in the ROW would be removed. Transmission towers are typically sited on higher ground, and they generally span drainages and associated riparian areas. Siting towers in this manner would increase the likelihood that the conductors may be above some riparian areas and may require only limited removal of vegetation. BPA would leave/protect low-growing vegetation where possible.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-353
RECEIVED: AUG 29 2001

-----Original Message-----
From: Cole Thompson [mailto:wct25@yahoo.com]
Sent: Tuesday, August 28, 2001 4:39 PM
To: lcdriessen@bpa.gov
Subject: power line development

Hello--

353-001 Just a quick note. Dont cut down any trees in our watersheds damn it!! I understand the need to create new power lines in a rapidly developing region- but for salmons sake, figure out a solution to cutting wide swaths through our forests. i am an avid hiker, and those cuts are saddening and i beleive unneccesary- so figure an alternative, you have the technology and the bubget. Seattle enjoys a solid source of freshwater, why take away from this vital resource.

353-002

Sincerely,
A Concerned citizen, Seattle Resident energy user, and lover of the roadless wilds.

353-001 Please see response to Comment 352-005.

353-002 Comment noted. If BPA makes a decision to build the proposed project, it would do so in an environmentally-responsible manner. BPA would obtain all applicable environmental permits from the appropriate land management agencies and other federal agencies, such as the USFWS, before initiating construction activities.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELI-354
RECEIVED:
AUG 29 2001

-----Original Message-----
From: Dorothy Sager [mailto:dozsager@hotmail.com]
Sent: Tuesday, August 28, 2001 7:07 PM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject:

Attention: Mr.Lou Driessen, Project Manager

354-001 I understand providing power to Northwest users is important. I am opposed to cutting any forest to do so. I want you to focus on adding additional circuits to towers in the existing corridor instead of clearing more forest area.

354-002 Whatever the outcome of this project, I expect that any forest or wetlands that are damaged will be replaced.

354-003 This is also a citizens request for a new EIS with needed information, a substantive cumulative effects analysis and additional alternatives (including conservation).

Submit comments to (before Sept. 4)

Dorothy Sager

354-001 Please see the response to Comment 340-003.

354-002 Please see the response to Comment 340-002. BPA has purchased lands adjacent to the Cedar River Watershed as compensatory mitigation for the forestland that would be taken out of production within the Cedar River Watershed. These lands could also be used as mitigation for the wetlands that would be impacted as a result of the proposed project.

354-003 Please see responses to Comments 349-001 and 350-003.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELL-355
RECEIVED:
AUG 29 2001

-----Original Message-----
From: Justin Birk [mailto:justinbirk@home.com]
Sent: Tuesday, August 28, 2001 4:20 PM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: new lines

355-001 I recently was informed that you are planning to put new transmission lines through the Cedar and Raging River watersheds, the same watersheds that supply Seattle with our drinking water. As I understand it, this area is protected from logging, and rightfully so. Not only would this compromise our water source, it would also place a large scar in our precious forest land. Haven't we seen enough clear-cutting from Weyerhauser? I do not approve of this course of action from my public utility. Please put additional lines on existing towers. Please don't destroy our forests.

Justin Birk
Green Lake

355-001 Please see responses to Comments 340-003 and 352-005.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KEL-356
RECEIVED:
AUG 29 2001

-----Original Message-----
From: Erica Kay [mailto:bf283@scn.org]
Sent: Tuesday, August 28, 2001 8:07 PM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: Comments regarding proposed logging in Cedar River Watershed to make way for power lines

Dear Lou Driessen, Project Manager,

356-001 It has come to my attention that a plan by the BPA to expand power lines would require logging and road building in the Cedar River Watershed (as well as nearby forests). 'Fraid not!

My basic comment is simple. This violates the HCP for this area which disallow any logging of this type in the watershed. As I understand the HCP to which the city of Seattle is accountable, this cannot even be considered in this protected area. As a citizen of Seattle, I demand that this project drop this idea immediately and consider legally (and ecologically) viable alternatives. No logging is legal in this watershed and the goals of the HCP are to remove roads not build new ones.

356-002 Although I don't fully understand the repercussions of adding additional circuits to the existing towers in that corridor, I suspect I could support that alternative, assuming any forest or wetland damage is mimimized and mitigated.

356-003 A new EIS that looks at additional alternatives and examines cumulative effects is needed.

Erica Kay
PO Box 95113
Seattle WA 98145
bf283@scn.org

356-001 The ***Final Cedar River Watershed Habitat Conservation Plan for the Issuance of Permit to Allow Incidental Take of Threatened and Endangered Species (HCP),*** does not "disallow logging of this type in the Watershed," as the commenter states. On the contrary, the HCP states "Removal of trees, down or standing, will be allowed along the existing or new rights-of-way, including roads, to protect public safety and facilities and to allow access. Trees removed for such reasons may be sold by the City, as long as any net revenues are used to offset costs of the HCP or watershed management."

356-002 Comment noted. Please see the response to Comment 340-003.

356-003 Comment noted. Please see responses to Comments 349-001 and 350-003.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-357
RECEI: E:
AUG 29 2001

-----Original Message-----
From: Paul Hezel [mailto:phezel@enviroissues.com]
Sent: Tuesday, August 28, 2001 8:46 PM
To: 'lcdriessen@bpa.gov'; 'coment@bpa.gov'
Cc: Paul Hezel
Subject: Raging Cedar Powerline project

Dear Lou -

357-001 Please include this letter with comments that do NOT support continuing with the Cedar River Watershed powerline project as stated in the DEIS. New powerlines should be added to the existing transmission towers, not along new towers through the watershed. Too much work went into protecting the Cedear River Watershed to have it hacked again by a linear project. It would do much to destroy the contiguous block of old growth habitat that exists there currently.

357-002

357-003 Write a new EIS. Include a conservation alternative. Evaluate more seriously the cummulative effects, including that of fragmenting habitat and

357-004 introduction of edge effect into old growth forest habitat, and potential habitat destruction at the river crossing.

357-005 If you find a way to go through with the project: ALL forest cut for the project should be replaced at a ration of 10:1, which may include purchase of Cascade Conservation Partnership lands at the same ratio.

Thanks.

Paul Hezel
5521 Brooklyn Ave NE
Seattle WA 98105
206-729-8429

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-358
RECEI. E:
AUG 29 2001

-----Original Message-----
From: dea@u.washington.edu [mailto:dea@u.washington.edu]
Sent: Wednesday, August 29, 2001 12:24 AM
To: lcdriessen@bpa.gov
Subject: Bonneville Power to clearcut Seattle's source of drinking water - the Cedar River Watershed!

I do not want Boneevile Power to destroy the city's protected water shed

358-001 with power lines. Destroying a natural resource like water sheds is an unsustainable prospect for human interest. Bonneville should use current cut paths from other power lines rather than mow down new ones.
-David A

357-001 Please see the response to Comment 340-003.

357-002 As described in Section 3.4 of the Vegetation Technical Report (Appendix C) of the EIS, the proposed transmission line ROW does not pass through old growth forest.

357-003 Comment noted. Please see response to Comments 411-006, 349-001, and 394-090.

357-004 Analysis of potential impacts from habitat fragmentation within the Cedar River Watershed was expanded in Section 4.1.1.1 of the Wildlife Technical Report (Appendix B). No old-growth forest habitat would be affected.

357-005 Comment noted. BPA has purchased land to be used as compensatory mitigation, to partially mitigate for the forestlands and wetlands that would be impacted by the proposed project. See response to Comment 340-002.

358-001 Please see the response to Comment 340-003.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-359
RECEI E:
AUG 29 2001

-----Original Message-----
From: Colwell, David G [mailto:david.g.colwell@Boeing.com]
Sent: Wednesday, August 29, 2001 7:15 AM
To: 'lcdriessen@bpa.gov'; 'coment@bpa.gov'
Subject: Raging Cedar Powerline

Dear Mr Driessen,

359-001 I deplore the proposed Raging Cedar Powerline because I am a resident of Seattle and don't want my watershed trashed by road building and tree cutting. Why cannot additional powerlines be hung on existing towers? You would not propose a construction of a new powerline though Mt Rainier National Park. Why do you propose construction in Seattle's protected watershed. It is clear from the DEIS that the BPA does not regard the loss of lowland forest as significant, but lowland forest is already disappearing fast enough. We don't need to loose more.

359-002

David G Colwell
Boeing SSG Facilities Services - Strategic Planning
*206-544-7457 (phone)
*206-797-4059 (pager)
*206-544-5889 (fax)
*M/C 2R-71 (mailcode)
*david.g.colwell@boeing.com (email)
C15-20 Building, South Park, Seattle, WA (location)

359-001 Please see the response to Comment 340-003.

359-002 Comment noted.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-360
RECEI E:
AUG 29 2001

-----Original Message-----
From: Paul Ballard [mailto:pballard@oz.net]
Sent: Wednesday, August 29, 2001 8:26 AM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: Bonneville Power Plan to Clearcut in the Cedar River Watershed!

Lou Driessen, Project Manager

360-001 Regarding the Bonneville Power Adminstration (BPA) plan to build nine miles of new 500 kilovolt line through the Cedar and Raging River watersheds. I support, instead, adding additional circuits to towers in the existing corridor. If there is any cutting, I insist that any forest or wetlands that are damaged be replaced. There are apparently discrepancies, including the amount of forest to be cut especially around old growth. I would ask for a new EIS with needed information, a substantive cumulative effects analysis and additional alternatives. This should of course include conservation.

360-002

360-003

360-004

Sincerely,

Paul Ballard
416 NW 92nd
Seattle, WA 98117
206 782 0924

360-001 Please see the response to Comment 340-003.

360-002 See response to Comment 357-004.

360-003 The Proposed Action would not require cutting any old growth on the Cedar River Watershed, or anywhere within the project area.

360-004 Comment noted. See response to Comment 357-003.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Wednesday, August 29, 2001 3:29 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: NINE MILES OF NEW TRANSMISSION LINES

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KEL T-361
RECEI E:
AUG 29 2001

-----Original Message-----
From: Stacey Glenewinkel [mailto:STACEY32@worldshare.net]
Sent: Wednesday, August 29, 2001 11:07 AM
To: lcdriessen@bpa.gov
Subject: NINE MILES OF NEW TRANSMISSION LINES

361-001 I am deeply disturbed about your plans to build nine miles of new 500kilovolt line through the Cedar and Raging River watersheds and your 1.5 miles of new road construction. Why do you think it's ok to clearcut a swath from 150' to 285' wide through the forest, including Seattle's watershed, which is currently protected from logging?? This plan would destroy forests recently protected by the City of Seattle and Protect Our Watershed Alliance. Why have you dismissed alternatives that would modify existing powelines, eliminating the forest destruction? There are important salmon fisheries in Raging River and the City of Seattle is working to re-establish salmon in Cedar River.

361-002 BPA feels the loss of forest is not large or important. Apparently you don't understand the importance of these low elevation forests, the rapid loss of forest in the county, and the landmark decision by Seattle to preserve its watershed forests. Would BPA propose a powerline through Mt. Rainier National Park? Then why through our protected watershed?

361-003 BPA needs to any new lines on the existing towers. In any alternative, BPA must fully mitigate for any impacts of their projects. And that means REPLACING any forests that they cut.

361-004 Please add additional circuits to towers in the existing corridor. I INSIST that any forest or wetlands that are damaged be replaced. I also ask for a new EIS with needed information, a substantive cumulative effects analysis and additional alternatives (including conservation).

Be responsible!!

Stacey Glenewinkel

361-001 Please see the response to Comment 340-003.

361-002 Comment noted.

361-003 Please see the response to Comment 340-002.

361-004 Please see responses to Comments 349-001, 350-003, and 357-005.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: Kel-J-362
RECEIVED:
AUG 30 2001

From: Richard Ellison [savetree@uswest.net]
Sent: Thursday, August 30, 2001 12:26 AM
To: comment@bpa.gov; lcdriessen@bpa.gov; michaels@pebp.org
Subject: Kangley-Echo Lake Transmission Line Project DEIS

August 30, 2001

362-001 I am writing in regard to the Draft Environmental Impact Statement (DEIS) on the Raging Cedar Powerline, also known as the Kangley-Echo Lake Transmission Line Project. I strongly oppose the cutting any forest areas, especially in the protected Cedar River Watershed, nor the destrruction of any wetlands in the construction process.Any and all wetlands and forests inpacted must be mitigated.

362-002 Long term and cummulative impacts from the project must be evaluated, including impacts to amphibian populations and state sensitive plant and animal species. Species like Tall Bugbane, Cicimifuga elata, are state sensitive species that are only found in lowland old growth and late successional forests. This species is likely extinct in King County and has few know populations in Washington State. Lowland old growth and late succesional forests are becoming rarer, and must be protected from all possible developments and disturbance. Many species that are not listed as endangered are still threatened by habitat fragmentation.

362-003 Alternative proposals must be evaluated in a new EIS, including options to modify existing towers or corridors to handle new power needs.

Thank you,

Richard Ellison, Save Seattle's Trees!
1938 10th Ave E
Seattle, WA 98102

362-001 Comment noted.

362-002 Please see response to Comment 394-090 for additional information on cumulative effects analysis.

As a part of this analysis for the SDEIS, BPA identified the potential effects on federally-listed threatened and endangered species, species of concern, and Washington State-listed threatened and endangered, and sensitive and monitor species with the potential to occur on the west side of the Cascades. Tall Bugbane was included in the analysis.

362-003 Please see the response to Comment 340-003.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Wednesday, August 29, 2001 4:36 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Logging, Kangley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-363
RECEIVED: AUG 30 2001

-----Original Message-----
From: Paul Waggoner [mailto:pwags@truth.com]
Sent: Wednesday, August 29, 2001 3:57 PM
To: 'lcdriessen@bpa.gov'
Cc: 'coment@bpa.gov'
Subject: Logging

Hallelujah !!

I happened to hear there is going to be some logging on the Cedar River Watershed - and I am delighted. ..Especially if it is old-growth.

Congratulations on your stewardship of a renewable natural resource.

Please continue to manage the forests, which certainly includes logging, and clearcutting is fine. Without it and the full sunlight to which it gives rise, Douglas-fir will not regenerate, and as you know, we'll end up with a lesser species, such as hemlock.

363-001

Please, do not cave-in to the vocal folks who think preservation is proper management.

We need the timber / lumber. We need the related jobs in the beleaguered timber industry. The forest needs the logging to harvest the trees that otherwise are destined to fall down and rot. The understory need the removal of the fuel that encourages catastrophic fire, and we need some roads for access for management and fire protection.

Regards,

Paul R. Waggoner
13802 SE 52nd Pl
Bellevue, WA 98006

425 / 644-1221
pwags@truth.com

363-001 Comment noted.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Wednesday, August 29, 2001 4:34 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Comment, Kangley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-364
RECEIVED: AUG 30 2001

-----Original Message-----
From: Zarah Kushner [mailto:zkushner@quorum-irb.com]
Sent: Wednesday, August 29, 2001 4:02 PM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: Comment

Dear Mr. Driessen, Project Manager,

364-001 I am recently heard about your plans to build nine miles of new 500kilovolt line through the Cedar and Raging River watersheds and your 1.5 miles of new road construction. I think it is reprehensible to clearcut a space from 150' to 285' wide through the forest, in Seattle's watershed, which is currently protected from logging, yes? This plan would destroy forests recently protected by the City of Seattle and Protect Our Watershed Alliance, a most progressive decision. Why have you dismissed alternatives that would modify existing powelines, eliminating the forest destruction? There are important salmon fisheries in Raging River and the City of Seattle is working to re-establish salmon in Cedar River. BPA feels the loss of forest is not large or important. Apparently you don't understand the importance of these low elevation forests, the rapid loss of forest in the county, and the landmark decision by Seattle to preserve its watershed forests. Would BPA propose a powerline through Mt. Rainier National Park? Then why through our protected watershed? BPA needs to any new lines on the existing towers. In any alternative, BPA must fully mitigate for any impacts of their projects. And that means REPLACING any forests that they cut. Please add additional circuits to towers in the existing corridor. I INSIST that any forest or wetlands that are damaged be replaced. I also ask for a new DEIS with needed information, a substantive cumulative effects analysis and additional alternatives (including conservation). Be responsible!

Thank you for listening. I hope that my words find ears that are more focused on the environmental consequences of actions to be carried out by a company than turning a profit.

Zarah Kushner, Concerned citizen against the plans that have been set into motion by BPA.

Zarah Kushner
Associate Project Manager
Quorum Review IRB
zkushner@quorum-irb.com
http://www.quorum-irb.com
(V) 206-448-4082
(F) 206-448-4193

364-001 Please see responses to Comment Letter 361.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, August 30, 2001 11:52 AM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: cedar & raging river watersheds

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-165
RECEI E:
AUG 3 0 2001

-----Original Message-----
From: jade deyo [mailto:jjdeyo@yahoo.com]
Sent: Wednesday, August 29, 2001 1:36 PM
To: coment@bpa.gov; lcdriessen@bpa.gov
Subject: cedar & raging river watersheds

dear bpa,

i have been a citizen of washington state for my entire life (going on 30 years now) and i have been living in seattle for the last five years. i've been to many of the other states in our great union, but none compare to the vast beauty of our state, washington.

365-001 i am writing to urge you to reconsider your stance on adding additional equipment to the cedar and raging river watersheds. i, along with many others, feel that adding additional circuits to the towers already standing would be more environmentally friendly than to tear up a large portion of the watersheds to add new equipment.

365-002 in addition i encourage you to be sure to thoroughly replace any wetlands or forest that have been or may be damaged by bpa.

365-003 i understand that you must satisfy the needs of many here in washington state, i just ask that you please take into account our environment as well. as the population of our state grows we need to take steps to ensure that protected (and non-protected) portions of our forest and wetlands don't suffer the consequences.

thank you for listening.

sincerely,
jade deyo
seattle, washington

365-001 Please see the response to Comment 340-003.

365-002 Comment noted. Please see response to Comment 340-002.

365-003 Comment noted. BPA is siting the needed facilities to minimize the impacts on the environment, while meeting the project's purposes and need.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-366
RECEI. .E:

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, August 30, 2001 11:42 AM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Raging Cedar Powerline project, Kangley - Echo Lake

-----Original Message-----
From: Paul Hezel [mailto:phezel@enviroissues.com]
Sent: Wednesday, August 29, 2001 6:36 PM
To: 'Driessen, Laurens C - TNP-3 '
Subject: RE: Raging Cedar Powerline project

Lou -

366-001 So what if you shared the magnitude transmitted over several different routes? Say you shared it on three routes - if you lost one, you would only lose 1/3 of the added power that this new project will be carrying. That wouldn't be so bad, would it?

366-002 Since I think some of the proposed cut areas are in very old growth forest, won't you have to cut a wider swath than the normal 75' ROW, to account for the larger trees in close proximity? That will not be good. How wide with the cut be at it's maximum?

366-003 What if you combined conservation with the above sharing on current lines. Have you realistically looked at that? I can't imagine that the pricing on that combination would be more than this entirely new project.

Looking forward to your reply. Thanks,

Paul

366-001 Increasing the number of routes and building additional lines would increase the environmental impacts.

366-002 Please see response to Comment 394-034 and Section 2.1.1.4 of the SDEIS.

366-003 Please see response to Comment 349-001.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, August 30, 2001 12:02 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Clearcutting Seattle's drinking water source

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KE-LT-367
RECEIVED:
AUG 30 2001

-----Original Message-----
From: earlybyrd@earthlink.net [mailto:earlybyrd@earthlink.net]
Sent: Wednesday, August 29, 2001 9:23 PM
To: lcdriessen@bpa.gov
Subject: Clearcutting Seattle's drinking water source

Dear Mr. Driessen,

I recently learned of the intention of the Bonneville Power Administration
to build a new 500 kilovolt line through the Cedar and Raging River watersheds that are protected by the City of Seattle and Protect Our Watershed Alliance. Wetlands and salmon fisheries that the City of Seattle
is trying to re-establish in the Cedar River would be impacted by this action. Your intention to clearcut through nine miles of forests in order
to complete this project is unacceptable and shows no regard for the work
367-001 that has been done to preserve these areas and their ecosystems.

You must find alternatives, particularly modifying the existing power structures to accommodate additional capacity instead of destroying valuable forests and compromising the Seattle watershed. In spite of the
opinion of the BPA that the destruction of this swath of forest is inconsequential, there are many of us who strongly disagree.

I am frankly appalled that your plan is being seriously considered, and I
strongly urge you to add additional circuits to the towers in the existing
corridor. You should be held accountable for any decision that adversely
367-002 affects the forest, wetlands and salmon, as well as the Seattle watershed.
These issues are of extreme importance to many people who are responsible
stewards of the environment. It is imperative that a new EIS with crucial
367-003 and needed information including a cumulative effects analysis and additional alternatives (including conservation), be investigated and proposed.

Please act responsibly and with regard for the land, the trees, the salmon
and most certainly the people of Seattle!

Barbara Glenewinkel

367-001 Comment noted.

367-002 Please see the response to Comment 340-003.

367-003 Please see response to Comment 349-001.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-368
RECEIVED:
AUG 30 2001

From: Roy D. Goodman [ROYGOODMAN@compuserve.com]
Sent: Friday, August 31, 2001 8:32 AM
To: Lou Driessen; Lou Driessen; Lou Driessen
Subject: Comment on Draft EIS on the Kangley-Echo Lake Transmission Line Project

August 30, 2001

Lou Driessen, Project Manager
Communications
Bonneville Power Administration - KC-7
PO Box 12999
Portland, OR 97212

RE: Draft EIS on the Kangley-Echo Lake Transmission Line Project

Dear Mr. Driessen,

368-001 I am appalled that the Bonneville Power Administration might build new powerlines through the Cedar River Watershed. We citizens of Seattle worked long and hard over the past years to protect this watershed from any further development or unnecessary roadbuilding/treecutting/ecological destruction. Last year the Seattle City Council enacted a 50 year Habitat Conservation Plan to protect this fragile watershed. The BPA's plan to build new roads and clearcut a swath through the forest within and surrounding this watershed is an affront on the citizens of Seattle, and a threat to this protected environment.

368-002 I hereby request that, instead of all this new construction/destruction, that the BPA add additional circuits to already existing transmission line towers. Even if this results in a greater cost to be passed on to us consumers, it is still a preferable alternative. Additional alternatives, including conservation, must be considered.

368-003 Do not damage our forests. Do not destroy our wetlands. Do not compromise our watershed and its surroundings.

Thank you for acting to protect and preserve our watershed, not do it any harm.

Roy D. Goodman
1614 Linden Ave. N., #Upper
Seattle, WA 98103
Phone: 206-633-5734
roygoodman@compuserve.com

Kangley-Echo Lake Transmission

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-369
RECEIVED:
AUG 31 2001

Telephone comment by Ginny Kuehn
8/31/01

Harold Wiren
4250 NE 88th Street
Seattle, WA 98115

369-001 1. Modify the existing power lines to accommodate the new ones.

369-002 2. New power lines are in a wetland area and are protected by the City of Seattle.

368-001 BPA understands that the City of Seattle has recently adopted a HCP in compliance with the Endangered Species Act. BPA expects to minimize any impacts to the environment in constructing, operating and maintaining the facilities over the life of the project. Please see response to Comment 340-002.

368-002 Please see the response to Comment 340-003.

368-003 Comment noted. Should BPA make a decision to build the project, it would do so in an environmentally-responsible manner. BPA understands the sensitivity of the Cedar River Watershed and adjoining lands, and intends to do what it can to protect and preserve the municipal watershed and not cause any harm, should a decision be made to site the facilities through the Watershed.

369-001 Please see the response to Comment 340-003.

369-002 Although the Cedar River Watershed is owned by the Seattle Public Utilities, it is located in unincorporated King County. The environmental regulations that govern the environmentally sensitive areas, such as wetlands, within the Watershed are the King County Sensitive Areas Ordinance, and state and federal regulations. BPA intends to comply with all applicable federal, state and local environmental laws and regulations to the extent practicable.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Friday, August 31, 2001 11:36 AM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Cedar River power line.Kangley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-370
RECEIVED:
AUG 31 2001

-----Original Message-----
From: Arthur Mink [mailto:mink3@jps.net]
Sent: Thursday, August 30, 2001 9:22 AM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: Cedar River power line.

Mr. Lou Driessen, Project Manager
Raging Cedar Powerline also known as the Kangley-Echo Lake Transmission Line
Project.

Dear Mr. Driessen:

370-001 We understand that BPA plans to clear cut a swath from 150' to 285' wide through Seattle's watershed, which is currently protected from logging. This plan would destroy forests recently protected by the City of Seattle and Protect Our Watershed Alliance. BPA apparently has dismissed alternatives that would modify existing power lines, eliminating the forest destruction.

BPA apparently does not understand the importance of these low elevation forests, the rapid loss of forest in the county, and the landmark decision by Seattle to preserve its watershed forests.

Would BPA propose a power line through Mt. Rainier National Park? Then why through our protected watershed?

We support adding additional circuits to towers in the existing corridor.

We insist that any forest or wetlands that are damaged be replaced.

We want a new EIS with needed information, a substantive cumulative effects analysis and additional alternatives (including conservation).

Sincerely,

*
Arthur R. Mink
*
Lynn Mink
169 Power Ave.
Seattle, WA 98122-6545

370-001 Please see responses to Comment Letter 361.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-371
RECEIVED: SEP 04 2001

From: L Brenner [brennerl@hotmail.com]
Sent: Monday, September 03, 2001 12:45 PM
To: lcdriessen@bpa.gov
Subject: Cedar & Raging River Watersheds

371-001 I am writing as a former citizen of Seattle (I currently live in Amsterdam)
to say that it is heartbreaking that once again something is being proposed
that will cause unneeded damage to the amazing country of the Pacific Northwest. I want to support the idea of adding circuts to existing towers
371-002 in the exisitng corridor. I want ot insist that all damage to forest and
wetland be repaired. I want to ask that a new EIS be filed.

371-003 We cannot ever estimate the damage actions like the proposed one will do.
We can estimate what we can STOP from happening. Please take preventative
action NOW

Thank you

Lise Brenner
Zocherstraat 38hs
1054 LZ Amsterdam

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-372
RECEIVED: SEP 04 2001

From: Driessen, Laurens C - TNP-3
Sent: Monday, September 03, 2001 9:10 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: <no subject>, Kangley - Echo Lake

-----Original Message-----
From: Midge Brenner [mailto:midgeb@u.washington.edu]
Sent: Monday, September 03, 2001 2:11 PM
To: lcdriessen@bpa.gov
Subject: <no subject>

To Lou Driessen, Project Manager
Bonneville Power Administration

Dear Mr. Driessen:

372-001 I have just learned--with alarm--that Bonneville Power Administration
has plans to cut old-growth forest, to clearcut a new corridor within the
Cedar River Watershed for its new Kangley-Echo Lake Transmission Line
Project. This would impact several wetlands and important salmon fisheries
in Raging River, as well as the work being done by the city of Seattle to
re-establish salmon in the Cedar River.
I am writing to urge the BPA to stop this planning immediately.
Instead, the BPA could improve the existing corridor by adding additional
circuits to the towers already there. If any forest or wetlands outside the
existing corridor are to be damaged, they should be replaced. But before
any action by the BPA, a new Environmental Impact Statement is needed. This
should include all necessary information that presents alternatives
including conservation, and that provides a substantial cumulative effects
analysis.
Please respect the importance to all of us of preserving low elevation
forests, particularly Seattle's watershed forests.
Sincerely,
Midge Brenner
2020 - 23rd Avenue E.
Seattle, WA 98112

371-001 Please see the response to Comment 340-003.

371-002 Comment noted. BPA intends to minimize the impacts to the environment, should a decision be made to build the project. Please see response to Comment 357-003.

371-003 Comment noted.

372-001 Please see responses to Comment Letter 361.

Kuehn, Ginny -KC-7

From: Doug Schuler [douglas@scn.org]
Sent: Monday, September 03, 2001 10:13 AM
To: coment@bpa.gov; lcdriessen@bpa.gov
Subject: Bonneville Power clearcuts

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-373
RECEI E:
SEP 0 4 2001

Lou Driessen, Project Manager
Bonneville Power Administration
Portland, Oregon

Dear Mr. Dreissen:

373-001 I am deeply concerned about the clearcut that the Bonneville Power Administration proposes to make within the Cedar River Watershed. Instead, why not improve the existing corridor? Bonneville could add additional circuits to the towers in the present corridor instead of clearcutting for a new corridor. In any case, an Environmental Impact Statement that includes conservation options is absolutely essential. 373-002

Sincerely,

Doug Schuler and Terry Frankel
Seattle

373-001 Please see the response to Comment 340-003.

373-002 Please see response to Comment 349-001.

Kuehn, Ginny -KC-7

From: Tracy Jenkins [tajenkins@pol.net]
Sent: Friday, August 31, 2001 11:27 AM
To: lcdriessen@bpa.gov
Cc: comment@bpa.gov
Subject: Raging Cedar Powerline

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-374
RECEI E:
SEP 0 4 2001

As a resident of the Northwest who lives here for the majesty and beauty of its forests, I am concerned about the casual and rapid destruction of the few remaining wildlands. The cedar river watershed is protected from logging by public request. Because the decision to damage ancient forests and wetlands is irreversible, and there is so little of the original forest left to protect, we need to go to great lengths to protect the remaining forests and wetlands. This is a priority that the public has already supported. PLEASE consider adding circuits to the existing power lines. If additional lines are necessary please minimize the width of destructive clearcut, and please replace lands impacted by the construction. The current EIS does not adequately address cumulative effects and alternatives to new lines. Please commission a new EIS with alternatives and long term cumulative effects addressed. These are critical decisions for the long term health and beauty of our northwest ecosystem. Let's not make them hastily.

374-001 374-002 374-003

Sincerely,
Tracy Jenkins, MD
3110 NW 75th St.
Seattle, WA 98117

374-001 Please see the response to Comment 340-003.

374-002 Comment noted.

374-003 Comment noted. BPA designs its facilities to have an economic life of approximately 50 years. It does not make hasty decisions in siting transmission facilities. As a federal agency, BPA is subject to the National Environmental Policy Act (NEPA) of 1969, as amended. NEPA requires that BPA undertake an environmental impact statement on all major federal actions prior to making its decisions.

Over the last three years, BPA has made a concerted effort to work with the potentially-affected public and involved government agencies to find alternatives for the proposed power line and related facilities, including undertaking this environmental impact statement. BPA is committed to complying with the letter and the intent of NEPA in identifying all of the environmental impacts the proposal would cause, in advance of the decision-maker making an informed decision. If a decision is made to build a transmission line, then those impacts would be minimized to the maximum extent practicable. See response to Comment 340-002.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-375
RECEIPT DATE:
SEP 04 2001

From: Megan Kelso [megan@girlhero.com]
Sent: Sunday, September 02, 2001 6:02 PM
To: lcdriessen@bpa.gov
Subject: new BPA powerlines

Dear Mr. Dreissen,
375-001 I'm writing to ask that you reconsider the new powerline corridor you are planning that will cut through the Cedar and Raging River watersheds. This would cause significant and adverse environmental impact to fragile and valuable and PROTECTED forests and wetlands. Please consider adding additional circuits to towers in the already existing corridor. I don't believe your EIS provides enough information about the cumulative effects of this new corridor, nor does it propose any viable alternatives. I think there should be a new EIS which provides this information. As a citizen of washington state, I care deeply about our environment and saving the salmon and old growth forest. We all need to try really hard to think in the long term about how to save these resources. I appreciate your consideration of this matter.

thanks
Megan Kelso
citizen member of Pacific Crest Biodervisity Project

375-001 Please see responses to Comment Letter 361.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-376
RECEIPT DATE:
SEP 04 2001

From: Judy Lightfoot [jlight@u.washington.edu]
Sent: Monday, September 03, 2001 9:41 AM
To: lcdriessen@bpa.gov; comment@bpa.gov
Subject: Proposed BPA clearcut

Card for Judy Lightfoot

Dear Mr. Dreissen,
I am deeply concerned about the clearcut that the Bonneville Power Administration proposes to make within protected watersheds. Instead, why not improve the existing corridor? Bonneville could add additional circuits to the towers in the present corridor instead of clearcutting
376-001 for a new one. In any case, before permitting BPA to act, demand a new Environmental Impact Statement that includes all necessary information (the present one is insufficient), that presents alternatives including conservation, and that provides a substantial cumulative effects
376-002 analysis. Finally, BPA should be made responsible for replacing any forest or wetlands that are damaged in the course of this new work.
Sincerely,
Judy Lightfoot, PhD

376-001 Please see the response to Comment 340-003.

376-002 Please see responses to Comments 340-002, 349-001 and 357-003.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-377
RECEIPT DATE: SEP 04 2001

From: Bruce Pringle [pringb@compuserve.com]
Sent: Monday, September 03, 2001 10:44 AM
To: Lou Driessen; Communications
Subject: Comment on DEIS on the Raging Cedar Powerline

Lou Driessen, Project Manager
Bonneville Power Administration - KC-7
Portland, Oregon

Subject: Comment on Draft Environmental Impact Statement on Raging Cedar Powerline

Dear Project Manager Driessen:

The Cedar River watershed has been giaven protection from logging, since it
is important in protecting the city water supply.
The proposed new powerline in the Cedar River and Raging River areas will
remove trees and undergrowth from areas as far as 200 feet from the towers.
Disturbing these valuable forests will damage wetlands and interfere with
salmon habitat. 377-001

The current Environmentat Impact Statement does not give adequate consideration to the possibility of using existing corridors for the new lines. It does not consider the cumulative effect over time of the proposed
project. It does not provide for replacing damaged forests and wetlands. 377-002

We have already lost most of our wild areas. Please do more to protect this one.

Sincerely,

Bruce Pringle
17037 12th Place SW
Normandy Park, WA 98166

377-001 BPA has proposed siting the transmission facilities (towers and access/spur roads) to avoid sensitive areas such as wetlands, and their buffer areas. Where these sensitive areas could not be avoided, we have attempted to minimize their impact. No wetlands would be filled, but about 14 acres of non-jurisdictional wetlands would be converted from forested wetlands to scrub/shrub wetlands.

Additionally, BPA intends to purchase or fund the purchase of additional land that could be used for compensatory mitigation to mitigate for the damage done to sensitive areas, should BPA make a decision to build the project. See response to Comment 340-002. BPA intends to comply with all federal, state and local regulations with respect to the proposed project, and minimize impacts to wetlands.

BPA has concluded consultation with the National Marine Fisheries Service under Section 7 of the Endangered Species Act. We have prepared a biological assessment (BA) and have concluded that the Proposed Action would not result in destruction or adverse modification of designated critical habitat. We asked NMFS for their concurrence in this finding, and received their concurrence in early February 2002. Please see Appendix U.

377-002 Please see responses to Comments 340-002, 349-001 and 357-003.

Harry Romberg
11538 17th Ave. N.E.
Seattle, WA 98125-5112

In follow-up to my e-mailed comments

HR

September 3, 2001

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# KELT-378
RECEIPT DATE:
SEP 04 2001

Mr. Lou Driessen
Project Manager
Bonneville Power Administration
PO Box 3621
Portland, OR 97208

Dear Mr. Driessen:

I am a lifetime 50+ year resident of the Puget Sound region and 33 year resident of Seattle. I commented extensively both orally and in writing on the Habitat Conservation Plan for the Cedar River Watershed and was deeply involved in what I believe to have been an incredible outcome, the full protection of the watershed. I am deeply disturbed by the current proposal known as the Kangley-Echo Lake Transmission Line Project and would thus like to comment.

378-001 I oppose the project as it currently is proposed and think that it must either be significantly modified or terminated altogether. As I'm assuming the latter option is not your preferred course of action, I urge the BPA to amend the current proposal to make it more environmentally responsible. The City of Seattle had remarkable foresight in deciding to protect the watershed as fully as it did and gave up a great deal in the way of profit and the offsetting of operating costs in doing so. This transmission project diminishes that decision and threatens some of the environmental benefits sought in deciding on such a progressive HCP.

378-002 I have very serious reservations about the necessity of the proposed Kangley-Echo Lake Transmission Line and strong objections to many features of this project. In particular, I believe that the Draft EIS did not adequately consider increased energy conservation, which could negate the need for the additional power lines. The City of Seattle has a strong history of energy conservation, and other utilities in this area also have strong conservation programs. Increased energy conservation saves the individual ratepayers utility costs and could eliminate the capital cost of this project and the environmental damage that will result. Whereas conservation may not be adequate to meet all of the long range energy needs of the region, it certainly plays an important role and cannot be ignored in any comprehensive view of local energy needs and solutions. It should therefore not be overlooked when determining the needs and indeed the need for this project.

378-003 I am deeply concerned by the increased swath of forest that must be cut for the transmission lines and the necessity to build roads to accommodate it. BPA contends that the impact on the forest would be negligible but I would argue that it is considerable. While Seattle is working hard to provide excellent low elevation habitat in the area and diminish road capacity within the watershed, this project does just the opposite. Not only do roads, staging areas, harvesting of trees and other construction activities impact the boreal habitat but they affect the very reason for the existence of a protected watershed; that is, providing high quality water to the local population, oddly enough the same people for which you wish to provide additional transmission capacity. I think that in this case the higher quality water is more important than the added electricity.

378-004 BPA should be viewing this project with the goal of not compromising the Cedar River Watershed HCP as is the current case. In the event that additional transmission lines are required, I believe that BPA should take a much harder look at placing additional lines on the existing towers or accommodating them in some way in the existing corridor. BPA asserts that new transmission lines are required because of the possibility of damage to the existing towers. However, in my opinion, that possibility is negligible. Certainly the cost of reinforcing and strengthening the existing towers in various ways would be substantially less than the cost of the proposed project. In addition, accommodating the new lines in the existing corridor would likely reduce the number and size or even eliminate the need for the currently planned construction staging areas which would further impact the watershed

378-001 Comment noted. BPA has selected its Proposed Action based on a number of factors, including electrical performance, cost, and level of impact to the human and the natural environment. Table 2-3 of the SDEIS compares the impacts among alternatives. The Proposed Action is less likely to impact cultural resources, would have the least line losses, and is one the most economical of the alternatives analyzed in the SDEIS.

BPA has agreed to a long list of mitigation measures to diminish the impact of the Proposed Action in the Watershed. Double-circuiting the crossing of the Cedar River will avoid clearing vegetation along the riverbanks. Constructing the towers with helicopters and using new tower footing designs called micropiles would reduce the amount of ground disturbance. The purchase or funding the purchase of land adjacent to the watershed for natural resource protection will more than offset the small amount of disturbance that is expected to result from the construction. Locating the Proposed Action adjacent to an existing line would take advantage of the existing access road system and would also minimize the amount of clearing of vegetation that would be necessary. See also response to Comment 340-002.

378-002 Please see response to Comment 349-001.

378-003 BPA anticipates no short-term or long-term impact to the municipal water supply as a result of the Proposed Action. If a decision is made to build the project, BPA would prepare and implement a storm water pollution prevention plan, under the National Pollutant Discharge Elimination System (NPDES), a program regulated by the Environmental Protection Agency. In complying with the NPDES requirements, no sediments in measurable quantities would be allowed to enter surface water. As a federal agency, BPA is required to comply with the Clean Water Act, and the National Drinking Water Act and BPA intends to do so. BPA is aware of the sensitivity of the area, particularly in the Cedar River Municipal Watershed, where drinking water is collected for 1.3 million people in the Seattle metropolitan area. BPA currently has an existing transmission line that crosses the Cedar River Municipal Watershed, and BPA knows of no problems the City of Seattle currently has with this existing line

378-005 The Draft EIS does not adequately consider the very serious environmental effects from this project. The project would require 1.5 miles of new road construction through the Cedar River Watershed and the Raging River Watershed. New roads are very likely to cause soil erosion and resulting damage to water quality and fisheries resources. Additional roads also cause fragmentation and have severe impacts on wildlife in these watersheds. Although the DEIS Summary seems to infer that the road rights-of-way would only require clearing for about 75 feet, in fact, cutting of trees can be as far as 200 feet from the power line (DEIS pages 2-5). Further, the roads would impact several wetlands. In light of the enormous amounts of money that the City of Seattle and many state and federal agencies are spending to protect wetlands and salmon habitat, this additional road construction is unwise as well as unnecessary. This is especially crucial when one considers the high likelihood that during a project of this scale, there will undoubtedly be fuel spills, oil leaks and other accidental but very serious incidents that will

378-006 have a major effect. As a further critical factor, the BPA should commit itself not to use herbicides in the Raging River Watershed, which contains important salmon runs.

378-007 Further, the DEIS does not adequately consider BPA's duty to mitigate if the project proceeds with the Preferred Alternative. Lowland forests are a critical ecological element in the Western Cascades. The Cedar River Watershed contains an unusually large block of old growth. It also contains second growth that now has the possibility of maturing into old growth as a result of the Cedar River HCP. This project, with a right of way up to 200 feet from the power line, would cause serious fragmentation through this forest ecosystem. Mitigation should include replacement habitat, including forests and wetlands, which should be in close proximity to the area that is disturbed. To the extent that local areas are not used for mitigation, the area of mitigation should be increased as the mitigation moves in distance. If mitigation is employed, the BPA should look at several close by areas in Green River, Raging River, near Selleck, and upper Rock Creek Valley.

378-008 Further mitigation should include but not be limited to the height of any transmission lines crossing the Cedar and Raging Rivers should be high enough to allow late successional forest to grow to 200' tall in the riparian zone of the river, and adjacent slopes. Given the topography on either side of the river, that should be feasible. The height of the towers should be increased if necessary.

378-009 Roads outside of cleared powerline right of way should be eliminated. Helicopters and/or trails to access those sites should be used instead. Any roads constructed should be offset by eliminating roads elsewhere in the watershed. No staging area should be allowed inside the watershed.

378-010 Furthermore, the DEIS fails to address cumulative impacts of this and other similar projects. Particularly when one looks at this in conjunction with existing transmission lines, the impact to forests and wildlife corridors becomes more than a little significant. In fact, this project degrades wildlife corridors in this critical ecological connection to Tiger Mtn. and Rattlesnake Ridge.

378-011 Whereas the current project will significantly affect the watershed, another route through the watershed would be far worse. Thus, I would strongly object to this course of action.

378-012 I believe has a long ways to go to adequately study the impacts of this project and the solutions to these and other serious problems. The Draft EIS lacks important site specific information on the location of towers, roads, and staging areas. It's analysis of streams and fisheries is inadequate. The cumulative affects analysis is essentially non-existent. The DEIS fails to consider a full range of alternatives. A supplemental Draft EIS should be produced and a broader public involvement process implemented.

378-013 I look forward to commenting on an improved supplemental DEIS which address these and other concerns that the current DEIS fails to address or addresses inadequately.

Sincerely,

Harry Romberg

Harry Romberg

other than an ongoing noxious weed problem that BPA is aware of. BPA would take precautions, such as washing vehicles, to prevent the spread of noxious weeds if BPA decided to build a line through the CRW.

BPA is working with Seattle Public Utilities and the Muckleshoot Tribe to develop a long-term solution to the noxious weeds issues on the CRW and on other BPA ROWs.

378-004 Please see the response to Comment 340-003.

378-005 Comment noted. BPA feels that we have adequately addressed the impacts of the project. Regarding potential soil erosion, BPA would comply with the Clean Water Act and the NPDES requirements in designing and implementing a storm water pollutant prevention plan. Erosion control devices would be left in place until the area has become at least 70 percent stabilized. They then may be removed or remain in place for a longer period. When removed, a Notice of Termination will be filed with EPA.

Please see response to Comment 357-004 addressing habitat fragmentation.

With respect to the clearing impacts, the commenter is correct, danger trees could be taken as far or farther than 200 feet from the power line, depending on their height, condition, and relationship to the line. See response to Comment 340-004.

378-006 Please see response to Comment 349-004.

378-007 Please see response to Comment 340-002.

378-008 BPA proposes to double circuit (at a cost of over $2 million) the proposed line with the existing line at the crossing of the Cedar River. This would avoid the need to clear additional riparian vegetation along the banks of the river. The crossing at the Raging River would use tower heights that would minimize clearing in riparian habitat as much as possible.

378-009 BPA is only proposing to build access/spur roads outside of the proposed right-of-way to avoid wetlands. Trails are not sufficient

surfaces for the equipment used to build and maintain the line. Helicopters would be used to construct the project, but BPA needs access to its tower sites at all times to operate and maintain the transmission system. Regarding eliminating roads elsewhere in the Watershed, BPA has no control over existing roads on private land. To access its transmission system, BPA prefers to acquire rights on existing access roads and only builds its own roads where there are no existing roads or access to those roads has been denied.

378-010 BPA feels that it has done an adequate job addressing cumulative impacts of past, present and any reasonable foreseeable future projects in the area in the SDEIS. BPA disagrees that critical wildlife corridors would be affected between Tiger Mountain and Rattlesnake Ridge.

378-011 Comment noted. BPA agrees that of the alternatives under consideration the Proposed Action is the preferable route.

378-012 and -013 Comment noted. A SDEIS was produced and distributed with updated information on cumulative impacts, fisheries, streams, mitigation measures, and site-specific information.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-379
RECEIPT DATE:
SEP 0 4 2001

From: Peter Roth [peterbroth@yahoo.com]
Sent: Sunday, September 02, 2001 4:05 PM
To: lcdriessen@bpa.gov; comment@bpa.gov
Subject: Raging Cedar Powerline/Kangley-Echo Lake Transmission Line Project comment

To Lou Driessen:

I would like to comment on Raging Cedar Powerline/Kangley-Echo Lake Transmission Line Project proposal.

379-001 While I support the addition of circuits to towers in the existing corridor, I must insist that any forest or wetlands that are damaged be adequately replaced. This requires a comprehensive Environmental Impact Statement (EIS) with a substantive analysis of ALL cumulative effects of any changes to the ecosystem. Included in this EIS should be alternatives that require NO environmental destruction. These non-destructive alternatives are the most important part of the EIS because they would require the least amount of effort and resources to implement.

Thank you for taking the time to read my input.

Sincerely,

Peter Roth
7415 - 5th Ave NE #208
Seattle WA 98115-5370

379-001 Please see response to Comments 349-001, 340-003, and 409-002.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-380
RECEIPT DATE:
SEP 0 4 2001

From: Kpthomas1@aol.com
Sent: Sunday, September 02, 2001 8:02 AM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: Proposed Powerline in Cedar and Raging River watersheds

Bonneville Power Administration,

I am writing to voice my opposition to the proposed nine miles of new powerline which the BPA is considering building in the Cedar and Raging River watersheds. These areas should not be subject to the road-building and clear-cutting which the installation of new powerlines would entail.

380-001 Any new lines should be placed on already exisiting towers, to minimize damage to the forests in the watersheds. Any damage done to forests or wetlands by the installation of new powerlines should be replaced.

Our watersheds and forests require protection now and in the future. Please do not build new powerlines.

Sincerely,

Karen P. Thomas
4435 First Avenue NW
Seattle, Washington 98107

380-001 Please see the response to Comment 340-003.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-381
RECEIPT DATE: SEP 0 4 2001

From: bweeks [bweeks@quidnunc.net]
Sent: Monday, September 03, 2001 10:26 AM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: BPA-Cedar River

Dear Mr. Dreissen,

I am deeply concerned about the clearcut that the Bonneville Power Administration proposes to make within the Cedar River Watershed. Instead,
why not improve the existing corridor? Bonneville could add additional circuits to the towers in the present corridor instead of clearcutting for a
new corridor. In any case, before permitting BPA to act, demand a new Environmental Impact Statement that includes all necessary information (the
present one is insufficient), that presents alternatives including conservation, and that provides a substantial cumulative effects analysis.
Finally, BPA should be made responsible for replacing any forest or wetlands
that are damaged in the course of this new work.

Sincerely,
Robert R Weeks

381-001 Please see the response to Comment 340-003.

381-002 Please see responses to Comments 340-002, 350-003, and 357-003.

SIERRA CLUB
Cascade Chapter
8511 – 15th Ave. NE
Seattle, Washington 98115

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-382
RECEIPT DATE:
SEP 0 4 2001

September 3, 2001

Lou Driessen, Project Manager
Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208

Re: Kangley-Echo Lake Transmission Line Project

Dear Mr. Driessen:

382-001 We have reviewed the Draft EIS on the Kangley-Echo Lake Transmission Line Project, also known as the Raging Cedar Powerline, due to its impact on those two river valleys. As proposed, the Sierra Club is opposed to this project.

382-002 BPA lines have huge impacts on forests and related wildlife including loss and fragmentation of habitat. Impacts of construction and operation will adversely affect water quality for a municipal water supply, affect compliance with the ESA, and diminish efforts to recover salmon and other listed species. Moreover, BPA would clearcut a swath through the watershed forest that we just succeeded in protecting.

382-003 The EIS is deficient for several reasons: an inadequate demonstration of need, failure to analyze a full range of alternatives, failure to acknowledge the seriousness of impacts, incomplete information, failure to provide adequate mitigation, and avoiding the true costs of alternatives. We ask that you correct these deficiencies and publish a supplemental Draft EIS.

Proposal
This is a substantial project, constructing nine miles of new 500kV line with towers 135' high. BPA proposes to clear vegetation from 160-300 acres and construct at least a mile and a half of new road. Also proposed are three staging areas of undetermined size and location, plus a three acre expansion of an existing substation. The cost is estimated at $11.5 million plus $6.5 million for substation addition (S-3).

Need
Purpose and Need Unsubstantiated

382-004 The need for this project has not been demonstrated, and the "purpose and need" statement in the DEIS is not clearly defined. The EIS merely claims that this project is needed to maintain system reliability and describes recent weather and general electrical grid situation and efforts at conservation. However, there is no substantive information that demonstrates that this project is necessary, nor that a more aggressive conservation effort would be a viable alternative.

382-005 There is no explanation of the electrical transmission system serving the King County area that supports the necessity of the proposed line. The DEIS should include a regional system analysis that shows the current situation and other improvements BPA is considering in the near term and distant future so the reviewer can understand why this specific link is necessary. Furthermore, it should demonstrate why BPA feels this project must be done in a particular manner and time frame that appears to preclude all but the selected alternative.

382-001 Comment noted.

382-002 Comment noted.

382-003 Please see responses to Comments 394-003, 378-012, and 378-001.

382-004 The description of the purpose and need for this project is greatly expanded in Chapter 1 of the SDEIS. A summary of the transmission planning studies (Appendix H) is available upon request.

382-005 BPA performed a regional system analysis that supported the subject project. These analyses are conducted through computer simulation studies. A summary of these studies is available upon request (Appendix H).

BPA is considering other improvements in the area. See Section 1.7 of the SDEIS.

382-006 Comment noted. Cost estimates for all the alternatives in the SDEIS were updated to include mitigation cost estimates. BPA is committed to providing the appropriate level of mitigation as required by King County's Environmentally Sensitive Areas Ordinance, Chapter 21A.24 of the King County Code. Although BPA as a federal government agency is not required to meet these procedural requirements, it strives to meet or exceed local development regulations' substantive requirements wherever possible. As a result, BPA is working with King County as well as Seattle Public Utilities and the U.S. Fish and Wildlife Service in developing a reasonable mitigation package that is acceptable to all of these agencies' needs. Please also see response to Comment 340-002.

382-007 Please see response to Comment 394-090.

Impacts

382-006 Contrary to BPA's description, this project has serious and extensive impacts. We are very concerned that BPA's approach to these impacts is weak and fails to fully understand them or fully mitigate for them. Such a project should not be constructed without such mitigation. Since full mitigation is not considered in the cost estimates, it is unclear whether alternatives rejected for cost would be less expensive.

Serious cumulative impacts ignored

382-007 BPA claims, "…the relatively small areas required for the proposed transmission facilities would have only a low impact." (DEIS 4-6). This disregard for the impacts to precious resources, such as late-successional forest, clean drinking water, and cultural resources as well as the cumulative impacts of transmission lines crisscrossing the forests of this region, is indicative of BPA's lack of understanding of the impact of this proposal. The cumulative effects analysis is extremely weak, with no data to justify conclusions. The EIS merely states that the cumulative impacts of forest loss is considered low (DEIS 4-53). On the contrary, the cumulative effects of this and other BPA lines is significant, and when combined with other loss of forest becomes quite significant. This disregard for the cumulative effects of BPA's actions is a serious deficiency of this EIS.

382-008 The DEIS must describe the impacts of existing line, as well as the combined effect of two lines. We understand that BPA is currently considering a similar project from Echo Lake to Monroe. This and other proposals must be described and the cumulative effects evaluated.

382-009 1.5 miles of new road construction has significant adverse impacts. Roads have high impact to soils, water quality, fragmentation of habitat, and wildlife behavior. BPA's proposal that 50' wide easement outside of powerline ROW seems excessive. While for planning purposes that might be appropriate, the road construction should be much narrower and specified within the narrowest easement. A 16' road surface plus 4-6' near curves is also excessive (DEIS p2-7). A single land road should suffice for equipment. Helicopters should be used if cranes cannot negotiate single lane roads with curves. Ten feet on either side of the road for ditches is also excessive. This 36' wide impact is not consistent with the 20' wide disturbance width used for the DEIS analysis (DEIS p2-7).

Protecting Important Resources

The Cedar River watershed encompasses a unique lowland forest that will be protected in perpetuity, thanks to the City of Seattle's vision and commitment. Surrounding remnants of the original forest, the second growth has been growing and developing for up to 100 years. Nowhere else in the county will we see such ancient forests- at low elevation, in large blocks. This is also a critical ecological connection to Tiger Mtn. and Rattlesnake Ridge.

382-010 While lands in the Raging River may be managed for timber, it will provide age classes of over 40 years, while in the powerline right of way trees will never exceed a few years. Due to conservation easements being developed in the valley, it should not be converted to urban uses. This and its location makes this valley particularly significant for forest ecosystem conservation. Thus, BPA should mitigate for the difference in this type of forest, by acquiring and conserving for forestry an equivalent amount of land that would otherwise be converted to non-forest uses.

The impact of the BPA line will be in perpetuity, therefore the mitigation must be in perpetuity. The only reasonable solution is BPA must replace the lost habitat, sometimes referred to as compensatory mitigation.

There are several excellent candidates in the vicinity of the line, including sections near Selleck, Taylor Mtn., the upper Rock Creek valley and Green River.

382-008 The DEIS and SDEIS contained a cumulative impact analysis that looked at the cumulative impacts of existing facilities when added to the proposed project and any reasonable foreseeable future actions. BPA does not know whether a line between Echo Lake Substation and Monroe Substation is needed. BPA's system planners are constantly studying the system, and only propose improvements to the system as they are needed. System planners have not determined that such a line is needed, and therefore, it would not be considered to be reasonable foreseeable at the present time.

382-009 The 50-foot road easement is a BPA standard for acquisition of a road to be constructed along a 500-kV transmission line. The typical cross section of a 16-foot wide road with ditches is 36-foot maximum with additional as may be required for cuts and fills or curve widening. Typically, a 16-foot wide road on the type of terrain in the project area would not require more than 26 feet.

BPA will specify helicopter/sky crane tower erection within the Cedar River Watershed to minimize impacts in the area. Helicopter tower erection would also be used outside the Watershed in those areas where access might impact wetlands. Roads would still be necessary to allow access to most of the tower sites that could be reached from uplands, for both construction and maintenance activities. However, no wetlands would be filled to reach tower sites.

382-010 Comment noted. BPA has purchased or will fund the purchase of land to offset those forestlands and wetlands that would be lost due to the Proposed Action. See response to Comment 340-002.

382-011 Please see response to Comment 394-034 and Section 2.1.1.4 of the SDEIS.

382-012 A SDEIS has been provided with more in-depth analysis of a variety of issues raised during the comment period for the Draft EIS.

382-013 When siting its transmission facilities, BPA avoids sensitive areas such as wetlands where it can. Where it cannot, these sensitive

382-011 The DEIS states several times that the clearing would be 150' wide, but table 2.1 (DEIS p2-6) says 374'. If no extra clearing is done between towers (that is 75', assuming as close as possible), then 187' would be cut on the other side; thus, total clearing is 262' wide. Additional "danger trees" could be felled (p S-3). This could increase to up to 476' slope distance through mature and old-growth forests. At only 150' wide, 9 miles of clearing equals more than 160 acres, but it is apparent that clearing could easily exceed 300 acres, much of it late-successional forest. This is a significant impact on forest, which only increases if we assume blowdown in adjacent forest due to this clearing. In addition, there would be 3 acres of

382-012 clearing for substation expansion. BPA is considering reduced clearing within the Cedar River watershed, but provides no specifics. This is crucial information and should be in a supplemental Draft EIS, rather than in the Final EIS.

Impacts on Wetlands

382-013 Ten wetlands with 242 acres are located within 500' study corridor (DEIS p3-47). While not all may be directly impacted by clearing and construction, all will be seriously affected. Mitigation measures should address all these. The first approach is avoidance. If an area can't be avoided, then replacement areas must be acquired and protected.

Important fisheries in Raging & Cedar Rivers

382-014 The City of Seattle is working to re-establish salmon in Cedar River. The Raging River has coho and Chinook salmon. Additional road construction, clearing, and potential spills all will adversely affect these species.

Impact on behavior of wildlife

382-015 Marbled murrelets may be using the upper watershed. This species tends to fly along the river corridors. Thus, any towers or lines that cross the rivers would present a hazard from both collision and electrocution. This is a significant impact, and one that bears on BPA's obligations under the ESA. As the forest approaches late-successional character, spotted owls will increase their use in this area. BPA's line will eliminate potential habitat and make it more difficult for owls to reach habitat to the west. Again, BPA's action may not be consistent with the ESA.

Fragmentation of habitat is a major concern, and one not adequately treated in the DEIS. This creates barriers to wildlife movements due to inappropriate habitat conditions and/or increased predator success. In some cases makes good habitat unusable. It is imperative that the upper and lower Cedar River forests be connected by the best possible habitat. Similarly, the connection to Tiger Mtn. and other forests in the vicinity is needed. BPA's powerlines are one of the most significant obstacles to achieving those goals.

Corridor management needs revision

382-016 The management of other vegetation in the ROW corridor (DEIS p2-5) is excessive and needs to be revised. Less clearing and more allowance for shrubby and woody vegetation should be included. This may require more frequent attention, to allow maximum height of vegetation, while maintaining safety clearances. Wherever topography is favorable, taller trees should be allowed to grow. In certain areas, this could be combined with installing taller towers, (thus increasing line height), to provide considerable forest cover.

Seattle City Light's management within the Ross Lake NRA has begun to incorporate some of these approaches. In special areas, such as the Cedar River watershed, special actions are necessary. While this might require more frequent corridor management, that is part of the price for traversing these special areas.

areas are spanned, and where they cannot be spanned, BPA minimizes its impact to the extent that it can. BPA has determined that the Proposed Action would convert approximately 14 acres of forested wetlands to scrub-shrub wetlands. No wetlands would be filled. BPA is looking for ways to mitigate for the wetland impacts; however, it proposes to use part or all of the 352-acre parcel recently purchased from the Trust for Public Land to mitigate for the conversion of forested habitat to non-forest uses, as well as to mitigate for a portion of wetland impacts associated with the Proposed Action. See also response to Comment 340-002 for information about compensatory mitigation.

382-014 Comment noted. BPA is aware that the City of Seattle intends to reestablish some species of salmon in the Cedar River, above Landsburg Dam, and that the Raging River has coho and chinook salmon. While additional road construction, clearing activities and potential spills could adversely impact these fish species, BPA would put in place mitigation measures to minimize any impacts. Additionally, BPA has written a biological assessment (BA) on the Proposed Action that has concluded that the Proposed Action may affect, but is not likely to adversely affect the chinook salmon (listed as threatened in the Puget Sound area) and their designated habitat, and that it may impact, but is not likely to adversely impact, the coho salmon (listed as a candidate species, under the Endangered Species Act).

In January 2002, NMFS issued a letter to BPA concurring with its effect determination of "may affect, but not likely to adversely affect" for Puget Sound chinook and their designated critical habitat; therefore, BPA has concluded informal consultation on these actions in accordance with 50 CFR 402.14 (b)(1). See Appendix U.

382-015 Section 4.1.1.1 of the Wildlife Technical Report (Appendix B) was amended to include a discussion of potential collisions with power lines by marbled murrelets potentially flying up river corridors. Section 3.3.2 was revised to include marbled murrelets as a species to be analyzed.

Section 3.3.2.1 of the Wildlife Technical Report was revised to reflect the level of potential future habitat loss in the lower

382-017 The new clearing and construction will allow incursions of noxious weeds. The current ROW has weeds, so the regional plan referenced in the DEIS is not adequate to control them. Additional clearing will engender additional weeds. A commitment to a control plan with proven effectiveness, even if it is all manual, must be a part of any powerline corridor.

We are pleased with your commitment to not use any herbicides in the Cedar River Watershed. (p S-5). However, it appears that it will be used in the Raging River watershed. The salmon in this river need the highest quality water and the powerline cross the river and continues for several miles in the watershed.

Alternatives

Range of alternatives is inadequate

382-018 The alternatives did not represent a full range, as numerous possibilities were rejected without further study. NEPA requires that reasonable alternatives be considered which include those alternatives that can meet the objectives, as defined by the purpose and need statement, of the proposal. For the stated goal, there is a much larger range of reasonable alternatives.

The DEIS does not provide sufficient analysis of alternatives outside of the Cedar River Watershed to support their elimination without detailed evaluation. The DEIS notes impacts to "developed land and people living in the area." While it is clear there would be impacts, there is no analysis of the type, amount or significance. BPA cannot simply dismiss an alternative just because it would have impacts. All of the alternatives through the watershed also have impacts, and yet they were not dropped from consideration. Lacking stated criteria and evaluation, there is no justification for dropping certain alternatives and narrowly limiting the range of alternatives considered in the DEIS.

The EIS must evaluate the full range of reasonable alternatives. The DEIS also needs to present a detailed cost justification for the proposed action to ensure that agency funds are being spent prudently. This should include full consideration of anticipated future projects, as well as considering mitigation measures that could avoid or reduce impacts of the proposed action. Furthermore, NEPA requires that federal agencies consider alternatives that can accomplish the objectives of the proposal, but at a lower environmental cost.

Alternatives not considered

382-019 Adding a circuit to the existing towers, or replacement towers should still be considered. The risk of loss of a tower is very low, especially given the limited access, so the risk of losing two circuits at the same time is low. At your public meeting, a BPA staff person said it would require a six months outage to replace the existing towers and line with a double circuit. What length of time can you have this line out of service? Did you analyze using existing towers within the Cedar River Watershed, and separate towers outside? With accelerated construction activities and careful scheduling could the outage period be reduced to levels that would not significantly affect system loads? Again, there was no information in the DEIS on these questions.

Alternatives of rebuilding other lines and adding equipment at substations to increase voltage were briefly mentioned and dismissed (p2-18). Information on these options should have been expanded and compared to the proposed action.

We agree that no additional powerlines from Stampede Pass to Echo Lake should be built, but rebuilding an existing line was dismissed with little discussion except the cost would be higher. There is no assessment of whether BPA would in the future propose an additional circuit or increase of voltage on this line. Would rebuilding a 500kV double circuit now be more cost effective in the long run? Will BPA want to build another powerline in the Echo Lake-Raver corridor? If so, why doesn't the agency

Cedar River Watershed and to discuss the potential impacts of creating dispersal barriers for this species. Although spotted owls may use habitat in the lower Cedar River Watershed in the future, it is not guaranteed.

The analysis of potential impacts from habitat fragmentation within the Cedar River Watershed was expanded in Section 4.1.1.1 of the Wildlife Technical Report.

382-016 For safe and uninterrupted operation of the transmission line, vegetation within the ROW is not allowed to grow above a certain height. Restrictions vary, however, depending on the terrain, the type of vegetation, and growth rates. It is BPA's intent to protect and maintain, as much as practicable, vegetation in the ROW that will not interfere with the safe and reliable operation of the line. In some places, towers are sited so that trees in canyons and along rivers can be maintained. In addition, long-term vegetation management on the ROWs includes the promotion of low-growing plant communities on the ROWs to "out compete" trees and tall-growing brush.

382-017 BPA contracted for a noxious weed survey in July 2001. Six noxious weed species were found within the Proposed Action area, with three being so common that King County and the Noxious Weed Program recognizes that control or eradication is not economically feasible. Most of the noxious weeds were found on the more disturbed sites outside the Cedar River Watershed. During construction, BPA will follow the recommendations in that report regarding preventative measures such as educating the construction contractor to identify and avoid infested areas, washing vehicles and equipment prior to entry and upon moving to another location, using certified weed-free materials brought onto the project area, and reseeding disturbed areas. Following construction, BPA will follow standards and guidelines set forth for noxious weeds as defined in the FEIS and Record of Decision for BPA Transmission System Vegetation Management Program (BPA 2000). The Vegetation Management ROD can be found on the Internet at ***www.efw.bpa.gov/cgi-bin/PSA/NEPA/SUMMARIES/VegetationManagement_EIS0285.*** See also Appendix K of the SDEIS. BPA and SPU are drafting an agreement that addresses

consider using towers that carry two circuits, so we don't have to go through the same discussion again in a decade or two.

We have similar questions about the Covington-Maple valley 30kV line. There is no backup information to the claim that that circuit could not be taken out of service for reconstruction or that vacant circuits could not be used as part of this alternative. (p 2-17)

Routes outside the watershed were rejected, but will these be necessary in the future anyway? The impacts were vaguely described, but at least one of these should have been included in the EIS. All the impacts of such lines should be analyzed and compared to the proposed action.

382-020 We are adamantly opposed to other routes through the Cedar River watershed (alt 2, 4a, 4b) as they also have impacts associated with the preferred alternative plus additional destruction and fragmentation of forests and other natural habitats.

Conservation should be first choice

382-021 We are concerned with the lack of consideration of energy conservation. With reduced demand, such lines would not be necessary. The DEIS did not adequately consider alternatives of energy conservation, merely stating that BPA was doing all it could. We do not agree. While most of our comments in this letter focus on the project, we have not been convinced that conservation would not obviate the need for this project.

Environmental Analysis

Inadequate information and analysis

382-022 The DEIS has inadequate information and incomplete analysis for a reasoned decision. It violates NEPA by failing to fully disclose all environmental impacts. Clearly, a supplemental DEIS is needed.

382-023 For instance, the DEIS says that three staging areas will be needed (S-4). How large willthese be? Where will they be located? What restoration measures will be implemented once they are no longer needed? This is key information lacking in the DEIS.

382-024 The fisheries analysis in the DEIS and technical appendix is inadequate due to lack of assessment of Type 4 and 5 streams, lack of thorough erosion assessment, minimal site-specific information on streams, no quantification of impacts by stream crossing, and lack of disclosure as to the extent of clearing in riparian areas. These omissions effectively preclude an evaluation of project effects.

382-025 The DEIS seems to avoid the fact that the Cedar Watershed is an unfiltered source of high quality water for over a million people in the Puget Sound region. The DEIS says nothing about potential impacts to the drinking water supply for these people. Incidents such as toxic spills or turbidity plumes are serious risks in any watershed, but are totally unacceptable in this watershed. What specific measures will be implemented to eliminate this risk? In addition, public notices and public meetings related to the NEPA scoping and DEIS comment periods have not been effective in involving those that drink this water. Additional public involvement with a Supplemental Draft EIS should be done.

382-026 Many of the impacts noted in the DEIS meet CEQ's definition of "significant." However, the DEIS avoids this determination, using instead the relative terms, "low, medium, and high." Thus, BPA has not taken a "hard look" at the impacts, as required by CEQ. Consequently, the public, other agencies, as well as BPA decision-makers do not have adequate information to review. Because of the importance of "significant impacts" in the NEPA process, failure to disclose this information is as serious breach of NEPA itself.

vegetation management of target species, including weeds, within the CRW.

382-018 In response to comments received about the range of alternatives analyzed in the DEIS, BPA analyzed five additional alternatives in the SDEIS that would avoid construction in the Cedar River Watershed.

382-019 Please see the responses to Comments 340-003 and 382-018.

BPA stated that the line could not be taken out of service long enough to be rebuilt. This is one of the main lines BPA relies on to carry power for the Seattle area when the existing Raver-Echo Lake line is forced out of service. Without the Covington-Maple Valley line, load in the Seattle area and/or Treaty return for Canada may have to be curtailed for the time period the line is out to be rebuilt. BPA has reevaluated and as a result included Alternative A, which uses the Covington-Maple Valley line corridor in the SDEIS.

The existing Raver-Echo Lake line (formerly the Raver-Monroe line) was built in the early 1970s. This line has been sufficient for system load purposes for the last 30 years. The addition of the second line will more than triple the power carrying capability of the two lines because each line will be more effective in backing up the loss of the other line and should therefore provide another 30 to 50 years of load serving capability.

382-020 See response to Comment 382-018.

382-021 Please see response to Comment 349-001.

382-022 Please see response to Comment 382-012.

382-023 BPA has no information on where the staging area(s) would be located at this time. The selection of staging areas would be at the discretion of the contractor and would be approved by the landowner. No staging areas would be in the Cedar River Watershed.

382-024 Erosion impacts and riparian clearing are assessed in Section 4.1 of the Fisheries Technical Report (Appendix A). Site-specific stream data are in Appendix A of the Fisheries

382-027 Several key aspects of the proposed transmission line are not described in sufficient detail to support an evaluation of impacts. We understand that BPA completed a Final Biological Assessment for this project during the public comment period for the DEIS. This indicates that sufficient details was available for the DEIS. The fact that specific, known design information for the proposed action was omitted from the DEIS indicates BPA has violated NEPA by failing to fully disclose environmental impacts. Please provide us with a copy of the biological assessment, and include it in a supplemental DEIS.

382-028 Failure to adequately describe the project compounds the vagueness of proposed mitigation measures, making it impossible to evaluate the effectiveness of mitigation. The net result is a level of uncertainty of the proposal's impacts that renders the DEIS useless to reviewers and decision-makers.

382-029 The impacts of the project are potentially greatest for the Cedar River Watershed, especially considering the area is the region's major drinking water supply, and the land is being managed under a complex Habitat Conservation Plan (HCP). However, BPA's proposed actions and their impacts are described so minimally that it is not possible for the public to evaluate the project's impacts. Once again, the DEIS does not fully disclose environmental impacts.

382-030 Site specific information on clearing requirements in the watershed (p2-6) and access roads (p2-7) is lacking, although at one point the DEIS describes removal of trees on the Cedar River as a "high" impact (p4-36). BPA attempts to avoid the requirement with an explanation that the information will be available for the Final EIS. This information is critical to evaluating project impacts and mitigation measures and therefore should be provided as part of the DEIS. Also, the DEIS does not describe tower locations, which could have substantial impacts. This does not provide the public with adequate opportunity to review the proposal. Again, a supplemental DEIS is needed.

382-031 Lack of consistency with federal, state, and local regulations
NEPA regulations require that an EIS discuss how the proposed action is consistent with federal, state, and local land use plans and policies. Has this been done, and if so how has BPA reconcile any conflicts. Two examples in the subject project are King County's sensitive areas and Shoreline Management provisions.

382-032 We cannot find where BPA coordinated with federal agencies on Endangered Species Act prior to releasing the DEIS. Perhaps this is one reason that the DEIS fails to fully assess impacts on endangered and threatened species such as Chinook salmon and coho salmon, and fails to address impacts on marbled murrelets. BPA has an obligation under the Endangered Species Act and Northwest Power Act to protect, mitigate, and enhance salmon runs where affected by its actions. However, BPA's proposed action has adverse impacts on federally listed salmon and their habitats that are not adequately mitigated.

382-033 This project will directly affect the Cedar River Habitat Conservation Plan, under the Endangered Species Act. BPA indicates that USFWS will have to "decide if the transmission line facilities require any change to the existing Habitat Conservation Plan…." The DEIS does not discuss the proposed action's impacts on the HCP, but the DEIS fisheries technical report suggests construction of the proposed action would violate provisions of the HCP. Commitments made by the City in its HCP would be substantially diminished by the BPA project, reducing the conservation value of the plan. The City should not need to modify the HCP as a consequence of BPA's activities. If BPA requests such changes, it must provide mitigation for any impacts that reduce the conservation value of the City's HCP that, at a minimum, compensates for that reduction in value.

382-034 **Mitigation**
The DEIS lacks mitigation for unavoidable impacts.
The DEIS suggests "mitigation measures", but these are actually standard practices (sometimes called best management practices or BMPs) and not really project mitigation measures. They do not offset, reverse, or rectify the impacts of constructing the proposed project. Thus, BPA's suggestion that "maintaining environmental quality" (S-2) is one of the purposes in developing this project, is but an empty statement. For example, although the DEIS states that impacts on ESA-listed species of fish are "high," BPA fails to commit to any mitigation that would offset those impacts.

Technical Report. Data do not indicate that detailed analysis of Type 4 and 5 streams would substantively alter the findings of the analysis. The effects of the Proposed Action on such streams would be approximately the same as the effects on Type 3 fish-bearing streams, and those effects are detailed in Section 4.0 of the Fisheries Technical Report.

382-025 Please see response to Comments 378-005 and 382-012.

382-026 BPA agrees that the proposed project has potentially significant impacts. That is why we immediately proceeded to produce an EIS rather than an Environmental Assessment. However, we intend to mitigate any potentially significant impacts to a level below significance because we believe doing so is in the public interest. We disagree that it is improper to use relative terms such as "low, medium or high" to discuss the nature of the impacts. We believe making these assessments helps the public and decision-maker to be better informed concerning the nature of the various impacts upon the environment.

382-027 BPA hired a team of consultants to assist the agency develop technical study reports that the agency used to write the DEIS and the SDEIS. Subsequently, BPA needed to survey the Proposed Action before the tower sites could be located and access/spur roads identified to reach these facilities. Following the survey, BPA identified where the wetlands were, and sited the proposed towers to avoid these sensitive areas. While it is true that our biological assessment contained the proposed tower site and access/spur road locations and was printed a short time after the DEIS, this information was not available at the time the DEIS was written. Additional information is in the SDEIS.

382-028 Chapter 2 of the SDEIS describes the alternatives considered to meet the need, and summarizes how the environmental consequences differ among alternatives. More detailed information is presented in Chapters 3, Affected Environment, and Chapter 4 Environmental Consequences.

382-029 Chapter 4, Environmental Consequences, identifies the impacts of the Proposed Action and alternatives.

382-035 We understand that BPA has not mitigated for habitat losses of their powerlines in the past. But this must change. Unless and until BPA makes a binding commitment to replace lost, damaged and fragmented habitat, we must oppose construction of this line.

382-036 BPA cannot externalize the costs of this project, as it has done with previous lines. The loss of the forest is more than just a loss of timber revenue. It is a permanent loss of habitat that is rapidly disappearing-especially in the foothills of the Cascades in King County. The cost of such replacement must be included in the cost, then compared to other alternatives. The sale of timber by the underlying landowner does not mitigate the long term impacts of logging. Past practice of ignoring the loss of forest permanently is no longer defensible.

The mitigation measures presented in the EIS are wholly inadequate for a project of this nature. All construction alternatives should include the following.

382-037
- BPA should replace all habitat damaged within the project area with equivalent habitat type and quality in the vicinity, or if unavailable, then increase acreage in ratio to lesser quality, plus a premium for fragmentation.

382-038
- The height of transmission lines at Cedar and Raging River crossings should be high enough to allow late successional forest to grow to 200' tall in the riparian zone of the river and to mature heights on the slopes above the river bottom. Given the topography on either side of the river, that should be feasible. BPA should increase the height of the towers in that vicinity if necessary. We are disappointed that this issue was not addressed in the DEIS. We had brought it up during scoping and public meetings at that time.

382-039
- Eliminate roads outside of cleared powerline right of way. Use helicopter and/or trails to access those sites. Any roads constructed should be offset by eliminating an equal or greater amount of road in the affected watersheds, over and above what is planned by the land owner.

382-040
- Minimize tree cutting outside of 150' corridor; first option should be to only top thjem, then, if necessary, removing those trees deemed likely to topple into the lines within a short period of time, rather than wholesale clearcutting.

382-041
- Apply measures to prevent any and all toxic materials and sediment from entering surface or subsurface waters in the Cedar River Watershed.

382-042 **Conclusion**
The Draft EIS is inadequate, and should be redone to display a full range of alternatives, demonstrate need, include relevant information, adequately assess the impacts and incorporate adequate mitigation, describe required coordination with other governmental entities, and incorporate and describe all costs of the project. The project fails to meet the requirements of NEPA and the ESA. We urge BPA to withdraw its proposal and only reissue a Draft EIS when has a proposed action that is legally and environmentally acceptable.

Thank you for this opportunity to comment on the DEIS. Please keep us apprised of any actions related to this proposal.

Sincerely,

Charles C. Raines
Director, Cascade Checkerboard Project

cc: Senator Patty Murray
Senator Maria Cantwell
King County Executive Ron Sims
Mayor Paul Schell

382-030 Please see response to Comment 382-012.

382-031 Section 5.10 of the SDEIS addresses the Coastal Zone Management Act. The information shows that BPA is, to the extent practicable, consistent with all federal, state and local government plans and programs, including the City of Seattle's recently adopted Habitat Conservation Plan (HCP).

With respect to the King County Environmentally Sensitive Areas Ordinance, Chapter 21A.24 of the King County Code, BPA is consistent to the extent that it can be. The proposed power line and access/spur roads were sited to avoid impacting sensitive areas. All are located on uplands. Where sensitive areas could not be avoided, i.e., conversion of forested wetlands to scrub/ shrub wetlands within the proposed right-of-way, the impact would be minimized by undertaking hand clearing, and either leaving the vegetation removed within the right-of-way as wildlife habitat, or removing it by sky crane or helicopter to avoid ground disturbance to the wetlands, and avoid fuel loading within the right-of-way. Additionally, BPA would be providing compensatory mitigation as required by the King County Code to mitigate for altering these wetlands. With respect to the Shoreline Management provisions of the King County Code, BPA's proposed project would not be considered to be directly affecting the coastal zone. Although the proposed transmission line would cross two Class 1 Streams, the Cedar and Raging rivers, which are governed by the Shoreline Management Act, no ground disturbing activities would be undertaken within 200 feet of these waterbodies.

382-032 Please see Section 5.2 of the SDEIS for a complete description of consultation with the U.S. Fish and Wildlife Service and NOAA Fisheries on threatened and endangered species. See also response to Comments 377-001, 382-014, 394-010, 394-088, 400-001, and 411-013.

382-033 The DEIS (Pages 5-16) stated that the HCP covers only actions by the City of Seattle, and that activities undertaken by other agencies are not addressed by the HCP, and therefore, require separate reviews by FWS and NMFS. Furthermore, the DEIS stated that BPA is consulting with both FWS and NMFS to ensure compliance with the Endangered Species Act.

It is unlikely that the City of Seattle will be required to modify its HCP as a result of BPA's project.

While BPA is not requesting any changes to the HCP, BPA has purchased or will fund the purchase of land to provide compensatory mitigation to replace spotted owl habitat as well as to compensate for the conversion of forested wetlands to scrub/shrub as a result of project. See response to Comment 340-002.

While we recognize that the proposed project crosses the City of Seattle's CRW, we do not believe it will seriously interfere with the purpose or objectives of the HCP that Seattle Public Utilities recently adopted. While admittedly the project will have some adverse impacts, the proposed alternatives represent the least-damaging routes that could be identified. For example, impact to wetlands and cultural resources were avoided to the maximum extent practical. Additionally, BPA intends to mitigate for any adverse impacts resulting from project implementation in a manner consistent with the HCP purposes, and which will, in effect, keep the HCP whole.

382-034 Please see response to Comment 340-002.

382-035 Please see response to Comment 340-002.

382-036 Please see response to Comment 340-002.

382-037 BPA would be altering habitat on the CRW from a forested habitat to a non-forested habitat over the 5 mile right-of-way within the CRW. BPA has purchased land to offer as compensatory mitigation for the forested habitat that would be converted to a non-forest use. Please see response to Comment 340-002.

382-038 The 135-ft tall tower referred to in the EIS is an average based on past experience with 500-kV towers. The actual height of the towers would be determined during the design phase of the project. The towers flanking the Raging River will be sized to minimize clearing in riparian habitat. BPA is using double-circuit towers on the Cedar River crossing to eliminate clearing near the river.

382-039 BPA would be building access/spur roads outside of the cleared right-of-way only to avoid sensitive areas such as wetlands and their buffer areas. With regard to eliminating the need to access tower sites, BPA cannot do so. BPA needs access to each tower site to construct, operate and maintain the transmission system in a safe and reliable manner. BPA will specify that helicopter construction techniques be used for this project if BPA decides to build the transmission line.

BPA has no authority to eliminate roads in the Cedar River Watershed. Seattle Public Utilities owns all roads within its property boundaries. BPA holds easement rights across some of these roads.

382-040 Please see response to Comment 340-004. Topping is not a recommended alternative to tree removal and should only be used if there are no other alternatives.

382-041 Comment noted. As a result of this and another comment, BPA has requested that the tower steel manufacture not dip the tower steel in a solution of sodium dichromate prior to shipment. Sodium dichromate is commonly used on tower steel following the galvanizing process to prevent white rust from forming on the tower steel during shipment. This material is water soluble, and would add a short-term pollutant to the Watershed. BPA thanks the commenter for the comment.

382-042 In response to comments, the SDEIS includes more information about these topics. BPA has initiated formal consultation with the USFWS and has concluded informal consultation with NMFS.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-383
RECEIPT DATE: SEP 04 2001

5027 19th AVE NE
SEATTLE, WA 98105
AUGUST 29, 2001

Communications
attn: Mr Lou Driessen, Project Manager
Bonneville Power Administration - KC-7
PO BOX 12999
Portland, Oregon 97212

Dear Mr. Driessen,

383-001 I am writing with regard to the Bonneville Power Administration's interest in building new powerlines in the Cedar and Raging River watersheds.

I appreciate the importance of providing electricity to customers and I admire BPA's ability to do so at a low cost. I am concerned however with BPA's proposal to install nine miles of 500 kilovolt lines with a necessity of clearing away between one hundred fifty to two hundred eighty five feet worth of trees. I am also concerned about the plans BPA has to build one and a half miles of new roads in order to accomplish this task.

Mr. Driessen, I am sure that you care about the ecosystem and that you love the outdoors as much as the next person. I gather that you comprehend the importance of low elevation forests, rapid loss of forests in King County, and Seattle's decision to preserve its watershed forests.

Sir, I am against building new 500 kilovolt

383-001 Please see responses to Comment Letter 361.

Mr Lou Driessen
August 29, 2001
page two

lines through the watersheds and I am opposed to construction of any roads in them. One of the reasons for my position sir, has to do with salmon fisheries in Raging River as well as Seattle's attempts to reestablish salmon in Cedar River.

383-002 Mr. Driessen, I do however support BPA adding additional circuits to towers in the existing corridor, if safe and if it can be done for a reasonable cost and without threat to BPA's workers.

Furthermore, I believe it to be of the utmost importance that any and all forests and wetlands that have been damaged by BPA be repaired through replacement. I also respectfully request a new Environmental Impact Statement with nothing less than all needed information, a substantive cumulative effects analysis as well as additional alternatives.

This letter states my position Mr. Driessen. I know BPA has a lot of pressure to produce but I think it can get the job done without harming our beautiful watersheds.

Tom Hundley
TOM HUNDLEY
tom@principia.edu

383-002 Please see the response to Comment 340-003.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-384
RECEIPT DATE: SEP 04 2001

4244 NE 88th Street
Seattle, WA 98115
August 31, 2001

Lou Driessen, Project Manager
Communications
Bonneville Power Administration - KC -7
Post Office Box 12999
Portland, OR 97212

Dear Project Manager:

384-001 This is to ask that the Bonneville Power Administration **build any new power lines through the Cedar and Raging River watersheds on already existing towers.**

384-002 The current plan--to clearcut a swath of forest (currently protected from logging) within the watershed and to construct new road--would have severe, extensive impacts throughout both watersheds. Wetlands, salmon grounds and fisheries, and forest habitat--all of which are at risk -- would be impacted by such a plan.

384-003 From my work in wetlands, I've found that mitigation does not recreate damaged or destroyed wetlands or forest. It may on paper, but the reality in every case is that the ecosystem never again works as it did before. This is true even for relatively small projects such as the BPA's proposed new 500 kilovolt line. A new Environmental Impact Statement (DEIS) is needed, with information and analysis of cumulative effects along with additional alternatives for the proposal to build within the Cedar River watershed.

I think it's vitally important to respect the sanctity of a protected watershed.

Sincerely,

Lynn Pruzan

Lynn Pruzan

384-001 Please see the response to Comment 340-003.

384-002 See response to Comment Letter 361.

384-003 See response to Comment Letter 361.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-385
RECEIPT DATE:

Dear BPA Project Manager,

385-001 Please enter this letter into the public record with regards to the DEIS for the Kangley-Echo Lake Transmission Line Project.

I'd like to add my voice to those who are calling for the following.

385-002 ① Any new lines should be placed on existing towers.

② In any alternative, the BPA must fully mitigate for any impacts of its projects.
ie- Replace any forests you cut or wetlands you destroy

385-003 ③ A new EIS should be developed that fully considers the cumulative effects of this project & all alternatives.

Thank you,

Robert Watter
7624 NE 145 Av.
Vancouver, WA 98682

385-001 Please see the response to Comment 340-003.

385-002 BPA would not be filling any wetlands. See response to Comment 340-002.

385-003 Please see responses to Comments 350-003 and 357-003.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-386
RECEIPT DATE: SEP 04 2001

6215 Ravenna Avenue NE
Seattle, WA 98115-7025
August 31, 2001

Lou Driessen, Project Manager
Communications
Bonneville Power Administration - KC -7
Post Office Box 12999
Portland, OR 97212

Dear Project Manager:

386-001 **Please, build any new power lines through the Cedar and Raging River watersheds on already existing towers.**

386-002 Also, please offer a new Environmental Impact Statement that supplies a substantive cumulative effects analysis of the proposal to build in the Cedar River Watershed, along with additional alternatives. The current plan--to clearcut a swath of forest (currently protected from logging) within the watershed and to construct new road--would have severe, extensive impacts throughout both the Raging River and the Cedar River watersheds. Wetlands, salmon grounds and fisheries, and forest habitat--all of which are at risk --would be impacted by such a plan.

Sincerely,

Ceci Cordova

386-001 Please see the response to Comment 340-003.

386-002 Please see response to Comments 340-002 and 357-003.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-387
RECEIPT DATE:
SEP 04 2001

4250 NE 88th Street
Seattle, WA 98115
1 September 2001

To the attention of: Lou Driessen, Project Manager
C/o Communications
Bonneville Power Administration - KC -7
Post Office Box 12999
Portland, OR 97212

Dear Project Manager:

Please, build any new power lines through the Cedar and Raging River watersheds on already existing towers.

387-001 Also, please offer a new Environmental Impact Statement that supplies a substantive cumulative effects analysis of the proposal to build in the Cedar River Watershed, along with additional alternatives. The current plan--to clearcut a swath of forest (currently protected from logging) within the watershed and to construct new road--would have severe, extensive impacts throughout both the Raging River and the Cedar River watersheds. Wetlands, salmon grounds and fisheries, and forest habitat--all of which are at risk --would be impacted by such a plan.

Sincerely,

Alice Wiren and Hal Wiren

ALICE WIREN and HAL WIREN

387-001 Please see response to Comment 386.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-388
RECEIPT DATE: SEP 04 2001

Aug. 29, 2001

Dear Lou Driessen,

We, the residents of Seattle, worked hard to have the Cedar River and the Raging River watersheds protected from tree cutting and from road building and to have past damage restored so we can be assured of a safe water supply

388-001 You already have a right of way through these watersheds that you can use for your expansion or you can use alternat routes outside of the watersheds.

388-002 I strongly oppose the proposed powerline that will further destroy our watersheds; on which there has been no offer of replacement forest and wetlands; and for which impact analysis and alternatives have not been prepared.

Sincerely

Tabitha Kiesel
109 NW 76
Seattle Wa 98117

388-001 Please see the response to Comment 340-003.

388-002 See response to Comment 340-002. The SDEIS identified the impacts of the Proposed Action and the impacts of the alternatives to the Proposed Action, including the No Action Alternative. The Administrator of BPA will use the SDEIS and the Final EIS to make a decision on the Proposed Action.

Telephone comment by Ginny Kuehn
9/4/01

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-389
RECEIPT DATE:
SEP 04 2001

Doug Lawrenson
3232 Conkling Place W.
Seattle, WA 98119
(206) 283-4350

389-001 I object strongly to the idea that this power line would go through Seattle's watershed, which has just gone through extensive public process to keep the city river watershed undisturbed and clean. The idea that old growth forests and the watershed maybe cut down for this power line is absolutely appalling and I am hoping that when you come up with the final scope of the EIS that it will include routes that avoid construction and maintenance in Seattle's watershed, not just Seattle's watershed. Seattle supplies water too much of the regions from this watershed. So I am absolutely adamant that you need to find routes that go outside the watershed and that don't cut down old growth forests.

Thank you.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Tuesday, September 04, 2001 4:39 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Cedar River Watershed

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-391
RECEIPT DATE:
SEP 05 2001

-----Original Message-----
From: James T Michel [mailto:micheljt@hotmail.com]
Sent: Tuesday, September 04, 2001 3:34 PM
To: lcdriessen@bpa.gov
Subject: Cedar River Watershed

Lou,

391-001 It has come to my attention that the BPA is considering cutting a new 9 mile
swath of the cedar river watershed to run new power lines. I am very opposed to this proposal. Currently, lines already exist, and running additional lines along the already existing corridor would be considerably
less invasive than removing trees form one very important watershed to further scar this unique wildlife habitat.

Please do not Cut any more in the Cedar River Watershed.

Best Regards,

James T. Michel
3018 26th Ave W
Seattle, WA 98199

389-001 Please see response to Comment 382-018.

391-001 Please see the response to Comment 340-003.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Tuesday, September 04, 2001 5:17 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Biodiversity Project, Kangley - echo lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-392
RECEIPT DATE:
SEP 0 5 2001

-----Original Message-----
From: Jill McGrath [mailto:cbcnews@cascade.org]
Sent: Tuesday, September 04, 2001 4:58 PM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: Biodiversity Project

To Lou Driessen, Project Manager:

Greetings,

I am writing to ask that the BPA not put any new lines on the existing towers. I understand that the BPA wants to build 9 miles of new 500 kilovolt line through the Cedar and Raging River watersheds. This would include 1.5 miles of new road construction. This plan would destroy forests recently protected by the City of Seattle.

392-001 Cutting of trees could be as far as 200' from the powerline, especially if it is old growth forest...not the 75' as is implied in the summary.

Would BPA build a powerline through Mt. Rainier National Park? Then why does it propose to through our watersheds?

I support adding additional circuits to towers in the existing corridor; I support having a new EIS with needed information on any decision.

In any alternative chosen, BPA must fully mitigate the impacts of the projects. That means replacing any forests that are cut.

Sincerely,

Jill McGrath
6743 Palatine Ave N
Seattle, WA 98103

392-001 Please see the response to Comment Letter 361.

Kuehn, Ginny -KC-7

PUBLIC INVOLVEMENT
LOG#: KE LT-353
RECEIPT DATE:
SEP 0 5 2001

From: Driessen, Laurens C - TNP-3
Sent: Tuesday, September 04, 2001 5:18 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Raging Cedar (Kangley-Echo Lake Transmission) Line

-----Original Message-----
From: Donald Potter [mailto:potter.d@ghc.org]
Sent: Tuesday, September 04, 2001 4:18 PM
To: lcdriessen@bpa.gov
Subject: Raging Cedar (Kangley-Echo Lake Transmission) Line

Dear Mr. Driessen,

I have been aware of the proposed Raging Cedar Powerline proposal for several months now, and am distressed that it would cause a number of environmental problems.

393-001 First, it destroys forests, including Seattle's watershed, which is now protected from logging. The loss of a forest is more than just a loss of timber revenue, but is a permanent loss of habitat, which is rapidly becoming scarce in this highly populated portion of the state.

Second, no mitigation of replaced forests is included in the proposal, and should be.

Third, the area encompasses a unique lowland forest, including old growth forest. Such projects fragment the forest and connectivity so vital for the survival and migration of species, both flora and fauna.

Please, do the following:
--add additional circuits to towers in the existing corridor
--replace any forests or wetlands that are damaged
--complete a new EIS with substantive cumulative effects analysis and additional alternatives, including conservation.

Thank you

Respectfully yours,

Donald E. Potter, MD
3823 140 th Ave NE
Bellevue, WA 98005-1473
e-mail: potter.d@ghc.org

393-001 Please see the response to Comment Letter 361.

Kuehn, Ginny -KC-7

From: Edvondrasek@aol.com
Sent: Wednesday, September 05, 2001 6:30 PM
To: lcdriessen@bpa.gov
Cc: comment@bpa.gov
Subject: (no subject)

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-396
RECEIPT DATE:
SEP 0 6 2001

Dear Sir, September 4, 2001

396-001 I am writing to voice my strong opposition to your proposed Raging Cedar Powerline Project.

I worked hard with the Pacific Crest Biodiversity Project (where I serve on the Board of Directors) and the Protect Our Watershed Alliance to move the City of Seattle to protect the watershed and the forests and fisheries it holds, and to create the HCP to which the City is accountable. This proposed powerline would violate the HCP, which disallows any logging of the type required by this project in our watershed. This project should not even be considered in this protected area. No logging is legal in our watershed and the goals of the HCP are to remove roads not to cut new ones.

I demand that BPA drop this proposal immediately and consider legal (and ecologically sound) alternatives, such as adding additional circuits to towers in existing corridors. I request a new EIS with information including a substabtive cumulative analysis and the addition of conservation alternatives.

Please keep me informed about the proposed project. Thank you.

Sincerely,
Chris Vondrasek
4742 35th Avenue S.
Seattle, WA 98118
email: bp649@scn.org

396-001 Please see responses to Comment Letter 361.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Monday, September 10, 2001 7:52 AM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Mr. Dreissen's reply, Kangley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-397
RECEIPT DATE:
SEP 10 2001

-----Original Message-----
From: Judy Lightfoot [mailto:jhlightfoot@hotmail.com]
Sent: Friday, September 07, 2001 12:04 PM
To: comment@bpa.gov; lcdriessen@bpa.gov
Subject: Mr. Dreissen's reply

Dear Mr. Dreissen,
Either you are being disingenuous for PR purposes or you didn't read my message carefully. I did not ask that the same lines or circuits be used for
additional power. Another possible option is to put up new towers in the

same clearcut swaths, if necessary slightly widened, instead of clearcutting
new swaths in different areas. Please be careful to understand public comments on this important issue.
Thanks,
Judy Lightfoot

>
>Date: Mon, 3 Sep 2001 21:15:34 -0700
>From: "Driessen, Laurens C - TNP-3" <lcdriessen@bpa.gov>
>Subject: RE: Bonneville Power clearcuts
>
397-001 > [The following text is in the "iso-8859-1" character set.]
> [Your display is set for the "US-ASCII" character set.]
> [Some characters may be displayed incorrectly.]
>
>Thank you for your comments. We will include them along with those from
>others to determine the selection of the final plan/alternative and
>mitigation measures. We are also concerned about the impacts to the
>natural
>environment and are looking at ways to mitigate as indicated in the Draft
>EIS. Concerning your suggestion of putting the new line together with the
>existing line, we cannot do that for reliability reasons, also described in
>the DEIS. It would be to big of a disaster to our electrical system to

>have
>both lines go out at the same time as is more likely in a double circuit
>situation.
>
> Lou
>
>-----Original Message-----

>Dear Mr. Dreissen:
>
>I am deeply concerned about the clearcut that the Bonneville Power
>Administration proposes to make within the Cedar River Watershed.
>Instead, why not improve the existing corridor? Bonneville could add
>additional circuits to the towers in the present corridor instead of
>clearcutting for a new corridor. In any case, an Environmental Impact
>Statement that includes conservation options is absolutely essential.
>
>Sincerely,
>
> Doug Schuler and Terry Frankel
> Seattle
>Judy Lightfoot, PhD
1326 NE 62nd St
Seattle, WA 98115
206/522-2269
http://www.homestead.com/judy_lightfoot

397-001 BPA is proposing to construct a new 500-kV line immediately adjacent to the existing 500-kV line from near the tap point to the Echo Lake Substation. Paralleling the existing 500-kV line would take advantage of the existing access road system already in place, and also the clearing that has taken place for the existing line. The reason that the second line could not be located within the same 150-foot wide right-of-way is that it would violate BPA design standards. Right-of-way widths are established to ensure safe, reliable operation of the lines. The existing 500-kV line is located in the center of the 150-foot-wide right-of-way. The proposed line also would be located in the center of a 150-foot-wide right-of-way; therefore if the line were built the two lines would be 150 feet apart. This is the minimum distance that the two lines could be operated safely and reliably. Section 2.3.8 of the SDEIS examines use of double-circuit towers. Also see responses to Comments 426-002 and 1459-009.

A non-transmission alternative that included conservation has been fully analyzed in the SDEIS. See Section 2.2.9 and Appendix J of the SDEIS.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-399
RECEIPT DATE:
SEP 10 2001

6528 - 50TH AVENUE NE
SEATTLE, WA 98115
SEPTEMBER 1, 2001

LOU DRIESSEN, PROJECT MANAGER
COMMUNICATIONS
BONNEVILLE POWER ADMINISTRATION - KC-7
POST OFFICE BOX 12999
PORTLAND, OR 97212

DEAR PROJECT MANAGER:

399-001 PLEASE, BUILD ANY NEW POWER LINES THROUGH THE CEDAR AND RAGING RIVER WATERSHEDS ON ALREADY EXISTING TOWERS.

399-002 ALSO, PLEASE OFFER A NEW ENVIRONMENTAL IMPACT STATEMENT THAT SUPPLIES A SUBSTANTIVE CUMULATIVE EFFECTS ANALYSIS OF THE PROPOSAL TO BUILD IN THE CEDAR RIVER WATERSHED, ALONG WITH ADDITIONAL ALTERNATIVES. THE CURRENT PLAN--TO CLEARCUT A SWATH OF FOREST (CURRENTLY PROTECTED FROM LOGGING) WITHIN THE WATERSHED AND TO CONSTRUCT NEW ROAD--WOULD HAVE SEVERE, EXTENSIVE IMPACTS THROUGHOUT BOTH THE RAGING RIVER AND THE CEDAR RIVER WATERSHEDS. WETLANDS, SALMON GROUNDS AND FISHERIES, AND FOREST HABITAT--ALL OF WHICH ARE AT RISK --WOULD BE IMPACTED BY SUCH A PLAN.

SINCERELY,

CARL PRUZAN

MARIAN PRUZAN

399-001 Please see responses to Comment Letter 361.

399-002 Please see SDEIS for more information about cumulative impacts.

Pacific Crest Biodiversity Project
4649 Sunnyside Ave N #321
Seattle, WA 98103

Ph: (206)545-3734
Fax: (206)545-4498
Email: pcbpinfo@pcbp.org
Web: www.pcbp.org

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-400
RECEIPT DATE:
SEP 10 2001

Lou Driessen, Project Manager
Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208

August 30, 2001

RE: Kangley - Echo Lake Transmission Project

Dear Mr. Driessen:

The Pacific Crest Biodiversity Project, a nonprofit organization with approximately 2,000 members, is dedicated to the protection and restoration of forest ecosystems in the Pacific Northwest. We played a key role in facilitating public involvement in the development of the Cedar River Habitat Conservation Plan and advocated an end to the commercial timber sale program within the watershed.

Just over two years ago, in a unanimous and historic vote, the Seattle City Council voted to end commercial logging in the Cedar River Watershed. The vote was a conclusion to a remarkable public process in which more than a thousand people turned out to hearings and hundreds submitted comments. When the process began, the city was not planning to consider an alternative with no commercial logging. In the end, overwhelming public support for making 100% of the watershed an ecological reserve and a willingness of customers to pay an additional $4 per average household per year led to the about-face. The city also expanded its goals for road decommissioning based on public input.

400-001 Especially within this context, proposals to cut trees or build roads in the watershed for anything but water quality or ecological integrity must be taken very seriously. It's as if the agency were proposing to cut a swath through an important park or wildlife refuge. We don't see how such a project could be consistent with Seattle's HCP for the watershed and are disappointed not to see a thorough discussion of this issue in the Draft EIS. We feel that the public should have the opportunity to see what the National Marine Fisheries Service and US Fish and Wildlife have to say about conflicts or consistency with the HCP before the project reaches the Final EIS stage.

About conservation: this was given minimal treatment in the DEIS. We do not feel BPA have given the public adequate information about the potential for conservation to

400-001 BPA agrees that the Cedar River Watershed is a very valuable water source and wildlife resource, and that any intrusions into the area should not occur lightly, or without good cause. The DEIS and SDEIS was sent to both USFWS and NMFS, who were invited to comment on the proposed transmission line. We have initiated formal consultation with USFWS and have concluded informal consultation with NMFS. See Appendix U.

The HCP is a plan that SPU had to prepare to build the Landsburg fish ladder and return chinook salmon to the upper Cedar River. It is a plan that was entered into between the landowner, Seattle Public Utilities, two state agencies, Washington State Department of Ecology and the State Department of Health, and the two federal agencies that have responsibilities under the Endangered species Act, the Fish and Wildlife Service and the National Marine Fisheries Service. As a federal agency, BPA does not prepare habitat conservation plans (HCPs), but instead is coordinating with these federal agencies under Section 7 consultation.

While SPU's HCP is not applicable to BPA's activities, BPA is subject to the Coastal Zone Management Act, which requires federal agencies to be consistent, to the extent practicable, with all applicable local, state and federal plans and programs in exercising its mission as the federal power marketing agency in the Northwest.

BPA contacted NMFS and USFWS earlier on in the project to request their participation as "cooperating agencies" under the National Environmental Policy Act of 1969, as amended. Both agencies declined. Subsequently, in early summer 2001, BPA prepared a biological assessment that identified what impacts, if any, would be created for listed and candidate species, as a result of the proposed project. BPA subsequently prepared an addendum to the BA, submitting additional information requested by FWS after receiving a letter from them stating that it could not concur in BPA's finding of no affect on the northern spotted owl, and requested that BPA enter into formal consultation with the agency. NMFS subsequently concluded that since the Proposed Action incorporates avoidance and minimization measures into the project, the agency can expect the effects of the action "to be discountable or insignificant."

400-002 obviate the need for this project. When the call went out from local government agencies to conserve energy during the acute phase of the power crunch, the response was swift and significant. How much would the region need to conserve to avoid the brownouts you project within a few years? In a supplemental EIS, please thoroughly evaluate a conservation option and allow the public to determine whether the targets are attainable.

400-003 We also do not feel it was appropriate for BPA to reject from further consideration the option of using the existing towers for the new lines. If you can deliver the power you believe is needed without clearing more forest or building more roads, please thoroughly analyze this alternative in supplemental EIS.

400-004 We feel that any option that clears forest or builds roads in the Cedar River Watershed is a nonstarter. That said, the analysis for any alternative that does contemplate destroying habitat must include mitigation measures and must factor in the associated costs. In our view, appropriate mitigation requires that any forest cleared be replaced in kind and that any new road miles be accompanied by the decommissioning of an equal number of road miles within the same watershed. To account for fragmentation caused by a newly cleared swath, additional replacement forest will likely be required for adequate mitigation.

400-005 Please issue an additional EIS that thoroughly analyzes the potential for conservation, alternatives prematurely rejected, and the relationship of the project to Seattle's HCP. We urge Bonneville Power Administration to present a preferred alternative which requires no clearcutting or roadbuilding within the Cedar River Watershed. To do otherwise flies in the face of the will of Seattle-area citizens and the historic, fifty-year plan enacted just two years ago.

Sincerely,

David Atcheson
Vice President

Therefore, NMFS concurred with BPA's effect determination of "may affect, but not likely to adversely affect" for the Puget Sound Chinook and their designated critical habitat. BPA has, therefore, concluded informal consultation with NMFS.

BPA has entered into formal consultation with the FWS. BPA will conclude this formal consultation with the agency prior to initiating any construction activities.

400-002 Please see response to Comment 409-002.

400-003 Please see the response to Comment 340-003.

400-004 See response to Comment 340-002.

With respect to the road issue, BPA would be building about 1-1/2 miles of new road within the Cedar River Municipal Watershed to build, operate and maintain the line. About half a mile of road in the CRW that crosses wetlands would be removed from service. Although BPA would be acquiring the rights to build these roads, it would have no authority to abandon any existing roads within the Cedar River Watershed, outside of those that it presently uses to operate and maintain the existing Raver-Echo Lake 500-kV line located there.

400-005 Please see response to Comment 357-003.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Monday, September 10, 2001 5:05 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Mr. Dreissen's reply

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT- 401
RECEIPT DATE: SEP 11 2001

-----Original Message-----
From: Judy Lightfoot [mailto:jhlightfoot@hotmail.com]
Sent: Monday, September 10, 2001 11:03 AM
To: lcdriessen@bpa.gov
Subject: RE: Mr. Dreissen's reply

401-001 Thank you for this explanation. How wide is the existing clearcut? How wide
will the widened clearcut be?
Thank you for your attention and time--
Judy Lightfoot, PhD
1326 NE 62nd St
Seattle, WA 98115
206/522-2269
http://www.homestead.com/judy_lightfoot

>From: "Driessen, Laurens C - TNP-3" <lcdriessen@bpa.gov>
>To: "'Judy Lightfoot'" <jhlightfoot@hotmail.com>
>Subject: RE: Mr. Dreissen's reply
>Date: Mon, 10 Sep 2001 07:51:49 -0700
>
>The preferred plan is to parallel immediately next to the existing line
>thereby reducing the amount of clearing needed as stated in the Draft EIS.
>We cannot put the new line in the existing R/W without doing any clearing.
>There is just not enough room. The only way to put the new line in the
>existing clearing is to remove the existing line and replace it with towers
>that would support the existing line and the new line such that both
>circuits would be on the same structure. That would be unacceptable from a
>reliability standpoint. So the preferred option is doing what you are
>suggesting, utilizing the existing right of way to the extend possible and
>minimizing clearing. In addition, we normally take any tree outside of the
>right of way that could potentially fall into the new line. In this case
>through the watershed, we are planning to take only those trees that are
>unhealthy and leaning heavily towards the line and are most likely to fall
>down in a heavy wind. All healthy trees would be allowed to remain. I
>think we have a preferred option that takes into account all the aspects
>and
>concerns while meeting the needs of the project and minimizing the
>environmental impacts to the watershed, other natural environments and
>people impacts. Hope this helps.
>
> Take care
>
> Lou

401-001 The existing Raver-Echo Lake 500-kV Transmission Line is located on a 150-foot-wide right-of-way, the same width as the proposed right-of-way.

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Washington State Convention & Trade Center

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Pam Beyenhof, Director
King County Department of Natural Resources
Dennis Black, Snoqualmie Pass
Jessica Dreyer-Buerhaus, Community Relations
Ross Bogue, Director of Operations - Fabrication
The Boeing Company
Ken Bounds, Superintendent, Seattle Parks & Rec
Mark Boyer, Middle Fork Outdoor Recreation Coalition
Brian Boyle, Mayor, City of Redmond*
Joanne Burnie*
Save Lake Sammamish, Friends of Cougar Mtn
Bonnie Bunning, S. Puget Sound Region Manager
Washington State Department of Natural Resources
Dick Cassay, Puget Materials Inc
Jim Chan, Parks & Recreation Commission
King County Parks & Recreation Division
Cecil Clark, Cascade Environmental Systems*
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Northwest Chapter, American Planning Association
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Bruce Dyer, Mayor, City of Issaquah
Dave Dunn, Washington Department of Natural Resources
Director, Office of Public Affairs
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Robert Gelb
Gail Hunt, Research Member, Chamber of Commerce
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WA State Enterprise
Jerry Ivers, Director of Mayor's Office*
Puget Sound Energy
Bill Kirby, King County Commissioner
Peggy Hennessy, Acting Director
Bellevue Parks and Community Services
Dianne Kirk, Port Protocol
The Mountaineers

Jeff Jones, General Manager
TCI Cablevision of Washington
Sandra Kaplan, Artist
Sierra Club
Washington Chapter
Trees St. Northwest Preservation Society
James Kenny, Director of Parks, King County
Jean Kim, Vice President, City of Kirkland
Bob Lagerquist, Land & Resource Team Coordinator
Seattle City Light
Doug Larsen, Director
Project Coordinator, Parks and Cultural Resources
Cougar Mtn Preserve*
Jim Lindberg, Public Lands
Northwest CPO, Professor, Retired
Gary Locke, Governor, State of Washington*
Dick Lyons, Director, Puget Sound Region, Mayor
Lynne Manuel, Bellevue City Council
Jim McDonald, Trade Specialist, 4th District
Peter McGarvey, Senior Attorney*
Alaska Airlines Corporation

Kathleen Mirsky, Board
Kitsap Mitigation Bank
Jeanne Nelson*
Cedar Grove Composting
Dave Nemer, Consultant
Brad Owen, State Senator
Lori Pickett, Consultant
Washington State Department of Transportation
Earl Phillips, Superintendent of Schools
Cle Elum-Roslyn School District
Ellen Pierce, Executive Director
Olympic Peninsula Visitors Bureau, Special Retired
Jane Quinn, Northwest Regional Administrator
Commander, Seattle Department of Transportation
Ray Quinn, Consultant, Retired
John Prosser, Planner, Supervisor
Mt Baker-Snoqualmie National Forest
Gary Rose, Director
Washington Recreation and Parks Association
Jacqueline Ross, Director, Regional Administrator
Washington State, Department of Transportation

Fred Rutkowski, Seattle Civic Leader
Charles Rivers, Tennis Club Director
Tolmie Creek Watershed Project
Don Ross, Area Director, 8th District
Paul Schaff, Mayor, City of Sammamish
Richard Schoen, CEO, Schoen Development
Kathleen Shaff, King County Executive*
Roger Shuler, C.E.T., Ranger District
Snoqualmie National Forest
Dave Richard Simms
University of Washington College of Forest Resources
Mark Sollitsch, Pacific Rim Forest Retired
Jack Stanley, Vice President, Jay Bank N.A.*
Oliver Stoller, Deputy Regional Director
National Park Service
Jim Tanner, Former King County
City of Duvall, Senior Vice President
Commercial Bank
Dave Vaagen, Manager, Land Use Planning
Puget Sound Energy, Company
* Member Executive Committee

MOUNTAINS TO SOUND GREENWAY

Advisory Council
Anthony Angell, Supervisor
WA Office of Environmental Education
Gary Benton, Mayor, City of Cle Elum
Priscilla Coates, Trustee, The B.L. Stimson Foundation, Inc
Mike Creighton, Mayor, City of Bellevue
Brendan Dennis, Community Leader
Jim Delaney, Mayor, City of South Cle Elum
Dave Durbin, King County Council Member, City of Rossyln
George D.W. Former President
Greater Seattle Chamber of Commerce
Rudy Fiorenzi, North Bend Dairy Manager
M. Baker, Snoqualmie National Forest
Roger H. Fujioka, Chairman, CEO and President
Safeco Corporation
Joan M. Fitz, Chairman & CEO, Seattle Mariners
Dixon Edens, Former Governor & U.S. Senator
Rand Fletcher, Mayor, City of Snoqualmie
Diane Fitzsimmons, Bellevue Community College
Art Fraziger, Mayor, City of Issaquah
Jon Greenfield, Attorney, Davis Wright Tremaine
Lynn Grimsley, Community Leader
Jeanne Harris, Former Mayor, City of Snoqualmie
Roger Hoole, Former Mayor, City of Issaquah
Rex Hurley, President and CEO
Plum Creek Timber Company
Jeanne Hunt, Forest Land Use Manager
Weyerhaeuser Company
Rosemarie Ives, Mayor, City of Redmond
Carol James, King County Citizens for Open Space
Gene Johnson, King County Citizens for Open Space
Ann Judd, Executive Secretary
King County Labor Council
Phyllis Lamphere, Civic Leader, Seattle
Calvin Lindstrom, Kittitas Audubon Society, NPS
Margaret Macleod, Interagency Coordinator
Jackie Cougar Tiger Mountain Interagency Committee
Doug MacWilliams, Former Supervisor
Mt Baker-Snoqualmie National Forest
Doug McClelland, King District Manager
Department of Natural Resources
Jane Morris, President & CEO
Seattle King County Convention and Visitors Bureau
Frances North, North Bend Civic Leader
Lloyd Olson, Civic Leader, Cle Elum
Penny Peabody, Past President
King County Economic Development Council
David Ramos, Kirkland City Manager
Bob Rose, Conservation Consultant
Joan Simpson, Mayor, City of North Bend
Lee Sperry, Superintendent, Plum Creek Timber
Lee Springate
City of Bellevue Parks and Recreation Department
Lucy Steers, League of Women Voters of Washington
Catherine Stephenson, Cle Elum District Ranger
Wenatchee National Forest
Arlene Wade, Cascade Pioneer 2000
Southwest Seattle Historical Society
Bob Watt, President
Greater Seattle Chamber of Commerce
Bernie Whitebear, Executive Director
United Indians of All Tribes Foundation
Colleen Willoughby, Civic Leader, Seattle

1011 WESTERN AVENUE
SUITE 606
SEATTLE, WA 98104

PHONE (206) 382-5565
VOLUNTEER LINE (206) 812-0122
FAX (206) 382-3414

WWW.MTSGREENWAY.ORG
EMAIL: MTSGREENWAY@TPL.ORG

August 31, 2001

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-402
RECEIPT DATE:
SEP 11 2001

Mr. Lou Driessen
c/o Communications, Bonneville Power Administration
P.O. Box 12999
Portland, OR 97212

Dear Mr. Driessen,

The Mountains to Sound Greenway Trust wishes to comment on the DEIS for the proposed Kangley-Echo Lake powerline expansion.

The private non-profit Greenway Trust and a variety of county, state and federal agencies have devoted significant, combined efforts and public funds for over ten years to create a permanent, multipurpose greenway corridor straddling I-90 from Seattle to the east side of the Cascade range. Through these combined efforts, over 80,000 acres have been brought into public ownership in the corridor, with goals to protect scenic values, wildlife habitat, forested landscapes, recreational opportunities, and environmental qualities. Over $80 million in public funding has been spent to conserve this broad landscape.

402-001 Because of these efforts, in 1999 the Greenway segment of the I-90 corridor was designated a "National Scenic Byway", the first interstate corridor in the nation so designated. This designation indicates that special consideration be given for any potential impacts to the scenic and visual character that now exists. As soon as BPA's Kangley-Echo Lake line crosses to the north face of Taylor Mountain it is within the viewscape of I-90 travelers who now enjoy a sweeping view over many miles of a forested basin. Doubling of the width of this power line corridor will negatively impact this view. Thus, we strongly suggest that BPA consider adding the additional power lines onto your existing towers, even if this requires replacing existing towers with a new design. In addition, we urge you to keep the cleared corridor width to an absolute minimum and to add a significant amount of plantings that minimizes the visual contrast between the power line corridor and the adjacent forest.

402-002

402-003

In the specific location of BPA's proposed power line expansion, the Greenway Trust and our partners have been instrumental in creating the

402-001 The proposed project would begin at the tap point at the southern end of the project and terminate at Echo Lake Substation, about a mile and a half south of I-90. The proposed line would not be located on the north face of Taylor Mountain; therefore, it would not be visible to travelers on I-90.

402-002 Please see the response to Comment 340-003. BPA will encourage low-growing vegetation in the right-of-way. BPA is proposing to use a "stable tree" criteria for identification of danger trees that would allow more trees to be left near the right-of-way. See Section 2.1.1.4 of the SDEIS.

402-003 and -004 Please see response to Comment 340-002.

August 31, 2001
Mr. Lou Driessen

"Snoqualmie Preservation Initiative," which will permanently conserve the forests of the Raging River basin from future development and impacts. We will soon secure public purchase of the 350-acre Trillium parcel in Section 26 that BPA's power line now passes through. This entire basin, as well as Tiger Mountain to the west, the Cedar River Watershed to the south, and Rattlesnake Mountain to the east have been deliberately conserved and will be managed as permanent forestland. Proposals for expanding power line corridors through any of these forests must carefully consider and absolutely minimize potential impacts to the multiple scenic, environmental, recreational, habitat, and forest product benefits that these forests provide. Much of the lowland forests of the Puget Sound region have been fragmented or lost; it is critical to carefully protect what remains.

402-004 Thus, the Greenway Trust is concerned that the DEIS for the Kangley-Echo Lake power line expansion makes no mention of mitigation for the permanent loss of forestland that the project proposes. We estimate the minimum, permanent loss of forest cover to be 150' (proposed corridor width) x 9 miles (proposed length) = 164 acres. In an era of salmon listings, new measures being taken to protect native vegetative cover and heightened sensitivity to the importance of forests for wildlife habitat, water quality and quantity, recreation, scenic values, air quality and carbon sequestration, and more, BPA should permanently replace the 164 acres of forest lost to clearing and "development" with a minimum of 164 forested acres elsewhere. Since the impacts of the proposed project are within the Greenway corridor, we believe that BPA should provide replacement forestlands within the corridor. This should be factored into the project costs and could be accomplished via a conservation easement or fee acquisition. The Trillium parcel, now held by the Trust for Public Land until public funding becomes available, offers an immediate mitigation opportunity if BPA wishes to participate in its public purchase.

402-005 Other proposals for development in this region have required compensating mitigation for loss of forestland and habitat. Most notably, King County has a "4:1 program" which requires a developer to donate 4 acres to public ownership for every one acre rezoned into a higher urban zoning status. The City of Issaquah has utilized an "Urban Village" designation to cluster proposed developments while permanently protecting 75% of each site as public forestland. The Cedar River Watershed implemented a new Habitat Conservation Plan to protect and restore its old-growth forest characteristics. These, and other programs have set a precedent that BPA should follow when planning for any new power line corridor in this region.

402-006 BPA's proposed approach to "danger trees" is another issue of concern. Cutting any tree within range of the powerline that MIGHT have a future impact is not acceptable. Just as the Cedar River Watershed is not allowing this approach across their land, BPA should take a similar approach along the entire 9-mile length, and use the "stable tree" approach everywhere. We also believe mitigation should be provided for any trees that are cut outside of the 150' proposed BPA ROW.

402-007 A great deal of effort and public investment has gone into creating the Mountains to Sound Greenway corridor and permanently protecting its scenic forested character. It should be the policy of BPA to minimize and mitigate any negative impacts its projects may bring to this corridor. Thank you for the opportunity to comment.

Yours truly,

James R. Ellis
President

402-005 In response to this and similar comments from government agencies, BPA is proposing to provide compensatory mitigation to offset impacts as a result of the Proposed Action. Please see response to Comment 340-002.

402-006 Please see response to Comment 340-004.

402-007 Comment noted.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-403
RECEIPT DATE:
SEP 12 2001

From: steve dubinsky & dina winkel [stevdina@oz.net]
Sent: Tuesday, September 11, 2001 9:14 PM
To: lcdriessen@bpa.gov; comment@bpa.gov
Subject: Kangley-Echo Lake transmission project

To Whom It May Concern -

I strongly disapprove of the plan to install 9 miles of new transmission lines through the Cedar River and Raging River watersheds.

403-001 I am concerned about the wildlife in this untouched area, which is vulnerable and can't fight back. We should know better than to intrude further into their habitat.

I am also concerned about the quality of the water that supplies the city. Construction of transmission lines will create silt and pollute runoff into the rivers and lakes. Erosion will strip the top soil of nutrients and adversely impact vegetation and wildlife.

403-002 PLEASE modify existing powerlines to carry the extra load, and leave the watershed alone.

Dina Winkel.

403-001 With respect to the comment that the commenter strongly disapproves of the proposal to construct the power line through the Cedar and Raging River watersheds, this comment is noted.

BPA is also concerned about the impacts of the proposed project on both the natural and human environment including impacts on fish and wildlife. Our SDEIS identified the impacts of the Proposed Action, and alternatives on the fisheries and wildlife resources (see Sections 4.6 and 4.7 of the SDEIS), and has also identified mitigation measures that would eliminate or at least minimize impacts identified.

We do not expect that any pollutants would enter surface waters as a result of the proposed project. BPA will comply with the National Pollutant Discharge Elimination System, and develop a storm water pollution prevention plan, prior to the onset of any construction activities. BPA will construct erosion control devices to prevent any sediment from entering surface waters, as required by the Clean Water Act, and the general permit issued by the state of Washington, Department of Ecology. To ensure that no pollutants enter ground water, BPA will leave the erosion control measures in place until the site is 70 percent stabilized, as required by the permit. Additionally, all disturbed areas would be reseeded following the completion of construction activities to reduce erosion.

403-002 Please see the response to Comment 340-003.

Kuehn, Ginny -KC-7

From:	Driessen, Laurens C - TNP-3	RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: KELT-404
Sent:	Wednesday, September 12, 2001 7:59 AM	
To:	Kuehn, Ginny -KC-7	
Cc:	Lynard, Gene P - KEC-4	RECEIPT DATE: SEP 12 2001
Subject:	FW: Cedar River Powerline, Kangley - Echo Lake	

-----Original Message-----
From: sierrasb@oz.net [mailto:sierrasb@oz.net]
Sent: Monday, September 10, 2001 3:02 PM
To: lcdriessen@bpa.gov
Subject: Cedar River Powerline

TO:
Bonneville Power Administration
PO Box 3621
Portland, OR 97208
lcdriessen@bpa.gov

FROM:
Shelly Baur
3926 SW Southern St.
Seattle, WA 98136

DATE: September 10, 2001

Dear BPA:

Seattle celebrated the protection of the Cedar River watershed, which I had thought would be protected for 50 years. Now, I find that BPA is undermining this protection with a proposed powerline. I want this to stop.

404-001 1. This pwerline is not necessary. BPA has not done all it can and should to conserve energy. Energy conservation was not pursued wholeheartedly during the 90s until the California energy crunch, and building powerlines through vital watersheds is not the answer to catching up.

404-002 2. I don't believe all alternatives to such a powerline have been exhausted such as lines through corridors already cut.

404-001 3. Your environmental impacts were not adequately assessed. I would like a new environmental impact statement done that looks at the watershed and its areas with the affects of all factors represented over time. This assessment should include alternatives.

404-004 4. You have not even attempted adequate mitigation for the proposed damage. If in the future such a line goes through, the forest, wetlands, riparian corridors, etc. should bought from private landowners in at least a 2 for 1 exchange so the public is compensated for its loss. This is necessary also in part so BPA has the full cost of such a project as part of its cost/benefit analysis. If included, I believe that the current costs outwiegh the benefits of the project as proposed and BPA will instead up the ante on conservation and alternative transmission measures.

So, do not build the line at this time.

Sincerely,

Shelly Baur

404-005 P.S.: Sorry I missed the official public comment period, but I do not feel BPA adequately advertised its intentions to the public, knowing how outraged we would be if it were well known. In future, I would like to see BPA advertise this more.

404-001 See response to Comment 349-001.

404-002 The Proposed Action would be next to an existing corridor.

404-003 See response to Comment 357-003.

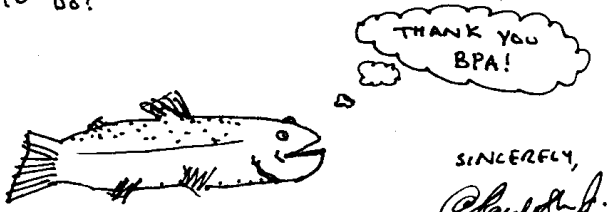
404-004 See response to Comment 340-002.

404-005 Comments noted. BPA does its best to notify all those who would either be affected by or interested in the Proposed Action. It does so early on after the system planners have identified a need. The comment period was extended from August 15th to September 4th, 2001. BPA tries to address all comments received even those submitted after the "official" review period has ended, to the extent possible.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-406
RECEIPT DATE: SEP 18 2001

DEAR MR. DRIESSEN,

406-001 PLEASE CONSIDER ENCOURAGING BPA TO PURCHASE AND PRESERVE AN EQUIVALENT AMOUNT OF LOW ELEVATION FORESTLAND THAT WOULD REPLACE THE LOSS OF HABITAT IN CEDAR RIVER FOREST. 4 OUT OF 5 SALMON AGREE... IT'S THE RIGHT THING TO DO!



SINCERELY,

RANDY SILL
2420 WESTLAKE
SEATTLE, WA. 98109

LOU DRIESSEN
BONNEVILLE POWER ADMINISTRATION
P.O. BOX 3621
PORTLAND, OR 97208-3621

TWP-3

406-001 Comment noted. BPA has purchased a 352-acre parcel formerly owned by the Trust for Public Land. This parcel is located immediately adjacent to and north of the Cedar River Municipal Watershed. The proposed power line would bisect the parcel. See also the response to Comment 340-002.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT- 407
RECEIPT DATE:
SEP 27 2001

1619 21st Ave. E.
Seattle, WA 98112
September 9, 2001

Mr. Lou Driessen
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Dear Mr. Driessen:

407-001 I thought that we locals had secured our watershed against any further logging. The sentiment against the Seattle Water Department's plan to keep rates down by continuing logging in the watershed ultimately prevailed. I assumed that was the end of it. Now it appears that the BPA wants to cut a wide swath through the watershed for a new power line. I am sure there are other routes for such a line. I hope you find such an alternative. I am opposed to the current BPA proposal.

Sincerely,

Christian Melgard

Christian Melgard

407-001 Comment noted.

1932 Eleventh Avenue East
Seattle, Washington 98102

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-408
RECEIPT DATE:
SEP 27 2001

September 10, 2001

Mr. Lou Driessen
Bonneville Power Administration
P.O. Box 3621
Portland, WA 97208-2621

Dear Mr. Driessen:

408-001 I am writing you to express my concern about BPA's intention to build a new power line in eastern King County. I am afraid it will destroy hundreds of acres of protected forest in the City of Seattle's Cedar River watershed. I understand that it will cross the salmon bearing Raging River and the future salmon bearing Cedar River. I also understand BPA intends to build new roads and expand the Echo Lake substation.

408-002 Mr. Driessen, I do not feel the Bonneville Power Administration has fully investigated the potential environmental damage this project will cause. Perhaps your Environmental Impact Study has not gone far enough. Do you fully understand the importance of the Cedar River forest? Or the cumulative effects of power lines which destroy and fragment OUR forests?

408-003 The construction of new power lines should require the replacement of damaged habitat. BPA should be required to acquire and preserve an equivalent amount of forestland elsewhere, perhaps some that is at risk of being developed commercially. I feel that BPA should bear the full REAL cost of building these power lines and not ignore the loss of important habitat for forest animals.

Please take our comments into consideration as you formulate BPA's strategy for expanding power service thru OUR forests.

Very truly yours,

David N. James

David N. James

408-001 Comment noted.

408-002 Comment noted.

408-003 Please see response to Comment 340-002.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, September 27, 2001 3:10 PM
To: Kuehn, Ginny -KC-7; Lynard, Gene P - KEC-4
Subject: FW: Please Protect the Cedar River Watershed

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-410
RECEIPT DATE:
SEP 27 2001

-----Original Message-----
From: Lisa Ramirez [mailto:lramirez@foe.org]
Sent: Thursday, September 27, 2001 2:24 PM
To: jim.compton@ci.seattle.wa.us; richard.conlin@ci.seattle.wa.us; jan.drago@ci.seattle.wa.us; margaret.pageler@ci.seattle.wa.us; peter.steinbrueck@ci.seattle.wa.us; heidi.wills@ci.seattle.wa.us; diana.gale@ci.seattle.wa.us; mayors.office@ci.seattle.wa.us; lcdriessen@bpa.gov
Subject: Please Protect the Cedar River Watershed

To My Elected Officials,

410-001 Please do not allow the Bonneville Power Administration to cut into our Cedar River Watershed. Their plan to clearcut a 9-mile strip of forest would adversely impact the ecosystem and our drinking water -- all for a powerline. This is unacceptable, especially since BPA has not even provided
any other viable options.

410-002 You already know the importance of this watershed. The Cedar River Watershed's fragile ecosystem is currently protected under an HCP. This area was threatened a few years ago by another logging proposal. To everyone's relief, the ecosystem was left in tact. Please do not allow the
logging to go through this time'

410-003 We must protect what is left, for us, for future generations, and for the
health of the planet. Please do the right thing and oppose BPA's destructive plan.

Thank you,
Lisa Ramirez
Seattle, WA

410-001, -002, and -003 Comments noted.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-412
RECEIPT DATE: OCT 04 2001

From: Micki Larimer [mickilarimer@home.com]
Sent: Wednesday, October 03, 2001 5:39 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Line

Dear BPA officials,

412-001 In the wake of the September 11th tragedies, Americans are more aware than ever of the potential for contamination of our air and water supplies. While the threat of extreme contamination from radicals outside our country looms large in the national psyche, the likelihood of our slowly poisoning ourselves must still be protected against. I urge you as a fellow Americans and representatives of our great country to protect the water supply of the Northwest's economic and and cultural center. Seek out and implement alternative routes for the Kangley- Echo Lake Transmission line that do not pose a threat to the Cedar River Watershed, or other vital water sources.

Sincerely,

Lari M. Larimer
Bellevue, WA

412-001 Comment noted. Though BPA's Proposed Action would cross through the Cedar River Municipal Watershed, BPA does not believe that this line is a threat to the Watershed. BPA is undertaking extraordinary measures to ensure that it does not, threaten the watershed, including providing compensatory mitigation to replace that forest habitat that would be converted to non-forest habitat following project implementation. See response to Comment 340-002.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-414
RECEIPT DATE: OCT 16 2001

Kangley-Echo Transmission Project

Telephone comment by Ginny Kuehn
1/16/01

Eldon Ball
Phone # 206-366-8405

414-001 I am calling in regard to the proposed transmission line through the Cedar River watershed. The transmission lines that were built across the Cascades from the Columbia River dams to western Washington were probably built in the 40's, 50's, 60's or 70's. I don't think there is anything much newer than that. It seems to me that with four or five transmission lines across Stampede Pass, four across Stevens Pass, one across Snoqualmie Pass that perhaps you could update some of the old lines that were 110 or 230 kilovolt and make them 500 kilovolt lines and don't track through additional watershed areas that are old growth forest that is pristine and shouldn't be damaged, maybe you could use some of your existing rights-of-way and just use them more efficiently.

I would like a reply.

Thank you.

414-001 Please see the response to Comment 340-003.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, October 18, 2001 12:16 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Kangley comment

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-415
RECEIPT DATE: OCT 19 2001

Another comment

-----Original Message-----
From: Hilary B. Bramwell [mailto:hilarybb@u.washington.edu]
Sent: Thursday, October 18, 2001 9:31 AM
To: florrainebodi@bpa.gov; comment@bpa.gov
Subject: Cedar river watershed

415-001 Hi. My name is Hilary Bramwell, and I am a resident of Seattle. I'm very concerned with the future health
of MY DRINKING WATER. I am writing to say that I absolutely am against the BPA's plan to build through the watershed area. Please realize that INDIVIDUALS (1.3 million of them) will be deeply affected. I'm sorry, but the purity of the water we have available to put in our bodies is more important than selling power to Canada. If you DON'T think it is, then you have some whacked-out priorities in my opinion. If you go through with the plan, I'm going to have to send the federal government a bill for my bottled water costs. I know they won't pay it, but hey, I'm really pissed off, and want to make people realize the implications of building transmission lines through the watershed area.
Please consider the human element here, as well as the environmental one. What BPA is planning just isn't right or fair. Thanks for listening.
sincerely, Hilary Bramwell

415-001 Comment noted.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOGIN: KEL T- #16
RECEIPT DATE: OCT 19 2001

From: Lynard, Gene P - KEC-4
Sent: Wednesday, October 17, 2001 11:12 AM
To: Kuehn, Ginny -KC-7; Taves, John - KR-7C
Subject: FW: Regarding the Cedar River Watershed

-----Original Message-----
From: Michael Shank [mailto:michaels@pcbp.org]
Sent: Tuesday, October 16, 2001 3:09 PM
To: 'gplynard@bpa.gov'
Subject: Regarding the Cedar River Watershed

Greetings, Gene!

My name is Michael Shank and I'm serving as the Membership Coordinator for
Pacific Crest Biodiversity Project. The Biodiversity Project spearheaded
Protect Our Watershed Alliance, an environmental coalition that protected
the Cedar River Watershed from commercial logging three years ago.

I have a few questions that have gone unanswered by Lou Driessen and I
thought you might be able to answer them.

416-001 We (along with SPU and the Seattle City Council) have asked that BPA pursue
other viable options outside the Cedar River Watershed and your reasons are
short and lack full articulation. Your first reason/excuse given in why
you cannot enter Maple Valley is that you cannot take turn the power off
long enough to replace the lines. Is it not true that you could replace
half of the line one year and the rest of the line the following year?

416-002 The second reason/excuse you give for not using Maply Valley is that two
vacant lines are needed for other purposes. Could you explain those other
needs? BPA is supposed to do such things in the DEIS and you haven't. I'd
appreciate it if you would.

Thank you for your time.

warm regards,

Michael

Michael Shank
Membership Coordinator

~Protecting and restoring forest ecosystems in the Pacific Northwest~

Pacific Crest Biodiversity Project
4649 Sunnyside Avenue North #321
Seattle, WA 98103

Phone: 206.545.3734 ext. 11
Fax: 206.545.4498
Email: michaels@pcbp.org
Web: http://www.protectandrestore.org

416-001 and -002 Please see new information included in the SDEIS and the response to Comment 382-018.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, October 18, 2001 5:15 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: clear cut

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-417
RECEIPT DATE: OCT 19 2001

-----Original Message-----
From: Marc Smason [mailto:musicetc@earthlink.net]
Sent: Monday, October 08, 2001 1:59 PM
To: lcdriessen@bpa.gov
Subject: clear cut

417-001 As a seattlite, i strongly oppose bonneville power's plan to clear cut through ceadar river water shed!

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, October 18, 2001 5:16 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Kangley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-418
RECEIPT DATE: OCT 19 2001

-----Original Message-----
From: Erwin Galan [mailto:galanerwin@hotmail.com]
Sent: Monday, October 08, 2001 1:06 AM
To: lcdriessen@bpa.gov
Cc: galanerwin@hotmail.com
Subject:

418-001 It is of the utmost importance that the Cedar River Watershed Be completey
protected against any intrusion whatsoever; educate the public regarding
how we can cut our consumption. This would eliminate the need of buiding
this transmission line. This IS realistic - think of how many business leave their lights and computers on AFTER hours. Look around.

417-001 Comment noted.

418-001 Comment noted.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-419
RECEIPT DATE: OCT 19 2001

From: Driessen, Laurens C - TNP-3
Sent: Thursday, October 18, 2001 6:05 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: NO to BPA's plan to log protected watershed, Kangley - Echo Lake

-----Original Message-----
From: Judy Lightfoot [mailto:jhlightfoot@hotmail.com]
Sent: Thursday, September 27, 2001 4:26 PM
To: jim.compton@ci.seattle.wa.us; jan.drago@ci.seattle.wa.us; margaret.pageler@ci.seattle.wa.us; diana.gale@ci.seattle.wa.us; richard.conlin@ci.seattle.wa.us; peter.steinbrueck@ci.seattle.wa.us; heidi.wills@ci.seattle.wa.us
Cc: clayton.antieau@ci.seattle.wa.us; mayors.office@ci.seattle.wa.us; lcdriessen@bpa.gov
Subject: NO to BPA's plan to log protected watershed

419-001 Dear City Council members:
Don't let BPA log the Cedar River watershed. The source of Seattle's drinking water should continue to be carefully protected from any logging at
all, but BPA hasn't even had the foresight to develop a complete proposal
that fulfills official guidelines - it hasn't prepared EIS for other options
than the one it happens to prefer, and there are other problems with its

proposal that SPU has carefully specified.
Please make sure this project does NOT go forward.
Thank you,
Judy Lightfoot

Judy Lightfoot, PhD
1326 NE 62nd St
Seattle, WA 98115
206/522-2269
http://www.homestead.com/judy_lightfoot

419-001 Comment noted.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-420
RECEIPT DATE: OCT 19 2001

From: Driessen, Laurens C - TNP-3
Sent: Thursday, October 18, 2001 6:37 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: proposed powerline in 2 watersheds. Kangley - Echo Lake

-----Original Message-----
From: virgileh [mailto:virgileh1@home.com]
Sent: Monday, September 17, 2001 6:54 PM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: proposed powerline in 2 watersheds

I understand that Bonneville Power Administration proposes new transmission
lines across the Cedar and Raging River watersheds. Via this e mail I am requesting that BPA

420-001 1 - place any new lines on existing towers (NO new roads!)

420-002 2 - replace any forest or wetlands that are damaged

420-003 3 - prepare a new EIS that contains a substantive cumulative effects analysis, and additional alternatives.

Please acknowledge receipt of my request.

Virgil E. Harder
8005 Sandpoint Way N.E.
Seattle, WA 98115

420-001 Please see the response to Comment 340-003.

420-002 See response to Comment 340-002.

420-003 See response to Comment 357-003.

Kuehn, Ginny -KC-7

rom:	Driessen, Laurens C - TNP-TPP-3
ent:	Tuesday, October 30, 2001 11:58 AM
o:	Kuehn, Ginny -KC-7
c:	Lynard, Gene P - KEC-4
ubject:	FW: Columbia River Treaty, Kanley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-422
RECEIPT DATE:
OCT 31 2001

----Original Message-----
rom: Steve Burke [mailto:nomadsteve@hotmail.com]
ent: Friday, October 26, 2001 3:35 PM
o: lcdriessen@bpa.gov
ubject: Columbia River Treaty

421-001

am concerned citizen of the Pacific Northwest and have just a few
uestions that you might be able to help me with. I have been following
he
ecent developments regarding the Cedar River Watershed, the primary
ource
f Seattle's drinking water and wonder if alternative routes for the
roposed powerline have been properly researched. For instance, have
nvironmental impact statements for other routes been proposed or
ompleted;
as the city brought to your attention the need for a water treatment
lant
hat would be created by current route? Additionally, I would be
ratefull
f you could pass contact information for the BC Hydro official with
hom
PA is working on the Kangley-Echo Lake Transmissio Project. Thank you
or
our time and help.

teve Burke
olitical Science Student from the University of Washington
402 N 145th
horeline, WA 98133
06.417.6500

421-001 The Cedar River Municipal Watershed HCP does not disallow logging, only commercial logging. BPA is in the business of transmitting electricity. Clearing of rights-of-way to safely construct, operate and maintain high voltage transmission lines is incidental to the delivery of electric power. Furthermore, the City's HCP is between the City of Seattle and the other signatories of the HCP, NMFS and the USFWS. BPA has concluded informal consultation with NMFS and has initiated formal consultation with the USFWS to meet the requirements of the Endangered Species Act of 1972.

BPA is proposing an insurance package to ensure protection of the CRW.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-TPP-3
Sent: Tuesday, October 30, 2001 11:58 AM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Columbia River Treaty, Kanley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-422
RECEIPT DATE:
OCT 31 2001

-----Original Message-----
From: Steve Burke [mailto:nomadsteve@hotmail.com]
Sent: Friday, October 26, 2001 3:35 PM
To: lcdriessen@bpa.gov
Subject: Columbia River Treaty

I am concerned citizen of the Pacific Northwest and have just a few questions that you might be able to help me with. I have been following the
recent developments regarding the Cedar River Watershed, the primary source
of Seattle's drinking water and wonder if alternative routes for the
proposed powerline have been properly researched. For instance, have
422-001 environmental impact statements for other routes been proposed or completed;
422-002 has the city brought to your attention the need for a water treatment plant
that would be created by current route? Additionally, I would be gratefull
422-003 if you could pass contact information for the BC Hydro official with whom
BPA is working on the Kangley-Echo Lake Transmissio Project. Thank you for
your time and help.

Steve Burke
Political Science Student from the University of Washington
1402 N 145th
Shoreline, WA 98133
206.417.6500

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-423
RECEIPT DATE:
OCT 31 2001

Kangley-Echo Lake Transmission Line Project

Telephone comment by Ginny Kuehn
10/31/01

Margo T. Fetz
1901 7th Avenue West
Seattle, WA 98119
206-284-5870

423-001 Add a line to the old towers instead of building new ones.

422-001 Please see response to Comment 382-018.

422-002 Yes. Seattle Public Utilities has stated that should BPA's project cause a violation of the water quality as a result of the Proposed Action, then BPA should be responsible to construct a water filtration plant for the City of Seattle. See also response to Comment 420-002.

422-003 You may call Phil Park (604) 293-5857 of BC Hydro.

423-001 Please see the responses to Comments 339-001 and 340-003.

OCT 14, 2001

LOU DRIESSEN
BPA

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-424
RECEIPT DATE: NOV 06 2001

Dear Lou,

424-001 As one of Seattle's citizens who worked hard to ensure the protection of the Cedar river watershed, I am asking you, nay, imploring you to reconsider the plan to site a new line through the Cedar river. Perhaps you could add an additional circuit to existing towers. We are doing our utmost to conserve electricity here in Seattle and frankly need more positive proof that a new line is absolutely mandatory.

Please exercise utmost creativity at solving this dilemma which could affect this region's drinking water for generations to come.
Thank you.

Aaron J. Silverberg

3520 NE 92ND ST
SEATTLE, WA 98115

424-001 Please see the responses to Comments 339-001 and 340-003.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-TPP-3
Sent: Wednesday, November 14, 2001 2:16 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Raging-Cedar Powerline, Kangley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-425
RECEIPT DATE: NOV 14 2001

-----Original Message-----
From: Darrel Weiss [mailto:djweiss1@mindspring.com]
Sent: Tuesday, November 13, 2001 9:49 AM
To: lcdriessen@bpa.gov
Subject: Raging-Cedar Powerline

Dear Mr. Driessen:

I am extremely concerned about the impacts threatening the Cedar River Watershed as a result of access and construction of the proposed powerline. The risks and impacts are far too great, and are unacceptable.

425-001 Just because there are few or no private landholders in the Cedar River Watershed to raise a fuss about the proposed raging-cedar powerline construction does not mean this is not extremely valuable "property."

THIS LAND IS PRECIOUS AND CONSIDERABLY MORE FRAGILE THAN PRIVATELY-OWNED PROPERTIES ALREADY "RULED OUT" AS ALTERNATIVES FOR THIS POWERLINE.

It appears the selected BPA alternative for a new powerline is based strictly on cost. Cost cannot continue to be the number one priority for such decisions or future generations will find themselves with a wasted environment that was exploited at every opportunity in the name of economic gain.

425-002 WE SHOULD BE PROUD OF THIS LAND AND DO ALL WE CAN TO PROTECT IT, RATHER THAN FIND WAYS TO CAPITALIZE ON IT. Such is the trend, and it must not continue.

If our power rates need to increase because we have exceeded our capacity, then the costs must be borne by those who demand it. We cannot continue to skirt the issue of rising costs resulting from our lifestyle choices.

It is time to do the right thing -- to make the correct choice for siting this powerline (if it is, indeed, essential). I believe you know in your heart what the "correct choice of action" is. Please reconsider your alternatives and take action that does not exploit the Cedar River Watershed.

Thank you.

Darrel Weiss
755 N 204th
Shoreline, WA 98133
206-542-0687

djweiss1@mindspring.com

425-001 Comment noted.

425-002 Please see response to Comment 382-018.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT- 426
RECEIPT DATE:
NOV 30 2001

6057 Ann Arbor Ave. NE
Seattle, WA 98115-7618
November 28, 2001

Communications
Bonneville Power Administration-KC-7
P.O. Box 12999
Portland, OR 97212

RE: New transmission lines to Seattle

Dear Sir/Madam:

I have recently become aware of the plan that you are developing to construct a second transmission line to the Seattle area. I am shocked to learn that you prefer a second transmission route that parallels the current transmission route. I have two major concerns with this possibility.

426-001
- The Cedar River Watershed supplies hundreds of thousands of men, women, and children in the Seattle area and the water must be safe and pure. Cutting a wide swath exposes our drinking water to the run-off of the silt and debris in this proposed area. We finally stopped logging in the area. This benefits our water supply by the action of rain and trees to keep our water safe.

426-002
- The proximity of the proposed second route so close to the current route exposes **both** routes to the very same climatic conditions that may knock out our power. It would seem logical to select an alternate route to avoid this potential devastating interruption of our power. In light of our fears of terrorist activities, it is also important to have a second route a considerable distance from the first route.

I look forward to your response to these concerns.

Sincerely,

Bonnie E. Miller

Bonnie E. Miller

CC: Seattle City Council

426-001 BPA would guard against any sediment from reaching surface waters within the Cedar River Municipal Watershed. BPA would undertake erosion control measures to ensure against siltation of surface waters, and therefore, BPA does not anticipate that any pollutants would affect the water quality of the Cedar River Municipal Watershed.

426-002 While NERC reliability criteria does not allow both of these lines (existing Raver-Echo Lake line and the proposed Kangley-Echo Lake line) to be strung from a single set of towers, siting the transmission lines adjacent to each other is permitted. Outage of two adjacent lines is much less likely than outages of both lines on a double-circuit tower. See also Section 2.3.8 of the SDEIS and the responses to Comment 1459-009. See public meeting Comment 20 for a description of NERC)

BPA transmission lines are designed to handle high winds and ice loading, so any single weather related event would unlikely result in the loss of both lines. BPA has looked at the expected common mode outage rate of two 500-kV lines on adjacent towers in this region and has found that exposure to be acceptable.

BPA is concerned about security and takes precautions throughout the transmission system.

powerex

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT— 427
RECEIPT DATE: NOV 30 2001

November 19, 2001

Gene Lynard (TTEC-4)
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon
97208

Dear Mr. Lynard:

Re: Kangley – Echo Lake Transmission Line Project

Powerex is responsible for marketing BC Hydro surplus energy, scheduling power deliveries resulting from Columbia River coordinated operation, and marketing surplus Canadian Entitlement to the Columbia River Downstream Benefits. Powerex also buys and sells electricity across western North America. In these capacities, Powerex makes extensive use of the Bonneville Power transmission system and its interconnections with Canada. In support of its trading activities, Powerex maintains involvement in Northwest and Western Interconnection regional planning activities for transmission system reinforcement. We would like to take this opportunity to comment on the need for the Kangley – Echo Lake Transmission Line Project. The following comments are based on our own experience with transmission restrictions and regional planning forums.

supply.
flexibility
commitment.

427-001

The Kangley – Echo Lake Transmission Line Project is one of many transmission projects needed for regional and Western Interconnection energy security. Over the past few years, power transfers between the Northwest U.S. and Canada have frequently been restricted due to inadequate transmission in the Seattle area. In extreme conditions, we understand this can threaten security of supply to the Seattle area.

Transmission owners in the Seattle Area, including BPA, Puget Sound Energy, and Seattle City Light, have undertaken many upgrades of the 230 and 115 kV transmission in the area over the past few years to relieve transmission constraints in the area and between the PNW and B.C. These owners have reported that the opportunities for further upgrades of the 230 and 115 kV to address restrictions are limited and that reinforcement of the 500 kV transmission system is needed. Information presented in public regional planning meetings on alternatives considered by the affected entities has shown the Kangley – Echo Lake line to be a key reinforcement for the area.

Planning studies have identified that the Kangley – Echo Lake Transmission Line Project is required mainly to maintain adequate transmission for supply to the Seattle/Tacoma area and relieve transmission capacity restrictions for the return of the Canadian Entitlement, as compared to importing power from Canada. The Columbia River Treaty provides for return of the Canadian Entitlement to Canada on a firm basis.

BC Hydro has invested in upgrades to maintain and enhance the transfer capability between B.C. and the PNW. Also, Powerex has participated in the costs of right of way maintenance for lines in the Seattle area to help maintain transfer capabilities.

427-002

While Powerex cannot comment on the specific routing or other aspects of the proposed line, Powerex believes that there is an urgent need to upgrade transmission capacity in the area to support Seattle area load growth and provide for return of increasing Canadian Entitlement capacity in April 2003.

Sincerely,

Phil Park, P.Eng.
Manager, Transmission Access

Direct Line: 604. 891.5020
Fax Line: 604. 895.7012
Email: phil.park@powerex.com

POWEREX CORP.
Suite 1400
666 Burrard Street
Vancouver, BC
Canada V6C 2X8
TEL: 604.891.5000
1.800.220.4907
www.powerex.com

427-001 Comment noted.

427-002 Comment noted.

November 2001

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-428
RECEIPT DATE:
DEC 06 2001

Attention Lou Driessen, Project Manager
Bonneville Power Administration - KC-7
PO Box 12999
Portland, Oregon 97212

Mr. Driessen,

428-001 I am deeply disturbed about your plans to build nine miles of new 500-kilovolt line through the Cedar and Raging River watersheds and your 1.5 miles of new road construction. Your preferred alternative states a plan to permanently clear-cut a swath from 150' to 285' wide through the forest, including Seattle's watershed, which is currently protected from logging. This plan would destroy forests recently protected by the City of Seattle and Protect Our Watershed Alliance. There are important salmon fisheries in Raging River and the City of Seattle is working to re-establish salmon in Cedar River. It was a landmark decision by Seattle to preserve its watershed forests. Would BPA propose a powerline through Mt. Rainier National Park? Then why through our protected watershed? Please thoroughly address your reasons for dismissing the other alternatives in your final EIS as your draft didn't adequately explain the reason they were thrown out.

428-002 Most of all, please realize that your plan is a temporary fix. In the next 10 years, we will be at the same load capacity that we are at now. What then? More logging in our watershed? What we need are stronger conservation programs. It is an unrealistic view that we have unlimited amounts of resources here in the Pacific Northwest. We have met a load capacity because the population has grown so significantly in the last 10 years. It's time we insist on conserving what we have and making it enough instead of simply saying we'll go find more. Especially when the only offered solution is one that could potentially contaminate the drinking water supply for over 800,000 Seattle residents who said they were willing to pay several dollars extra each year to protect our watershed.

428-003 If in the end you decide that conservation won't work and we need a new line, add additional circuits to towers in the existing corridor. I realize the potential for large scale failure, but I also realize the possibility is rare that this would happen. I INSIST that any forest or wetlands that are damaged be replaced. I also ask for a new EIS with needed information, a substantive cumulative effects analysis and additional alternatives especially including conservation.

Thank you,

Sabrina Shepherd

650 SW 316th St.
Federal Way, WA 98023

428-001 Please see response to Comment 382-018.

428-002 See response to Comment 349-001.

428-003 Please see the response to Comment 340-003.

Kuehn, Ginny -KC-7

From: mlorincz [mlorincz@fhcrc.org]
Sent: Monday, December 10, 2001 4:20 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Project

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-429
RECEIPT DATE:
DEC 11 2001

Hello,

429-001 I am writing to voice my opinion on the Kangley-Echo Lake Transmission Project. Clearcutting in the Cedar River Watershed to construct a powerline highway through this beautiful natural area is not a good solution to the issue faced by the Bonneville Power Administration
The Cedar River Watershed should be preserved as is.

Matthew C. Lorincz
mlorincz@fhcrc.org

429-001 Comment noted.

Kuehn, Ginny -KC-7

From: Lynard, Gene P - KEC-4
Sent: Tuesday, December 11, 2001 2:12 PM
To: Kuehn, Ginny -KC-7
Cc: Driessen, Laurens C - TNP-TPP-3
Subject: FW: Proposed Raging-Cedar Powerline

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-430
RECEIPT DATE:
DEC 11 2001

Another email on the Kangley-Echo Lake EIS. Thanks.

-----Original Message-----
From: Darrel Weiss [mailto:djweiss1@mindspring.com]
Sent: Monday, December 10, 2001 8:06 PM
To: Gene Lynard (E-mail); Laurens Driessen (E-mail); Tom Pansky (E-mail); Vickie VanZandt (E-mail)
Cc: Ron Sims (E-mail); Gary Locke (E-mail); Heidi Wills (E-mail); Jan Drago (E-mail); Jim Compton (E-mail); Judy Nicastro (E-mail); Margaret Pageler (E-mail); Nick Licata (E-mail); Peter Steinbrueck (E-mail); Richard Conlin (E-mail)
Subject: Proposed Raging-Cedar Powerline

Dear Bonneville Power Official (Mr. Lynard, Mr. Driessen, Mr. Pansky, Ms.
VanZandt):

430-001 You know how people are always saying "not in my backyard"? I would like to
remind you that this is not the case for myself and many others who are very
concerned that a new powerline is proposed to be built in the Habitat-Conservation-Plan-protected Cedar River watershed. It is not our backyard -- it the Seattle area's primary drinking water supply -- and it is
a place that really should not be considered for a construction project of
this magnitude.

I'm surprised that you let the not-in-my-backyard-property-owners (those whose properties fall into your category of "routes considered but eliminated") scare you off.

430-002 The watershed is not the only alternative. It is not the best alternative.
It is the riskiest alternative. It is the most damaging alternative (and therefore, most certainly, the most costly alternative).

The City of Seattle's drinking water watershed should not be for sale.

I believe it was a mistake to quickly rule out alternatives outside the watershed because "hundreds of rural-residential properties" would object to
a powerline in their backyard.

430-003 I am copying this message to my elected officials, urging their support in
siting the powerline outside the watershed. If the project moves forward
within the watershed, I urge them to assure that significant mitigation compensation be assessed the BPA. I also urge them to make sure the BPA takes every precaution to assure that the watershed is not damaged or compromised in any way.

The safeguards necessary to comply with the 50-year HCP protecting the watershed have not been adequately addressed. They need to be addressed considerable detail. The impacts also must be adequately mitigated.

Please -- do not trample on the watershed! Pursue another, less threatening
route.

Darrel Weiss
755 N 204th
Shoreline, WA 98133-3112
206-542-0687

430-001 Comment noted.

430-002 Please see response to Comment 382-018.

430-003 See response to Comment 340-002.

Kuehn, Ginny -KC-7

From: Lynard, Gene P - KEC-4
Sent: Friday, January 04, 2002 4:27 PM
To: Kuehn, Ginny -KC-7
Subject: FW: KANGLEY-ECHO LAKE TRANSMISSION LINE

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT- 431
RECEIPT DATE: JAN 07 2002

More comments on Kangley-Echo Lake already. Thanks.

-----Original Message-----
From: Peter Rimbos [mailto:primbos@attbi.com]
Sent: Wednesday, January 02, 2002 5:51 PM
To: gplynard@bpa.gov
Subject: KANGLEY-ECHO LAKE TRANSMISSION LINE

Gene,

We understand the comment period on the draft EIS for the subject project is closed. However, as long-time residents in the Greater Maple Valley area, we wished to express our concerns with the subject project.

431-001 1. The Draft EIS fails to demonstrate a need for an additional transmission line.
431-002 2. Has the BPA done enough to increase conservation and reduce demand, especially during the peak power periods in question?
431-003 3. Has the BPA completed a detailed evaluation of other alternatives?
431-004 4. Were full mitigation costs included in BPA's analyses (e.g., a line through the watershed would be more expensive if full mitigation costs were included, such as damaged habitat)?

Please revise this project. Thank you.

Peter and Naomi Rimbos
19711 241st Ave SE
Maple Valley, WA 98038-8926
primbos@attbi.com

431-001 Comment noted.

431-002 See response to Comment 349-001.

431-003 Additional information on the alternatives has been included in the SDEIS.

431-004 Please see response to Comment 382-006.

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT- 432
RECEIPT DATE: JAN 14 2002

From: MPaul Hansen [student_uw98115@yahoo.com]
Sent: Sunday, January 13, 2002 4:10 PM
To: comments@bpa.gov
Cc: student_uw98115@yahoo.com
Subject: Comments on HV BPA transmission lines

1-8-02
RE: Kinsley-Kanley Line upgrade - comments

Perhaps lattice tower aesthetics can be improved.

432-001 So they resemble the Tokoyo Tower or Eiffel Tower. By adding dummy member with slotted end holes, to soften sharp re-entrant corners. So the body-pedestal looks like curves rather than straight lines

432-002 Also [this may be redundant] has consideration been given to a new cross mountain HV line over Stampede Pass but then through Cedar Notch, down the Cedar River, via the existing 115 kv line to the Fairwood Station near the large Seattle load center? Just a thought, for what it is worth.

432-001 Comment noted.

432-002 If another line is needed across the Cascade Mountains, it would likely be needed north of Seattle in the Monroe area. BPA has identified that another cross-mountain 500-kV line would be necessary after about 2010, but has not done a more extensive siting evaluation.

Public Meeting

1 What clearance criteria do you use over trees?

2 You should be able to figure how tall towers need to be to have adequate clearance (and) be able to keep trees in right-of-way.

3 EIS needs more detail describing where trees can be left in gorges — maybe just cutting on banks. Because in these areas, there may be adequate clearance.

1 and 2 BPA typically removes all tall-growing vegetation within the ROW during the construction process. This precludes problems during the stringing process (stringing involves connecting the conductor from tower to tower and trees left in the ROW can interfere with that process) and makes returning for vegetation maintenance unnecessary for a number of years. Tall-growing species will either resprout or seed in during that first 3–5 year period and some of those species can grow 10 feet or more per year. In certain locations, where topography is such that BPA can retain tall-growing vegetation (such as over canyons or deep ravines), the minimum clearance over these trees varies depending on the voltage of the line. In this case, where a 500-kV transmission line is proposed to be built, a minimum distance of is 20 feet plus the specific vegetative species' growth factor to the line needs to be maintained to prevent flashover.

3 The trees within the Proposed Action area are upwards to 200 feet tall. To allow trees to remain in the ROW, the towers would need to be about 350 feet high or higher, considering sag, insulators, minimum clearance to the trees, etc. Discounting the fact that these taller towers would be much more expensive to build and maintain, there are a number of reasons why taller towers are not a good idea:

- For reliability, towers of the new line must not be able to fall into the adjacent line. So the taller the structure, the farther it must be away from the existing line. For 350 foot towers, the new line must be about 350 feet away from the existing line. In addition to a large increase in costs, many more new access roads would need to be constructed. Some of these roads would need to go through sensitive areas.
- This height of towers would require a much larger "foot print" — 80 to 100 foot square — to withstand the weight of the steel. A larger "foot print" would require much more land to be disturbed and cleared around the bases, which would cause higher impacts on the environment.
- Taller towers would create a visual eyesore on the landscape since they would be approximately 150 feet above the forest canopy.
- Any transmission tower over 200 feet in height has to go through FAA registration. The FAA may require lights on the

4 BPA doesn't allow trees to grow to height within clearance limits. (Probably more economical to keep cleared.) EIS should address maintaining vegetation to clearance limit — say come in and top once a year. Weigh environmental impacts to cost. Or have taller towers to allow vegetation to grow taller.

5 I suggest you excerpt some items out of Vegetation Management EIS into this EIS, since many people don't have time to go through numerous documents.

6 Going through watershed is a special situation that calls for special measures; you can't use standard practices.

7 BPA's estimate of 1.5 miles of new access roads: Is that based on general assumptions or actual field review?

8 Are there conditions that you would use helicopters to install towers rather than driving to sites?

towers. If lights are required, a separate powerline of lesser voltage would have to be built to power those lights.

Leaving trees in the ROW can cause problems with stringing the conductor. During stringing, the conductor is connected from tower to tower. Trees interfere with this process and have caused bodily harm to workers.

4 BPA is responsible for providing low-cost electricity to the Pacific Northwest. To keep those costs low, BPA needs to find the most economically efficient and environmentally acceptable method to keep its transmission lines safe and reliable. To allow trees to grow in the ROW and continually top them would be very costly and would involve bringing in equipment to do that job since climbing smaller trees is not safe. Bringing in this specialized equipment would not only cause a safety hazard (especially if trees are maintained near the minimum clearance requirements), but would probably require additional roads to get the equipment to the trees. Bringing in additional equipment also increases the risk of accidental fuel/oil spills and the introduction of noxious weeds. Controlling vegetation in its earliest stages is the most economically efficient and environmentally acceptable way to maintain the safe and reliable operation of our transmission lines.

5 Please see Appendix K in the SDEIS for a summary of BPA's Vegetation Management EIS.

6 BPA is aware of the unique protection that the Cedar River Watershed requires and agrees with your comment. For example, during surveying of the preferred alternative, special surveying techniques were used to avoid cutting any trees over 2 inches in diameter. If BPA decides to build a transmission line, special care will be taken to protect this resource.

7 The road estimate was made prior to a field review using aerial photomaps and a general working knowledge of the local terrain. An updated estimate based on a field review is included in the SDEIS.

8 Helicopters have been used in situations where access conditions make it difficult to drive large equipment, such as

9 Purpose of the project is not substantiated in the Draft EIS.

10 There are no studies (power-flow) in the document to substantiate the need statement.

11 Can we provide the power-flow studies for review? WSCC cases.

12 Why isn't there a public meeting being held in Seattle?

13 The project hardly affects the people of Maple Valley and affects the people of Seattle much more.

14 Do we send power out of the state?

15 Agree with preferred alternative since it is the least disruption to the watershed itself. The routes avoiding the watershed are twice as long and have greater impact to residences. (Ravensdale)

16 Why doesn't the DEIS address the actual clearing anticipated? It is much too general.

cranes, to tower sites. However, helicopter construction does not totally eliminate the need for vehicle access to each tower site because foundations still need to be installed. BPA will require the construction contractor to use helicopter construction techniques if BPA decides to build the line.

9 Additional information has been added to the SDEIS to address this comment. Please see Chapter 1.

10 Please request a copy of SDEIS Appendix H, Summary of Transmission Planning Studies for more information.

11 See response to Comment 10.

12 BPA did hold public meetings in Seattle to get scoping comments for the SDEIS and to gather comments after release of the SDEIS.

13 Comment noted.

14 Yes, BPA does send power out of the state. BPA also imports power from other states and British Columbia when power is needed in the Pacific Northwest.

15 Comment noted.

16 Please see response to Comment 394-034.

17 Why do you need a new corridor? Why can't you use existing towers?

18 If the existing Kangley-Echo Lake line were taken down to rebuild a new double-circuit line, how long would it be out of service? (Answer: 6-8 months.)

19 Why can't you build the new line immediately adjacent to the existing line so you don't have to clear a whole new right-of-way?

20 NERC: Is this an advisory or regulatory group?

21 Is BPA buying replacement land for the wetlands it is impacting?

17 A new corridor is needed because the line on the existing corridor (Raver-Echo Lake No. 1 500-kV line) cannot be removed from service for the length of time (approximately 7 or 8 months) it would take to rebuild it to a double-circuit line. The system without the existing line (Raver-Echo Lake No. 1 500-kV line) will not be able to serve expected load, the return of the US-Canada Treaty power and withstand another line outage (required to meet national reliability criteria) without a high probability of uncontrolled loss of load or a system collapse in the Puget Sound Area. Also, rebuilding the existing line to a double-circuit line essentially provides no additional capacity to serve the Puget Sound load. This is because BPA must plan for an outage of the double-circuit line as required by the North American Electric Reliability Council (NERC). This in essence will not allow BPA to make use of the new line on the double-circuit towers, therefore making the investment worthless.

18 Seven to 8 months. Due to NERC rules, BPA cannot build this project on double-circuit towers.

19 BPA must maintain a safe electrical clearance between adjacent lines and to the edge of the right-of-way. The new line cannot be built on the existing right-of-way and maintain both a safe electrical distance to the existing line and edge of right-of-way. BPA also wants to make sure one tower cannot fall into the adjacent line.

20 NERC, or the North American Electric Reliability Council, was established in 1968 to promote bulk electric system reliability and security. Among other responsibilities, it establishes operating and planning standards to ensure electric system reliability. NERC is composed of ten Regional Councils including the Western Electricity Coordination Council (WECC). WECC members include 97 electric utilities, 17 affiliate members, and nine State Commission representatives. (See www.wecc.biz and www.nerc.com.) BPA and other utilities follow NERC and WECC criteria to ensure reliable electric service. The Reliability Council operates under a system of voluntary compliance. In addition, BPA and most members of WECC have agreed to mandatory compliance with certain criteria and standards.

21 BPA is studying impacts to wetlands and natural habitat for endangered species within the Cedar River Watershed. The Preferred Alternative (Alternative 1) minimizes additional rights-

22 Reducing or minimizing impacts is not adequate mitigation.

23 DEIS ignores cumulative effects of building the line through the forest and watershed.

24 You need to replace right-of-way acreage taken out of forest production. Low elevation forests are disappearing. Just because you haven't replaced acreage in the past, that's not a good enough reason not to start now.

25 Will we see, in the near future, retrofitting old double-circuits to single-circuit with greater separation between lines? That would be a huge impact.

26 As reliability standards change over time, so do mitigation requirements (replace areas permanently lost).

27 If you remove 150 acres of mature forest, you should replace with same, or multiplier of 150 acres for immature forestland.

of-way needed by paralleling the existing Raver-Echo Lake line. This alternative also uses existing access roads where possible. New towers and access roads have been located out of wetlands. Some wetlands would be converted from a timbered wetland to scrub-shrub wetlands.

BPA would also cut only those trees outside the right-of-way that are unhealthy, are leaning towards the line or are very likely to fall into the new line. This is a drastic reduction from normal practice of cutting any tree that could potentially fall into the new line. BPA would be willing to reduce reliability of the new line to cut as few trees as possible within the Watershed. In addition, trees next to the Cedar River would not be cut or if they are too tall, only topped.

In addition, BPA has purchased land for potential replacement habitat forest and wetlands. See response to Comment 340-002.

22 Mitigation measures cited do prevent, reverse, and rectify impacts during or from construction. There are impacts that are not reversible such as permanent loss of timber and access road construction. BPA is studying the possibility of replacement as an additional mitigation measure. Please see response to Comment 340-002.

23 Please see response to Comment 394-090.

24 See responses to comments 21 and 22.

25 BPA has no program to rebuild/replace existing double-circuit 500-kV towers to two single-circuit towers for reliability purposes to meet new reliability guidelines. Nevertheless, under NERC reliability guidelines, BPA is required to plan for outage of a double-circuit tower, whether that facility is new or existing. If the guidelines cannot be met, then some action is required, which could include reconfiguration, remedial action schemes or building additional lines.

When there is a need for new projects, some will be double circuit and some will be single circuit lines. When BPA sites these lines there may be a need for separation from other lines. BPA has a long history of replacing old single and double-circuit low capacity lines with very high capacity single or double-circuit 500-kV lines and thereby minimizing the environmental impact. BPA has installed two of these high

28 There are some of us who want to pay for quality and full mitigation.

29 You have eliminated alternatives outside of watershed, without providing a full analysis in the DEIS, thereby limiting your alternatives. The DEIS doesn't provide the relative impact of the off-watershed routes, it just simply states that a number of people didn't want this (Ravensdale) route.

30 Why were the alternatives for Rocky Reach-Maple Valley (rebuilt double-circuit, or new parallel line) dismissed?

31 What about the option of building new generation facilities?

capacity lines across the Cascades in the last 20 years by removing old, smaller lines.

26 See responses to Comments 21 and 22.

27 See responses to Comments 21 and 22.

28 Comment noted.

29 Please see response to Comment 382-018.

30 These two alternatives are fully analyzed in the SDEIS.

31 New generation facilities are presently being proposed and constructed all across the Northwest. However, due to the deregulation of the power industry, which allows non-utilities to construct power plants, BPA has no control over where or when these plants are built. This makes transmission planning extremely difficult because a transmission line cannot be built as fast as a generation plant and the transmission system can only be planned about 4 or 5 years into the future. Completed generation plants are incorporated in the planning studies.

32 Shouldn't the system be evaluated on efficiency rather than economics in regard to delivering power?

33 What about Echo Lake to Monroe? Do you have the same situation as for this project? (This is another example of cumulative affects.)

34 What was the purpose of alternatives 5a, 4b and 2?

32 The transmission system must be planned on a least cost basis, which incorporates efficiency. Transmission design is a very careful tradeoff between cost, needs and capacity.

33 The purpose and need for the Monroe-Echo Lake 500-kV line would be to ensure reliable service to Puget Sound Area loads and to integrate potential new generation projects. Need depends in part on the decision of generation developers. BPA is examining alternatives, including approaches that do not require transmission construction. A decision on the need has not been made.

34 No Alternative 5a was considered.

The purpose of Alternative 2 is to avoid taking two residences located next to the south end of the Proposed Action. The purpose of Alternative 3 was to meet the WECC's reliability criteria, which recommended a minimum of 2000 feet separation between transmission line rights-of-way with at least one common terminal. Separation provides increased system reliability.

Alternatives 4A and 4B avoided the two residences located next to the southern portion of Alternative 1, the Proposed Action, and also avoided a separate crossing of the Cedar River. Both of these alternatives provided for crossing the Cedar River immediately adjacent to where BPA's existing line crosses the Cedar River. Additional alternatives were added in the SDEIS.

35 You cross both Cedar and Raging rivers, plus several tributaries. (Raging river has salmon, Cedar River will have salmon.) You need to look to see how tall towers need to be to keep full riparian habitat intact along river crossings. EIS only lists 135-ft. tall towers.

36 What is minimum clearance for the 500-kV line?

37 I'm assuming the route alternatives are not going to change (east or west) of routes identified.

38 How am I going to be treated by BPA since your new line will take out my house and barn?

35 Please see response to Comment 382-038.

36 The minimum ground clearance for a BPA 500-kV line is 35 feet.

37 Please see response to Comment 382-018.

38 As stated in the Federal Highway Administration's Brochure, "Your Rights and Benefits as a Displaced Person, Under the Federal Relocation Assistance Program," government programs designed to benefit the public as a whole often result in acquisition of private property, and sometimes in the displacement of people from their residences, businesses or farms. As a means of providing uniform and equitable treatment for those persons displaced, your government passed the "Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970," and the "Uniform Relocation Act Amendments of 1987."

Any individual, family, business or farm displaced by a federal or federally-assisted program shall be offered relocation assistance services for the purpose of locating a suitable replacement property. Relocation services are provided by qualified personnel employed by the Agency. It is their goal and desire to be of service to you, and assist in any way possible to help you successfully relocate.

You may review the Federal Highway Administration's Web site "Your Rights and Benefits as a Displaced Person," at www.fhwa.dot.gov/realestate/rights/index.html.

39 Will the appraiser be looking at damages outside the right-of-way?

40 When you put in the new line, you will devalue my house located on the west side of the line.

41 Who will decide the final alternative?

42 Can we use superconducting conductors?

43 Are there any plans for future expansion east or west of the project area?

44 Where BPA removed lines (230-kV) on the Columbia-Covington right-of-way, would BPA ever build new lines in this right-of-way? When?

45 Could BPA's public involvement office publish in newspaper a yearly statement that BPA's rights-of-way are not public rights-of-way?

39 BPA usually only purchases the land rights that it needs. If BPA intends to acquire only a portion of the property, the Agency must state the amount to be paid for the part to be acquired. In addition, an amount will be stated separately for damages, if any, to the portion of the property you will keep. If the Agency determines that the remainder property will have little or no value or use to you, the Agency will consider this remainder to be an uneconomic remnant and will offer to purchase it. You will have the option of accepting the offer for purchase of the uneconomic remnant or of keeping the property.

40 See SDEIS Section 4.11.2.5, Community Values and Concerns, Property Value Impact.

41 Following the completion of the environmental review, the BPA Administrator will make a decision on the proposed project. The Administrator will choose the Proposed Action or one of the alternatives. BPA is expected to make a decision on the project 30 days after the release of this Final EIS.

42 No, the use of superconducting conductors is technologically infeasible at this time.

43 No, there are no plans to expand east or west of the project area.

44 This right-of-way is very valuable to BPA for future use. This statement is simply made because new rights-of-way are so difficult to acquire given the expansion of population and human activities outside of major urban areas. BPA does not have a date for this use.

45 Unfortunately, publishing ads or legal notices in all the newspapers of the Northwest would be expensive and whether the people who trespass on private property would read the notices and follow their direction is questionable. Illegal use of property is a continuing concern for BPA and property owners. Our maintenance staff would be happy to discuss your particular concern at your convenience.

46 At one time BPA put in a gate for us, but vandals cut it down repeatedly — costing BPA too much money to maintain the gate at this location.

47 Are you bringing in lines from the east, or just tapping the new line into the existing lines?

48 Where are the new towers going to be placed in relation to the existing towers?

49 The Ravensdale alternative would have affected "many more owners," but it is unfortunate that it has to affect other private individuals.

50 The preferred route has much less impact to residential properties than the Ravensdale route would have, although it is too bad that two houses and a barn are impacted.

51 It makes sense that the preferred route has less impact to timber, and requires fewer roads. Also this route would probably have less chance of having to condemn to acquire properties.

52 What about 30 years from now? Will a project like this come up again?

53 Where are the power sources that serve the power to this area?

46 Yes, there have been gates that BPA has stopped maintaining due to the high cost of maintenance. However, we work very hard with landowners to maintain the gates. Currently we are installing stronger gates in these areas to try and keep vandals out.

47 The new line would be connected to an existing line.

48 In most cases the new towers will not be placed directly opposite of the existing towers but will be offset ahead or back-on-line. The distance of offset varies, but it would be about 50 feet.

49 Comment noted.

50 Comment noted.

51 Comment noted with respect to your first point. Paralleling an existing transmission line in a wooded area does minimize the clearing that would be required because no danger trees would exist, and therefore have to be removed, on the west side of the right-of-way, since there is an existing transmission located there. Additionally, BPA would take advantage of the existing access/ spur road system (to the maximum extent possible) so as to minimize the number of new roads that would be needed to serve the new line.

With respect to the second point, it is typically true that the fewer number of property owners, the less chance that any property would need to be condemned to site the line.

52 The need for additional projects in the future would depend on load growth.

53 This is not a question that can be answered with any certainty. The entire Western US electric system is interconnected. It is possible that if you are a Seattle City Light customer for example, the power Seattle City Light is buying could be coming from a power generator in El Paso, Texas or from the Centralia Coal Generating plant or any one of 1,000 other generators throughout the west. Only if the Puget Sound area were isolated from the rest of the system would it be apparent that generators in the area are serving the load.

54 How does BPA use growth-rate study information collected by boring trees?

55 The DEIS is unclear about how much area is actually being cleared of trees, 150 ft. vs. up to 400 ft.

56 Vegetation will rapidly invade areas cleared of timber. How will BPA manage the right-of- way?

57 What information do you have on wildlife kills related to transmission lines (raptors)?

58 Does BPA keep records of bird kill found along right-of-way?

59 Since groundwire can have a detrimental impact on migratory birds, can you do without ground wire on this project? (Note: overhead ground wire can be marked.)

60 I recognize the need for power, but the preferred alternative is much less traumatic than an alternative like the Ravensdale route.

61 Any way to underground the line?

62 This project affects the folks in Seattle more than it does those in Maple Valley, so why are you holding the meeting in Maple Valley instead of Seattle?

54 The information gathered from boring the trees gives us an idea of the age and the growth rate of the trees and an indication of site potential. When a new ROW is cleared, trees that previously grew within the protection of a group of trees (with relatively little exposure to wind) are now exposed making them vulnerable to wind throw. This vulnerability persists for about 3 to 5 years after clearing until the trees become used to their new environment and become more "wind firm." Because of this, BPA uses the growth information to add in a margin of safety of about 5 years to the calculations of safe heights.

55 See response to Comment 16.

56 BPA has prepared a programmatic EIS for its vegetation management program associated with transmission lines, roads, and related facilities. The EIS identifies appropriate measures to protect the environment while minimizing danger tree risks and maintaining the ROW within safe, reliable conditions. These guidelines provide for protecting water resources by using herbicide buffer zones. BPA would comply with the standards and guidelines established in this EIS and the Record of Decision for vegetation management (BPA 2000). See SDEIS Appendix K for more information.

57 BPA does not have any information about wildlife kills related to transmission lines. None have been found on the existing ROW.

58 BPA does not keep records of birds killed along the ROW.

59 We cannot do without overhead groundwire on this line. In the past, where a migratory bird path has been identified, BPA has installed bird flight diverters.

60 Comment noted.

61 Undergrounding the line was considered but eliminated because of cost. See Section 2.3.1.

62 We held the meeting at the Maple Valley Community Center in Maple Valley since that facility was the closest suitable meeting place to the proposed project. Meetings were held in Seattle for scoping of the SDEIS and to receive comments on the SDEIS.

Chapter 2 Response to Comment Topics	
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access roads	411-017, 394-022, 394-026, 394-037, 394-038, 394-039, 394-044, 394-047, 394-084, 394-104, 394-135, 394-173, 394-180, 394-187, 394-189, 394-204, 394-218, 394-268, 394-269, 394-270, 394-276, 394-294, 394-304, 395-002, 395-006, 405-001, 405-006, 405-017, 340-002, 342-001, 349-003, 377-001, 378-001, 378-009, 382-009, 382-014, 382-027, 382-039, 397-001, 400-004, PM #3, PM #4, PM #7, PM #21, PM #22, PM #51
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BC Hydro	422-003
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Coastal Zone Management Act	394-008, 395-045, 382-031, 400-001
coating on towers, zinc, sodium dichromate	394-175, 382-041
Columbia-Covington line	PM #44
comment period	404-005
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cultural resources	411-018, 394-016, 394-017, 394-111, 394-124, 395-006, 405-001, 405-017, 405-018, 405-019, 405-020, 378-001, 382-033
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easements, right-of-way	390-003, 394-034, 394-038, 394-047, 394-111, 394-157, 394-216, 395-006, 395-015, 382-009, 397-001, 401-001, PM #19, PM #44
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	Note: PM = public meeting comment #

Chapter 3 — Comments and Responses-SDEIS

In this Chapter comments from:

- Federal Agencies
- State Agencies
- Local Agencies
- Tribes
- Groups and Individuals
- Public Meetings

BPA completed a supplemental draft environmental impact statement (SDEIS) for the proposed Kangley-Echo Lake Transmission Line Project. The SDEIS was released to the public for a 45-day review and comment period that ended on March 1, 2003. Five public meetings were held at various locations in King County during the week of February 3-6 to gather public comments on the SDEIS.

This chapter contains the written comments from letters, e-mails, and comment sheets received during the comment period for the SDEIS and BPA's responses to those comments. It also contains the comments from the public meetings and telephone calls received during the comment period. Chapter 2 contains the written and oral comments received during the comment period for the DEIS and BPA's responses to those comments.

Letters and comment sheets were given numbers in the order they were received. Separate issues in each letter were given separate codes. For example, letter 394 might have issues 394-001, 394-002, and 394-003 identified within its text. Comments from the public meeting were also numbered. BPA prepared responses to each of these individual comments.

The chapter is organized in the following sequence: comments from ***federal agencies*** are followed by comments from ***state agencies*** (page 3-7), ***local agencies*** (page 3-11), ***tribes*** (page 3-31), then ***groups and individuals*** (page 3-43). Comments from the ***public meetings*** are at the end of the chapter (page 3-163). Because we have organized comments this way and often reference responses to other comments, please use the numerical list on the back of this page for reference. See also the reference page in Chapter 2. A listing of related comments by issue is at the end of the chapter on page 3-343.

(Comments on the SDEIS begin with BPA log #1389; earlier letters were for scoping, or comments on the DEIS)

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Federal Agencies

United States Department of Agriculture | Forest Service | Okanogan and Wenatchee National Forests Headquarters Office | 215 Melody Lane Wenatchee, WA 98801 (509) 662-4335 TTY – (509) 662-4396 FAX – (509) 662-4368

LOG INVOLVE
G#: KELT-1480-
RECEIPT DATE: FEB 24 2003

File Code: 1950-4
Date: February 10, 2003

Lou Driessen
Project Manager
DOE-Bonneville Power Administration
P.O. Box 491
Vancouver, WA 98666-0491

Re: Kangley-Echo Lake Transmission Line Project

Dear Mr. Driessen:

On July 8, 2002, the USDA Forest Service (USFS) entered into an Interagency Agreement (No. 02-IA-11061703002) as a cooperating agency with the Bonneville Power Administration (BPA) in the development of the Supplemental Draft Environmental Impact Statement (SDEIS) for the Kangley-Echo Lake Transmission Line Project.

1480-001 As stated in the agreement, the USFS is to review environmental documentation and provide feedback to ensure that these documents could support decisions that may be required by the USFS. This includes environmental review and coordination with BPA on transmission line alternatives that cross National Forest System lands on the Mt. Baker-Snoqualmie and Wenatchee National Forests. In addition, the agreement specifies that the USFS, as a cooperating agency, will provide guidance on potential issues and analysis needs to sufficiently address current USFS requirements and processes.

1480-002 In reviewing the SDEIS that was recently released, I note that BPA is recommending Alternative 1, which parallels an existing BPA transmission line through the Cedar River Municipal Watershed, as the preferred alternative for this project. This alternative does not cross National Forest System land and, therefore, would not require any action on the part of the USFS.

1480-003 However, the analysis has not been performed at the same level of intensity for the alternatives proposed across National Forest System land. I understand you are aware that if one of the alternatives across National Forest System land (Alternative B or D) were selected as the preferred alternative for this project, the SDEIS would be inadequate to support the necessary decisions that would be required by the USFS. Additional field surveys, analysis, and consultation would be necessary to adequately display and disclose the impacts that would likely occur on National Forest System land. If this situation were to occur, further project delay would be inevitable in order to accommodate the required steps.

1480-004 I look forward to a continuing cooperative relationship regarding this project and other BPA projects that may involve National Forest System lands. If public comment on the SDEIS suggests a possible change in the preferred alternative, please notify the USFS project contact, Floyd Rogalski, at the earliest possible time. Thank you.

Sincerely,

/S/ SONNY J. O'NEAL
SONNY J. O'NEAL
Forest Supervisor

1480-001 Comment noted.

1480-002 Comment noted.

1480-003 BPA is aware of the additional work necessary if an alternative on National Forest land is chosen and the time it would take to complete this work.

1480-004 Thank you for your cooperation.

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 356
Portland, Oregon 97232-2036

PUBLIC INVOLVE.
Log#: KELT- 1514
RECEIPT DATE:
MAR 0 4 2003

IN REPLY REFER TO
ER03/87

February 28, 2003

Lou Driessen, Project Manager
Bonneville Power Administration
Communications – KC – 7
P.O. Box 12999
Portland, Oregon 97212

Dear Mr. Driessen:

1514-001 The Department of the Interior has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the Kangley-Echo Lake Transmission Line Project, King County, Washington. The Department does not have any comments to offer.

We appreciate the opportunity to comment.

Sincerely,

Preston A. Sleeger
Regional Environmental Officer

1514-001 Comment noted.

State Agencies

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

PUBLIC INVOLVEMENT
LOG#: KELI- 1397
RECEIPT DATE: JAN 23 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments

Stewart G. Reinbold
WDFW, Area Habitat Biologist
c/o dept of ecology, 3190 160th Ave SE
Bellevue, WA 98008

1397-001 Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Stewart G Reinbold, WDFW

Address c/o dept of Ecology, 3190 160th Ave SE Bellevue, WA 98008

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1397-001 A list was developed from the sign-in sheets and any one who requested to be added to the mail list was, along with people/persons who signed in, but were not found on previous lists.

KELT-1446

FEB 12 2003

Washington State Legislature **Metropolitan King County Council**

February 7, 2003

Bonneville Power Administration
Public Affairs Office – KC - 7
PO Box 12999
Portland, OR 97212

Re: Kangley-Echo Lake Transmission Project – SDEIS

Dear Public Affairs Office:

1446-001 We would like to take this opportunity to thank the Bonneville Power Administration (BPA) for all of its hard work and efforts in completing the Supplemental Draft Environmental Impact Statement (SDEIS) for the Kangley-Echo Lake Transmission Project. BPA's willingness to consider all of the comments submitted for this document is to be commended.

1446-002 We continue to support BPA's preferred alternative for construction of this important transmission line as the most reasoned and balanced solution. The SDEIS clearly shows that the preferred alternative is both the most cost-effective and the most environmentally sound option.

1446-003 We also applaud BPA's consideration of new and environmentally friendly technologies such as micro-piles and the use of helicopters in the construction plan for the transmission line.

Thank you again for your hard work and dedication to the community.

Sincerely,

Dino Rossi
State Senator
5th Legislative District

Cheryl Pflug
State Representative
5th Legislative District

Glenn Anderson
State Representative
5th Legislative District

David W. Irons
King County Councilmember
Council District 12

cc: The Honorable Jennifer Dunn, U.S. Congress
Greater Maple Valley Area Council

1446-001 Comment noted.

1446-002 and -003 Comments noted.

Local Agencies

KENT
WASHINGTON

PUBLIC WORKS
on Wickstrom, P.E.
tor of Public Works

one: 253-856-5500
Fax: 253-856-6500

220 Fourth Ave. S.
nt, WA 98032-5895

KELT-1447

FEB 1 2 2003

Fubruary 4, 2003

Bonneville Power Administration
Public Affairs Officer - KC -7
P.O. Box 12999
Portland, OR 97212

RE: KECN - Kangley - Echo Lake Transmission Project
DOE/EIS 0317-S1

Dear Sirs,

1447-001 Thank you for the opportunity to provide comments on the proposed alternatives for the Kangley - Echo Lake Transmission Line Project, Supplemental Draft Environmental Impact Statement (EIS). The City of Kent supports your decision to proceed with Alternative 1 as outlined in the EIS.

1447-002 As you are aware, the City of Kent utilizes groundwater and surface water rights to provide municipal water supply to the citizens of the Kent area. Clark's Springs, located near the Four Corners area of Maple Valley, provides over 60% of Kent's Water supply. BPA transmission lines are present on the Clark Springs property, with additional lines proposed under Options A. Option A also would traverse the city owned Kent Springs property, another source of municipal water supply for the City of Kent.

1447-003 1447-004 1447-005 As required by the 1986 amendments to the Safe Drinking Water Act and the Washington State Drinking Water Regulations (WAC 246-290-135), the City of Kent completed a Wellhead Protection Program which identified the Wellhead Protection Area (WHPA). The WHPA covers a majority of the southern portion of Alternative A between the Covington and Raver Substations and the southern portion of Option C. This also includes the WHPA for Covington Water District which provides municipal water to the Covington and Maple Valley areas. The aquifers in the WHPA are very shallow and unconfined, making them very susceptible to contamination. Concern exists regarding the maintenance effects of the BPA easements on the groundwater supply within these WHPAs. This information is documented in the City of Kent Wellhead Protection Program forwarded to you in September of 2001. In addition, copies have recently been forwarded to your consultants CH2M Hill and Shannon and Wilson.

1447-006 1447-007 1447-008 1447-009 Rock Creek flows through the Clark Springs facility and is an important natural resource, not only for the City of Kent municipal water supply, but also for anadramous fish populations, including sockeye, coho, steelhead and cutthroat trout. Alternative A would add an additional set of tower structures which would require

1447-001 Comments noted.

1447-002 The City of Kent groundwater supply area has been addressed in the SDEIS. Additional information has been provided in Shannon and Wilson Inc.'s letter to BPA dated January 16, 2003. See Appendix Y.

1447-003 See response to Comment 1447-002.

1447-004 and -005 See response to Comment 1447-002.

1447-006, -007, and -008 Comment noted. Documented anadromous fish use of Rock Creek, a tributary to the Cedar River at river mile 18, includes Chinook salmon, Coho salmon, and sockeye salmon per the Washington Department of Fisheries - A catalog of Washington stream and salmon utilization, Volume 1, Puget Sound (1975), and fish use information available at Stream Net (<http://www.streamnet.org>) accessed March 2003. Sockeye are considered to be present only within the main stem of the Cedar River.

1447-010
1447-011
1447-012
1447-013

removal of vegetation around the stream, potentially impacting the anadramous fish populations, altering the large wetland found on the City of Kent property and potentially altering localized hydrology. The City of Kent is currently developing a Habitat Conservation Plan for the Clark Springs facility under the provisions of the Endangered Species Act. The HCP will include an evaluation of land use impacts on the stream system, anadromous fish populations and their habitat.

1447-014

Less than a mile east of Clark Springs property, the Landsburg Mine is present (Sec 24 and Sec 25, T 22 N, R 6 E, WM). The mined section, Rogers Coal Seam, was mined to a depth up to 750 feet. Subsidence of the overburden left a trench roughly 60-100 feet wide, 20-60 feet deep, and approximately 3/4 mile long. This trench was subsequently used in the late 1960s to early 1980s for disposal of industrial wastes, and construction and land clearing debris. Drums, and liquids from tanker trucks were disposed in the northern portion of the trench. The Landsburg Mine site is currently under an Agreed Order with the Department of Ecology to clean up the former mine site.

1447-015

The mine is relevant as Alternative C is located adjacent to the former mine. We are concerned about the impacts any high voltage power lines may have on the various contaminants dumped in the Landsburg mine and the potential effects on groundwater quality.

1447-016
1447-017

The City of Kent strongly favors Alternative 1 as proposed by the Bonneville Power Administration, and we do not favor the alternatives that would create some potential impacts to the City of Kent property, the municipal water supply, or the natural resources found within the City's watersheds.

We look forward to working with you to manage our regional natural resources.

Sincerely,

Don Wickstrom, P.E.
Public Works Director

c: Mr. Kelly Peterson, Wellhead Protection Engineer
Mr. William Wolinski, Environmental Engineering Manager
Mr. Brad Lake, Water Superintendent
Mr. Patrick Fitzpatrick, Deputy City Attorney
Mr. Tom Brubaker, City Attorney
Mr. Judy Nelson, Covington Water District
Mr. Gene Lynard, Bonneville Power Administration
Ms. Cindy Custer, Bonneville Power Administration
File

1447-009, -010, and -011 BPA would site its transmission facilities (towers and access roads) to minimize sensitive resources such as streams and wetlands. BPA avoids these resources where it can, spans them where it can't avoid them, and mitigates if it can't span them. Impacts to the fishery resource are expected to be low to moderate, the same as with the Proposed Action, and the impact to wetlands are expected to be moderate with 17 acres of wetlands affected. The impact to groundwater is expected to be moderate to high. The wells under the City of Kent's wellhead protection program are considered highly susceptible to groundwater contamination.

1447-012 and 1447-013 Comment noted.

1447-014 and -015 The location of the Landsburg Mine adjacent to Alternative C is discussed in the SDEIS, Section 4.1.5.1 Settlement Hazard and its location shown on Sheet C-1 of Figure 5B of Appendix M. The transmission line ROW would be approximately 500 feet to the east of the mine trench that has been used as a disposal site. We have no evidence of harmful interactions between higher levels of electromagnetic radiation (EMR) on toxic wastes and groundwater quality.

1447-016 and -017 Comments noted.

DDES

King County
Department of Development
and Environmental Services
900 Oakesdale Avenue Southwest
Renton, WA 98055-1219

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# KE-LT-1489
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February 27, 2003

Bonneville Power Administration
Public Affairs Office-KC
PO Box 12999
Portland, OR 97212

RE: Kangley-Echo Lake Transmission Line Project

To whom it may concern:

King County Department of Development and Environmental Services (DDES) has completed its review of the Supplemental Draft Kangley-Echo Lake Transmission Line Project. King County DDES focused primarily on impacts to the natural environment, specifically project impacts related to wetlands, streams, and fish and wildlife.

As specified in previous comment correspondence, King County's Sensitive Areas Ordinance (SAO), KCC 21A.24, only allows for the alteration of wetland, and wetland and stream buffers for specific permitted alterations or under provisions of a Reasonable Use Exception, KCC21A.24.070, or Public Agency or Utility Exception (PAUE), KCC 21A.24.070A. The PAUE is code applicable to your situation for the proposed project.

1489-001 **Alternatives Analysis/Sensitive Areas Review/Mitigation**

King County DDES understands that the BPA proposes to build a single-circuit 500-kV transmission line from a tap point on an existing 500-kV line near Kangley, Washington to its Echo Lake substation near North Bend, Washington. The preferred alternative for this line, also called Alternative 1, is nine miles long. Five miles of the proposed route would go through the Cedar River Municipal Watershed. In addition, Echo Lake substation would be expanded by about three acres to the east and new equipment would be installed to accommodate the new line.

Based on review of Kangley-Echo Lake Transmission Line Project Supplemental Draft Environmental Impact Statement, the preferred alternative cannot meet all provisions of

1489-001 Comment noted.

Section 21A.24.070 of the King County Code provides for an agency or utility to apply for an exception to the Sensitive Areas Ordinance, if the application of this chapter would prohibit a development proposal by a public agency and utility.

As a federal government agency, BPA is prevented from applying for a local government permit, including an exception to a local government code. Since Congress has not waived sovereign immunity with respect to local zoning ordinances, BPA is prevented from complying with the County's procedural requirements. Although we do not comply with the procedural provisions of local government code, we do comply with the substantive intent of local government law, and we feel we have done so in minimizing impacts to sensitive resources to the maximum extent possible.

BPA as a federal agency does not apply for county permits, but would meet the equivalent of county requirements where feasible. Due to the nature of a transmission line, it is not possible to not impact riparian areas along streams and rivers and wetlands and their buffers. In order to keep a transmission line reliable, tall-growing species of trees need to be cut within riparian and wetland areas. BPA is proposing to compensate by planting/seeding low-growing plant species back where taller trees would have been taken. In addition BPA would purchase, or fund the purchase of, other properties (just for the Kangley-Echo Lake Project Alternative 1). BPA's intention is to convey the land to the City of Seattle for long-term protection. If all or part of the property is found to be unsuitable for mitigation of habitat loss, BPA intends to sell those portions of the property considered unsuitable for this purpose. In this case, BPA would sell the property subject to a restriction prohibiting residential or commercial use. The prohibition of commercial use would not include timber growing and harvesting, which would continue to be an allowable use.

BPA understands that the King County Code recognizes that utility corridors must cross sensitive areas in order to provide

the King County Sensitive Areas Code (21A.24). However, the King County's Sensitive Areas Code recognizes that utility corridors must cross sensitive areas in order to provide service to King County residents. The Code allows utilities in wetland buffers (KCC 21A.24.330.E), in stream buffers (KCC 21A.24.370.D), and across streams (KCC 21A.24.370.G), subject to certain criteria. Crossing wetlands with utilities is not a permitted alteration. The proposed clearing and/or filling in wetlands and in wetland and stream buffers requires a Public Agency Utility Exception (PAUE) for the construction of the transmission lines (KCC 21A.24.070.A). These Code citations are included in this letter by reference.

The criteria for authorizing PAUE's as set forth in KCC 21A.24.070.A(2) are identified below:

1489-001

> The department shall review the application based on the following criteria: there is no other practical alternative to the proposed development with less impact on the sensitive area; and the proposal minimizes the impact on sensitive areas.
>
> An analysis of alternatives to the project is required in order to approve a PAUE. Administrative Rule 21A-24-025 specifies criteria for DDES' evaluation of an alternatives analysis for a PAUE. DDES shall review the applicant's evaluation of alternatives, needs and objectives, the nature of the project, and the other factors set forth in subsection A of the rule, to determine if there is a practical alternative that would satisfy the purpose and need for the project and result in less impacts to the sensitive area and buffer. DDES shall determine that there is no practical alternative only if it concludes that the basic purpose of the project cannot practicably be accomplished using a project or non-project alternative, an alternative location, or an alternative construction technique that would avoid, or result in less adverse impacts on, a sensitive area or its buffer.

1489-002

The Bonneville Power Administration (BPA) performed an Alternative Transmission Line Routing Analysis for the Kangley-Echo Lake Transmission Line Project (DEIS June 2001 and SDEIS January 2003). Alternative project routes and design and construction methods were considered, and this study provided optimum routes for the corridors associated with the Project. The factors weighed in evaluating various routes for the transmission lines: use of existing corridors, community impacts, environmental impacts, construction factors, and system reliability.

King County DDES has noted that impacts to wetlands and streams have been minimized through the design and review process. Because the preferred route (Alternative 1) would parallel an existing 500-kV transmission line, compared to the other action alternatives, clearing would be minimized and the need to construct additional access roads (2.9 miles of new access road) would be reduced. Additionally, 0.6 miles of access road would be removed from service.

services to King County residents, that crossing wetlands is not a permitted alteration, and that a utility/public agency must apply for a public agency/utility exception. Please see previous response.

As a federal government agency, BPA is required to prepare an environmental impact statement (EIS) under the National Environmental Policy Act before making a decision on any major federal action, such as adding a 500-kV transmission line to BPA's main grid.

BPA has prepared a SDEIS, identifying the impacts of nine build alternatives, non-transmission alternatives and a No Action Alternative. As a part of this analysis, BPA identified how those impacts could be mitigated.

In addition to the best management practices, BPA proposes to offer 473 acres in compensatory mitigation to mitigate for the loss of approximately 90 acres of habitat for the northern spotted owl, and for alteration of 14 acres of forested wetlands to nonforested scrub/shrub wetlands within unincorporated King County. The 473 acres of compensatory mitigation would be located immediately north and immediately south of the Cedar River Municipal Watershed.

1489-002 Comment noted.

1489-003 Comment noted.

BPA has completed a wetland delineation report, dated March 28, 2002, which has been sent to you.

For a complete review of all streams proposed to be crossed under project Alternatives A, B, C (Options C-1 and C-2), and D (Options D-1 and D-2), please see Appendix N of the SDEIS. Revised Appendix A – Table A-1 of the Final Fisheries Technical Report (see Addition to Appendix A in the FEIS) contains this information for Alternatives 1-4. For a complete list of streams

The BPA identified mitigaiton measures that would be utilized under any of the proposed action alternatives. These mitigaiton measure include, but are not limited to, use of special design elements and construction techniques, season restrictions on construction, supervised erosion control practices, purchasing land as replacement habitat for habitat affected by the project, wetland mitigaiton including careful cutting and removal of only vegetation that are tall-growing species, reseeding where vegetation has been removed, and purchase of lands that contain wetlands, streams, and upland habitats.

1489-003 Under the action alternative review, King County DDES noted that, with the exception of Alternatives B and D, similar impacts on wildlife identified under all alternatives, however, it was noted that overall, the least amount of vegetation disturbance would occur under the Preferred Alternative (Alternative 1). Additionally, under Alternative 1, a total of 14 acres of wetland would be impacted. Impacts to the 14 acres of wetland only include vegetation disturbance, and the primary impacts would include the conversion of forested wetlands to scrub/shrub and emergent wetlands. Fewer acres of impacts to wetlands were noted under some of the other action alternatives; however, as stated previously, overall land area impacts under the other action alternatives were greater. With the exception of Alternatives B and D, impacts to fisheries and stream resources were identified as being similar under all the action alternatives. At this time, however, it is not clear exactly how many streams and of what type are proposed to be crossed under each of the alternatives.

It is understood that mitigation for environmental impacts will include minimization during project construction and operation, limited on-site mitigation, and that most impacts will be primarily mitigated off-site. It is also understood that the off-site mitigation options are still being finalized.

1489-004 Overall, based on the provided alternative analysis, it appears that King County DDES could support the Preferred Alternative (Alternative 1). However, BPA has not supplied sufficient documentation to establish conditions and mitigation measures to insure the proposed project will mitigate impacts on streams, wetlands, and associated buffers, and fish and wildlife.

Under the selected alternative, the BPA will need to:

1) Accurately quantify impacts to streams, wetlands, and their buffers. To facilitate quantification of impacts, the BPA will need to delineate and classify wetlands (KCC 21A.06.1415) and streams (KCC 21A.06.1240) within 100-feet of the proposed right-of-way. Based on the classification of wetland and streams, their location, and buffer requirements, impacts to wetland, streams and their buffers would need to be quantified.

1489-005

2) Mitigation will be required for alteration of wetlands, streams, and their buffers. The PAUE process does allow some flexibility in mitigation; however, mitigation should be consistent with the following King County regulations:

to be crossed in association with the Preferred Alternative, please refer to Tables 3 and 5 within the Final Wetland Delineation Report, Kangley-Echo Lake Transmission Line Project (March 28, 2002).

1489-004 See response to Comment 1489-003.

1489-005 BPA has purchased 350 acres in the Raging River Basin and may purchase or fund the purchase of other properties that could be used for compensatory mitigation to mitigate for the unavoidable impacts to sensitive resources. These properties may achieve greater biologic and hydrologic conditions, as called for by KCC 21A.24.340, than would result without the project.

BPA anticipates no alteration to streams; however, stream buffers would be impacted, as allowed by King County Code.

Per KCC 21A.24.340, all alterations on wetlands shall be replaced or enhanced on the site or within the same drainage basin using the following formulas: Class 1 and 2 wetlands on a 2:1 basis and Class 3 Wetlands on a 1:1 basis with equivalent or greater biologic functions. Replacement or enhancement off the site may be allowed if the applicant demonstrates to the satisfaction of King county that off-site location is in the same drainage sub-basin as the original wetland and that greater biologic and hydrologic conditions will be achieved.

1489-005 Per 21A.24.380, replacement or enhancement shall be required when a stream or buffer is altered pursuant to an approved development proposal. There shall be no net loss of stream functions on the development proposal site, and no impact on stream functions shall occur from the approved alterations. Replacement or enhancement for approved stream alterations shall be accomplished in streams on the site unless the applicant demonstrates to the satisfaction of King county that: 1) enhancement or replacement on the site is not possible, 2) the off-site location is in the same drainage sub-basin as the original stream, and 3) greater biologic and hydrologic functions will be achieved.

1489-006 3) Monitoring of the mitigation measures shall be required for five years following installation as specified on the approved plans, to evaluate whether or not the project performance standards have been met.

Should you need to discuss this information further, please feel free to call me at 206-296-7392.

Sincerely,

Bill Kerschke
Environmental Scientist III

1489-006 BPA understands King County requirements and would meet those requirements where feasible including monitoring.

February 28, 2003

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Bonneville Power Administration
Communications Office – KC-7
P.O. Box 12999
Portland, Oregon 97212
email: comment@bpa.gov

RE: Kangley-Echo Lake Transmission Line Project

1490-001 I am writing on behalf of the City of North Bend to comment on the Kangley-Echo Lake Transmission Line Project Supplemental Draft Environmental Impact Statement (SDEIS).

1490-002 The City is in support of the SDEIS conclusion that Alternative 1, a new single circuit 500 –kV transmission line routed through the Cedar River Municipal Watershed, would have the least environmental and fiscal impact. The City notes that Alternative 1 provides substantially increased environmental mitigation measures to protect the Cedar River Watershed, at a significant cost to the BPA customers. If similar care were taken to protect the environment on any of the other alternatives evaluated in the SDEIS, the cost of those alternatives would be significantly higher. The potential increase in cost to mitigate routes other than Alternative 1, to the same mitigation standards proposed for Alternative 1, should be evaluated in the Supplemental Final Environmental Impact Statement.

1490-003 The City is not in support of Alternative B, rebuilding the Rocky Reach-Maple Valley-345 kV to Double Circuit 500-kV from East of Stampede Pass to the Echo Lake-Maple Valley lines. Alternative B would result in a replacement of the existing150-foot tall towers with 180-foot tall towers. The change would create a significant increase in the visibility of the transmission line from the City of North Bend, adversely impact the Rattlesnake Mountain Scenic Area south of North Bend, and adversely impact the scenic value of the Mountains to Sound Greenway, for the length of the new line. Access routes required for reconstruction of the line could adversely impact the Forster Woods subdivision located south of Interstate 90 in North Bend.

1490-004 Similarly, the City is not in support of Alternative D, constructing a new Single-Circuit 500-kV line west of the Cedar River Watershed to the Echo Lake- Maple valley lines. As proposed in the SDEIS, the new 500-kV line would be located adjacent to the existing

1490-001 and -002 Comment noted. Please see response to Comments 1420-001 and -002.

1490-003 Comment noted.

1490-004 and -005 Comment noted.

1490-004 150-foot tall Rocky Reach-Maple Valley-345 kV running from east of Stampede Pass to the Echo Lake-Maple Valley lines. Alternative B would result in clearing another 150-feet wide right of way and constructing a new set of 180-foot tall towers next to the existing 150-foot tall Rocky Reach-Maple Valley-345 kV towers. Alternative D would also create a significant increase in the visibility of the transmission line from the City of North Bend, adversely impact the Rattlesnake Mountain Scenic Area south of North Bend, and adversely impact the scenic value of the Mountains to Sound Greenway for the length of the new line. Access routes required for construction of the new line could adversely impact the Forster Woods subdivision located south of Interstate 90 in North Bend. Additionally, the 150-foot wide clearing required for Alternative D could adversely impact the streams, steep slopes and geologically unstable ground above the Forster Woods development. The City experienced significant flooding and sedimentation problems from the streams eroding the unstable ground on the north slope of Rattlesnake Ridge in 1996. The City strongly opposes any action that would adversely impact the stability of the hillside and increase runoff and sedimentation in the streams on the North slope of Rattlesnake Ridge.

1490-005

1490-006

1490-007 For the reasons outlined above the City is would favor implementation of Alternative 1, a new single circuit 500 –kV transmission line routed through the Cedar River Municipal Watershed, because it would have the least environmental and fiscal impact, based on the information contained in the SDEIS.

Thank you for the opportunity to comment.

Sincerely,

Laurence Stockton,
Community Services Director

Copy

Mayor
Council
City Attorney
City Administrator

1490-006 Comment noted.

1490-007 Comment noted.

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PUBLIC INVOLVEMENT
LOG# KELT-1492
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MAR 03 2003

March 1, 2003

Lou Driessen, Project Manager
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

Subject: Comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Kangley-Echo Lake Transmission Project. Reference number: T-DITT-2.

Sent via e-mail to: comment@bpa.gov

Dear Mr. Driessen:

Seattle Public Utilities (SPU) is responsible for providing drinking water to 1.3 million customers in urbanized areas of western King County and the southern portion of Snohomish County. SPU takes approximately two-thirds of this drinking water from the Cedar River. SPU owns the 90,546-acre Cedar River Municipal Watershed (CRW) and manages its land and aquatic resources for water supply, the protection and restoration of fish and wildlife habitat, and the protection of cultural resources. SPU's companion utility, Seattle City Light, owns and operates a hydroelectric facility and associated transmission lines in the Watershed.

1492-001 This letter provides SPU's comments on BPA's Supplemental Draft EIS (SDEIS) for the Kangley-Echo Lake Transmission Project. SPU provided comments during the scoping for the Draft EIS (DEIS) in letters to BPA dated April 28, 2000, and October 2, 2000. SPU also provided comments during the comment period for the DEIS on September 4, 2001. SPU provided comments to BPA on the scoping of this SDEIS in a letter dated July 22, 2002. To the extent applicable, these comments are incorporated herein by this reference.

SPU has the following major points on the SDEIS. Additional details for these points and others are included below.

1492-002 • The purpose and need for this project should be clearly and completely described in the SDEIS.

Dexter Horton Building, 10th Floor, 710 Second Avenue, Seattle, WA 98104
Tel: (206) 684-5851, TTY/TDD: (206) 233-7241, Fax: (206) 684-4631
An equal employment opportunity, affirmative action employer, Accommodations for people with disabilities provided upon request.

1492-001 Comment noted.

See responses to Comment Letter 394.

1492-002 Please see Chapter 1 of the SDEIS.

1492-003 Please see Chapter 1 of the SDEIS. Please see responses to Comments 340-002, 1415-003, and -004.

1492-004 BPA has worked closely with the City of Seattle to develop construction measures and stormwater pollution controls to minimize water quality impacts from construction of the project. From the onset, BPA designed the project, including placement of roads and towers, to avoid all sensitive areas, to the maximum extent feasible. To address unavoidable impacts, BPA is in the process of acquiring and protecting compensatory mitigation properties adjacent to the CRW that will help reduce future impacts to the CRW from potential development. We also intend to implement new turbidity monitoring devices in the CRW to increase awareness of when the water supply system may need to temporarily shut down to protect City water customers due to turbidity. Finally, we are acquiring insurance coverage for unforeseen events (caused by BPA's construction or operation and maintenance of the transmission line), which would trigger new environmental requirements. We believe we are taking extraordinary steps to address the concerns raised by the comment.

1492-005 Please see the mitigation listed for each of these resources in the SDEIS. Also please see responses to Comments 340-002, 1415-003, and -004.

1492-006 A Summary of Transmission Planning Studies is provided in Appendix H (available on request). BPA did a comprehensive evaluation of transmission infrastructure needs which is summarized in "BPA Infrastructure Projects, February, 2003," available at http://www.bpa.gov/Corporate/KC/home/keeping/03kc/KC_Infrastructure.pdf. A variety of alternatives were identified to address the particular purpose and need, including reconfiguration of existing lines in the Puget Sound area. The alternatives are described in Chapter 2 of the SDEIS.

1492-003 • SPU opposes construction of this transmission line through the CRW unless the impacts on the Watershed can be fully mitigated and the City and its water customers can be fully protected and compensated. The SDEIS should include an analysis of all potential impacts to the CRW, explain how they would be addressed and mitigated, and indicate how SPU and its customers will be protected from the associated potential harm.

1492-004 • BPA should carefully evaluate the potential impacts on drinking water (particularly during construction) of any routes through the CRW and indicate how SPU and its water supply customers will be protected from the associated potential harm.

1492-005 • Measures to mitigate for impacts to natural, social, and cultural resources should be described in the SDEIS, and those measures should fully mitigate for any unavoidable adverse impacts caused by the construction and operation of the transmission line.

PURPOSE AND NEED

1492-006 The SDEIS should thoroughly explain the purpose and need for the proposed action. It is unclear from BPA's previous statements and documents why the proposed routes or the infrastructural choice embodied by them can alone fulfill the BPA's more general grid objectives for redundancy, or why a proposed action on any other of BPA's eleven other major high-voltage transmission lines serving the Puget Sound area could not meet the stated objectives with less environmental impact. The SDEIS would benefit from a detailed explanation of the electrical transmission system serving the Puget Sound area that supports the necessity of the proposed action, and BPA should consider referencing system plans or a regional analysis (along with a description of other improvements BPA is considering in the near and distant future) so the reader can understand why this specific, relatively short link in a much larger system is necessary. In short, BPA should explain how the risk of failure of the existing BPA transmission line in the Watershed justifies the need for an additional transmission line to be built in the Watershed.

1492-007 The SDEIS should also clarify who, specifically, would benefit from the electricity transmitted through this line. Some members of the public may believe that citizens of Seattle will most benefit from this project. In Section 2.3.5, what does "to make profits in the lucrative short- and near-term markets" mean exactly? BPA's own public statements suggest the Northwest will not be the major beneficiary of this project, due to Canada's plans to wheel the energy it receives from the Canadian Entitlement through this new project to California and other southern-tier states. The SDEIS should clearly state which countries, states, and energy markets will benefit from this project and how they will benefit. BPA must have some idea what Canada plans to do with the power it receives at Blaine because that power would be wheeled over BPA's transmission infrastructure if it is to be sold back to US markets. The SDEIS should describe these destinations and the parties benefiting from that power.

1492-008 In an advance copy of the SDEIS [p. 1-4 (box) (5-year planning timeframe) and p. 10: Section 1.7], BPA stated "…studying whether another transmission line between the Echo Lake Substation and Monroe–Echo Lake substation…" This project is not mentioned in the publicly released SDEIS, but should be. Combining two or more projects (such as rebuilding

1492-007 The primary beneficiaries are consumers in the Puget Sound Area and in British Columbia served by retail utilities that take service over the BPA transmission grid. This essentially represents all residential, commercial and industrial consumers in the area. For information on the Canadian Treaty, please see Section 1.2.2 of the SDEIS, Appendix I and response to Comments 1422-002-001, 1422-002-002 and 1421-031-001. Consumers in the Puget Sound Area directly benefit from the Treaty. We believe that Canada may "make profits in the lucrative short- and near-term markets" mostly in the spring and summer, not in the winter when this problem occurs.

1492-008 The reference to this line was changed in the SDEIS for security reasons.

BPA has included in its planning any future potentials for any alternative. This Kangley-Echo Lake project cannot be included with any future alternative. In fact, in the early 1990s, BPA did a project that would have produced a new 500-kV line across the Cascade Mountains into the King County area and also the Kangley-Echo Lake project. Through the then environmental/ NEPA process, BPA determined that the "Cross-Mountain" portion of the project and the Kangley-Echo Lake portion could be delayed by construction of a new substation, called Schultz, in the Ellensburg area, and through targeted conservation. Also it was determined that if another line is needed across the Cascade Mountains, then it would likely be needed north of Seattle in the Monroe area and not in the Echo Lake Substation area. BPA has tentatively determined that the next cross-Cascade line is needed in 2010, but that date could be substantially affected by the rate of load growth and new generation west of the Cascade Mountains. Therefore Alternative B and D likely will have no advantage to future projects and cannot combine economical resources. BPA has also acknowledged in the current Kangley-Echo Lake SDEIS that Alternatives A and C would use a vacant 500-kV circuit on their north end to get into Echo Lake Substation. BPA has plans to use this vacant circuit sometime in the near future as growth in King County continues. When the need arises to use these

1492-008 the 50-year old 345 kV Rocky Reach-Maple Valley line over Snoqualmie Pass or building another 500kV on the Maple Valley-Echo Lake Alternative A) with a new 500 kV line could alter the "prefer-ability" among current project alternatives and present valuable opportunities for cost savings over the long term. Why are these future projects for these lines not being considered for design and construction simultaneously with the needed 500kV line? If the reason is that BPA's planning horizon is "five to seven years" [SDEIS p. 1-4 (box)], then this would be inconsistent with BPA's previous actions on other projects. That is, BPA has previously invested resources for the long-term without knowing the complete future picture (e.g. WPPPS and Trojan). Such an investment (designing and constructing two projects in concert) would appear to offer cost advantages in this case, considering even conservative estimates of growth in Western Washington. The SDEIS should completely describe all short- and long-term planned system upgrades, reconstruction, and new construction for all transmission facilities in and near the project area, and describe why BPA has not investigated design solutions involving the reconstruction/upgrade/construction of two or more transmission lines in concert as project alternatives.

RISK ASSESSMENT FOR "FAIL SCENARIOS"

1492-009 The SDEIS should include an explanation of how risks to power lines are calculated and used in defining system reliability standards and performance.

1492-010 This would provide a better context for BPA's risk assessments for this project. For example, Watershed forests can be subject to extreme fire hazard, "microbursts" have historically leveled forests near the proposed project, and parts of the proposed line would be located on ancient landslide deposits. The SDEIS appears to take a superficial, simplistic risk evaluation approach that doesn't fully justify selection of the proposed action in terms of reliability. BPA should address these potential risk issues in the SDEIS.

ALTERNATIVES EVALUATED IN THE SDEIS

1492-011 SPU appreciates the SDEIS's inclusion of alternative routes located outside the CRW. However, it is not clear why the four alternatives (besides the proposed action) that cross the Cedar River Watershed (CRW) are still being analyzed and considered in the SDEIS. These superfluous alternatives are distracting and don't bring any significant information to light.

1492-012 In addition, the SDEIS fails to provide detailed cost estimates for all alternatives while still using project costs to evaluate alternatives. The cost estimates associated with project alternatives are difficult to understand. The SDEIS needs to present a cogent and detailed description of cost estimates for all alternatives because BPA is using relative costs in the decision-making process for this project. It is difficult to assess if project costs are being "inflated."

1492-013 For example, additional cost of mitigation for alternatives mixes standard and sound design and construction BMPs with "mitigation." The BMPs should be considered standard elements of design and construction, not additional mitigation costs: use of erosion specialists and monitors for erosion control, use of temporary mats to cross wetland vegetation, use of special surveying techniques to minimize vegetation disturbance; use of special clearing criteria; restricting ground-disturbing activities to the dry season (Alternative 1); minimizing wetland impacts, use of special care and design for crossing fish-bearing streams (Alternative A).

1492-014 But, when actual compensatory mitigation actions are described, then these are not included in the mitigation costs across the board for other alternatives [e.g. measures needed for the

vacant circuits and either Alternative A or C is using this vacant circuit, then another transmission line would need to be constructed to replace the vacant circuit occupied by Alternative A or C. Other future projects are not in the same area and/or provide no benefits to this project, such as a possible future line from Echo Lake Substation to the north. BPA planned Kangley-Echo Lake as part of a broad examination of infrastructure needs, which is summarized in Infrastructure Keeping Current, February, 2003, available at http://www.bpa.gov/Corporate/KC/home/keeping/03kc/KC_Infrastructure.pdf.

See response to Comment 1492-006.

1492-009 and -010 The risks and criteria that BPA uses to plan the grid are summarized in Section 1.2.1 of the SDEIS and described in more detail in "Reliability Standards: meeting national and regional requirements for electric system reliability," available at http://www.bpa.gov/Corporate/KC/home/keeping/03kc/KC_Reliability.pdf. BPA has over 30 years of experience with an existing transmission line in the CRW which has operated with acceptable reliability and without impact on the CRW.

1492-011 and -012 Comment noted. Please see response to Comments 1420-001 and -002.

1492-013 and -014 Please see response to Comments 1420-001 and -002.

1492-015 and -016 Please see response to Comments 1420-001 and -002. BPA would minimize and mitigate impacts to wetlands and other sensitive areas on any alternative. BPA would likely not purchase additional properties for impacts to sensitive areas outside the CRW.

1492-017 See response to Comment 382-026.

1492-018 The only alternative that has detailed engineering and engineering survey information available is the Proposed Action (Alternative 1). Due to the need to get the project energized as quickly as possible, BPA has taken the risk and

1492-014 approximately 401 landowners potentially affected (What measures?; BPA already owns the
1492-015 ROW.) (Alternative A)]. Or, compensatory mitigation for wetland impacts and timber
1492-016 removed in sensitive/critical areas (Alternative B) (Why is this not included as mitigation for ALL alternatives, including Alternative 1?)

GENERAL COMMENTS ABOUT IMPACT ASSESSMENT AND MITIGATION

1492-017 The SDEIS should disclose the significance of impacts. The DEIS and SDEIS use terms such as "low, medium, and high" to describe impacts. This may assist making relative comparisons among the alternatives considered, but it fails to identify whether or not these impacts are "significant." Based on the NEPA regulations' definition of "significant," many of the impacts identified in the SDEIS would qualify. The SDEIS should disclose this information so that the public and other agencies, as well as decision-makers, have adequate information to review.

1492-018 Also, the SDEIS should describe alternatives in sufficient detail to support evaluation of impacts and mitigation measures. Examples of important details might include clearing requirements, tower locations and designs, and access roads. This information would help in understanding potential impacts because in many aspects the alternatives may be reported to have very similar impacts. Further, providing the project details would help evaluate the effectiveness of proposed mitigation.

1492-019 The landowner most affected by this project is the City of Seattle, and the impacts of the
1492-020 project are potentially greatest and certainly most complex for the Cedar River Municipal Watershed, especially considering: 1) the area is the region's major drinking water supply, and 2) the land is being managed under a complex Habitat Conservation Plan (HCP) and associated legal commitments to the federal government. It is therefore especially important to the City that the SDEIS fully disclose potential environmental impacts so the public and decision-makers are able to make informed decisions regarding this proposed project.

1492-021 Mitigation measures in the SDEIS should be committed to with reference to specific
1492-022 mitigation plans. Further, mitigation actions need to be clearly linked to making "significant" impacts "not significant," which raises the question, again, of why the SDEIS does not use the traditional NEPA "significance" designations that most EIS's and reviewers use to assess
1492-023 impacts and the proposed mitigation actions. For example, for the above reasons, it is not clear to SPU (from the SDEIS language) just exactly how the HCP would remain "intact and whole" (Section 5.5.8.5) if BPA's project were allowed to pass through the CRW.

IMPACTS ON THE CEDAR RIVER WATERSHED

1492-024 The Watershed is ecologically unique in the Puget Sound region. It includes some of the largest contiguous areas of older forest habitat (between 60 and 100 years old) at low-to-mid-elevation, areas that would be significantly impacted by alternatives 1 through 4. The Watershed is located in an area of the Cascade Mountains that has been identified by federal biologists as critical to the long-term survival of many species dependent on old-growth forest habitats. It is embedded in an area of checkerboard ownership in the central Cascades that is essential to dispersal of organisms between the north and south Cascades; the Watershed is a

gathered this information knowing that the Administrator could chose another alternative. If he chooses another transmission alternative, BPA would need another two or more years to energize this project. BPA understands that it is taking a financial risk investing in the preferred alternative beyond what BPA would normally do ahead of the Record of Decision. Other alternatives do not have this detailed information. For the other alternatives, BPA has used a worst case scenario, such as more clearing than would actually be necessary, including clearing at sensitive areas such as wetlands and creek and river crossings.

1492-019 and -020 Comment noted.

1492-021, -022, and -023 See response to Comment 382-026.

1492-024 Comment noted.

1492-025 Comment noted.

1492-026, -027, and -028 Comment noted.

BPA's proposed transmission line would expand the existing 150-foot wide right-of-way through the CRW to a 300-foot wide right-of-way. BPA did evaluate the impacts to vegetation (low to moderate), and for threatened, endangered or sensitive species (moderate).

1492-029, -030, and -031 Please see responses to Comments 1492-004 and 1421-030-001. BPA has consulted with the USFWS and NMFS. Letters from NMFS were included in the SDEIS (Appendix U) and state that NMFS agrees with BPA's determination of "may affect, but not likely to adversely affect" for Puget Sound chinook and their designated habitat.

1492-032, -033, and -034 Spills of fuel or hazardous materials in the CRW could impact groundwater that may eventually flow into the Cedar River. The potential for such spills would be greatest during construction. A spill response plan will be developed and incorporated into the SWPP Plan, as described in Section 4.3.3.2 of the SDEIS. See response to Comment 394-139. In

1492-024 large block of protected forest that is a key element in this north-south habitat connectivity. The Watershed comprises two-thirds of the Cedar River Basin, and includes the headwaters of the major river supplying Lake Washington. The Cedar River includes some of the most important salmon habitat in the Lake Washington Basin.

1492-025 The SDEIS should take into account the growing local and regional importance of the CRW as wildlife and fish habitat, a wildlife movement corridor, and a refugium, amid urban development and extractive land uses. This role has a significant social and biological value that needs to be taken into consideration in evaluating the potential impacts of this project.

1492-026 SPU recently completed its Habitat Conservation Plan for the Cedar River Watershed under the federal Endangered Species Act (ESA). On April 21, 2000, the City of Seattle along with the National Marine Fisheries Service (NMFS) and the U. S. Fish and Wildlife Service (USFWS) signed the Implementation Agreement for this HCP and received the associated Incidental Take Permits under the ESA. The HCP and its implementing agreements represent

1492-027 the cutting edge, regionally and nationally, of applied ecosystem management principles and were the culmination of over six years of effort in building regional consensus on the future direction for the management of the terrestrial and aquatic resources of the Watershed.

1492-028 The intensive public review for this HCP revealed broad public support for protecting the habitats in the Watershed and not creating more large openings in the forest by commercially harvesting timber. In response to this, the City decided to discontinue commercial timber harvest over the next 50 years. BPA's proposed routes through the Watershed would result in making large clearings in this important forested area. The local and regional consequences of the proposed large-scale fragmentation and removal of older forest in this sensitive area should be thoroughly evaluated in the SDEIS.

1492-029 In its scoping letters for the DEIS and SDEIS, SPU identified the need for BPA to address affects of the project on the HCP. SPU needs to be certain that the proposed project will not diminish the conservation value of the plan and that the City and its water supply customers will be fully protected.

1492-030 SPU believes that the proposed routes through the CRW could, unless adequately mitigated, have significant impacts on species protected under the Endangered Species Act, and on their habitat. Protected salmon species are expected to be present in the Alternative 1 through 4 project areas by the fall of 2003. These issues need to be carefully evaluated in the SDEIS,

1492-031 which should disclose and evaluate the extent to which the proposed routes through the CRW would affect the habitat of listed species. The SDEIS should also describe how BPA would protect the City from any possibility that the terms of the HCP will be violated.

IMPACTS TO DRINKING WATER SUPPLY

1492-032 Generally, the SDEIS downplays the regional significance and social function of the CRW as a municipal water supply. For example, Section 4.5 indicates that groundwater impacts for

1492-033 Alternative 1 would be low (despite the groundwater contributions to Cedar River flows upstream of Landsburg), while groundwater impacts for Alternative A would be high due to the City of Kent well-head protection area. The SDEIS must explicitly address the potential

1492-034 impacts of the proposed action on drinking water and the City's ability to provide that water to those who need it. Because the Cedar River source is unfiltered, SPU is required to control the Watershed in accordance with a Department of Health (DOH)-approved control program. Any crossing of the Cedar River and its tributaries in this area of mature forest could pose significant risks to the drinking water supply during construction. Construction activities have the potential to cause high water turbidity events that could result in exceedance of federal drinking water standards, and potentially result in the need for expensive water filtration that

1492-035 otherwise would not be needed or required. The SDEIS should disclose and evaluate these risks, and should describe how BPA will protect the City and its water supply customers from the associated potential harm. In addition, the SDEIS needs to present a more detailed discussion of federal and state drinking water quality regulations and constraints as they pertain to the CRW.

general, impacts to groundwater that provide a sole drinking water source (City of Kent wellhead protection area) will be greater than impacts to groundwater that eventually drains to a surface water source of drinking water (CRW) due to shorter travel times and less dilution. Construction site impacts would be local and temporary. Tower sites would be isolated and away from stream crossings. Mitigation measures described in the DEIS and SDEIS would be used to reduce the potential of turbid water events. Water quality regulations are discussed in Sections 3.5.3 and 3.5.4 of the SDEIS and in letters from Shannon and Wilson, Inc. to BPA dated January 16, 2003 (see Appendix Y).

1492-035 Please see response to Comment 1492-004. Impacts to drinking water regulations have been discussed in the SDEIS. As mentioned above, BPA is proposing to extraordinary steps to minimize construction impacts to the CRW by designing the project to avoid impacts, by undertaking various best management practices to minimize harm, and by purchasing mitigation to compensate for those impacts that cannot be avoided. The mitigation should leave the CRW with a net environmental benefit. Moreover, BPA already has an existing 500-KV line that parallels the proposed line. The existence of the existing line offers convincing evidence that such a line is compatible with water quality. To our knowledge, no water quality problems have ever been attributed to the existing line. If there are some minimal impacts to water quality during construction, these impacts would only be temporary. The ROW should be stabilized (naturalized) in one or two growing seasons.

1492-036 Please see response to Comments 1420-001 and -002.

1492-037 and -038 BPA has prepared a SDEIS and has included Chapter 5, entitled "Consultation, Permit and Review Requirements." Within Chapter 5, BPA has discussed consistency with federal, state and local environmental laws, and regulations. Additionally, BPA has published a letter from the Washington Department of Ecology (Appendix V of the SDEIS), stating that "Ecology agrees with your determination and assessment that the proposed action is consistent to the maximum extent practicable with the enforceable policies of Washington's

IMPACT AVOIDANCE, MINIMIZATION, AND MITIGATION

1492-036 SPU believes that no matter which construction alternative is ultimately selected, BPA should commit to constructing a project that uses innovative approaches, designs, and technologies that avoid and minimize adverse impacts to the maximum extent feasible. The SDEIS should specify in detail how BPA intends to do so. The SDEIS should also clearly describe the steps BPA plans to take to fully mitigate the unavoidable adverse impacts associated with each alternative.

CONSISTENCY WITH FEDERAL, STATE, AND LOCAL REGULATIONS AND POLICIES.

1492-037 NEPA regulations require that an EIS discuss possible conflicts between the proposed action and the objectives of federal, state, and local land use plans, policies, and controls[40 CFR 1506.2(d)].

1492-038 However, the SDEIS does not discuss possible conflicts or inconsistencies of its proposed action with approved state and local plans and laws. Where inconsistency exists as, for example, regarding King County's critical areas (streams, wetlands, and buffers) and Shoreline Management provisions, the SDEIS should describe the extent to which the agency would reconcile its proposed action with the plan or law. In this regard, it is not clear from SDEIS Section 5.5.6 just how BPA's compliance with the ESA and coordination with state and federal fish and wildlife agencies would alone achieve consistency with King County's critical area provisions or "meet or exceed the substantive standards and policies" of those provisions. Nor is it clear (in Section 5.8.2) how activities will be coordinated with King County and exactly how consistency with King County's critical areas regulations will be achieved through this "coordination."

CULTURAL RESOURCES

1492-039 The SDEIS asserted that impacts will be "low" for the proposed action. SPU does not believe that the SDEIS contains an adequate amount of information to support this conclusion, and believes that, given the location of Alternative 1, these impacts could be significant. The SDEIS should provide the information needed for a more complete assessment of this issue.

VISUAL RESOURCES

1492-040 BPA's SDEIS states there would be no or low impacts to visual resources for Alternative 1 and that the proposed action would not be visible from state routes 18 or 90. In fact, however, the proposed action would be visible from state routes 18 and 90 (as the existing transmission line is visible), by numerous workers and visitors to the Watershed, and from airplanes. The SDEIS should accurately assess impact to visual resources and commit to mitigation that avoids and minimizes adverse impacts and compensates for unavoidable adverse impacts.

Should you have questions or require further information, please contact Clayton Antieau at 206-233-3711 or Jim Erckmann, at 206-233-1512.

Sincerely,

SUZANNE FLAGOR
Director, Watershed Management
Seattle Public Utilities

cc: Craig Hansen, USFWS
Steve Landino, NMFS
Greg Nichols, Mayor
Chuck Clarke, SPU
Hardev Juj, Seattle City Light

Coastal Zone Management Program and will not result in any significant impacts to the State's coastal resources." With respect to the King County Sensitive Areas Ordinance, Chapter 5 of the SDEIS states that BPA will comply with the substantive intent of the County zoning ordinance.

1492-039 and -040 The cultural resources work conducted for the selected alternative is adequate to conclude that its potential for impacts on these resources is low. The study was exceptionally thorough, starting with background research and a sensitivity analysis that concluded that the routing had a relatively low potential for containing cultural resources. The fieldwork included more than 1,150 subsurface test probes and also involved the participation of the Muckleshoot Indian Tribe in the survey and in interviews about traditional use of the area. The methods and results of the cultural resources study are reported in a lengthy report that is confidential with respect to public distribution but has been reviewed by SPU, the State Office of Archaeology and Historic Preservation, and the Indian tribes. An additional survey will be conducted of newly-identified project features such as roads and staging areas. The report includes an Unanticipated Discovery Plan that provides specific procedures in the event that any artifacts or human remains are found.

We do not believe the new line would be visible from either State Route 18 or from I-90; however, the proposed transmission line would be visible to air traffic flying over or in the vicinity the Cedar River Municipal Watershed. Our SDEIS identified this impact and stated that the impact to visual resources would be low to moderate on views from cars or aircraft, and moderate to high on some Kangley area residents for whom the transmission line would be the dominant visual feature.

The transmission line would be designed to mitigate the visual impacts with darkened steel towers, nonspecular conductors and insulators that are non-reflective.

King County
Water and Land Resources Division
Department of Natural Resources and Parks
King Street Center
201 South Jackson Street, Suite 600
Seattle, WA 98104-3855
206-296-6519 206-296-0192 Fax

INCOMING
LOG #: KELT- 1515
RECEIPT DATE:
MAR 0 4 2003

February 28, 2003

Bonneville Power Administration
KC-7, PO Box 12999
Portland, OR 97212

To Whom It May Concern:

1515-001 King County Department of Natural Resources and Parks (KCDNRP) is pleased to have the opportunity to comment on the supplemental draft Environmental Impact Statement (SDEIS) for the proposed Kangley-Echo Lake Transmission Line Project. As steward of King County's environment and natural resources, this agency has concerns regarding the extent of analysis

1515-002 performed by the Bonneville Power Administration (BPA) on the impacts of this project on those resources and, in particular, on federally listed salmonids in King County, Washington.

1515-003 To date, significant attention in the review of this project has been focused on the Cedar River Watershed. To an extent this is appropriate. Several of the alternatives promise significant impacts to many citizens of unincorporated King County, the river is home to several Endangered Species Act (ESA) listed and unlisted native salmon stocks, and the preferred alternative raises critical issues regarding the protection of the main source of potable water for

1515-004 the region. Specific concerns regarding the first two matters have been raised in previous letters from King County. Those concerns remain relevant and should continue to be accounted for in the review process. Also, it is my understanding that BPA has been engaged in intense

1515-005 negotiation with Seattle Public Utilities (SPU) regarding potential impacts of the proposed project in the upper watershed in close proximity to its water supply diversion. I am hopeful that issues raised regarding potential impacts to the water supply diversion and to natural resources

1515-006 nearby will be addressed in a manner that meets the needs of BPA, SPU, and the natural resources of the upper watershed.

1515-007 It is important, however, to remember that the majority of the proposed alternatives indicate that the new powerline facilities will begin and end in unincorporated King County and that the preferred alternative indicates that approximately half of its land impacts will also occur there. A significant portion of those impacts will occur in the Raging River watershed. The Raging River is a significant local natural resource that will be adversely impacted by the proposed

1515-008 alternatives. The Raging River provides important spawning grounds for the Snoqualmie River

1515-009 population of threatened Puget Sound chinook salmon and coho salmon. Action by the BPA to

1515-010 construct a second Right-of-Way across the Raging River would degrade valuable habitat and could slow local recovery efforts. King County believes that the Raging River should be given

1515-011 similar consideration as the Cedar River and that an analysis should be performed to consider the environmental benefits of doubling the conductors at the crossing site.

1515-001 and -002 Comment noted.

1515-003, -004, -005, and -006 Comments noted.

1515-007 Comment noted.

1515-008 Comment noted.

1515-009 and -010 BPA has consulted with the NOAA and NOAA has stated that since the Proposed Action incorporates avoidance and minimization measures into the project design, the effects of the action can be expected to be discountable and insignificant. NOAA has concurred with our effect determination of "may affect, but not likely to adversely affect" for Puget Sound chinook and their designated habitat.

1515-011 See response to Comment 1485-007.

1515-012 King County believes that the Final Supplemental Fisheries Report (Fisheries Report) of the SDEIS does not provide adequate analysis of the potential adverse impacts to chinook and coho populations resulting from each proposed alternative. In fact, the Major Conclusions section (section 1.3) of the report (page 7) states that "All action alternatives would have similar impacts to fish and their habitat." This is not accurate since each alternative proposes crossings at different river locations with different populations of fish and a variety of habitats. Before a final EIS is issued, specific impacts of each alternative should be prepared.

1515-013

1515-014 The Fisheries Report acknowledges that the clearing of riparian vegetation along the Raging River and other streams with threatened salmonids "could constitute a high impact" (page 39). Recognized impacts such as decreased large woody debris recruitment, decreased riparian shading, increased stream temperatures, and increased bank erosion may result in significant cumulative impacts to fish and their habitats. Yet, the report also states that these conclusions "cannot be confirmed until the extent of clearing needed in the affected areas is known"(page 39). This is important information and should be provided in order to make an informed selection of the alternatives. King County would like to see a more thorough analysis of impacts performed at each of the proposed alternative sites.

1515-015

1515-016 The Final Supplemental Vegetation Technical Report (Vegetation Report) does not provide an in-depth analysis of riparian clearing needed to accommodate the conductors, overhead ground wires, and insulators designed for each alternative. In order to make an informed decision regarding alternative selection and the impacts of each alternative on vegetation management, more information is needed. For example, if the minimum conductor-to-ground clearance for a 500-kV line is just over 29 feet, what is the allowable distance between vegetation and the conductors? Does the vegetation need to be removed completely even in the riparian areas?

1515-017 In summary, King County Department of Natural Resources and Parks has a specific interest in protecting the Raging River. It is an important tributary to the Snoqualmie River and provides spawning and rearing habitat for threatened salmonids. The current suite of alternatives, in particular the preferred alternative, propose management actions that could have significant adverse impacts to the Raging River and its adjacent riparian area. The state of information and the depth of analysis provided in the SDEIS, the Fisheries Report, and the Vegetation Report do not adequately address these potential impacts. King County requests that BPA conduct a more thorough analysis on the impacts to the Raging River and its salmon populations and present the findings before an alternative is selected.

1515-018

1515-019 Thank you for the opportunity to comment on the SDEIS for the proposed Kangley-Echo Lake Transmission Line Project. If you have any questions about our comments, please call James Schroeder, Project Manager, in the Water and Land Resources Division with the King County Department of Natural Resources and Parks, at (206) 205-8309.

Sincerely,

Daryl Grigsby
Manager

cc: Rick Kirkby, Manager, Water Resources Unit, King County Department of Natural Resources and Parks (KCDNRP)
Kevin Owens, Manager, Regional Policy Unit, KCDNRP
Harry Reinert, Special Projects Manager, King County Department of Developmental and Environmental Services (KCDDES)
Mark Sollitto, Transfer of Development Rights Program, KCDNRP
Bill Kerschke, Senior Ecologist, Land Use Services Division, KCDDES
James Schroeder, Project Manager, Water and Land Resources Division, KCDNRP

1515-012 and -013 BPA believes that the analysis of specific impacts has been completed for each alternative, is accurate, and gives the decision maker enough information to make an informed decision.

1515-014 and -015 The Raging River crossing is located across a very deep drainage and in some areas near the river, no vegetation would be cut because there is enough clearance between the line and the river. Some trees may be cut where they could pose a danger to safe operation of the line.

1515-016 The minimum allowable clearance between conductor and vegetation is 20 feet plus the specific vegetative species' growth factor. In general, all tall-growing species would be cut to almost ground level except at specific sensitive areas such as riparian areas where any vegetation could be allowed to grow within the 20 feet plus growth factor to the conductor. So the actual height of the vegetation allowed at riparian areas depends on the actual height of the conductor at that site. Due to the special status of the Cedar River Watershed and its HCP, BPA is willing to work with Seattle to allow young, tall-growing tree species to remain longer before cutting to create a taller habitat without creating a hazard for the transmission line. If possible, no low-growing vegetation species will be cut near riparian areas during construction.

1515-017, -018, and -019 BPA believes that the analysis of specific impacts has been completed for each alternative, is accurate, and gives the decision maker enough information to make an informed decision. Because of the presence of endangered species in the area including chinook salmon in the Raging River, BPA prepared a biological assessment and entered into Section 7 consultation with NMFS in July 2001. This consultation was completed on January 28, 2002, with their finding that "Since the proposed action incorporates avoidance and minimization into the project, NMFS can expect the effects of the action to be discountable or insignificant. Therefore NMFS concurs with your effect determination of "may effect, but not likely to adversely affect" for Puget Sound Chinook and their designated habitat.

Please see response to Comments 1515-014 and -015.

SNOHOMISH COUNTY PUD PUBLIC UTILITY DISTRICT NO. 1

Providing quality water, power and service at a competitive price that our customers value

INVOLVE... KELT- 1516 ..
RECEIPT DATE: MAR 04 2003

February 28, 2003

Bonneville Power Administration
Public Affairs -KC
P.O. Box 12999.
Portland, Oregon 97212

BPA Representative:

1516-001 Public Utility District No. 1 of Snohomish County ("District") has reviewed the Supplemental Draft Environmental Impact Statement Summary DOE/EIS-0317-S1 and applicable appendices. The District comments will focus on the need for transmission reinforcements in the Puget Sound area and not on the specific corridor and facility alternatives proposed to implement the Northwest transmission system reinforcement.

1516-002 The District actively participated in a number of Northwest transmission planning activities including the Bonneville Power Administration Infrastructure for Technical Review Committee ("ITRC"). This committee was formed to evaluate needs for significant transmission addition in the Northwest, including the Kangley Echo Lake transmission line project. BPA evaluated numerous alternatives with electric industry representatives. The ITRC evaluated and scrutinized the projects to ensure that they would resolve existing system deficiencies as well as provide for future needs. The "Puget Sound Area Additions Project," also known as "G1 Project," includes the Kangley-Echo Lake 500-kV line as well as the SnoKing 500/230-kV bank addition which will be located in Snohomish County. These projects carefully coordinated with other planned projects, including the second 500kV line between Monroe – Echo Lake known as the "I-5 Corridor G8 Project". The Northwest electric utilities have developed and supported these electric system plans to benefit the Puget Sound and Northwest.

1516-003 1516-004 1516-005 These projects, in conjunction with other planned projects, will increase the system load service capacity, level of service, and transfer capability in the Puget Sound area. Without these "G" projects, BPA will not be able to meet its obligation under the "Columbia River Treaty and Return of the Canadian Entitlement" or the transmission load service obligations to Puget Sound area electric utilities. Significant transmission congestion and curtailments have already caused material economic impacts to the region. The region to date has capitalized on the use of reactive additions and Remedial Action Schemes ("RAS") to provide small incremental capacity additions to avoid major transmission expansion. However, 15 years of major growth in the Northwest with no substantial transmission expansion has severely burdened the existing transmission system. The District is in agreement with BPA and many other Northwest electric utilities, that it is time to expand the transmission system before the system is gridlocked and the economic and environmental ramifications of resolving the problems are insurmountable. Therefore, the District strongly supports the proposed projects; the District does not however, endorse or oppose any particular installation plan or location for the much-needed improvements.

Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Statement DOE/EIS-0317-S1 and applicable appendices

If you have any questions, please contact John Martinsen, Principal Engineer, System Planning and Protection, at 425-783-4327.

Sincerely,

Ignacio Castro, Jr.

Ignacio Castro, Jr.
Manager, System Planning and Protection
Distribution Services Division
Snohomish County Public Utility No. 1
1802 75th Street, S.W.
Everett, Washington 98203-6264

2320 California Street • Everett, WA • 98201 / *Mailing Address:* P.O. Box 1107 • Everett, WA • 98206-1107
425-783-1000 • Toll-free in Western Washington at 1-877-783-1000 • www.snopud.com

1516-001 Comments noted.

1516-002 Comments noted.

1516-003 Comment noted.
1516-004 Comment noted.
1516-005 Comment noted.

Tribes

THE TULALIP TRIBES

Cultural Resources Department
x̌alal?tx̌ʷ
6410 - 23rd Avenue N.E.
Marysville, WA 98271
(360) 651-3300
FAX (360) 651-3312

The Tulalip Tribes are the successors in interest to the Snohomish, Snoqualmie, and Skykomish tribes and other tribes and band signatories to the Treaty of Point Elliott

PUBLIC INVOLVEMENT
LOG#: KELT-1434
RECEIPT DATE: FEB 12 2003

January 28, 2003

Mr. Ken Johnston
Tribal Account Executive
Department of Energy
Bonneville Power Administration
P.O. Box 491
Vancouver, WA 98666-0491

Dear Mr. Johnston:

This is in response to your letter dated January 14, 2003-re: T-DITT-2 in King County, Washington.

The position and concerns of the Tulalip Tribes are outlined in the following SOP's.

1. Cultural Resources Office will be the point of contact for this project.

1434-001 2. We would ask that before any major construction be done at the project site:

That you do a cultural and archaeological assessment before any work begins no matter how big or small the project.

1434-002 3. Whatever is being proposed that it does not adversely effect the natural resources in that area such as: timber, floral, faunas, i.e., adjacent to rivers and streams.

1434-003 4. Ethno botany, i.e., plants indigenous to the Puget Sound (pre-contact). We would like to see more time given to identifying indigenous plants @ project sites. To begin developing a profile of what types of plants that are still in existence that was indigenous to the environment, and after construction that any replanting is done with indigenous plants of the area.

1434-004 1434-005 5. To protect our water resources and fisheries.

6. That you only contact tribal representatives that are federally recognized, and that representatives have tribal jurisdiction in the area of your work project.

1434-006 These SOP's should serve as our basic concerns when it comes to buildings and development projects in Snohomish, King and Island County.

We appreciate the opportunity of working with you on the project. This office would like to do periodic site visitations as the project progresses. Thank you.

Sincerely yours,

Hank Gobin,

Cultural Resources Manager

1434-001 Comments noted.

1434-002 BPA will do its best to minimize impacts to these resources.

1434-003 As a federal agency, BPA is required to comply with the Endangered Species Act, therefore, surveys would be conducted for rare and endangered plant species if their habitat could be found in the area. No rare or endangered plant surveys were conducted for the proposed project, since the habitat where these species are found is not present. The only other plant surveys that were conducted as a part of the proposed project was for undesirable plants, such as noxious weeds. BPA routinely conducts weed surveys before and after construction.

1434-004 and -005 BPA has proposed extensive mitigation to protect water resources and fisheries.

1434-006 BPA is working closely with representatives of the Snoqualmie and Muckleshoot tribes, both of whom are federally-recognized tribes. With respect to site visitations, BPA would be happy to take representatives of the Tulalip tribes to the site, and would do so, with the landowners permission.

MUCKLESHOOT
CULTURAL RESOURCES PROGRAM
39015 172nd Avenue S.E. • Auburn, Washington 98092-9763
Phone: (360) 802-2202 • FAX: (360) 802-2242

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# KE-LT-1487
RECEIP
MAR 03 2003

February 28, 2003

Lou Driessen, Project Manager
Department of Energy, Bonneville Power Administration
PO Box 491
Vancouver, Washington 98666-0491
by fax to 503-230-3285

RE: T-DTITT-2 Kangley -Echo Lake Transmission Line Project

Mr. Driessen,

The Wildlife and Cultural Programs of the Muckleshoot Indian Tribe (MIT) appreciate the opportunity to submit the attached comments on the Supplemental Draft EIS for the Kangley - Echo Lake Transmission Line Project.

1487-001 The Cultural Resources Program has previously requested that BPA correct certain misrepresentation and inaccuracies that were identified in the HRA Cultural Resources Technical Report which supplements this SDEIS. We also requested that BPA republish the HRA report as corrected.

1487-002 The Tribe has notified BPA that Section 106 compliance is not complete for this project until the Area of Potential Effect (APE), including access roads and staging areas, is fully identified and surveyed for historic and cultural resources. Section 106 compliance must be completed while there is time to relocate such roads and areas if necessary to avoid adverse impacts. Comments on these matters and Appendix X, the Monitoring and Unanticipated Discovery Plan, have been previously submitted to BPA by letters dated February 3 and 13, 2003

1487-003 The Muckleshoot Tribe's Wildlife Program has worked for years to combat the adverse and cumulative toxic effects of noxious weed infestations located on or near, and directly attributable to, BPA transmission line corridors.

1487-004 Adverse impacts are especially severe on the elk and deer herds which the Tribe manages in the Cedar, Green, and White River drainages.

1487-005 Mitigation for this problem and restoration of appropriate native forage plants to benefit the health of the herds, will require a detailed program with clear commitment to management targets, effective timing of treatment, and funding resources. This will be especially important where herbicides are not an option for use in the Cedar River Watershed (CRW). The SDEIS puts forward general proposals and guidelines, but does not present specific analyses or a scientific, and detailed vegetation management plan that could effectively mitigate this problem.

1487-001 Comment noted.

1487-002 The report, including the Appendix D, Unanticipated Discovery Plan, is being revised in light of your comments. BPA will continue to consult with the Muckleshoot Tribe as required for Section 106 compliance and will conduct additional assessment of the access roads and staging areas. Consultation will be ongoing through the construction of this project, if BPA decides to build Alternative 1.

1487-003 and 004 Comment noted.

1487-005 BPA will continue to work with SPU and the Muckleshoot Tribe to develop a specific plan that meets the needs of all parties interested in providing forage plants while protecting the safety of the transmission line, should BPA decide to build Alternative 1.

1487-006, -007, -008, and -009 BPA does recognize the cultural importance of the CRMW to the tribe and provided for HRA to interview Muckleshoot tribal elders in coordination with tribal staff. HRA'S cultural resource survey was thorough. BPA conducted many meetings with tribal members to understand the Tribe's concerns. See Appendix W. Meetings with the Tribe continue.

We also understand that future development within the CRMW is limited by the landowner, Seattle Public Utilities. Furthermore, we understand that currently three power line rights-of-way exist within the CRMW, two BPA rights-of-way and one Seattle Public Utilities right-of-way. The proposed project would be located adjacent to one of the existing BPA rights-of-way, thereby minimizing environmental impacts to the maximum extent possible.

With respect to the assertion that we have not analyzed the cumulative effects of the proposed project through the CRMW, we disagree. We have analyzed the cumulative effects of the proposed action for each resource area in the DEIS and the SDEIS. We have designed the proposed transmission line to avoid sensitive environmental resources where we could, span them where we could not avoid them, and offer compensatory

1487-006 Throughout the SDEIS, and specifically in its discussions of treaty rights and trust responsibility, BPA does not take into account the unique cultural importance of the CRW for the Muckleshoot Tribe, or the implications of the unusual circumstances that will preserve the Watershed from most future development under Seattle Public Utility ownership. The cumulative impacts of the proposed second transmission line through this preserved area, rather than through more developed routes, have not been addressed in the SDEIS, nor is the BPA's trust responsibility to mitigate for such adverse and cumulative effects discussed. The disproportionate impacts on the Tribe are also a matter of Environmental Justice subject to the direction of Executive Order 12898.

1487-007
1487-008
1487-009

1487-010 In conclusion, BPA has a continuing duty to manage lands associated with this project over which it has authority, to assure that Tribal treaty rights are unimpaired. This duty includes the obligation to consult with and involve the Muckleshoot Tribe, and integrate BPA and Tribal co-management plans where decisions involve such issues as the harvest of trees; placement of wood in streams; culvert installation and maintenance; availability of wood for fuel and cultural purposes; planning for eradication of noxious weeds and selection of species for replanting; and designation of areas for treatment; for mitigation or for habitat replacement.

1487-011
1487-012
1487-013
1487-014
1487-015

Please contact me at (360) 802-2202, extension 105 if you have any questions.

1487-016
1487-017
1487-018
1487-019

Sincerely,

Melissa Calvert

Melissa Calvert, Director
Muckleshoot Wildlife and Cultural Resource Programs

mitigation to mitigate for impacts that could not be avoided. We believe we have met our trust responsiblities

With respect to causing disproportionate impacts to tribal interest, as opposed to others, we also disagree. BPA has been meeting with the Muckleshoot Tribe on the proposed action for over three years. During this time, we have sought to find out if the proposed project would impact any traditional cultural properties (TCPs), and interviews with tribal elders were conducted. The information revealed that no TCPs would be affected. And to avoid impacts to other cultural resources such as plants or woody vegetation important to the Tribe that could neither be moved or harvested in advance of construction, we proposed to relocate the facilities (towers and access roads), as long as they would not be relocated from uplands to wetlands, and would not affect any angle points or the substation expansion area. Following the 45-day review period BPA gave the tribe to recommend relocating any of the proposed facilities, none were received.

Additionally, BPA's cultural resource contractor, with assistance form the Muckleshoot and Snoqualmie tribes, undertook a cultural resource survey of the proposed right-of-way, digging more than 1,170 holes looking for cultural resources. Only two potential resources were found, one an artifact related to the logging industry (metal spike) and the other, a trench, were discovered. Neither were of any cultural significance.

BPA wishes to continue to meet with the Muckleshoot Tribe in an attempt to meet our Trust responsibilities; however, we disagree that constructing the line along the proposed alignment would violate the Executive Order on Environmental Justice. BPA feels that it has considered this Executive Order during the environmental review, and feels that none of the alternatives analyzed would violate the intent of the Executive Order.

1487-010, -011, and 0-12 As stated above, BPA has initiated consultation with the Muckleshoot Tribe on this project, and we remain committed to continue to meet and consult with the Tribe on matters that concern them. BPA is developing a ROW management plan which is environmentally sensitive, and will leave woody debris in streams to benefit fish and other wildlife, to the extent practical. It will also involve use of native plant seeds. However, the majority of the proposed ROW occurs within the CRW, owned and managed by SPU. SPU adopted an

MIT Cultural Resources Program SDEIS Comments, incorporating all prior written comments including those submitted 9/4/2001; 2/3/03 and 2/13/03:

	SDEIS citation, Page.	SDEIS text	Comment:
1487-020 1487-021	Section 2.1.1.7 page 2-12	"BPA would install 9 gates".	Access restrictions affect Tribal resources management and exercise of treaty rights. MIT requests access of those areas behind gates that are owned by BPA; and BPA cooperation in obtaining access to lands owned by other entities.
1487-022 1487-023 1487-024 1487-025	Summary Section S.3.11 page S-35 and Section 3.13 page 3-90 Cultural Resources	The probability for encountering prehistoric cultural resources along any of the alternatives varies by landform...and increases along the Cedar river and other water sources....There is also a high probability of encountering many historic-period cultural resources despite that fact that few recorded resources are in the immediate vicinity of the alternatives. . Many such resources have been identified in archival sources and maps, although few have been formally inventoried or even verified on the ground by cultural resource professionals."	This section does not accurately reflect the information contained in BPA's Cultural Resources Report regarding eligible and potentially eligible sites within the APE for the preferred project route. It also indicates that Section 106 compliance work was not initiated for any route except he proposed alternative. The APE for the proposed route must also include access roads (Sec 2.1.1.5 page 2-10) and staging area locations that have not been identified (Sec 2.1.1.8 page 2-13) . Once identified, these should be surveyed, therefore Section 106 work is not completed for the preferred route.
1487-026	Section 4.12 Cultural Resources page 4-162, 163	"In general the Proposed Action contains the least	. It is not possible to generalize about the

HCP for this watershed in April 2000, and any harvest of tress, and/or placement of wood, in streams or on the land, would be undertaken with the permission of the landowner.

1487-013, -014, -015, -016, and -017 No new fish culverts would need to be installed for the proposed project. However, BPA has agreed to correct problems associated with three existing culverts on its Raver-Echo Lake ROW, immediately adjacent to the proposed ROW. Prior to doing so, BPA would obtain the appropriate permits from the Army Corps of Engineers and will ensure that they meet the current Washington Department of Fish and Wildlife design criteria.

1487-018 and -019 Pursuant to tentative agreements reached with the U.S. Fish and Wildlife, through a biological consultation, and negotiations with the City of Seattle, BPA has agreed to purchase several tracts of land, to permanently protect those lands from development, and to allow them to be managed as wildlife habitat and for conservation purposes. See response to Comment 340-002.

1487-020 and -021 BPA is acquiring easement rights for access roads and the transmission line right-of-way, and does not have the authority to grant access to others. Anyone wanting to access private property must seek the permission of the underlying fee owner.

1487-022 and -023 HRA performed a thorough survey of the preferred route and located a logging feature and a trench feature, neither of which appears to be eligible for the National Register of Historic Places. The contractor has conducted further work at the trench feature, at the request of OAHP and the Muckleshoot Tribe. They found nothing significant. HRA preformed background research and viewed the routes of the other alternatives to provide a professional opinion of their sensitivity for containing cultural resources.

1487-024 and -025 BPA will conduct a cultural resource assessment of proposed access roads off the previously surveyed ROW and will also survey the proposed staging areas if the areas have not been previously disturbed.

1487-026 1487-027		number of culturally sensitive areas of all alternatives, with much of the route situated on moderate to steep slopes and with mo cultural resource sites (formally inventoried or identified by archival research) occuring on or within its proposed ROW.	probability (for archeaological discovery) rating for this extensive linear route. While 2/3 of the lands within the proposed ROW may be steep slopes, 1/3 should be considered to have a high probability for cultural resources. The last sentence is incorrect, as at least two NR eligible or potentially eligible properties were identified within the ROW. (Ref MIT letters to BPA of 2/3 and 2/13/03)
1487-028	Section 4.12.1 Impacts page 4-163., 164		Springs are also high probability indicator water sources as are historic berry fields, bogs, and camas swales
1487-029		"A few cultural resources have been identified within a mile of the route in this northern portion, but none of the sites have been formally inventoried or identified on the ground by trained cultural resources staff."	It appears that Section 106 requirements have not yet been completed for this area.
1487-030	Section 5.4 Heritage Conservation p. 5-8	"None of the previously recorded cultural resources sites occur on or near (within 700 feet) of the	The cultural Resources Technical Report acknowledges that the Cedar River Pack Trail is

1487-026 and -027 It is possible to generalize about the relative probability of the alternative routes for containing areas sensitive for the existence of cultural resources. It is true that the preferred route contains two cultural resources. HRA recommends both as being ineligible for the National Register of Historic Places and has conducted further investigation at one of the sites as requested by OAHP and the Muckleshoot Tribe.

1487-028 and -029 Comment on springs and other environmental features noted. BPA is not required to conducted detailed cultural resource surveys of all alternative routes.

1487-030 and -031 Comment noted. Construction of the preferred alternative would not adversely affect the CRPT.

1487-030 1487-031 1487-032 1487-033 1487-034 1487-035		proposed BPA project area."	located within the ROW for the project, though located 800 feet from the nearest tower footing. The CRPT and other trails are historic properties and traditional cultural resources of importance to the tribes that historically utlized the Cedar River Watershed . See SPU's Draft CRMP page ——— Mitigation measures consisting of leaving trees and vegetation along the river were identified to mask visual impacts from the trail route for the power lines above. The CRPT and other aboriginal trails in the CRW are traditional cultural resource that deserves further study including identification of the original route, and consideration for possible restoration as mitigation.
1487-036 1487-037 1487-038	Section 5.9 Environmental Justice page 5-27	"The alternatives would not adversely affect any minority or economically disadvantaged groups in the project area because they do not reside in the project area in large numbers , and are less than 5 percent of the total population"	We do not agree with this conclusion or BPA's analysis of Executive Order 12898. This project has the potential to cause the Muckleshoot Tribe disproportionate harm because of potential for adverse impacts because on its treaty and cultural resources and use areas, and access to treaty resources within the project

1487-032 The cultural resources assessment concluded that construction of the preferred alternative should not adversely affect the CRPT and that there were no other traditional cultural resources that would be affected.

1487-033 Comment noted.

1487-034 and -035 Construction of the preferred alternative is not expected to result in adverse effects to the CRPT.

1487-036, -037, and -038 It is unclear from the comment precisely what disproportionate impacts the writer is referring to. As stated above, the proposed alignment does not actually touch any land currently owned by the Muckleshoot Tribe. BPA also believes whatever Treaty rights the Tribe has now, before the proposed project would be implemented, will remain intact. As far as BPA can tell, the highest percentage of population of Native Americans (including all Native Americans, Eskimo and Aleut) that would be affected by any of the five alternatives is 1.07 percent (Alternatives B and D) of the affected population. Overall, as far as we can tell from the census data, the social and ethnic makeup of those persons most directly affected by the preferred alternative, those in greatest proximity to the project, are above-average income, non-minorities. In fact, the area has relatively few residences or businesses, and is more rural, or forested in nature than urbanized. The project is not located in an area inhabited by the underprivileged or minority populations. The project is not intended to benefit one segment of the population, or specific community, as a regional electrical distributor will benefit the general population of King County, the City of Seattle, and western Canada. As such, we believe the Tribe would share in the benefit of the project, as would the general population as a whole.

The cultural resources assessment stated that the proposed project would not adversely affect three previously identified resources located within the APE and proposed for listing in the National Register: the Cedar River Pack Trail; the Chicago, Milwaukee, St. Paul, and Pacific Railroad right-of-way; and the Cedar River Cultural Landscape District.

1487-038			area.
1487-039 1487-040 1487-041 1487-042	Section 5.20 Treaty rights and Trust Responsibility page 5-36		BPA's federal trust responsibility for treaty resources and traditional use areas is more than a duty of consultation. It involves protection, and mitigation of harms to those resources that are caused by agency actions. Muckleshoot has indicated various means throughout these comments and in meetings with BPA, to accomplish the trust responsibility.

MIT Wildlife Program SDEIS Comments, also incorporating prior written comment submitted 9/4/2001:

	SDEIS citation, Page #	SDEIS text	Comment
1487-043 1487-044	Section 2.1.1.7 page 2-12	"BPA would install 9 gates".	See above comment for Cultural Resources
1487-045	Pg. 4-8	Mitigation of construction impacts.	Impacts to calving and fawning animals should be considered and mitigated for by delaying or minimizing work during those times of the year that may cause the greatest harm.

1487-039, 040, -041, and -042 BPA agrees that as a federal agency, we have a general trust responsibility. As we have indicated in our negotiations with the Tribe, we want to continue to try to address concerns raised by the tribe, and will do so as long as those concerns are consistent with our other statutory duties and obligations.

The cultural resources assessment did not identify any cultural resources and use areas that would be adversely affected by the construction of the preferred alternative.

1487-043 and -044 See response to Comment Letter 405.

1487-045 Fawning and calving season for deer and elk occurs from March to June.
If the decision is made to build Alternative 1, construction would begin in August, after the fawning and calving season has ended.

1487-046 1487-047 1487-048 1487-049	Pg 4-88, Section 4.7.3.6	"Manipulating low-growing vegetation and control of noxious weeds benefit forage for species such as deer and elk."	This discussion needs to be claified and expanded. The creation of low growing vegetation habitats can produce several different effects, not all of which are beneficial to deer and elk. MIT is currently involved in a scientific study identiftying quality and quantity of forage in the Green and White River Watersheds. BPA should assist the Tribe to develop innovative ways to create high quality deer and elk forage under transmission line ROW's.
1487-050	Pg.4-110, 114; Section 4.8.2.4	"Proposed action has potentially high impacts from noxious weed colonization in disturbed areas."	It is unclear in the text and in Appendix K how this impact is specifically mitigated for where SPU prevents use of herbicides. No treatment plan is clearly specified as having yet been developed.

1487-046 and -047 BPA will continue to work with SPU and the Muckleshoot Tribe to develop a specific plan that meets the needs of all parties interested in providing forage plants while protecting the safety of the transmission line, should BPA decide to build Alternative 1.

1487-048 and -049 BPA is interested in reviewing MIT's study. BPA uses relevant information in developing vegetation management plans for BPA's ROWs. The MIT's suggestions for high quality deer and elk forage on BPA's ROWs are important input to the vegetation management process and will be studied. BPA will work with relevant parties to determine the best vegetation management plans.

1487-050 See response to Comment 1485-009 and 1487-006.

1487-051 1487-052			BPA should adopt and implement an agressive vegetation management program to limit colonization by non-native species *regardless of whether or not such a program is also being carried out by adjoining landowners*. The disturbance caused by the transmission line ROW is often the agent that allows the invasive species into an area. We believe BPA should take responsibility to keep all ROW's clear of noxious weeds.
1487-053 1487-054	Appendix. K, Pg. 8	"Take full responsibility for controlling noxious weeds on fee-owned property."	See comment above. Those properties should be identified on a map, as well as identification of responsibility on those lands that are not fee owned.
1487-055 1487-056	Appendix. P, Pg. 7	" ..the project would require the long-term conversion of certain areas from managed forest to non-forest use."	Impacts from and mitigation for this action should be clearly delinated. A permanent commitment of resources has impacts not only locally, but also on other species within the vicinity of the project.
1487-057	Appendix P. Pg. 20	".. Alternative 1 would be constructed on an easement purchased by BPA and the substation expansion would be on land owned in fee by BPA."	Again, a map documenting BPA ownership and interests in lands involved in this project should be in the SDEIS.
1487-058	App. P, Pg. 26	"Implement aggressive vegetation management programs to limit the colonization of non-native species and eradicate noxious weeds."	Each vegetation management plan, as well as where it would be implemented, and the special program that would be implemented within SPU boundaries should be clearly defined.

1487-051 BPA (Snohomish Region) over the last 2 or 3 years has taken an active role in reducing the spread of noxious weeds, primarily Scotch broom. When soil is disturbed during vegetation maintenance activities we typically use grass seed on the disturbed areas. This is a direct result of a request to do so by the Muckleshoot Tribe. The State and County Weed Boards do not require the eradication of Scotch broom. It may not be feasible or cost effective to treat all areas if the surrounding landowners do nothing. Because of budget constraints, BPA needs to choose the potential areas, in consultation with tribes and landowners, where the desired results can be achieved.

1487-052 See response to Comment 1487-051.

1487-053 and -054 BPA has maps of fee-owned property and does take full responsibility for the control of noxious weeds on fee-owned property. However, as stated above under Comment 1487-051, if the surrounding landowners are not treating or trying to control the noxious weeds on their property, it may not be feasible or cost effective for BPA to do so. BPA would work with adjoining landowners where possible to gain control over noxious weeds in the area. BPA would like to work with the Muckleshoot Tribe to identify those areas that would result in the greatest benefit to treat.

1487-055 and -056 BPA is proposing to acquire land for compensatory mitigation for these impacts. See response to Comment 340-002.

1487-057 See revised Map 9.

1487-058 See response to Comment 1485-009 and 1487-006.

Groups and Individuals

Kuehn, Ginny - DM-7

PUBLIC INVOLVEMENT
LOG#: KELT-1389
RECEIPT DATE: JAN 2 2 2003

From: rrtrujillo@msn.com
Sent: Sunday, January 19, 2003 8:20 AM
To: BPA Information
Subject: External Generic (NOTA) information request

NOTE: A copy of what the sender submitted on the form was e-mailed back to them.

Submitter: pam trujillo

Their e-mail address: rrtrujillo@msn.com

Date Submitted : 2003 January 19 US Pacific Time 8:19:48 AM

Their address:

15894 451st ave se, n bend wa 98045

Their telephone: 425 888-1260

Their request or Comment:

1389-001 i received your info on the powerlines - i was affected by both alternative b and d - per your letter if i understand this correctly has bpa decided for sure to proceed with the preferred route - and does this mean on real estate sales that alternative a-d does not need to be included as an undisclosed issue? may i get a definite statement that states the power lines b and D are no longer an issue -

1389-001 BPA apologizes for the disruption that this project has caused to landowners along the proposed route alternatives. Although the SDEIS identified the preferred route, route Alternatives A-D remain under consideration. The Record of Decision, which is expected in August 2003, will identify whether BPA has decided to proceed with the non-transmission alternative, no-action alternative, or identify which route has been selected for the construction alternative. We cannot provide advice to you regarding disclosure laws.

Kuehn, Ginny - DM-7

PUBLIC INVOLVEMENT
LOG#: KELT-1390
RECEIPT DATE: JAN 2 2 2003

From: Freelon Hunter [freelon.hunter@attbi.com]
Sent: Sunday, January 19, 2003 1:14 PM
To: comment@bpa.gov
Subject: T-DITT-2

I am writing to comment on the proposed Kangley - Echo Lake Transmission Line Project.

1390-001 1390-002 1390-003 1390-004 I support the choice of the line going through the Cedar River watershed and away from the developed areas of SE King County. Although there is no clear evidence at this time of health risk due to location of high power transmission lines through populated areas, there would certainly be fear of such health risk. This would cause property devaluation. Also, the building period itself would cause disruption, with potential noise and air pollution.

1390-005 My support for the Cedar River watershed choice is predicated on an assumption that BPA will take extraordinary measures to protect the watershed from degradation and pollution both during the building phase and during the maintenance phase. Certainly there should be no chemicals or pesticides used on this project, but brush should be kept clear by hand. Also, particular care should be taken around stream beds to prevent soil ersosion and chemical pollution of all kinds, including from motorized equipment.

Sincerely,
Freelon Hunter
25001 180th Ave SE
Kent, Wa. 98042
freelon.hunter@attbi.com

1390-001 and -002 Comment Noted.

1390-003 and -004 Construction noise is typically exempt from noise ordinances because they are temporary impacts, but BPA would try to keep noise to a minimum. Please see Sections 4.13 and 4.14 of the SDEIS. BPA would use best management practices to hold down dust and minimize air pollutants.

1390-005 Please see response to Comment 340-002.

Kuehn, Ginny - DM-7

PUBLIC INVOLVEMENT
LOG#: KELT-1391
RECEIPT DATE: JAN 2 2 2003

From: Alan Bryant [bryanta@qwest.net]
Sent: Monday, January 20, 2003 8:07 AM
To: comments@bpa.gov
Subject: Kangley-Echo Lake Transmission Line

1391-001 My wife and I live in North Bend close to the watershed area and we would not want any harm to come to that pristine area, however it makes the most sense to add the additional power line there. We are in favor of your preferred route, Alternative 1.

Dr. and Mrs. Alan Bryant
16326 426th Way SE
North Bend, WA.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

PUBLIC INVOLVEMENT
LOG#: KELT-1392
RECEIPT DATE: JAN 2 2 2003

1. Please have your environmental studies look at

2. I need more information about

1392-001 3. I have these other comments Thank you for the latest notice. It appears that your studies have been thorough, and based upon my limited understanding of the project, I think you've made a good decision, sticking with the alternative route which was the route originally preferred.

Thanks and regards, [illegible]

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name M Bergquist
Address 28415-181st Ave. SE
E-Mail Address Kent, WA 98042

March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1391-001 Comment noted.

1392-001 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1393
RECEIPT DATE: JAN 22 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments

1393-001 Please do not come thru my
1393-002 property with the power lines. I am
1393-003 alone, my husband passed away. The noise
from them, etc., would be too much for me.
I also enjoy my flowers, & it would be
through my flower bed.

Sincerely, Juanita Serbesku

1393-004 P.S. I can't go to any meeting as I don't drive much, Neil's night.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name

Address MRS PAUL SERBESKU
16241 SE 272ND ST
COVINGTON WA 98042-8212

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

BONNEVILLE POWER ADMINISTRATION

1393-001, -002, and -003 Please see response to Comments 1390-003 and -004.

1393-004 Comment noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

INVOLVEMENT
KELT-1394
RECEIPT DATE:
JAN 22 2003

1. Please have your environmental studies look at

2. I need more information about

1394-001 3. I have these other comments Put the lines through the watershed.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name James & Linda Osbourn

Address 21660-271 Pl SE, Maple Valley WA 98038

E-Mail Address lindaosbourn1@prodigy.net

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1394-001 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1395
RECEIPT DATE:
JAN 23 2003

1. Please have your environmental studies look at

2. I need more information about

1395-001 3. I have these other comments LANDOWNERS WHO WILL BE DISRUPTED BY THIS PROJECT SHOULD BE COMPENSATED FAIRLY FOR LOSS OF USE AND LOSS OF INCOME.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Peggy Orosco

Address 26809 172nd PL SE COVINGTON 98042

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

BONNEVILLE POWER ADMINISTRATION

1395-001 BPA will compensate landowners fair market value for the land rights needed for the Kangley-Echo Lake Transmission Line Project. We apologize for the disruption that this project has caused to other landowners impacted by the proposed project.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

KELI 1396

JAN 23 2003

1. Please have your environmental studies look at

2. I need more information about

1396-001 3. I have these other comments I Live in Winterwood est. AND I HAVE TOWERS IN MY BACK YARD, I DO NOT WANT MORE IN MY BACK YARD.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name STAN Fulled

Address 19315 SE 284TH ST, Kent WA 98042

E-Mail Address

Stan's Headers
4715 AUBURN WAY N.
AUBURN, WA 98002

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

BONNEVILLE POWER ADMINISTRATION

1396-001 Comment noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . .

RECEIVED BY BPA
PUBLIC INVOLVEMENT
KELI 1398
RECEIPT DATE:
JAN 23 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments GOOD Job & Celine
YOU Made THE BEST ROUTE
AND THAT IS ALT 1, parallel
existing BPA Transmission Line
THROUGH WATERSHED.

Don Johnson
30131-312TH WAY SE
RAVENSDALE
98051

1398-001

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name

Address

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1398-001 Comment noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

KELT-1399

JAN 23 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments

1399-001 We agree with your choice of Alternative 1. This is the most logical and safe choice.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Eric/Judy Benton

Address PO Box 614, Ravensdale, WA 98051

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1399-001 Comment noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

PUBLIC INVOLVEMENT
LOG#: KELT-1400
RECEIPT DATE: JAN 23 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments – THE SEATTLE WATER DEPARTMENTS CONTINUAL WHINING ABOUT WATER QUALITY AND THE NEED FOR A MULTI MILLION DOLLAR FILTRATION PLANT IF THE WATERSHED ROUTE IS CHOSEN IS QUESTIONABLE.
AT THE PRESENT TIME SWD IS ERECTING A HUGE FILTRATION SYSTEM ON LAKE YOUNGS. THIS PROJECT HAS BEEN IN THE WORKS FOR YEARS WHO IS TRYING TO KID WHO – PLEASE ELABORATE ON THIS ISSUE.

1400-001

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name C. E. PARSONS

Address 17414 SE 238 KENT, WA 98042

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1400-001 Our understanding is that Seattle Public Utilities (SPU) is constructing a water purification plant, not a water filtration plant at Lake Youngs. The water purification plant involves using ultraviolet light to purify drinking water at this location. We understand that the plant has been designed to be compatible with a water filtration plant, should SPU ever add such a facility in the future.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

1. Please have your environmental studies look at

PUBLIC INVOLVEMENT
KELT-1401
RECEIPT DATE:
JAN 23 2003

2. I need more information about

3. I have these other comments I am a lifetime member of the Sierra Club and a structural Engineer. Anybody that looked at the topo map would have seen the project has almost no impact on Cedar River water quality.

1401-001

I say go ahead and build the line using good construction practices to minimize any runoff during construction.

1401-002

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Robert Harn

Address 4007 39th SW Seattle, WA 98116

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1401-001 Comment noted.

1401-002 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1. Please have your environmental studies look at

PUBLIC INVOLVEMENT
LOG#: KELL 1402
RECEIPT DATE: JAN 23 2003

2. I need more information about

1402-001 3. I have these other comments Run the line thru the watershed. Other routes would destroy many homes and disrupt families.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Walter & Evelyn Miller
Address 27233 SE 208th St.
E-Mail Address Maple Valley, WA 98038

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1402-001 Comment noted.

BONNEVILLE POWER ADMINISTRATION

PUBLIC INVOLVEMENT
LOG#: KELT-1403
RECEIPT DATE: JAN 3 0 2003

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1403-001

1. Please have your environmental studies look at The crossing of the Raging River as I do Steelhead Surveys every 2 weeks there from March - June Coho + Steelhead migrate up into that area from November - May thus fry may be there ~~through~~ July

2. I need more information about 425 413 5859

3. I have these other comments

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name

Address

E-Mail Address

David Foster Smith
22061 Peter Grubb Rd SE
Renton, WA 98058

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1403-001 For the protection of aquatic species, no in-water work is proposed for constructing the Raging River crossing. If in-water work is required, US Army Corps of Engineers-approved in-water work windows for the Raging River would be adhered to (no work from July 1st - September 15th) for the protection of salmonid species. Furthermore, the floodplain of the Raging River is about 180 feet below the surrounding plateau from which the conductor wire would be strung. This feature will enable the conductor to be strung without the removal or trimming of trees within the floodplain of the river, thus avoiding potential affects to the aquatic and terrestrial habitats that could occur if work was performed within the riparian area associated with the Raging River.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project KELT-1404

"I'd Like to Tell You . . ."

RECEIVED BY BPA PUBLIC INVOLVEMENT RECEIPT DATE: JAN 24 2003

1404-001 1. Please have your environmental studies look at persuing Alternative #1; simply expanding existing lines through Cedar River Watershed. It's the least expensive with least amount of environmental impact.

1404-002 2. I need more information about the final decision. This decision could have a huge impact on my home & family

1404-003 3. I have these other comments A few issues, We need to curb urban sprawl which is creating part of this excessive demand,

1404-004 Persuing making existing power go further by conservation, ~~make~~ I believe it's best to build new lines ONLY where there is already existing lines,

1404-005 It's wasteful to condemn properties and ruin

1404-006 other's view unnecessarily.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name John Whitmore

Address 28123 SE 221st St. Maple Valley, Wa. 98038

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1404-001 Comment noted.

1404-002 The final decision will be made by BPA's Administrator in a Record of Decision. People on the project mailing list will be sent notice of the decision.

1404-003, -004, -005, and -006 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

INVOLVEMENT
KELT-1405
RECEIPT DATE: JAN 24 2003

1. Please have your environmental studies look at

2. I need more information about

1405-001 3. I have these other comments We agree with Alternative 1, Thank you.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Sara Denman & Darrel Nash

Address 26673 220 PL SE Maple Valley WA 98038

E-Mail Address [redacted]

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1405-001 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

KELT-1406

JAN 24 2003

1. Please have your environmental studies look at

2. I need more information about

1406-001 3. I have these other comments The BPA's current SEPA is the right result environmentally and from a social cost perspective. It makes no sense to run the line outside of the watershed!

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Angela Nieman

Address P.O. Box 207, Hobart, WA 98025 (Hobart)

E-Mail Address #

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1406-001 Comment noted.

Kuehn, Ginny - DM-7

KELT-1407

JAN 24 2003

From: Alan Cornell [Alan@NSCO.com]
Sent: Friday, January 24, 2003 8:29 AM
To: 'comment@bpa.gov'
Subject: T-DITT-2, Kangley-Echo Lake Transmission Line Project

1407-001 In response to your January 14, 2003 letter, my comment pertains to the adequacy of your route information. The map scale is so small that it is not possible to precisely determine the route i.e. you are only illustrating wide corridors. Without the exact location within the corridor, it is difficult to evaluate the impact on residents, wetlands, etc.

Alan Cornell
29270 188th Ave. SE
Kent, WA 98042
Alan@nsco.com

Kuehn, Ginny - DM-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1408
RECEIPT DATE:
JAN 28 2003

From: Danica Wettland [wettland@mindspring.com]
Sent: Friday, January 24, 2003 1:33 PM
To: tblwebcomments@bpa.gov
Cc: tblweb@bpa.gov
Subject: External Web Feedback

1408-001 Hello, my name is Danica Wettland and I continue to receive information on the Kangley-Echo Lake Transmission Line Project in the mail. However, I cannot tell by the map that you have send me and the map on your website, if this proposal would effect my property. I reside at 31722 SE Kent-Kangley Road. Can you please let me know if this information is being send to me as a community member or if this proposal will actually effect my property.

Danica Wettland
Mk (425)277-0977

Kuehn, Ginny - DM-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1409
RECEIPT DATE:
JAN 28 2003

From: Wagner, Linda [Linda.Wagner@kent.k12.wa.us]
Sent: Monday, January 27, 2003 4:22 PM
To: inet:
Subject: Covington Power Lines

1409-001, 1409-002, 1409-003 As principal of Grass Lake Elementary in the area possibly affected by the addition of power lines, I wish to express my deepest concern regarding the impact on our children and families. Notwithstanding the unknown physical harm this project may have on us, I am also concerned about the height of the power standards. My understanding is that they could double or triple in height. I have visions of an earthquake tumbling these standards and them falling onto our school grounds. We are directly next to the current power standards.

Please reconsider the placement of any additional power lines/poles to an area not adjacent to our school.

Thank you!

Linda Wagner, Principal
Grass Lake Elementary
28700 191st Place S.E.
Kent 98042
(253) 373-7661

1407-001 The mail list for landowners along the proposed route alternatives reflects thousands of parcels, so it was not practical to include parcel maps to indicate where individual properties are located relative to the proposed routes. The corridor for Alternative C running north and south was identified as a swath approximately 250 feet wide, although only a corridor 150 feet wide would be needed if this route were to be selected. BPA could not be more specific regarding this alignment since a site-specific route had not been surveyed. Landowners have called into BPA requesting that their specific properties be identified relative to the proposed routes, and BPA has provided site-specific maps to these landowners and will continue to do so as requests come in.

1408-001 Your property lies south of the east-west portion of Alternative C and appears not to be directly affected.

1409-001, -002, and -003 Comment noted. BPA's tower design standards exceed seismic loading standards so our towers will withstand earthquakes.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

BPA INVOLVEMENT
KELT-1410
RECEIPT DATE: JAN 28 2003

1. Please have your environmental studies look at

2. I need more information about

1410-001
1410-002
1410-003

3. I have these other comments Mitigation for the Transmission Line should include the conservation of Timberlands adjacent to the Cedar River Watershed to expand the existing protected areas

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Mark R. Johnsen

Address 4032 W. Dravus Seattle WA 98199

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1410-001, -002, and -003 Please see response to Comment 340-002.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

PUBLIC INVOLVEMENT
LOG#: KELT-1411
RECEIPT DATE: JAN 28 2003

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1411-001 1. Please have your environmental studies look at Solar and Wind generated energy.

2. I need more information about

1411-001 3. I have these other comments We prefer Alternative 1 which parallels an existing BPA transmission line Because it is least disturbing to citizens and makes sense.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name

Address

E-Mail Address

Yvonne Debruyne
20323 289th Ave. SE
Maple Valley, WA 98038

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

BONNEVILLE POWER ADMINISTRATION

1411-001 Renewable generation such as wind and solar were not considered for this study because their resource characteristics are a poor match for BPA's needs to defer this project. Wind energy was excluded because the Puget Sound Area is not home to a commercial-grade wind resource. Solar was excluded because the critical hours occur during the winter months when solar radiation is scarce, and many of the target hours occur during the evening. Please see Appendix J, Section 5.3.6.

Comment noted.

Kuehn, Ginny - DM-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KEL I-1412
RECEIPT DATE:
JAN 29 2003

From: Lynard, Gene P - KEC-4
Sent: Tuesday, January 28, 2003 4:45 PM
To: Kuehn, Ginny - DM-7
Subject: FW: Kangley-Echo Lake Transmission Line

I received this email message yesterday, and have responded to it. Please log this in as a comment. Thanks.

-----Original Message-----
From: Jean Michaelson [mailto:jbmichaelson@msn.com]
Sent: Monday, January 27, 2003 8:41 PM
To: gplynard@bpa.gov
Subject: Kangley-Echo Lake Transmission Line

Mr. Lynard -

1412-001 My husband and I recently moved from Colorado to the Hobart area. We have recently been told that a decision has been made on where this new transmission line is to be constructed. Is there a map indicating the route on your web site? If so, can you please attach it and e-mail me back. We live on 290th Ave. SE, backing to King County/Taylor Mountain Park, at the end of SE 204th Ave.

Thank you, Jean and Paul Michaelson

jbmichaelson@msn.com

1412-001 BPA has sent you maps indicating that your property lies over a mile east of Alternative C.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1/25/03

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1413
RECEIPT DATE: JAN 29 2003

1. Please have your environmental studies look at

2. I need more information about

Mark & Lisa Griffith
21320 185th Ave SE
Renton Wa 98058

3. I have these other comments We are still in favor of Alt 1 - thru the watershed

1413-001 has the ↓ environ. impacts

1413-002 ↓ cost

1413-003 not detrimental to human health or adverse to property values.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name

Address

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1413-001, -002, and -003 Comment noted.

Kuehn, Ginny - DM-7

COPY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1414
RECEIPT DATE:
JAN 31 2003

From: RONKATR@cs.com
Sent: Thursday, January 30, 2003 6:08 AM
To: comment@bpa.gov
Subject: SDEIS for Kangley-Echo Lake Transmission Line

1414-001 | 1414-002 | We will not be able to attend the public meetings you will have regarding the SDEIS for Kangley-Echo Lake Transmission Line. We wanted to support your decision to build the power line next to the existing one inside the Cedar River Watershed, instead of the neighborhoods of Maple Valley.
Thank you

Ron and Kathy Ryan
26531 SE 237th St.
Maple Valley, WA 98038
425-432-2673

1414-001 Comment noted.

1414-002 Comment noted.

Kuehn, Ginny - DM-7

From: Allyson Schrier [allysonv@direcway.com]
Sent: Thursday, January 30, 2003 4:51 PM
To: comment@bpa.gov
Cc: Evan Schrier
Subject: Raging Cedar Powerline

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1415
RECEIPT DATE:
JAN 31 2003

1415-001 1415-002 I am writing to make known my extreme concern about the proposed powerline to be constructed. Such a move should not happen until conservation and other electrical systems have been fully explored.

1415-003 If a powerline is to be constructed, then BPA must mitigate any new or expanded corridor by acquiring and protecting
nearby forestland including:

1415-004 400 acres along Raging River near Highway 18, and
600 acres near the Cedar River (Section 25, owned by Plum Creek Timber Co., and subdivided for development)

1415-005 This mitigation MUST be done with BPA funds, not with Land and Water Conservation Fund, or Forest Legacy money, as BPA has suggested.

1415-006 1415-007 On any powerlines constructed I believe that BPA should raise the height of the lines and minimize width of any corridors over the Raging & Cedar Rivers to protect riparian forests.

1415-008 1415-009 There should be NO NEW ROADS! If towers are to be installed, it should happen with helicopters.

1415-010 A continual program for removal of non native plants growing in the newly deforested areas must be implemented.

Thank you

Allyson Schrier
4710 286th Avenue SE
Fall City, WA 98024
425-222-4556

1415-001 and -002 Please see response to Comment 349-001.

1415-003 and -004 Please see responses to Comments 340-002 and 1489-001 regarding BPA's easements on property transferred to the City of Seattle and others.

1415-005 BPA would use its own funds to purchase additional properties. BPA would likely be purchasing more than is needed for mitigation. Agencies interested in those remaining parcels with conservation easements or deed restrictions could use any of their own funds including Land and Water Conservation Funds or Forest Legacy money.

1415-006 and -007 Because the Cedar River is a drinking water source and has potential fish habitat, our Preferred Alternative crosses the Cedar River using double-circuit towers on the existing ROW, thus minimizing clearing across the Cedar River. The double-circuit towers will cost $2 million. BPA looked at this possibility at the Raging River crossing. Because the Raging River is not a drinking water source we determined that the cost was too high for the benefit. We will mitigate and will consider topping trees, if feasible, instead of complete removal across the Raging River.

1415-008 and -009 BPA is proposing constructing the line with helicopters. However, there is work that needs to be done that requires access roads. Most of the roads that would be used are existing roads, with only new spur roads needed to the new tower sites. BPA does need access to each tower for maintenance also.

1415-010 Please see response to Comment 382-017.

Walter & Evelyn Miller
27233 SE 203th St.
Maple Valley, WA 98038

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1416
RECEIPT DATE:
JAN 31 2003

Jan. 29, 2003

BPA.
Communications
DM-7 P.O. Box 12999
Portland, Or. 97212

Gentleman,

1416-001 Please build the proposed Langley-Echo Lake Transmission Line next to the existing one inside the Cedar River Watershed. The alternative routes would be a disruption to peoples lives and homes.

Thanking you,
Walter Miller
Evelyn Miller

Copy sent to:
State Representative
5th Legislative District
Cheryl Pflug

1416-001 Comment noted.

KELT Project

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1417
RECEIPT DATE:
JAN 31 2003

Telephone comment by Alvie Hairston
January 31, 2003

Name: Mrs. Mardesich
Address:
Number: 425-338-3144

1417-001 **Comment**: This is Mrs. Mardesich, and we have received notification from BPA as to property to the Hiach Kangley area, Kangley Echo-Lake area. I'm not too sure what it is all about but, basically what I want to know is BPA in position to want to be buying the property to which I'm getting the notice of should they be allowed to go ahead with this project. If you could give me a call and give me a yah or nay, this is a pretty basic question. My number is 425-338-3144 and the owner of the property is August, like the month, Mardesich. There are two pieces in that area and I am assuming this is why we are getting the notices. Thank you.

Kuehn, Ginny - DM-7

LOG#: KELT-1418
RECEIPT DATE:
FEB 03 2003

From: kidmen@gte.net
Sent: Saturday, February 01, 2003 11:58 AM
To: BPA Public Affairs
Subject: External Public Affairs information request

NOTE: A copy of what the sender submitted on the form was e-mailed back to them.

Submitter: Dan Carroll

Their e-mail address: kidmen@gte.net

Date Submitted : 2003 February 1 US Pacific Time 11:57:41 AM

Their address:

17626 S.E. 260th Place
Kent, WA 98042

Their telephone:

Their request or Comment:

1418-001 Can you please send me your latest proposal on the power line transmission lines that you intend to run through Covinton Washington. I also would like to have a map for the location of the proposed lines.

Thank you.

Kuehn, Ginny - DM-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1419
RECEIPT DATE:
FEB 03 2003

From: rhodynut [rhodynut@netzero.net]
Sent: Monday, February 03, 2003 2:30 PM
To: comment@bpa.gov
Subject: T-DITT-2

1419-001 I continue to support BPA's preferred route, Alternative 1, which parallels an existing BPA transmission line through the Cedar River Municipal Watershed. Thank you for considering my previous input and continuing to keep me informed as this project progresses.

Dan Bailey
23335 264th Ave SE
Maple Valley, WA 98038

1417-001 This property is located along Alternatives B and D. Although the SDEIS identified the preferred route, Alternatives A-D remain under consideration. The Record of Decision, which is expected in August 2003, will identify whether BPA has decided to proceed with the non-transmission alternative, no-action alternative, or identify which route has been selected for the construction alternative.

1418-001 BPA's analyzed several alternatives inside and outside of the Cedar River Municipal Watershed. Alternative A would rebuild BPA's existing Covington to Maple Valley 230-kV transmission line to a double-circuit 500-kilovolt (kV) line. The new towers would be about 175-ft. tall. The new 500-kV line would be constructed on existing right-of-way. Each end of the new line would be connected to existing unused 500-kV circuits such that the new line would be connected to the Raver and Echo Lake Substations. The northern vacant circuit would need to be connected to Echo Lake Substation with a short line on BPA property. BPA preferred transmission route is Alternative 1, which would construct a new single-circuit 500-kV transmission line across the Cedar River Municipal Watershed. The project map is posted on the Transmission Business Line Web site, www.transmission.bpa.gov/projects. If you need a more detailed map, BPA can send one to you in the mail.

1419-001 Comment noted.

Kuehn, Ginny - DM-7

From: Chris Gulick [goo@nwlink.com]
Sent: Monday, February 03, 2003 7:20 PM
To: comment@bpa.gov
Subject: Raging Cedar Powerline

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1423
RECEIPT DATE: FEB 04 2003

Re: Kangley/Echo Lake Transmission Line
Dear Mr. Driessen:

1423-001 I am very concerned about the proposed Kangley/Echo Lake Transmission Line also known as the Raging Cedar Powerline for the impacts this project will cause on the Cedar and Raging River valleys. These are my concerns:

1423-002 1) Is this project necessary? BPA states that the new line is needed to accommodate electrical growth and reliability concerns in the Puget Sound area. As for growth, I request that BPA pursue an aggressive conservation campaign before building a new powerline. Puget Sound residents, more than just about any other in the country, understand the need for conserving energy, and will do it if educated and asked to. And as for reliability concerns, I ask BPA to pursue electrical system changes to the best of its ability and the existing system's capability.

1423-003 2) If BPA does build a new corridor or expand an existing one, it's imperative that it mitigates for the environmental impacts. BPA should acquire and protect nearby forestland including 400 acres along the Raging River near Highway 18, and 600 acres near the Cedar River that is Section 25, owned by Plum Creek Timber Co. and currently subdivided for development. In order to pay for necessary mitigation, BPA needs to use its own funds, and not those of the Land and Water Conservation Fund or Forest Legacy money. If BPA decides that it can't afford mitigation, then it shouldn't proceed with the project.

1423-004

1423-005
1423-006
1423-007
1423-008 3) If BPA does build a new line, I request the following: raise line height and minimize the corridor width over the Raging and Cedar Rivers to protect riparian forests; do not build any new roads, and install towers with helicopters; and replace invasive plant species such as scotch broom and blackberry with native vegetation in rights of way.

1423-009 4) As for where to build the line, I request that BPA doesn't build it in the Cedar River Watershed. This 90,000-acre watershed provides low elevation forest habitat for wildlife, something that is being gobbled up by ever-increasing development in the greater Seattle area. The watershed has been logged in the past, but the City of Seattle has taken progressive steps to rectify the past damage by prohibiting further logging, thereby ensuring a continued and reliable source of clean drinking water. I don't see how clearcutting a swath of mature forests, erecting electrical towers and stringing power cables will do anything to preserve wildlife habitat and clean water.

1423-010

1423-011

Thank you

Sincerely, Chris Gulick

Chris Gulick
goo@nwlink.com

1423-001 Comment noted.

1423-002 The project is necessary in order to reliably meet electric demands in the Puget Sound Area during extreme cold weather. BPA has supported conservation programs in the region for many years. Nevertheless, it is clear that conserving enough power to delay the project is not possible. See Section 2.2.9 and Appendix J of the SDEIS. See also response to Comment 1421-032-003. Further comments noted.

1423-003 and -004 Please see responses for Comments 1415-003, -004 and -005.

1423-005, -006, -007, and -008 BPA would use the existing right-of-way for the existing 500-kV line by using double-circuit structures to cross the Cedar River, such that no clearing needs to take place within the Cedar River canyon. BPA would use care to minimize clearing at the Raging River crossing. To raise structures would impose a reliability hazard for BPA because the new line could potentially fall into the existing line. The current design would prevent that. Also taller structures may present a hazard to flying aircraft and may require special paint and lights. BPA will concentrate on clearing techniques and encouraging low-growing vegetation along the Raging River and associated creeks. BPA is studying how best to take care of noxious weeds such as Scotch broom. BPA has programs in place to take care of Scotch broom with machine cutting and herbicides. Chemicals cannot be used in the Cedar River Watershed, so BPA would use other means to try to control these invasive plants. BPA is working with the city, county and tribes to determine the seed mixtures to use to meet their needs. Some new roads would be needed so that some existing roads that currently go through wetlands can be removed. Short spur roads will be needed for access to individual tower sites.

1423-009, -010, and -011 Comment noted.

PUBLIC INVOLVEMENT
LOG# KELT- 1424

BPA Public Hearing on Cedar River Watershed Powerline Expansion Project, Tuesday, February 04, 2003

This is my 3rd time attending such a hearing. I was hoping we would not have to get into a seemingly indefinite battle, but here we are.

1424-001 1424-002 **This is about a pristine forest, the Cedar River Watershed, which serves the City of Seattle and surrounding areas, and which is one of only a few in the entire United States that is so clean it needs no filtration system other than what nature has provided.**

1424-003 **This is also about, whether it is indicated in the provided documentation by the BPA or not, about an energy debacle brought about by deregulation and the subsequent opportunistic energy fraud perpetrated by Enron and other companies. We were told there was a shortage (which was manufactured), and that therefore we need to upgrade.** our power grid.

We are still being told this. I have not forgotten about Enron and the way they scammed the entire Western United States. Evidently others have forgotten. I hope you haven't.

1424-004 1424-005 **Because of this ongoing perpetuated threat of having our lights, our heat, and our dialysis machines suddenly turned off, we are supposed to throw our entire concept of environmental stewardship out the door. We are supposed to be concerned now about energy shortages and "national security" more than we are about clean water.**

1424-006 1424-007 1424-008 **If polluted water, the loss of entire species of Salmon and other fish, the loss of habitat for numerous other species, further degradation of a fast disappearing forest, and the insult to the people that hunted and fished there before we came is not a threat to our national identity, and our national pride, then what is it? A simple inconvenience?** Is it progress?

I don't buy that. Please don't try to blackmail us with threats of blackouts. That is exactly what Enron and the rest of those corrupt corporations were telling us. We need to hear the truth.

1424-009 1424-010 **The BPA needs to stop thinking about cheap and easy. They need to think about management, and about respect for the concerns of the majority of us who depend upon this water, this watershed, and who love this area.** For its intrinsic beauty rather than for the monetary benefits we might enjoy by exploiting its

1424-012 1424-013 **By the way, BPA employees and their subcontractors are being paid money to come in and gouge another swath out of our watershed. Those of us such as myself, who go there to restore it, to repair the damage, do NOT GET PAID. We do it for free, because we give a damn!**

1424-011 **Thank you.**

1423-001 and -002 Comment noted.

1424-003 Comment noted.

1424-004 and -005 Comment noted.

1424-006, -007, and -008 Comment noted.

1424-009, -010, and -011 The risk of blackouts is real. On August 10, 1996, a transmission outage on the BPA system blacked out 7.5 million customers up and down the west coast. BPA is working to make sure that does not happen again. Comments noted.

1424-012 and -013 Comment noted.

Biodiversity NORTHWEST

Formerly Pacific Crest Biodiversity Project

Protecting and restoring forests of the Pacific Northwest

KELT-1425
RECEIPT DATE: FEB 04 2003

BPA
Communications – KC -7
PO Box 12999
Portland, Oregon 97212
Subject: Comments on Kangley Echo-Lake Power Line Project

1425-001 As there has not been sufficient time to review the 1800 page Supplemental Draft Environmental Impact Statement or the Non-Transmission Alternative study, Biodiversity Northwest requests an additional thirty days to review and allow for public comment both organizationally and for citizens who are also needing more time for adequate review.

Assuming the new deadline of April 1, 2003, all interested parties will have more adequate time to give proper examination of aforesaid articles and studies. Without the thirty day extension, BPA could be perceived as attempting to move pertinent information forward without sufficient public review. We hope that BPA complies.

1425-002 While Biodiversity Northwest will need more time to fully inspect the 1800 page SDEIS and the Non-Transmission Alternative, we would like to take this opportunity to encourage BPA to not proceed with the Cedar River Watershed like they're proceeding with the Columbia River by backing out of contracts, commitments and promises.

With the Watershed as the preferred alternative, how is the City of Seattle, environmental groups and local citizens expected to believe the promises put forth in any BPA-administered mitigation package if it is not legally binding? We understand from BPA's track record (e.g. the Columbia River) that the agency prefers to refrain from any legally binding commitment at all. How then can we believe anything that you offer at the negotiating table unless BPA will agree to sign under the legally-binding line?

Biodiversity Northwest encourages BPA to only discuss a mitigation package with the City if BPA is willing to be held accountable for their alleged promises.

1425-003 1425-004 1425-005 Biodiversity Northwest also encourages BPA to follow the legal procedures as stated in the NEPA process which require the agency to seriously study all feasible alternatives and to be in compliance with scoping comments that request specific studies. The SDEIS, at first look, seems to fail in this regard, refraining from any feasible Non-Transmission Alternative that is more comprehensive, incorporating Entitlement negotiations, Demand Response programs, Demand-Side Management programs, Generation & Distributed Generation, Regional Availability of Natural Gas, Existing Distributed Generation, New Distributed Generation, Renewable Generation and emerging technologies.

1425-006 1425-007 BPA's SDEIS appears to review only a handful of these possible Non-Transmission Alternatives and has admitted to failing to produce anything comprehensive because of lack of time. We're encouraging you to take the necessary time. Tom Foley states that these studies will need to take place in the next few years and we're asking that you study them now. The rest of Biodiversity Northwest's comments will come after the public comment due date has been extended.

Submitted by Michael Shank, Outreach Director for Biodiversity Northwest
4649 Sunnyside Ave N. #321 Seattle, WA 98103

4649 Sunnyside Avenue North #321 Seattle, WA 98103
Phone: 206.545.3734 Fax: 206.545.4498 Email: info@biodiversitynw.org Web: www.biodiversitynw.org

1425-001 See response to Comment 1421-038.

1425-002 See response to Comment 1421-038.

1425-003 and -004 See response to Comment 1421-038.

1425-005 See response to Comment 1421-038.

1425-006 and -007 The consultants developed a comprehensive study of non-transmission alternatives that was not compromised by the time available to complete the analysis. See responses to comments 1421-038-004, -005 and -006. They found that "A high level of load reduction or additional generation is required to defer KEL. (Appendix J, Section 1.2)" See response to Comment 1421-032-003. The immediacy of the problem makes achieving this large amount of demand reduction even less feasible.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

INVOLVEMENT KELI 1426
POST DATE: FEB 2 4 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments I have testified on this transmission line several times.

1426-001 I still do not like the fact that an additional line is preferred through the watershed. However, neither would I advocate building through people's back yards. If we must build a new transmission line through the watershed, I would advocate reconstructing the existing towers so they can handle the extra load rather than building an additional set of towers.

1426-002 If we must do any constructing of roads, BPA should fully decommission at least as many miles as are built.

1426-003 BPA should also mitigate for lost habitat and habitat disturbance by putting lands adjacent to the watershed into some sort of conservation

1426-004 status by transferring title to Seattle or King Co. with the reservation that it be conserved.

1426-005 In addition, simple 1:1 replacement of lost habitat acreage is not adequate because widening the existing corridor increases hazards to wildlife and habitat fragmentation.

1426-006 BPA should purchase with their own funds, section 20 & turn over to the city

1426-007 Should any additional construction be done in the watershed (i.e. the new line or any of the construction alternatives), minimal construction techniques should be

1426-008 used in order to minimize damage to wetlands, the

1426-009 riparian habitat, water quality and the landscape in general.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Harry Romberg

Address 11538 12th Ave. NE Seattle 98125

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1426-001 See response to Comment 1421-039-002.

1426-002, -003, and -004 BPA would propose to make it such that some roads within the existing right-of-way could no longer be used. Those roads go through wetlands. In addition, BPA would work with the city of Seattle to see about removing from service other roads for the benefit of Seattle and BPA. Also see responses to Comment 1415-003, -004 and -005 concerning purchasing other lands.

1426-005 and -006 See responses to Comments 1415-003, -004 and -005. BPA would use its own funds.

1426-007, -008, and -090 BPA would use helicopters and other techniques to minimize disturbance to soils. Trees cut may be left inside wetlands to provide for wildlife cover and to minimize disturbance to the ground. Low-growing vegetation would be allowed to grow adjacent to and near streams. No clearing would take place inside the Cedar River canyon.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

LOG/INVOLVEMENT
LOG#: KELT 1422
RECEIPT DATE: FEB 0 6 2003

1. Please have your environmental studies look at

2. I need more information about

1427-001 * If the alternative is to go through the watershed and it poses no risk to people ?

3. I have these other comments

1427-002 We are very concerned and upset if a line should go through our backyard.

1427-003 Our baby room is right below this posible line addition it is something that we are outright opposed to (if it goes through Winterwood Estates)

☒ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Guy + Tamblynne Hall

Address 18424 SE 288th St Kent Wa 98042

E-Mail Address tamblynne@attbi.com

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1427-001 Other than the concerns about Seattle's drinking water, there would be no direct impacts to people within the CRW. One to two homes may be removed outside the CRW. There would be visual impacts in the Kangley/Selleck area and to those people traveling inside the CRW.

1427-002 and -003 Comment noted.

Kangley-Echo Lake Transmission Line Project

Telephone comment by Ginny Kuehn
02/06/2003

PUBLIC INVOLVEMENT
LOG#: KELT-1428
RECEIPT DATE:
FEB 0 6 2003

Katie Saylor
32929 SE 44th St.
Fall City, WA 98024

(425) 222-3735

1428-001 Suggestion to – instead of cutting new swath through the Cedar River Watershed double-up your lines on the existing towers.

1428-001 See response to Comment 1421-039-002.

Kuehn, Ginny - DM-7

PUBLIC INVOLVEMENT
LOG#: KELT-1431
RECEIPT DATE:
FEB 1 0 2003

From: Joel Sisolak [joels@cedarriver.org]
Sent: Friday, February 07, 2003 1:01 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Project

1431-001 Please extend the comment period for this project by at least 30 days. More time is needed for the public to read and digest the entire 1800 page SDEIS, and review the study on the Non-Transmission alternative.

Thank you for your consideration.

Joel P. Sisolak
Executive Director
Friends of the Cedar River Watershed
3512 23rd Avenue NW #201
Seattle, WA 98117
(206) 297-8141
f: (206) 297-8142

1431-001 Due to the very tight schedule, BPA will not extend the comment period.

Kuehn, Ginny - DM-7

KELT-1432
FEB 1 9 2003

From: MARGE CHISSUS [mchissus@attbi.com]
Sent: Sunday, February 09, 2003 1:54 PM
To: comment@bpa.gov
Subject: alternate C
Importance: High

Dear Sir / Madame of BPA
1432-001 **We are very much opposed to the alternate C, and feel along with many others it should be going through the water shed like proposed a couple of years ago.**
1432-002 **This whole thing has put us on 'hold' for many months now in regards to selling our property. As soon as the 'votes' are counted we NEED a written statement from BP stating they are not using alternate C which would then take our property at;**
26813 SE 236th St
Maple Valley, Wa. 98038
425-413-8667
mchissus@attbi.com
Thank you for your time reading this.

1432-001 Comment noted.
1432-002 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ." KELJ-1433

FEB 10 2003

1433-001 1433-002 1433-003

1. Please have your environmental studies look at One number of Creeks and wet lands it would need to get environmental impact studies completed prior to starting. It would also be detrimental to the wintral elk herds in this area.

2. I need more information about

1433-004 1433-005

3. I have these other comments Although King Co. has responsibilities to protect the community, I can not see any positive alternative to route the transmission lines through the water shed where existing line is at this time. The cost and the difficulty in going any other route would be excessive. However, if the Cedar Water shed is not viable, I recommend we (local area) charge King County for excess waste of tax payers money, and try to form new County as in past years.

☒ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name S. ROGER STOUT

Address 26258 SE 188th ST, ISSAQUAH, WA 98027

E-Mail Address S.Roger9090@yahoo.com

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1433-001 and -002 We have already undertaken our environmental review of sensitive areas such as streams and wetlands, and have published this information in the SDEIS. BPA's first priority in designing its facilities is to avoid where we can, span where we can't avoid, and mitigate for those sensitive areas that cannot be spanned. However, if BPA selects any other alternative other than Alternative 1, additional environmental work would be necessary, primarily surveys.

1433-003 Comment noted.

1433-004 and -005 Comment noted.

Amy Gulick
44521 SE 166th Street
North Bend, WA 98045

PUBLIC INVOLVEMENT
KELT-1435
RECEIPT DATE: FEB 12 2003

February 3, 2003

Mr. Lou Driessen
BPA
Communications KC-7
P.O. Box 12999
Portland, OR 97212

Re: Kangley/Echo Lake Transmission Line

Dear Mr. Driessen:

1435-001 In regards to the Kangley/Echo Lake Transmission Line, also known as the Raging Cedar Powerline for the impacts this project will cause on the Cedar and Raging River valleys, I have the following comments.

1) Is this project necessary? BPA states that the new line is needed to accommodate electrical growth and reliability concerns in the Puget Sound area. As for growth, I request that BPA pursue an aggressive conservation campaign before building a new powerline. Puget Sound residents, more than just about any other in the country, understand the need for conserving energy, and will do it if educated and asked to. And as for reliability concerns, I ask BPA to pursue electrical system changes to the best of its ability and the existing system's capability.

1435-002

1435-003

2) If BPA does build a new corridor or expand an existing one, it's imperative that it mitigates for the environmental impacts. BPA should acquire and protect nearby forestland including 400 acres along the Raging River near Highway 18, and 600 acres near the Cedar River that is Section 25, owned by Plum Creek Timber Co. and currently subdivided for development. In order to pay for necessary mitigation, BPA needs to use its own funds, and not those of the Land and Water Conservation Fund or Forest Legacy money. If BPA decides that it can't afford mitigation, then it shouldn't proceed with the project.

1435-004

1435-005

3) If BPA does build a new line, I request the following: raise line height and minimize the corridor width over the Raging and Cedar Rivers to protect riparian forests; do not build any new roads, and install towers with helicopters; and replace invasive plant species such as scotch broom and blackberry with native vegetation in rights of way.

1435-006
1435-007
1435-008
1435-009
1435-010

4) As for where to build the line, I request that BPA doesn't build it in the Cedar River Watershed. This 90,000-acre watershed provides low elevation forest habitat for wildlife, something that is being gobbled up by ever-increasing development in the greater Seattle area. The watershed has been logged in the past, but the City of Seattle has taken progressive steps to rectify the past damage by prohibiting further logging, thereby ensuring a continued and reliable source of clean drinking water. I don't see how clearcutting a swath of mature forests, erecting electrical towers and stringing power cables will do anything to preserve wildlife habitat and clean water.

1435-011

1435-012

1435-013

Thank you.

Sincerely,

Amy Gulick

1435-001 See response to Comment 1423.

1435-002 See response to Comment 1423.

1435-003 See response to Comment 1423.

1435-004 and -005 See response to Comment 1423.

1435-006 and -007 See response to Comment 1423.

1435-008 and -009 See response to Comment 1423.

1435-010 See response to Comment 1423.

1435-011, -012, and -013 See response to Comment 1423.

1436-001

BONNEVILLE POWER ADMINISTRATION

PUBLIC INVOLVEMENT
RECEIPT DATE: FEB 12 2003

Kangley - Echo Lake Transmission Line Project KELT-1436

"I'd Like to Tell You . . ."

1. Please have your environmental studies look at Please put plenty of bright balls on all of your power lines, including the high single ground line which is hard to see, so pilots can see them all easily! Thanks, from retired cargo air pilot with lots of power line flying. ☺ It's very important
2. I need more information about
3. I have these other comments Have a good day!

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Mark A. Starr

Address 44998 S.E. 149th Place North Bend, WA. 98045-9783

E-Mail Address SSTARR2@Mindspring.

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1436-001 BPA will work with the FAA to determine spans that need to be marked for safety.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

LIC INVOLVEMENT
LOG#: KELT- 1437
RECEIPT DATE: FEB 12 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments WE BELIEVE THE PREFERRED (ALTERNATIVE 1) IS THE BEST CHOICE WITH THE LEAST AMOUNT OF IMPACT TO THE SURROUNDING COMMUNITIES AND ENVIRONMENT. UTILIZING THE EXISTING RIGHT OF WAY REQUIRES THE LEAST AMOUNT OF NEW PROPERTY BEING DISTURBED.

WE LIVE IN THE ELK RUN (1) DEVELOPMENT.

1437-001

1437-002

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name TERRY & DENNIS HIGASHIYAMA

Address 27420 - 227th AVE SE 98038

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1437-001 and -002 Comment noted.

BPA Comments **February 6, 2003**

PUBLIC INVOLVEMENT
LOG#: KELT- 1438
RECEIPT DATE: FEB 1 2 2003

1438-001
- Some folks have talked about sediments running into the Cedar River from the BPA construction activity. To me this idea makes no sense. What is the distance from the river to the closest transmission tower? I thought I heard 1,000 feet. According to the SDEIS the total cleared area for each tower is 40 square feet. How can a 40 square foot area located a distance (of 1,000 feet) from the river cause any measurable sedimentation in the river? The banks of a river have a far greater potential of causing sediments to flow into the river than two 40 square foot cleared areas 1,000 feet from the river. .

1438-002
1438-003
- SPU has trashed the Cedar River Watershed, now they want to trash my backyard (Alt. C).

1438-004
1438-005
- As part of preferred alternative 1 has the BPA looked at decommissioning existing gravel roads in the CRW. Alternative 1 requires 91 acres of cutting trees for the new right of way. The BPA would decommission 91 acres of logging road. Ninety one acres of road would equate to 21.4 miles of logging road (assuming a 35 foot road cut).

1438-006
1438-007
- As part of preferred alternative 1 has the BPA looked at purchasing adjacent parcels for mitigation.

Jon Zak
PO Box 551
Hobart, WA 98025

1438-001 Comment noted.

1438-002 and -003 Comment noted.

1438-004 and -005 BPA is in discussions with Seattle about the possibility of decommissioning some roads outside the rights-of-way. Some existing roads inside the existing right-of-way would be made such that people can no longer travel across them. Those particular roads would be replaced with new roads because the existing roads go through wetlands. BPA has purchased 350 acres of land immediately north of the watershed and is looking at the possibility of purchasing more lands.

1438-006 and -007 See response to Comment 340-002.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

ENVIRONMENT
KELT- 1439
DEPT DATE
FEB 12 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments

1439-001 A. covington to Maple valley substation Preexisting line (Yes)
1439-002 B. covington to Echo lake Substation Preexisting line (Yes)
1439-003 C. Power substation to Maple Valley/Echo lake substation's (NO)
1439-004 4B. (NO)
1439-005 4A. (NO)
1439-006 1. /A1. (Yes)
1439-007 2. (NO)
1439-008 3. (NO)
1439-009 B Echo lake to Stampede (Yes) / D Echo lake to Stampede (NO)
1439-010 ☒ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Bethany A. Linn

Address 30621 153rd Ave. S.E. Kent, Wa. 98042-5512

E-Mail Address SunShinestarbright@Hot Mail.Com (Private)

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

BONNEVILLE POWER ADMINISTRATION

1439-001 Comment noted.
1439-002 Comment noted.
1439-003 Comment noted.
1439-004 Comment noted.
1439-005 Comment noted.
1439-006 Comment noted.
1439-007 Comment noted.
1439-008 Comment noted.
1439-009 Comment noted.
1439-010 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project KELT-1440

"I'd Like to Tell You . . ."

FEB 12 2003

1440-001
1440-002
1440-003

1. Please have your environmental studies look at the impact on the forest, streams, and wild life out side the water shed boundaries. The trees on our farm - Fir, Cedars, maples, hemlock are much older than those that would be cleared in the water shed.

2. I need more information about

1440-004
1440-005

3. I have these other comments Our country is in crisis on many fronts right now. We should be energetically researching systems that would reduce our need for electricity. People might be more willing to conserve energy if they were charged a higher rate for power used that exceeded a reasonable amount.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Sarah M Tracy

Address

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1440-001, -002, and -003 BPA's environmental analysis that was recently completed and published in the SDEIS included analysis on four "build" alternatives outside of the Cedar River Municipal Watershed, Alternatives A, B, C and D.

1440-004 and -005 Comment noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ." KELI-1441

FEB 12 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments

1441-001 We wholeheartedly support BPA's preferred Alternative #1.
It is the most efficient route (time, energy, impact on
property values in South King County). While we believe there
1441-002 will be some negative impact to the enviornment, we believe
that BPA will minimize damage as much as possible. This is
1441-003 the cost of providing more power to a growing city.
1441-004 Please be generous with compensation to private land holders.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Heather McCurdy + William Bruce McCurdy

Address 19514 SE 277th St Kent, WA 98042

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1441-001 Comment noted.

1441-002, -003, and -004 Thank you for your comment. BPA will offer landowners fair market value for the land rights needed for this project. Please refer to the SDEIS, Section 4.11.2.5, Community Values and Concerns, Property Value Impact.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

1. Please have your environmental studies look at KELT-1442

FEB 1 2 2003

2. I need more information about

3. I have these other comments Attended the Feb 6 Meeting (2003) @ Tahoma High School — Summary comments

1442-001 (1) BPA is doing good job representing plan & options.

(2) Alternate 1 is obvious choice for the people of SE King County

1442-002 (3) If other ~~options~~ option is selected, you will get a huge negative response and will cause further delay / added costs.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Bill Benshoof

Address 19031 SE 293rd St Kent WA 98012

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

BONNEVILLE POWER ADMINISTRATION

1442-001 and -002 Comments noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ." KELT-1443

ALT. (C)

FEB 12 2003

1. Please have your environmental studies look at

1443-001 If you clear Property with Trees and So forth what will it look like at the end - STICKERS Like I Have now under the existing Line I already Have

2. I need more information about

1441-002 3. I have these other comments House Value Dropping at least $100,000

1441-003 SEATTLE IS out of Line - going through the watershed is a NO BRAINER!

1441-004 King County should waive Taxes on Property that Has Powerlines or Easements - I Have 4 Acres of Line and Easements now

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Jim Kreig

Address 27815 SE 264th ST Rav. WA. 98051

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1443-001 Our environmental studies included Alternative C, both Options C1 and C2. Land use impacts would be high with both options, and the impacts to the visual resource would be moderate to high for those residents where the transmission line would be the dominant visual feature.

1443-002 BPA will offer landowners fair market value for the land rights needed for this project. See response to Comment 1441-002. If BPA needs to acquire land rights across your property, and you disagree with BPA's opinion of fair market value, BPA would be willing to review any additional market data that you may have, or review recent appraisals of your property. You may also choose to use the condemnation process, and have the courts establish Just Compensation for your property.

1443-003 and -004 Comments noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

KELT-1444

FEB 12 2003

1. Please have your environmental studies look at

2. I need more information about

1444-001 3. I have these other comments My Family has lived in the Pacific NW
1444-002 For 50 years. I favor the preferred Alternative No. 1 and would like to see no monies to go to the City of Seattle and/or building of facilities for the
1444-003 City of Seattle. The decision should be made now and not delayed any longer as the new transmission
1444-004 lines when completed will save approximately 5 KW/year of energy costs.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name JOHN HUSON

Address 20318 SE 243 ST Maple Valley WA 98038

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1444-001 and -002 Thank you for you comment and concern for BPA's financial situation. BPA is committed to mitigating the impacts caused by this project. Some of that mitigation may be to pay Seattle to offset the cost of right-of-way through the CRW.

1444-003 The preferred alternative would reduce losses by approximately 11 MW on peak.

Comment noted.

1444-004 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

KELT-1445

FEB 12 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments

1445-001 The effect on families living along the
1445-002 existing easements, the effect it will have
1445-003 on people, their homes, home value, and
animals living in residential areas along
alternative "A".

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name

Address

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1445-001, -002, and -003 Comments noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

1. Please have your environmental studies look at KELT-1448

FEB 1 2 2003

2. I need more information about

1448-001 3. I have these other comments Keep out the power line project you have in mind. Take it elsewhere.

Thank you.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name R. T. Naylor

Address PO Box 7144

Covington, WA 98042

E-Mail Address

by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1448-001 Comment noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

KELI-449

1. Please have your environmental studies look at

FEB 1 2 2003

2. I need more information about

3. I have these other comments THE ROUTE THROUGH THE CEDAR RIVER WATERSHED IS THE CORRECT ROUTE TO UTILIZE AND HAS THE LEAST IMPACT BY FAR. THE WATERSHED WAS BEEN LOGGED FOR MANY YEARS AND THE MINIMAL CLEARING FOR THE POWERLINE IS NOTHING COMPARED TO PAST LOGGING PRACTICE. IT WILL ACTUALLY CREATE HABITATE THAT IS BETTER FOR MORE ANIMALS & OTHER WILDLIFE THEN DENSE FOREST. IN FACT, IT MORE CLOSELY MATCHES NATURAL ACTIONS SINCE NO FIRES WILL NORMALLY BE ALLOWED TO BURN.

1449-001

1449-002

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Wayne L. Snoey

Address 25907 175th Way SE, Covington, WA 98042

E-Mail Address Waynedemene@aol.com

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1449-001 and -002 Comments noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ." KELT-1450

FEB 12 2003

1450-001 1. Please have your environmental studies look at This is a joke. the groups
1450-002 were not formed to protect people, they were formed to protect you; to make deals. We are almost out of air/water. the water, food, air are toxic.

2. I need more information about

1450-003 3. I have these other comments you better tell people the truth and cut the load. Cutting the trees in the watershed, anothe transmission line etc-etc-. Will just make less time for everyone, you passed the point of no return a long time ago. Deal with it. I am fighting the same issues for over 40 years. Denial of reality does not change reality.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Carolyn DeVita

Address 8441 36th Ave. SW Seattle Wa. 98126

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1450-001, -002, and -003 Comments noted.

PUBLIC INVOLVEMENT
LOG#: KELT-1451
RECEIPT DATE:
FEB 12 2003

February 10, 2003

Bonneville Power Administration
Communications Office - KC-7
P.O. Box 12999
Portland, Oregon 97212

Reference: "Kangley-Echo Lake Transmission Line Project"

Dear Lou Drissen,

1451-001 I would like to give my support to the preferred alternative, alternative one, on the Kangley-Echo Lake Transmission Line Project. I attended the Feb. 6, 2003 meeting at Tahoma High School and heard the information and concerns presented at that meeting. I also have had time to look at table 2-3, summary of impacts from alternatives, taken from the latest environmental impact statement. This is a very complete summary of all the impacts that the Bonneville Power Administration considered and each alternative route is evaluated per impact. I am a resident of Hobart and would be effected if route C1 or C2 were selected. The first impact, land use, is the one concern evaluated that should be the deciding factor in placing the lines. The BPA has eight choices with low or no impact to human families. One of these eight choices needs to be selected, regardless of cost to BPA. No one should be forced to live near a 500 kilovolt transmission line and that is what happens when the lines are placed in existing neighborhoods. People can't sell because of the very real health concerns that BPA itself recognizes. This line can be built without subjecting any families to these health concerns and without impacting any neighborhoods.

1451-002
1451-003
1451-004
1451-005
1451-006

1451-007 The proposed, preferred plan displaces two homes and a barn. Please fairly compensate these families and purchase the properties so the transmission lines can proceed with no further delay. It is extremely fortunate to have a route that can be built with so few families displaced. The City of Seattle is the largest end user of the electricity generated. It does not seem unreasonable to ask them to cooperate in allowing the lines to pass through their Watershed. The BPA plan is to use helicopters in the placement of the towers and removal of trees. It addresses run off and is working with The Watershed to assure that the water quality will not be compromised. The BPA is showing greater concern for The Watershed environment than Seattle itself has in the past.

1451-008
1451-009
1451-010
1451-011
1451-012
1451-013
1451-014

1451-015 Hopefully the proposed plan will be accepted by The BPA, it displaces only two homes and the cost is low. But, keep in mind, if another alternative is needed there are eight routes with low or no impact to families. Whereas, Alternative A displaces 25 families, Alternative C1 displaces 30 - 35 families, Alternative C2 displaces 23 - 28 families, Alternative D1 displaces 11-14 families and Alternative D2 displaces 8 families. Remember to factor in all the people living right next to the lines or who would have them crossing their property. These are the true victims who have every reason to worry about the health effects to themselves and their children. They are needlessly being put in harms way. We do not know all the long term effects of these high voltage lines but we do know that this is a case with many alternatives, and where no one needs to be put at risk.

1451-016

1451-017 The BPA stated this project will save them 48 million kilowatt-hours of energy per year due to lower loadings on the lines. The value of the energy savings will cover most if not all, of the project cost according to the BPA. Any costs incurred by the BPA will be recouped by the BPA continuously, on a yearly basis indefinitely. Whatever the cost, it will be recouped There is no economic reason that justifies putting these lines through alternatives A, C1, C2, D1 or D2.

Yours Truly,

Jacqueline Thompson

Jacqueline Thompson
20810 266th pl SE
Maple Valley, Wa. 98038

1451-001, -002, and -003 Comments noted.

1451-004, -005, and -006 Each of the alternatives will impact residential properties either directly, by having to acquire land rights needed for new right-of-way, or indirectly, by constructing a new line adjacent to residential property. See response to Comment 1441-002.

1451-007 and -008 See response to Comment 1395-001.

1451-009 and -010 Comment noted.

1451-011 Comment noted.

1451-012, -013, and -014 Comment noted.

1451-015 Comment noted.

1451-016 Our environmental analysis looked at the long-term health impacts of the proposed transmission line and concluded that the impacts would be mostly no to low impacts, and a high impact for the No Action Alternative.

1451-017 The loss savings benefits go to consumers through their retail utility, but not to BPA. See response to Comment 1421-056-001. Also, all alternatives for this project result in lower losses ranging from 4 to 11 MW lower than without the project. Comment noted.

Kuehn, Ginny - DM-7

KELT-1452
RECEIPT DATE
FEB 14 2003

From: William Rogers [aprec8@msn.com]
Sent: Wednesday, February 12, 2003 1:01 PM
To: comment@bpa.gov
Subject: Kangley Echo Lake Transmission line

1452-001
1452-002

As a resident of Winterwood Estates I am writing to endorse the BPA proposal for the Kangley Echo Lake Transmission line to be installed over the Cedar River Watershed. This is the best proposal for power lines installation available. It will not affect property values or endanger schools near the present lines running through Winterwood Estates.
Thank You
William T. & Sheryl-Jean Rogers
18910 S.E. 287TH St.
Kent, Wa. 98042-5425
253-630-1791

1452-001 and -002 Comments noted.

February 12, 2003
P.O. Box 259
Maple Valley, WA 98038

KELT-1453
RECEIPT DATE:
FEB 14 2003

Bonneville Power Administration
Communications Office - KC-7
P.O. Box 12999
Portland, OR 97212

Re: Proposed Kangley-Echo Lake
500KV Transmission Line

Dear Sirs:

1453-001

I believe the proposed route through the Cedar River watershed is the best one, especially considering the alternatives.

First, I think that Seattle's fears of their water supply becoming contaminated by silt run-off are unfounded. Was the water quality harmed when the first power line was constructed? And the chances of it happening are even more remote now with the use of modern, environmentally aware techniques such as the use of silt fences and employing helicopters to carry in much of the material.

Second, if the Seattle Water Dept. is so worried about their water supply being contaminated, why did they allow the construction of a fish ladder on the Cedar River at Landsburg Park? I would much prefer a little silt in my drinking water once than thousands of rotting salmon every year!

1453-001 Comments noted.

1453-002

Third, the argument about disturbing the wildlife is ridiculous. The elk herds and deer have become so accustomed to people that they range freely through the Hobart-Maple Valley area. I have had to put up fencing to keep them out of our yard. And the demand for more land for "wildlife mitigation" is simply a land grab tactic.

1453-003

The watershed route is the only sensible choice. Please do all that you can to avoid running it through populated areas. It will be to every ones advantage.

Sincerely,

Charles F. Stotts

1453-002 and -003 Comments noted.

KEL-I-1454

FEB 14 2003

From: Silverstein, Brian L - TOP-PPO2-2
Sent: Wednesday, February 12, 2003 6:33 PM
To: Driessen, Laurens C - TNP-TPP-3; Taves, John - DR-7-C; Kreipe, Mike - TOP-PPO2-2; Horvath, Julius G - TOP-PPO2-2; Lynard, Gene P - KEC-4; Hilliard Creecy, Jamae - T-DITT2; Custer, Cindy J - DR/WSGL
Subject: KEL Call from Mountaineers

1454-001 I got a call from Ed Henderson from the Mountaineers. He was at the NCA presentation that we did at NWEC. At the meeting he asked me why we couldnt double circuit through the watershed and I explained the reliability concerns. He called today and asked why, then, can Alternative B use double circuit. This question has come up before. I left a voice mail with the following:

We must examine and be able to survive loss of a double circuit (allowed exceptions include the one span across the Cedar River). Alternative B puts the 500-kV line on a tower with the existing Rocky Reach-Maple Valley 345-kV line. The 345-kV line is not as strong a source as a 500-kV line, so the simultaneous loss of one 500-kV and one 345-kV is not traumatic. Also they go to different locations - we wont lose two lines into Echo Lake.

Kuehn, Ginny - DM-7

KEL-I-1455

FEB 14 2003

From: fbmcgalliard [fbmcgalliard@seanet.com]
Sent: Thursday, February 13, 2003 8:37 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Line Project

1455-001 1455-002 1455-003 1455-004 1455-005 1455-006 We live in Winterwood (28415 185th S.E. Kent) along one set of your high voltage lines that have been considered for an expansion of the power line. We are concerned that the route along our property and throughout the rest of our neighborhood is already fully developed and any expansion of the lines would seem sure to force changes in the permanent buildings and in the rather substantial forrest which has grown up just beyond the existing rights of way. The power line could really have a negative impact on the property values and the asthetic beauty along the whole corridore through the neighborhood. I hope that your considerations include a clear assessment of the full impact, the terrible personal cost, as well as expense that such a change would have on this quiet and outstanding collection of homes and the families living in them.

1454-001 We must examine and be able to survive loss of a double circuit (allowed exceptions include the one span across the Cedar River). Alternative B puts the 500-kV line on a tower with the existing Rocky Reach-Maple Valley 345-kV line. The 345-kV line is not as strong a source as a 500-kV line, so the simultaneous loss of one 500-kV and one 345-kV is not traumatic. Also they go to different locations, so we would not lose two lines into Echo Lake Substation.

1455-001 and -002 Comments noted.

1455-003 and -004 Comments noted.

1455-005 and -006 Our analysis looked at the impacts to the social environment as well as the natural environment for all project alternatives under consideration including Alternative A. A summary of these impacts in contained on Table 2-3 in the SDEIS.

Kuehn, Ginny - DM-7

From: Judy and Mike Smith [jmsmith37@attbi.com]
Sent: Friday, February 14, 2003 10:23 PM
To: comments@bpa.gov
Subject: Kangley-Echo Lake Transmission Line Project

KELT 1458
RECEIPT DATE: FEB 18 2003

1458-001
1458-002
1458-003

As a resident of Winterwood Estates, we oppose Alternative A because of the impact it would have on our community. It would significantly affect property values because it would have an impact on our environment, especially with the loss hundreds of trees. The current powerline runs adjacent to the Grass Lake Elementary School, and increased EMF would pose a health risk.

1458-004

We encourage the BPA's proposal for the Kangley-Echo Lake Transmission Line Project over the Cedar River watershed, so the new line does not impact the Winterwood Estates residential area.

Thanks,
Mike & Judy Smith
28139 192 Pl. S.E.
Kent, WA 98042

1458-001, -002, and -003 Comments noted.

1458-004 Comment noted

Kuehn, Ginny - DM-7

...IC INVOLVEMENT
KELT-1459
...EIPT DATE:
FEB 18 2003

From: Peter Rimbos [primbos@attbl.com]
Sent: Saturday, February 15, 2003 6:02 PM
To: comment@bpa.gov
Subject: BPA Kangley-Echo Lake Transmission Line--SDEIS COMMENTS

Lou Driessen
BPA - KC-7
PO Box 12999
Portland, Oregon 97221

Mr. Driessen,

1459-001 1459-002 1459-003 We attended the public meeting held February 5th at the Maple Valley Community Center regarding the SDEIS and the proposed additional BPA transmission line through the Cedar River Watershed. We wish to express our thanks to BPA for preparing the SDEIS and holding public meetings throughout the area. That said; however, as long-time residents of the greater Maple Valley area, we still have deep reservations and concerns with this project. We don't want this additional transmission line in the Cedar River Watershed. It is a forest preserve and an additional transmission line would seriously damage this ecosystem and bring serious risks to the drinking water of so many in the Puget Sound area. We also don't wish to see an additional transmission line cut swaths through the greater Maple Valley area and adversely affect our fellow residents.

We have reviewed the SDEIS and offer the following specific comments:

1459-004 1459-005 1. BPA fails to clearly demonstrate a need for an additional transmission line. It is not apparent BPA has done enough to increase conservation and reduce demand, especially during the few peak power periods in question. BPA should pursue serious conservation and energy efficiency programs before building an additional transmission line.

1459-006 2. BPA's Non-Transmission Alternative isn't comprehensive enough. It is not a feasible and legitimate alternative as is legally required. We request a more thorough evaluation of a non-transmission approach.

1459-007 1459-008 3. BPA's risk analyses are not consistent across the board. When looking at worst-case events, such as a 1 in 20 year cold snap to "justify" the supposed need for an additional transmission line, any contamination to the Puget Sound area's water supply from the Cedar River Watershed leading to replacement and construction of water filtration plants should also be addressed in worst-case risk and cost analyses.

1459-009 4. It is not apparent that double circuiting of the transmission line through the Cedar River Watershed has been adequately addressed. What are the specific cost and risk analyses associated with such double circuiting and how would they compare to the Preferred Alternative?

1459-010 5. The 1961 Columbia River Treaty is touted as a major reason for an additional transmission line. However, British Columbia is a power *exporter*. Power delivered to Canada over an additional transmission line most likely will be sold right back to California. BPA stated at the public meeting they have no authority to change the treaty. That understood, we believe that in the Public interest it is prudent for BPA to explore with the proper Federal Authorities (who can affect changes to the treaty through negotiation) whether some arrangement with Canada might obviate or at least defer an additional transmission line. It is not apparent in the SDEIS that BPA has explored this approach in any meaningful way.

1459-011 6. What specific mitigations is BPA proposing and committing to if and when an additional transmission line is built? BPA should protect other forest lands to offset the loss of forest from the Preferred Alternative's linear clearcut through the Cedar River Watershed. Since there is little ancient forest for replacement of cutting mature forests, a multiplier should be applied. The following nearby forest lands should be included: (1) 400 acres along Raging River near SR-18 and (2) 600 acres near the Cedar River--specifically, Section 25, owned by Plum Creek Timber Co., and subdivided for development. This should be done with BPA funds, not with Land and Water Conservation Fund or Forest Legacy money, as BPA has suggested. This is BPA's mitigation for violating the Puget Sound area's water supply and, therefore, BPA should pay with their own funds.

1459-012 In summary, we request BPA thoroughly address a Non-Transmission Alternative backed by a serious conservation and energy efficiency program, one in which all Puget Sound area citizens and businesses win in the near term and the long term. In addition, we urge BPA to revise this project to reflect our concerns and those of many other Puget Sound area citizens and organizations. We request our comments herein be included in the public record. Thank you very much for your efforts.

Peter and Naomi Rimbos
19711 241st Ave SE
Maple Valley, WA 98038-8926
primbos@attbl.com

1459-001, -002, and -003 Comments noted.

1459-004 and -005 See response to Comment 1423-002.

1459-006 See response to Comments 1421-032-002 and -003.

1459-007 and -008 BPA and Seattle recognize that the risk for causing more than two events of massive erosion to happen in one year during the construction phase is extremely unlikely. Although extremely small, the risk is still there. BPA would purchase insurance just in case for the cost of a turbidity filtration plant if one were needed to be constructed.

1459-009 Section 2.3.8 of the SDEIS examines the double-circuit alternative. The WECC Reliability Criteria (http://www.wecc.biz/documents/policy/WECC_Reliability_Criteria_802.pdf) does not permit exceptions for double-circuit towers but for short distances (e.g., river crossings). See page 28, Table I, Category C, Contingency 5 (Any two circuits of a multiple circuit powerline) and footnote g. BPA did a risk analysis for the WECC Reliability Probability Evaluation Work Group (RPEWG) to demonstrate acceptable performance for the proposed Kangley-Echo Lake line on a parallel right-of-way.

1459-010 See response to Comment 1421-031-001.

1459-011 Please see response to Comments 1415-003, 004 and 005.

1459-012 See response to Comments 1421-038-004 and 1421-032-003.

Comments are included in the public record.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

RECEIVED BY BPA PUBLIC INVOLVEMENT
LOG#: KELT-1460
RECEIPT DATE: FEB 19 2003

1. Please have your environmental studies look at

2. I need more information about

1460-001 3. I have these other comments I support BPA proposal for the Kangley - Echo Lake Transmission Line Project over the Cedar River Watershed.

☑ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name James T Cooney

Address 18428 SE 280th St Kent Wa 98042-5447

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

BONNEVILLE POWER ADMINISTRATION

1460-001 Comment noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

BY BPA
PUBLIC INVOLVEMENT
LOG#: KEL-I-1461
RECEIPT DATE: FEB 19 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments I would Like to Voice my support for The Kangley-Echo Lake Transmission Line Project to be installed over The Cedar River Watershed. It will have the least negative impact at this Location

1461-001

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Della Wilmot

Address 28023 194th PL SE, Kent Wa 98042

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

BONNEVILLE POWER ADMINISTRATION

1461-001 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

INVOLVEMENT
#: KELT-1462
EIPT DATE:
FEB 19 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments I fully support BPA's proposal for the Kangley - Echo Lake Transmission Line project to be installed over the Cedar River watershed. This is the "best" alternative as it avoids the Cross Lake Elementary School. Thanks for coming to that solution.

1462-001

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Glen U. Hamapp

Address 2802-6 189th Ave SE, Covington, WA 98042

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1462-001 Comment noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

PUBLIC INVOLVEMENT
C#: KELT-1463
RECEIPT DATE: FEB 19 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments

1463-001 I support your proposal for the new (Kangley - Echo Lk) transmission lines to be installed over the Cedar River Watershed as this would have the least impact on neighborhoods, schools, and the environment.

I am concerned of the effects on people.

Thank You for Your attention

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Mrs Shirley J. Jones

Address 27917 195th Ave SE / Kent, WA 98042

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1463-001 Comment noted.

LIC INVOLVEMENT
S#: KELT-1465
CEIPT DATE: FEB 20 2003

-----Original Message-----
From: Stan Fuller [mailto:stans@wa.net]
Sent: Thursday, February 20, 2003 8:23 AM
To: nmwebster@bpa.gov
Subject: re: Kangley-Echo Lake Transmission Line Project

1465-001 I am opposed to a increase in power lines going thru my residential area (Winterwood) I think it is better to go thru the water shed. Stan Fuller 19315 SE. 284th. st. Kent, WA. 98002
STAN

1465-001 Comment noted.

FOOTHILLS WATER ASSOCIATION
P. O. Box 545 Ravensdale, WA. 98051

...IC INVOLVE...
...#: KELT-1466...
...EIPT DATE: FEB 20 2003

To whom it may concern,

1466-001 Thank you for the opportunity to comment on the proposed Kangley-Echo Lake Transmission Line Project and voice our concerns regarding our community water system. As the board of directors for the water system (known as Foothills Water Association) we feel it is our duty to make certain our community's water source is not affected in any negative manner involving the proposed transmission lines.

1466-002 Our community has only recently begun to enjoy our new water system after many, many years of effort involving planning and countless meetings with numerous government and private agencies. This community had suffered for literally decades with old, delapidated surface water systems, resulting in a health hazard for the sixty plus homes that relied on those systems. The State Department of Health , U.S. Department of Ecology, U.S. Rural Utilities Services, and King County have all been actively involved in solving this major problem for this area. Our

1466-003 new water system has involved purchasing property with an active well, drilling an additional deeper well, constructing a 20,000 gallon water tank and booster pump station , purchasing an emergency generator, and installing miles of new water mains, pressure reducing vaults, and individual meter boxes and service lines for the now 74 homes that rely on our community's water system. Of course, this entire system had to be professionally engineered and go through all the permitting and agency red tape involved with a project of this scope. The funding for all this came from several sources, including a King County Community Development Block Grant, a construction loan from Washington State and a loan and grant from U. S. Rural Utilities Services. The total cost of this project is approximately 1.7 million dollars. The reason this cost is approximate is because this system is so new we haven't closed out the project yet. This should happen within the next few months. The new system is performing well and soon (for the first time in decades to our knowledge) our community will be enjoying a Health Department approved water system.

1466-004 As stated earlier, this new water system has not come easily. There have been hundreds and hundreds of hours of work done by volunteers from the community involving meetings, paperwork and construction as well as current operation of this system. This has not been a simple undertaking and we want to insure that the people involved with this Transmission Line Project take our water system seriously as an entity that could be impacted by their project.

1466-005 We hope whoever is involved in this Transmission Line Project is aware that the proposed new line runs through the property that is directly adjacent to (west of) Foothills Water Association's wells, tank , generator and booster pump station. Foothills is concerned that there could be some mishap with the transmission towers or lines

1466-006 that would cause harm to our system or property. We would like to be assured that this transmission line project plan will include the protection of our new water system. Perhaps this would involve Bonneville purchasing or having in place an insurance policy that would include the Foothills property and all facilities.

1466-007 We were also curious to know if Bonneville is still considering the alternate routes of 4A and 4B, which would route the transmission lines around the water system as well as homes in the area, helping to avoid possible dangers to these concerns. We would like to know if routes 4A & 4B are still being considered and if not , why not.

Again, thank you for allowing us to voice some of our concerns involving possible impacts to our community's water system and, again, we would like assurance from you that our concerns are being addressed.

Very sincerely yours,
FOOTHILLS WATER ASSOCIATION
BOARD MEMBERS:
Rick Kenney, Garret Morgan, Ruth Mackie
William Guerrini, Charlie LaFleur
Pat Schaeffer, Brynne Martinson

PS. The names and numbers of some of the government agencies and officials involved with this water system are listed below.
Washington DOH - Jim Nilson 253 395 6764 Bob James 253 395 6768
USRUS - Vic Paulino 253 857 2881 Dave Dunnell 509 664 0239
Washington State Public Works Board - Isaac Huang 360 725 5009
King County CDBG - Eric Jensen 206 296 8696

1466-001 Comment noted.

1466-002 Comment noted.

1466-003 Comment noted.

1466-004 This item has been addressed in a letter to BPA dated March 3, 2003 and is summarized below. The Schultz-Raver No. 2 500-kV transmission line traverses east-west across the south end of the Foothills Water Assoc. (FWA) service area. The Raver-Echo Lake 500-kV transmission line extends to the north across the northwest corner of the FWA service area. The FWA's well field is located about one block east of the current Raver-Echo Lake transmission line easement and abuts the south boundary of the Cedar River Watershed.

Alternative 1 extends about 3,800 feet through the FWA service area. Alternative A would tap into the Schultz-Raver No. 2 500-kV transmission line near the west boundary of the FWA service area and extend west in an existing transmission line ROW. If Alternative 1 or A is constructed, a relatively small portion of the existing area that the FWA currently serves will be impacted. These impacts will be limited in intensity and area and will be primarily temporary.

Potential impacts to the groundwater supplies are discussed in Appendices F, M and Y. It is unlikely that the FWA's groundwater source will be impacted by the construction or operation of the transmission line; however, spills of fuel oil, lubricants or other hazardous materials could occur. A Stormwater Pollution Prevention Plan that will include a hazardous materials spill response plan will be required to be in place during construction. These plans typically require vehicle fueling and storage, and storage of hazardous materials, to occur away from groundwater protection areas. This plan is intended to facilitate a rapid, appropriate response to reduce or eliminate potential impacts in the unlikely event that a hazardous material spill occurs.

1466-005 and -006 Please see response to Comments 1466-004.

1466-007 Routes 4A and 4B are still under consideration as are all of the alternatives analyzed in detail in the SDEIS.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

PUBLIC INVOLVEMENT
S#: KELT-1467
RECEIPT DATE: FEB 20 2003

1. Please have your environmental studies look at _____

2. I need more information about _____

3. I have these other comments I think it is a wise choice to have the transmission lines go through the watershed. The watershed is a vast tract of land. Surely people would be more affected by having an increase of electricity running through these wires than planted trees. Who knows exactly what that voltage changes in the human body. Think of the possible lawsuits in the decades to come if it turns out increased transmission of energy causes ill effects.
Also imagine trying out all the property too close to the hub lines. What a nightmare!
Congratulations for your company! For a wise decision I support you all the way
Arlene Sudal

1467-001

1467-002

1467-003

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name _____

Address _____

E-Mail Address _____

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1467-001 Comments noted.

1467-002 The expected magnitudes of the electric and magnetic fields from the proposed Kangley–Echo Lake 500-kV line are described in Appendix E, Electrical Effects. As indicated in Appendix G, Assessment of Research Regarding EMF and Health, health effects research (through mid-2000) shows no convincing evidence that field levels associated with the proposed line cause harmful health effects. This conclusion represents the findings of numerous scientific review panels. Furthermore, regulatory organizations have stated that there are insufficient data to establish exposure limits based on long-term exposures to fields at the levels found near transmission lines.

Subsequent updates of the health assessment find that recent research findings have not altered the conclusion that there is no convincing evidence linking transmission line fields to adverse health effects. The latest assessment was prepared for the BPA Grand Coulee–Bell 500-kV project and includes research through May 2002 (see Appendix Z).

BPA must rely on assessments of known impacts and not on possible future findings. Epidemiological, cellular and animal research over several decades has not demonstrated a link between exposures to electric and magnetic fields from transmission lines with an adverse health effect. To speculate on the impacts of future legal proceedings arising from unidentified impacts is beyond the scope of the environmental process.

1467-003 Comments noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

1. Please have your environmental studies look at

IC INVOL.
#: KEL T- 1468
EIPT DATE
FEB 2 0 2003

2. I need more information about

3. I have these other comments Why don't you go 4A & 4B - It makes more sense and wouldn't hurt the land owners as much. At least pay them what it's worth. You're robbing the land owners. It's the bad guys so big that little people mean nothing to you —

Kangley resident

1468-001

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name

Address

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

BONNEVILLE POWER ADMINISTRATION

1468-001 Alternatives 2, 4A and 4B were located to avoid residences. Seattle does not want the transmission line to cross the CRW, but if it does, then only if it were parallel to the existing line to minimize impacts. That is the main reason for BPA choosing Alternative 1 as the preferred plan while recognizing that it could cause the removal of two homes.

See response to Comment 1395-001.

February 16, 2003

LIC INVOLVEMENT
G#: KELT-1469
EIPT DATE: FEB 20 2003

Bonneville Power Administration
Communications Office – KC-7
P.O. Box 12999
Portland, OR 97212

Reference: Kangley-Echo Lake Transmission Line Project

Dear Sirs:

1469-001 Please leave out my property for consideration of the new proposed location of your 500 Kilovolt transmission line. My property address is 19202 208th Avenue S.E.
Renton, WA 98058

1469-002 My husband and I built our home at the above address in 1954 and '55. It has been My home all these years and I am very content here. The additional high voltage would impact the future sale of my property. Who would want to live under that? It is definitely a high-impact on the future land use. Please consider the alternatives in your final dec-Ision and let me live in peace as I have all these years. Thank you for the opportunity to Express my request.

Sincerely,
Jewell Loomis - Browning

Jewell Browning
19202 208th Ave. S.E.
Renton, WA 98058
(425) 432-0358

1469-001 Comment noted.

1469-002 Thank you for your comment. See response to Comment 1441-002.

Kuehn, Ginny - DM-7

From: twinrivltd [twinrivltd@email.msn.com]
Sent: Saturday, February 22, 2003 11:18 AM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Line project Comments.

LIC INVOLVEMENT
#: KELT-1470
RECEIPT DATE:
FEB 24 2003

1470-001 I have felt from the beginning that the best and most reasonable route for the expansion of the Kangley-Echo Lake Transmission Line is through the Cedar River Watershed or Alternative 1. It will have the least amount of impact on everyone and everything including the Environment. To consider placing this transmission line anywhere else is simple ludicrous. To actually believe that in doing so will substantially harm the environment, as all the environmentalist groups would tell you, is also ludicrous. Anyone that believes that this line should be
1470-002 placed outside the watershed where private property would have to be purchased and other property severally
1470-003 impacted when we have a viable route already in place in my opinion is doing so only because they have an agenda to push. As for the mitigation of impacts to the drinking water for the City of Seattle I believe if there is actually an impact mitigation should be included . However it would appear to me there should be a
1470-004 Minimal Amount of Impacts to this area. In reality I believe the City Of Seattle is and will try to get BPA to have to spend money on mitigation of some sort only so as to prevent them from having to do so in the future whether the project goes through the watershed or not.. After many years of being involved in the process with State, County and Local Government and being on two Councils in the area in the past, including the Cedar River Council, they will do anything they can to stop or control how a project goes forward and will want to get something in return for nothing. Put the line through the Watershed and lets move on....

I am currently on the mailing list & would assume I will hear through the mail on further developments on this issue.

Thank You

Frederick W. Corlis
21235 230th. Ave. S.E.
Maple Valley, WA. 98038-8920

1470-001 Comment noted.

1470-002 Comment noted.

1470-003 and -004 Comment noted.

Kuehn, Ginny - DM-7

From: evansthree@attbi.com
Sent: Sunday, February 23, 2003 10:11 AM
To: comment@bpa.gov
Subject: Comment on Kangley-Echo Lake SDEIS

LIC INVOLVEMENT
#: KELT-1471
RECEIPT DATE:
FEB 24 2003

1471-001 I am pleased to take a moment to comment favorably on the Kangley-Echo Lake trnasmission line project. Amidst the flurry of competing interests and opinions, the BPA has selected the alternative with the least negative consequences, and that makes the most sense for the environment, for impacted neighborhoods, and for the rate payers. Congratulations for a job well done, and I aplaude your courage to do the right thing under fire.

1471-001 Comments noted.

Kuehn, Ginny - DM-7

From: r.crump@attbi.com
Sent: Sunday, February 23, 2003 1:53 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Line Project

PUBLIC INVOLVEMENT
#: KELT-1472
SUPT DATE
FEB 24 2003

1472-001 As a concerned Winterwood Estates homeowner I would like to add my comments to bypass our property with this proposed transmission line project. With the economy chipping away at our retirement accounts, the last thing we need is to have our property values decrease too. Preventing increased EMF issues by running this line over the Cedar River Watershed route rather than through our neighborhood will also benefit our Grass Lake Elementary school children.

1472-002

Thank you for your consideration,

Rick Crump
28617 184th Place S.E.
Kent, Wa. 98042

1472-001 Comments noted.

1472-002 Comments noted.

Kuehn, Ginny - DM-7

From: Raymond Power [tigarpower@attbi.com]
Sent: Sunday, February 23, 2003 8:06 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Line Project Comments

PUBLIC INVOLVEMENT
#: KELT-1473
SUPT DATE
FEB 24 2003

BPA,

1473-001 I support Alternative 1, which parallels the current line through the Cedar River Watershed. It is the only one which makes sense. These reasons include: has the least environmental impacts, is the most direct route, the most cost effective, and impacts very few people.

1473-002 The City of Seattle's claim that this MAY degrade the water quality in the watershed is nonsense and unsubstantiated . They have logged the watershed for many years with no degradation of water quality.

1473-003

1473-004 This line should not take any of the more western routes which traverse private property. This will result in a lot of opposition by the property owners.

Raymond Power
23916 232nd Place SE
Maple Valley, WA 98038

1473-001 Comments noted.

1473-002 and -003 Comments noted.

1473-004 Comments noted.

Kuehn, Ginny - DM-7

From: Zak, Jon [Jon.Zak@METROKC.GOV]
Sent: Monday, February 24, 2003 9:24 AM
To: 'Lou Driessen'
Cc: 'Gene Lynard'; 'Comment@bpa.gov'
Subject: Kangley-Echo Lake Transmission Line Project

KELT-1474

FEB 24 2003

Dear Mr. Driessen:

1474-001 My wife and I have lived in the Hobart area for 18 years. Two years we moved ½ mile west into our dream home in Maplewood Estates. Alternative "C" of the BPA plan has a 500kv line running on our eastern property boundary. We would not have purchased this home had we known about the possibility of a 500 kv powerline running next door. If this powerline is built bordering our back yard we will be moving.

1474-002, 1474-003, 1474-004, 1474-005, 1474-006 I would like to talk about the human cost of this project. We spent two years looking for our home. I don't want to do that again!! Other people have spoken about being reimbursed for property easements, right of ways, etc. Will we be reimbursed for having this line bordering our property? I doubt it. Will this line reduce our property value? Of course. Our view will be a transmission line next door, instead of tall trees on a green belt. Are we going to have harder time selling our house? Of course. Are these being factored into the cost of this project? I doubt it. They should be!!! Are my neighbors and I going to do everything possible to stop this legally? **You can count on it.**

1474-007, 1474-008 I would like to talk about what Seattle calls the "pristine watershed and their legacy for the future". This watershed has been decimated by logging for about 100 years. There are more than 600 miles of gravel roads in the watershed. At the BPA meeting at the Seattle Center last week I was happy to hear that folks from Seattle are planting trees in the watershed. Where do you think they are planting these trees? In the second growth forest, I don't think so. How about in a clearcut created by logging. How can a clearcut with some newly planted trees in an area with 600 miles of gravel roads, be called a "pristine watershed". I suppose it is pristine compared to First Avenue in Seattle.

1474-009, 1474-010 My definition of old growth is a forest where one could walk through with out seeing 10 to 15 foot diameter stumps. I don't think there is any of this left in the watershed. One needs to go to Mount Rainier National Park, Olympic National Par, North Cascades National Park or some of the Wilderness areas recently established by the Forest Service to see old growth. **Nature, not man is the only cause of trees falling here!! This is the legacy we are leaving for our children. Not some watershed that's been raped for 100 years and now is untouchable**!! Are people in Seattle that provincial or are they just apathetic?

1474-011, 1474-012 I would like to address vandalism on transmission lines. I believe that in the cost analysis, vandalism must be taken into account in the life cycle cost of any new transmission line. I am sure the BPA must keep records of vandalism repairs on transmission lines. It should be an easy thing to take into account.

The watershed is the best location for this new transmission line !.

Sincerely,

Jon Zak
PO Box 551
Hobart,WA 98025

1474-001 Comments noted.

1474-002 Comments noted.

1474-003, -004, -005, and -006 1474-011 and -012 BPA will compensate landowners fair market value for the land rights needed for the Kangley-Echo Lake Transmission Line Project. We apologize for the disruption that this project has caused to other landowners impacted by the proposed project.

1474-007 and -008 Comments noted.

1474-009 and -010 Comments noted.

1474-011 and -012 Although a serious problem, transmission line vandalism costs are tolerable over the life expectancy of the transmission line. Natural caused damage from wind, ice, snow, landslides and lightning strikes is typically more significant than man-caused vandalism. Still, vandalism is a matter that BPA takes seriously and addresses directly and proactively. BPA has been closely monitoring trends in transmission line vandalism since 1988. Over that period of time, system-wide transmission line vandalism has averaged approximately $500,000 per year. This is the direct cost of replacing/repairing damaged equipment and does not include the economic losses to customers inconvenienced by loss of power, or the losses to BPA from foregone power sales revenues resulting from service interruptions. In 1994, BPA established a toll-free nationwide hotline for citizens and ratepayers to report any incidents of malicious vandalism, illegal dumping, theft or threats impacting BPA property and assets, and BPA personnel. Rewards of up to $25,000 are offered for information leading to the arrest and conviction of any person committing criminal act against the power system. The program has helped to reduce transmission line vandalism by more than 80 percent.

Comment noted.

Kuehn, Ginny - DM-7

From: Zak, Jon [Jon.Zak@METROKC.GOV]
Sent: Monday, February 24, 2003 9:27 AM
To: 'Lou Driessen'
Cc: 'Gene Lynard'; 'Comment@bpa.gov'
Subject: Kangley-Echo Lake Transmission Line Project

LC INVOLV...
#: KELT-1475..
EIPT DATE:
FEB 24 2003

Dear Mr. Driessen:

1475-001 I found this information on the Seattle Public Utilities website. It should be obvious to anyone reading this document that the turbidity problems in the water of the Cedar River are the direct result of poor management by SPU. **The BPA should not have to pay for any filtration plant.**

This is the link to this webpage:

http://www.ci.seattle.wa.us/util/CedarRiverHCP/Road.htm

1475-002 Below, I have copied and pasted this information for your use:

"Road Improvements and Maintenance

Road improvement projects and maintenance activities will reduce sediment loading to streams from road-related landslides and erosion.

1475-003 Watershed Road Improvements and Maintenance

Several road-related activities will be carried out in the watershed to minimize sediment delivery to streams, improve drainage patterns altered by roads, and provide fish passage. Roads are a major contributor to accelerated rates of sedimentation and erosion into streams, and thus can adversely affect water quality. Road Decommissioning

1475-004 Many roads in the watershed were used almost exclusively for logging traffic in the past and will no longer be needed. The Over $5 million is designated to a road decommissioning program to deconstruct 236 miles (38%) of the existing road network. This will have substantial benefits, as these roads will no longer contribute to sedimentation of streams and will not require the time and money involved in maintenance.

1475-005 Roads will be deconstructed in a manner that will improve hillside drainage patterns and stability and minimize sediment delivery to streams. At stream crossings, culverts and fill material will be removed and other restoration efforts will be undertaken to restore natural stream function, benefit fish survival, increase spawning habitat, and protect the drinking water supply. Road Improvements

Road improvements will increase the functionality of the watershed road system while maintaining more natural flow patterns and providing for fish habitat. Existing roads will be improved for long-term control of sediment loading to streams and to allow for the expansion of fish habitat. Roads with priority stream crossings will be upgraded to provide passage of 100-year flows, and problem stream crossings will be stabilized to reduce erosion. Ditches will be designed to empty away from streambeds and cross-drains will mimic the natural hillside flow patterns. Fish passage structures may be constructed in specific locations where roads break the connectivity of fish habitat and fish would significantly benefit from access to upstream habitat. Additionally, new roads may be constructed for emergency reasons or to establish access to new projects. These roads will be constructed according to rigorous standards to prevent road-related problems. Road Maintenance

1475-006 Road maintenance standards will be improved as new technology and equipment become available to allow effective management of the watershed road system. Road maintenance activities will be carried out to allow use by the watershed staff and prevent any future sedimentation problems. Maintenance activities include: grading and shaping of the road surface; maintaining ditches and waterbars and cleaning culverts and catch basins; installation, replacement and repair of culverts; mechanical vegetation control; application and replacement of rock ballast and surfacing; and removal of material such as rock fall from cut banks."

Sincerely,

Jon Zak
PO Box 551
Hobart, Washington 98025
E-mail: jon.zak@metrokc.gov

1475-001 Comments noted.

1475-002 and -003 Comments noted.

1475-004 and -005 Comments noted.

1475-006 Comments noted.

Kuehn, Ginny - DM-7

From: Zak, Jon [Jon.Zak@METROKC.GOV]
Sent: Monday, February 24, 2003 9:30 AM
To: 'Lou Driessen'; 'Gene Lynard'
Cc: 'Comment@bpa.gov'
Subject: Kangley Echo Lake Transmission Line Project

LIC INVOL
KELT-1476
FEB 2 4 2003

-----Original Message-----
From: Zak, Jon
Sent: Friday, February 21, 2003 2:55 PM
To: Zak, Jon
Subject: FW: Kangley Echo Lake Transmission Line Project

Lou, Gene,

Please check out this site:

http://www.cityofseattle.net/util/earthquake/default.htm

Click on "Begin Slide Show".

1476-001

Under "Masonry Pool"

- Sedimentation due to failure of lakeshore
- Silt Fences
- Road construction in HCP
- Oil spill booms used to dampen wave action to minimize erosion from exposed soil
- Installation of a floating turbidity curtain in LAKE to isolate DIRTY WATER from WATER INTAKE
- Heavy Equipment operating near lake shore

Under "100 Road"

1476-002

- Slump of fill at culvert outlet above Cedar River
- Quarter mile long series of tension cracks

Under "200 Road"

- Tension cracks above a creeping slope near Chester Morse Lake
- Relocate road into hill on solid ground
- Slumps
- Landslide in rocky-cut slope

1476-003
1476-004
1476-005

Prior to adapting the "Habitat Conservation Plan" SPU was logging like crazy in the watershed. I am happy that commercial logging has been stopped. However the BPA will cut less than 1/10 of one percent of the watershed area for the new transmission line corridor . If this was before the adoption of the "HCP" the cutting of trees would not have been an issue. **The way SPU had been managing the watershed is a classic example of poor management, bureaucracy and short sightedness. Now, the precautions SPU is demanding the BPA take in the construction of the new transmission line is HYPOCRISY!!**

Sincerely,

Jon Zak
PO Box 551
Hobart, WA

1476-001 and -002 Comments noted.

1476-003 and -004 Comments noted.
1476-005 Comments noted.

Kuehn, Ginny - DM-7

From: Zak, Jon [Jon.Zak@METROKC.GOV]
Sent: Monday, February 24, 2003 9:36 AM
To: 'Lou Driessen'
Cc: 'Gene Lynard'; 'Comment@bpa.gov'
Subject: Kangley-Echo Lake Transmission Line Project

KELT-1477
FEB 24 2003

Dear Mr. Driessen:

1477-001 1477-002 1477-003 1477-004 1477-005 My wife and I live on 2 - ½ acres in a development of about 100 homes in Hobart. The water in our development is supplied by "Cedar River Water & Sewer". They buy their water from Seattle Public Utilities. Because we drink Seattle water, we too expect clean water. Our eastern property boundary will be the centerline of the proposed transmission line right of way for Alternative "C". We would loose the trees on one quarter of our property. These trees are in a native growth protection area. Our trees range in size from 2-1/2 to 5 foot in diameter. I doubt there are trees this size in the lower watershed. Aren't our trees as important as trees in the watershed? Alternative "C" would completely destroy our privacy and our views of magnificent trees in our backyard. It would destroy our experience of living in nature. This was the reason we bought this property.

1477-006 I would like Seattle Public Utilities to answer these three (3) questions:

1. Where is the evidence that BPA has caused any harm to water quality or watershed operation in its 30 years of operating a power line in the watershed?

1477-007 1477-008 2. What evidence does Seattle have that clearing an additional 80 acres for a second power line is more damaging to water quality than failure to replant the 600 miles of logging roads already in the watershed? The total acreage of 600 miles of logging road is almost 1,900 acres. **An additional 80 acres for a second power line is only 4% of the acreage of the logging roads already in existence in the watershed.**

1477-009 1477-010 3. Clearing 80 acres of second or third growth forest for an additional power line would require less than 1/10 of 1 percent of the watersheds total acreage of 90,240. **How can this small an amount of clearing have any impact on water quality?**

1477-011 1477-012 1477-013 1477-014 The "Habitat Conservation Plan" is a great idea. Too bad the Habitat Conservation Plan was not an idea of the City of Seattle. The City was forced to create a Habitat Conservation Plan to meet the requirements of the Endangered Species Act. How about the habitat of people living along Alternative "C". Is wildlife habitat inside the watershed more important than habitat for both wildlife and humans outside the watershed? **The people who loose their property will be paying the price for Seattle's water. The City of Seattle will destroy the rural communities of Hobart and Ravensdale; all due to unfounded water quality issues. I wonder how history will look back at this?**

1477-015 1477-016 1477-017 Alternative "C" would clearcut approximately 250 acres of private property for the new powerline right of way. How could any property owner in the Hobart/Ravensdale area be reimbursed for the aesthetic loss in property value due of this new right of way? **This public right of way should be located on public property! The routing that BPA is proposing for Alternative "C" is ludicrous!!!**

Thank you.

Sincerely,

Jon Zak
PO Box 551
Hobart

1477-001 and -002 Comments noted.

1477-003 and -004 Trees are a valuable resource irrespective of where they would be located. BPA would minimize clearing for the project to the maximum extent possible.

1477-005 Comments noted.

1477-006 Comments noted.

1477-007 and -008 Comments noted.

1477-009 and -010 Comments noted.

1477-011 and -012 Comments noted.

1477-013 BPA's environmental analysis on the proposed project addresses impacts on the human environment, which includes both the social as well as the natural environment. BPA does not rate wildlife habitat inside the CRW more important than habitat for wildlife and humans outside the CRW.

1477-014 Comment noted.

1477-015, -016, and -017 Comment noted.

Kuehn, Ginny - DM-7

From: Zak, Jon [Jon.Zak@METROKC.GOV]
Sent: Monday, February 24, 2003 9:15 AM
To: 'Lou Driessen'
Cc: 'Gene Lynard'; 'Comment@bpa.gov'
Subject: KECN - Kangley-Echo Lake Transmission Project

KE L T- 1478
FEB 2 4 2003

-----Original Message-----
From: Zak, Jon
Sent: Friday, February 21, 2003 2:50 PM
To: Zak, Jon
Subject: FW: RE: KECN - Kangley-Echo Lake Transmission Project

-----Original Message-----
From: Zak, Jon
Sent: Friday, January 24, 2003 11:58 AM
To: Zak, Jon
Subject: FW: RE: KECN - Kangley-Echo Lake Transmission Project

To: Mr Lou Driessen

1478-001 1478-002 Alternative "C" passes over hundreds of individual residences. I can not speak for others, but I would never purchase a home under or near a 500 KV line. It is not fair to add this 500 KV line on any established neighborhood. I don't know how anyone could put a price on the reduction in property value and the aesthetic loss caused by this proposed line. I believe this proposed 500 KV line would result in a flood of lawsuits from the affected landowners.

1478-003 I believe that any new route should pass through the watershed. There are existing transmission lines in the watershed already. This is

1478-004 the shortest route. There are few homes to pass over. The watershed has already been logged extensively. I have hiked up McClellan's Butte many times and every time I am shocked by the devastation I see in the watershed. Lots of clearcutting. Any small stands of old growth timber could be easily avoided in the routing of the new line. This route would be less expensive for the BPA and would save money for all users of BPA power. A route through the watershed would not affect the adjacent communities. I can't understand why anyone in Seattle would be concerned with an additional transmission line in the watershed. How many people from Seattle have even visited the watershed? How much damage would a few more transmission towers in a 90,546 acre watershed create.

1478-005 I have been in the Sultan Basin Watershed. It is the watershed for the City of Everett. After signing in at a checkpoint anyone can visit the Sultan Basin Watershed. They even allow fishing and the use of canoes, kayaks and even electric powered boats on Spada Lake. This watershed is also heavily logged and there are clear cuts everywhere.

It's time to quit the politics and let the BPA run the line through the watershed!!

Thank you.

Sincerely ,

Jon Zak
PO Box 551
Hobart, Washington 98025
E-mail: jon.zak@juno.com
E-mail: jon.zak@metrokc.gov

1478-001 and -002 Comment noted.

1478-003 Comment noted.

1478-004 Comment noted.

1478-005 Comment noted.

Kuehn, Ginny - DM-7

From: Zak, Jon [Jon.Zak@METROKC.GOV]
Sent: Monday, February 24, 2003 9:39 AM
To: 'Lou Driessen'
Cc: 'Gene Lynard'; 'Comment@bpa.gov'
Subject: Kangley-Echo Lake Transmission Line Project

-IC INVOLV...
#: KEL-T-1479...
EIPT DATE: FEB 24 2003

-----Original Message-----
From: Zak, Jon

Dear Mr. Driessen:

1479-001 I did a survey of the trees in our backyard. All our trees are second growth. These trees are in the right of way for the proposed Alternative "C". All of these trees will have to be logged for the proposed powerline right of way. The trees I measured ranged in diameter from 22 inches to 60 inches. **A sixty inch diameter tree is 5 feet! Are there trees this size in the lower watershed?** Here is a partial inventory of our larger trees:

Cedar #1	31 inch diameter
Cedar #2	47 inch diameter
Hemlock #3	22 inch diameter
Cedar # 4	56 inch diameter
Cedar #5	60 inch diameter
Hemlock#6	25 inch diameter
Cedar #7	44 inch diameter
Fir #8	31 inch diameter
Cedar #9	51 inch diameter

To compute the diameter I measured the circumference of these trees at four (4) foot above ground level and then divided by 3.1416.

1479-002 **Aren't our trees as important as trees in the watershed? Our trees are very important to us!**
1479-003 These trees are one of reasons we purchased this property. If these trees are logged our view would become transmission towers or transmission wires. These trees are worth a great deal more to us than
1479-004 the market value we would receive from the BPA. **Our trees are the "crown jewels" of our property!! There is no reasonable amount of money that could reimburse us for the aesthetic loss of these trees!!**

Sincerely,

Jon Zak
PO Box 551
Hobart, WA 98025

1479-001 Comment noted.

1479-002 Comment noted.

1479-003 Comment noted.

1479-004 Comment noted.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# KELT-1481
RECEIPT DATE:
FEB 27 2003

Formerly Pacific Crest Biodiversity Project

Protecting and restoring forests of the Pacific Northwest

February 25, 2003

BPA
Communications – KC -7
PO Box 12999
Portland, Oregon 97212
Subject: Comments on Kangley Echo-Lake Power Line Project

1481-001 BPA's Non-Transmission Alternative (as presented in the SDEIS) isn't complete or comprehensive enough and fails to be a feasible and legitimate alternative as legally required. BPA's SDEIS appears to review only a handful of these possible Non-Transmission Alternatives and has admitted to failing to produce anything comprehensive because of lack of time. We're encouraging you to take the necessary time.

1481-002 Biodiversity Northwest requests a more thorough examination of a Non-Wires Alternative to obviate the need for a power line. The first draft of the Non-Transmission Alternative was not a sufficient proposal.

1481-002 We request that BPA not assume a $25 million limit (cost of Watershed route) when researching the Non-Transmission Alternative – as BPA has done when figuring available dollars for a Non-Transmission Alt. (BPA has not used this dollar limit on any other route.) Tom Foley says that you'll need to plan for future legitimate Non-Transmission alternatives soon and conduct a more comprehensive Non-Wires analysis, factor in money allowed for future studies NOW.

1481-003 If you're assuming "worst case scenarios" on the winter crisis (1 in 20 year chance for Artic cold) and using them as the foundation of all your charts and the basis for your much-needed power line through the Watershed, then also figure in the "worst case scenario" costs of a violation of the City of Seattle's clean water supply that would cost BPA $110 million to replace. Be consistent about our "risk potential" when you run your numbers.

1481-004 Biodiversity Northwest also encourages BPA to follow the legal procedures as stated in the NEPA process which require the agency to seriously study all feasible alternatives and to be in compliance with scoping comments that request specific studies. The SDEIS, at first look, seems to fail in this regard, refraining from any feasible Non-Transmission Alternative that is more comprehensive, incorporating Entitlement negotiations, Demand Response programs, Demand-Side Management programs, Generation & Distributed Generation, Regional Availability of Natural Gas, Existing Distributed Generation, New Distributed Generation, Renewable Generation and emerging technologies.

1481-001 See response to Comments 1421-038-004, 1421-038-005 and 1421-038-006.

1481-002 See response to Comments 1421-032-003 and 1421-032-004.

1481-003 We are being consistent in our numbers. We also assume a worst case scenario concerning the filtration plant and would purchase an insurance package for that risk. The cost of the insurance policy is included in the cost of the preferred plan, Alternative 1.

1481-004 See response to Comments 1421-038-004, 1421-038-005 and 1421-038-006.

BPA believes it has followed the required NEPA procedures. In response to public comments, we prepared a SDEIS to consider additional alternatives not considered in the DEIS. In the SDEIS, we considered a reasonable array of non-transmission alternatives.

1481-005 Double-circuit construction on the entire project will not meet the purpose and need. See response to Comment 1421-039-001 and Section 2.3.8 of the SDEIS.

1481-006 BPA has undergone formal consultation with the USFWS. We also conducted focused surveys for spotted owls last year, and are conducting them again this year. Thus far, no spotted owls have been detected in the action area. The USFWS has determined that this project does not jeopardize the continued existence of spotted owls, and that the take attributed to this project is minimal. Our proposed mitigation would ensure that more potential owl habitat is protected if the project is built, compared to the No Action Alternative.

1481-005 **The preferred alternative (the Watershed) is an option only if BPA adheres to the following:**

a. Double-Circuit wires on entire project (no widening of path necessary)

1481-006 **b. Spotted Owl Habitat issue resolved and mitigated (Biodiversity Northwest is as concerned as USFWS is on potential adverse effects to Spotted Owl habitat. This issue has not gone off our radar screen until we hear otherwise from USFWS.)**

1481-007 **c. Legal and Binding commitment on any Mitigation Package with Seattle**

1481-008 **d. Develop legal contract that prevents BPA from entering Watershed in future.**

1481-009 **e. Remove roads in Cedar River Watershed after construction is finished.**

1481-010 **f. Acquire lands to add to Watershed to mitigate for removal of trees.**

1481-011 **g. Fund the replacement of a City Filtration Plant if you cause a violation (as noted in the WA State Dept. of Health standards) in the City of Seattle's water supply.**

1481-012 With the Watershed as BPA's preferred alternative, how is the City of Seattle, environmental groups and local citizens expected to believe the promises put forth in any BPA-administered mitigation package if it is not legally binding? We understand from BPA's track record (e.g. the Columbia River) that the agency prefers to refrain from any legally binding commitment at all. How then can we believe anything that you offer at the negotiating table unless BPA will agree to sign under the legally-binding line?

Biodiversity Northwest encourages BPA to discuss a mitigation package with the City only if BPA is willing to be held accountable for their alleged promises.

1481-013 Biodiversity Northwest is still requesting a 30 day extension (until April 1) to provide adequate opportunity for public comment to be thorough and comprehensive. Without that 30 day extension, BPA (it appears) is trying to prevent thorough scrutiny of their Supplemental Draft Environmental Impact Statement.

Submitted by

Michael Shank
Outreach Director
Biodiversity Northwest
4649 Sunnyside Ave N. #321
Seattle, WA 98103

1481-007 BPA is in the process of finalizing a Memorandum of Agreement with Seattle that contains a description of the mitigation we have agreed to provide for this project. This is a legally binding document.

1481-008 The MOA prohibits BPA from building new rights-of-way within the CRW. However, BPA has retained the right to make improvements (e.g., upgrades) within the proposed right-of-way for this project.

1481-009 BPA will maintain the roads in the CRW that it uses in good working order. However, the CRW contains hundreds of miles of roads that were built to log timber and for other purposes, and are unrelated to any of BPA's projects. Therefore, BPA does not believe it is our responsibility to remediate or restore impacts created by others. However, in one instance, BPA has agreed to abandon 0.6 mile of BPA road.

1481-010 Concerning the acquisition of lands outside the CRW, please see response to Comments 1415-003, -004, and -005.

1481-011 Currently there is no water filtration plant on the Cedar River water supply, so replacement is not possible. BPA would purchase an insurance policy to cover the cost of a filtration plant in case a filtration plant would need to be constructed due to impacts from this project. It is unlikely that this would occur because of impacts from this project.

1481-012 See response to Comment 1481-007. See response to Comment 1481-007.

1481-013 See response to Comment 1421-038-001.

Kuehn, Ginny - DM-7

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG IN RECEIPT KELT-1482 DATE: FEB 27 2003

From: Pedigo, Jack M [jackpedigo@kpmg.com]
Sent: Wednesday, February 26, 2003 1:24 PM
To: 'comment@bpa.gov'
Subject: RE: Cedar River

1482-001 The Cedar River watershed is an important source of water for the Seattle community. Any projects through the watershed affects the whole community.
1482-002 Any and all electrical projects including powerlines should be mitigated as much as possible. Mitigation should include raising the lines as high as possible and narrowing the width of the right of way. There should be no
1482-003 increase in roads and new forest lands should be protected as an offset to any projects. The Seattle community enjoys one of the lowest rates in the
1482-004 country and an increase in those rates would be warrented in order to protect our environment and to increase incentives toward conservation/sensible power usages.

Jack Pedigo
7912 35th SW
Seattle, WA 98126
206)938-1236
parvinjack@yahoo.com

1482-001 and -002 BPA determines the height of its transmission lines by maintaining a safe clearance between the phase conductors and ground and other points such as other power lines, communication lines and roads. Raising lines is not economical and can cause safety problems for air traffic. Additionally, there are visual impacts that have to be considered. Right-of-way widths are determined by calculating how much the conductor swings and keeping a safe horizontal clearance to objects not on right-of-way such as buildings. Raising the line would not necessarily reduce the right-of-way width needed.

See also response to Comment 340-002.

1482-003 and -004 There will be some increase to the amount of roads due to the very short new “spur” roads needed to get to individual tower sites. Other new road segments are needed to bypass wetlands that existing road segments go through. BPA is in discussions with Seattle concerning the potential of closing more roads within the CRW. Concerning Seattle’s electric rates, BPA’s study of non-transmission options indicates those options at best would delay the need for this project by only two to three years making these non-transmission options not viable.

Kuehn, Ginny - DM-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1483
RECEIPT DATE:
FEB 27 2003

From: Zak, Jon [Jon.Zak@METROKC.GOV]
Sent: Thursday, February 27, 2003 11:03 AM
To: 'Lou Driessen'
Cc: 'Gene Lynard'; 'Comment@bpa.gov'
Subject: Kangley-Echo Lake Transmission Line Analysis Issues

Dear Mr. Driessen,

After attending the recent public meeting in Maple Valley, I wanted to mention a couple of issues I feel should be given consideration at as part of the transmission line right-of-way analysis.

1483-001 First, in regard to the potential for pollution or siltation of the water supply for the alternatives which cross the Cedar River Watershed, has any analysis been done to quantitatively estimate and compare the potential pollution/siltation from the proposed transmission line project, with current levels of pollution and siltation? The proposed project, both during the construction phase and during normal operation in succeeding years, might likely be insignificant when compared to siltation and pollution levels arising from natural causes, current normal use and management activities in the watershed, and particularly in comparison with past years when active logging operations were common in the watershed. And if the additional pollution/siltation is insignificant, there would seem to be little justification to even consider alternatives which cost more or significantly impact a large number of property owners outside the watershed.

1483-002

1483-003 Also, when comparing costs of the various alternatives, are BPA project costs the only costs compared, or are overall costs to the public and additional potential benefits considered? For example, even if the BPA were made to contribute to the cost of a water filtration system as part of this project, that filtration plant would significantly improve water quality above current baseline levels, might likely have to be installed at some point in the future because of existing siltation/pollution levels, and if so the cost would be bourn by the public anyway, regardless of which governmental agency provided the funding. Costs spent to buy new power line right-of-ways, by comparison, are not a net benefit to anyone - not the citizens who are forced to give up part of their land, not the adjacent landowners who must live with the impacts of the power line, and not the public if land is available in the watershed which would not significantly adversely impact water quality.

I would like to request that these issues be given consideration in your Final Environmental Impact Statement.

Sincerely,

Jon Zak
PO Box 551
Hobart, WA 98025

1483-001 and -002 The BPA as specified under the EPA rules pertaining to stormwater discharges into surface water bodies (40 CFR 122-124), shall obtain an NPDES permit for construction activities, including clearing, grading, and excavation, that disturbs one or more acres of land. Under Section 402 of the Clean Water Act, federal facilities (or projects) are subject to these permitting requirements, administration of this program has been delegated to the State, however, for federal projects, EPA administers this program. BPA as a federal agency, will obtain a general NPDES permit from EPA Region 10. BPA will prepare a project specific Storm Water Pollution Prevention (SWPP) plan. This plan helps ensure that erosion control measures would be implemented and maintained during construction. It also addresses best management practices for stabilization, stormwater management, water quality monitoring, and other control measures. Additionally the SWPP plan contains a site-specific Spill Prevention, Control and Countermeasures (SPCC) Plan, that covers the project scope of work (including equipment, materials, and activities). Refer to Comment Letter #394 - Appendix A. Section 1.1.1.4 Storage, Assembly, and Refueling Areas, and 4.5.2.1.

1483-003 Please also see response to Comments 1420-001 and -002. A new transmission line does benefit the general public including those property owners who are directly impacted. The cost of a new power line are added to the cost of electricity people throughout the region buy. As the cost of the project goes up, so do the rates people pay for their electricity. BPA seeks the least cost alternative that has the least overall impacts. BPA has determined Alternative 1 through the CRW is its preferred route as having the least overall environmental impacts and the least overall cost.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1484
RECEIPT DATE:
FEB 27 2003

February 17, 2003

Bonneville Power Administration
Media Relations – KC7
P. O. Box 3621
Portland, OR 97208-3621

Re: Comments to SDEIS for Proposed 500 KV Transmission Line Kangley-Echo Lake

Attention: Lou Dreissen, Project Manager

1484-001 We have reviewed the SDEIS and have attended all four public meetings conducted in King County earlier this month. The information provided by BPA has substantiated the need for additional electrical
1484-002 power capacity in this region. The arguments provide by BPA regarding conservation and alternative sources have been compelling – people are not going to make "lifestyle changes" sufficient to offset demands of growth and alternative sources are too far in the future.

We would like to make these comments about the SDEIS, itself.

1. 1484-003 Maintenance costs were not identified in the analyses for any of the alternatives. We expect that they are length dependent and location dependent. We would expect maintenance costs to be significantly lower for the preferred alternative, since it is the shortest and most highly protected.
   1484-004 We believe that a 50-year projection of maintenance costs should be included in the costs of all alternatives for decision purposes.
2. 1484-005 BPA has (and is) offering Seattle Public Utilities a disproportionately more expensive environmental mitigation plan for the Seattle Watershed. This coupled with a disproportionately
   1484-006 more expensive construction management plan, which has been offered for the Seattle Watershed, masks the true picture of costs. BPA should add the incremental environmental mitigation and the incremental construction costs, which were developed for the Seattle Watershed route(s), to
   1484-007 the costs of each of the proposed routes outside the watershed to reflect more accurate cost comparisons. Common sense would suggest that the relative cost difference between all routes outside the Seattle Watershed and the preferred route are much greater than the figures shown in the SDEIS. This comparison (e.g. based upon incremental cost analyses) is the correct basis for decision-making.
3. The SDEIS understates the socio-economic impact proposed routes A and C in two ways:
   1484-008 a. Direct impacts to property values and community values of transmission line construction.
   1484-009 1484-010 1484-011 1484-012 b. Permanent indirect impacts to property values and community values (e.g. less flexibility in property owner's use of property and being subject to BPA operations personnel presence at any time).

On another point, BPA appears to be taking advantage of its status as an agency of the Federal Government in its real estate offers. We suspect that this is, in part, a result of the corporate
1484-013 independence of the BPA real estate organization. Whatever the reason, it is unfortunate because it further jeopardizes an otherwise excellent plan. BPA should be using local, state certified appraisers. Note that we previously (June 2002) provided your office with an independent consultants' study, which corroborates the point that BPA's real estate appraisals for private property are low relative to normal real estate experience, including our own.

1484-014 In conclusion, Bonneville has made the right route decision three times – keep the 500 KV transmission line in the Seattle Watershed.

Richard E. and Joan E. Bonewits

Richard E. and Joan E. Bonewits
20114 S E 206th St.
Maple Valley, WA 98038

Cc: State Representative Cheryl Pflug, State Representative Glenn Anderson,
State Senator Dino Rossi, State Representative Jack Cairnes, State Representative Geoff Simpson,
State Senator Stephen Johnson,

U.S. Representative Jennifer Dunn, U.S. Senator Patty Murray, U.S. Senator Maria Cantwell

King County Council Member David Irons, King County Council Member Kent Pullen

Governor Gary Locke

1484-001 and -002 Comment noted.

1484-003 and -004 In actuality, the maintenance costs, based on present worth, are not a large cost contributor for comparison analysis. The CRW does provide protection for the transmission lines, but the special care BPA maintenance crews will need to take to preserve/enhance wildlife habitat and to protect water quality in the Cedar River and Rock Creek more than make up for any savings BPA would see as a result of security within the CRW.

1484-005 and -006 The increased costs for going through the CRW are based on mitigation for removing timber covered by Seattle's HCP and for mitigation for potential impacts to Seattle's drinking water source. BPA has included mitigation measures for the other routes based on the type of potential impacts they would have to wildlife habitat and other resources.

1484-007 Please see response to Comments 1420-001 and -002.

1484-008 and -009 The SDEIS provides general socio-economic impacts of the proposed transmission line for all route alternatives. Please refer to Section 4.11.2.5, Community Values and Concerns, Property Value Impact. If the Record of Decision identifies that the construction alternative has been selected along a specific route, then specific appraisals will be prepared for the land rights needed.

1484-010, -011, and -012 See response to Comments 1484-008 and -009.

1484-013 BPA staff appraisers are not required to be state certified. However, all BPA staff appraisers have chosen to be state certified. BPA appraisers follow the Uniform Standards of Professional Appraisal Practices and follow all applicable federal guidelines. Also see response to Comment 1429-021-001. If BPA needs to acquire land rights across your property, and you disagree with BPA's opinion of fair market value, BPA would be willing to review any additional market data that you may have, or review recent appraisals of your property. You may also choose to use the condemnation process, and have the courts establish Just Compensation for your property.

1484-014 Comment noted.

February 26, 2003

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1485
RECEIPT DATE: MAR 03 2003

To: Lou Driessen
BPA - KC-7
PO Box 12999
Portland, Oregon 97221

Re: Kangley/Echo Lake Transmission Line

Dear Mr. Driessen,

1485-001 This letter is in response to the EIS for the proposed Kangley/Echo Lake Transmission Line.

1485-002 Before building the proposed 9-mile long transmission line through the Cedar River Watershed, I urge you to consider other alternatives, including energy conservation programs, revising contracts with Canada and other electrical system changes.

1485-003 1485-004 This transmission line will severely impact forests, wetlands and other wildlife habitat and corridors in the Cedar River Watershed. Salmon in the Cedar and Raging Rivers may be affected as well as the quality of this drinking water source.

1485-005 If the Bonneville Power Administration does in fact decide to build the transmission line through the watershed, BPA must fully mitigate for the impacts of a new line and propose specific steps to achieve proper mitigation for this project.

1485-006 1485-007 Proper mitigation for any new or expanded corridor should include acquiring and protecting nearby forestland. Since there is not adequate ancient forest left in the area to acquire that is equivalent to the quality of forest proposed to be clear cut for the transmission line, it is necessary to increase the amount of lesser quality forest acquired. Since this is BPA's mitigation project, these forest lands need to be purchased with funds from BPA's budget and should be factored into the total cost of the transmission line project. These lands should include:

- 400 acres along Raging River near Highway 18, and
- 600 acres near the Cedar River (Section 25, owned by Plum Creek Timber Co., and subdivided for development).

1485-008 To protect riparian forests, a mitigation plan should also include raising the height of lines and minimizing the width of the clear cut corridor by placing 2 circuits on each tower over the Raging & Cedar Rivers. To minimize the impact of construction, the installation of towers should by done by helicopter, and no new roads built.

1485-009 Finally, the mitigation project should address eradication of weeds, such as Scotch broom, that migrate into the area as a result of clear-cutting. Native plant restoration should occur in areas previously inhabited by weeds.

1485-010 1485-011 Please consider other options to building a transmission line through the watershed. If these alternatives are considered and BPA still decides to build a transmission line through the watershed, they must do so with the least impact, the proper mitigation plan and they must factor the costs of mitigation into the costs of the project.

Thank you for your time and consideration.

Sincerely,

Kristen Paynter

1485-001 Comment noted.

1485-002 BPA has considered other alternatives. See Chapter 2 of the SDEIS.

1485-003 and -004 NMFS has concurred with BPA's analysis that the proposed action "may affect, but not likely to adversely affect" Puget Sound salmon. See Appendix U of the SDEIS.

1485-005 Please see response to Comments 1415-003, -004, and -005.

1486-006 Please see response to Comments 1415-003, -004, and -005.

1485-007 BPA would be replacing two structures on the existing line with double-circuit structures at the Cedar River crossing due to potential but unlikely impacts to Seattle's unfiltered drinking water and to fish and wildlife. The cost of this double-circuit option is over $2 million for construction and material costs and an unknown amount for the loss to utilities while the existing line is out of service for at least three weeks during the summer. The double-circuit option also would reduce reliability of the system somewhat by having both circuits on the same towers.

1485-008 The crossing of the Raging River also has potential environmental impacts, but would not impact an unfiltered drinking water supply. BPA is not proposing a double-circuit option across the Raging River due to the potential high costs, decrease in reliability, and the ability to mitigate potential impacts to the river. Mitigation could include topping of trees if feasible and planting and seeding low-growing plants where trees have been cut.

The trees that would be removed are primarily second growth conifers about 36 to 75 years old. See response to Comment 340-002 regarding BPA's purchase of property for compensatory mitigation.

1485-009 It may not be possible to eradicate noxious weeds such as Scotch broom within the CWR because BPA is unable to use herbicides as a management tool. The proposed corridor would be monitored annually to identify any noxious weeds. The area would also be replanted with native plants and/or grasses in disturbed areas to control any noxious weeds during

construction. Maintenance of both the existing corridor and the proposed corridor would include yearly monitoring for noxious weeds and the treatments prescribed. The following treatment methods would be used to control the spread of noxious weeds: machine cutting, hand cutting, pulling and re-planting with native plant species and or grasses. Outside the CRW, herbicides may be used with the permission of the landowner.

1485-010 BPA has considered other alternatives to building a transmission line. See Chapter 2 of the SDEIS.

1485-011 Comment noted.

Kuehn, Ginny - DM-7

From: Robin [rmcclellan55@comcast.net]
Sent: Thursday, February 27, 2003 8:45 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Line Project

PUBLIC INVOLVEMENT
LOG# KELT-1486
RECEIP
MAR 03 2003

Feb. 27, 2003

To Whom it May Concern:

1486-001 We would like to state our support for the Bonneville Power Authority's proposal for the Kangley-Echo Lake Transmission Line Project to be installed over the Cedar River Watershed. Although new to the community, my husband and I are deeply concerned about the impact an expansion of power lines would have on the Winterwood Estates.

1486-002 Although very concerned about the all the effects (decrease in property values, increase in the Electric & Magnetic fields, harm to near by parks and the loss of hundreds of trees), we worry most about the impact an expansion of this magnitude would have on the Grass Lake Elementary School. It is unconceivable that this site would ever be consider for an expansion with a school sitting so close to it. Please take this into consideration when making your decision

Again, we strongly urge you to support the BPA proposal for the Kangley-Echo Lake Transmission Line Project to be installed over the Cedar River Watershed.

Thank you for your consideration in this matter.

Robin and Michael McClellan
19021 SE 283rd St.
Kent WA, 98042

1486-001 and -002 Comment noted.

February 28, 2003

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# KELT-1488
RECEIPT
MAR 03 2003

Lou Driessen, Project Manager
BPA – KC – 7
P.O. Box 12999
Portland, Oregon 97221

RE: Kangley – Echo Lake Transmission Line Project

Dear Mr. Driessen:

The Mountaineers is one of the oldest and largest conservation and recreation organizations in the Pacific Northwest with approximately 15,000 members. We have been very active commenting on many BPA projects, and numerous energy projects by various other agencies over the years. The Kangley – Echo Lake Project stands at the intersection of two public utility services, which many if not most of our members, directly depend upon; that is to say, electric power and clean, fresh water. We are anxious that both of these services be provided in as environmentally benign fashion as possible.

1488-001 The Mountaineers appreciates the effort put into the Supplemental Draft Environmental Impact Statement (SDEIS) and into investigation of possible non-construction alternatives. These addressed many of the issues raised by the initial DEIS. The list of actions proposed to mitigate the adverse effects of power line construction, page S-4 of the SDEIS is most impressive and we support all of them. Should the BPA choose Alternative 1, through the Cedar River Watershed (CRW), we believe that the BPA should provide mitigation of the necessary right-of-way clearance by decommissioning at least an equal acreage of roads both within the CRW and in the Raging River Drainage.

1488-002 The Mountaineers is strongly supportive of the single tower, double circuit crossing, of the Cedar River and maximum protection of all wetlands and riparian areas.

1488-003 The Mountaineers have worked very hard along with many other organizations, including the Seattle Public Utility Department to develop the Habitat Conservation Plan (HCP) for the CRW, protecting both water quality and conserving habitat. The CRW provides both clean, fresh water for the city and, many suburbs and is an important spawning habitat for salmon. Any insurance

1488-004 purchased to provide mitigation of potential damage to the water quality must be adequate to redress the full cost of the worst case scenario.

1488-005 We appreciate that current electrical distribution system reliability and efficiency require that additional transmission lines are required. However, The Mountaineers strongly encourages the BPA to increase emphasis and funding on conservation, and distributed generation, such to obviate the future need for such large projects through either protected lands or residential areas.

Thank you for the opportunity to make these comments.

Sincerely,
THE MOUNTAINEERS

Glenn Eades,
President

Cc: Margaret Pageler, Seattle City Council
Sara Patton, Northwest Energy Coalition

1488-001 Comment noted.

BPA would replace some existing roads within the Cedar River Watershed that currently go through wetlands with new roads that would bypass wetlands. No fill would be placed within wetland. The roads replaced would be made such that vehicles could no longer traverse them and would have to use the new roads. BPA would also make it such that one particular road on the north side of the watershed, just outside the watershed, could no longer be used by the public. No additional roads outside the watershed would be decommissioned. BPA is in discussions with Seattle on potential other roads that could be decommissioned within the watershed.

1488-002 Comment noted.

1488-003 Comment noted. The insurance has a limit of $105 million. This was the estimated cost of building a water filtration plant designed to meet the Cedar River Watershed's requirements.

1488-004 and -005 Please see Chapter 2 for information on BPA's conservation programs and funding and Appendix J for information about non-transmission alternatives.

SIERRA CLUB
Cascade Chapter
180 Nickerson #202
Seattle, Washington 98109

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# KELT-1491
RECEIPT DATE:
MAR 03 2003

March 1, 2003
(via email: comment@bpa.gov)

Lou Driessen, Project Manager
Bonneville Power Administration
PO Box 12999
Portland, Oregon 97221

Re: Kangley- Echo Lake Transmission Line

Dear Mr. Driessen:

The Sierra Club has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed Kangley- Echo Lake Transmission Line. BPA has appropriately decided to issue a Supplemental EIS on this project as the earlier draft EIS was inadequate and failed to look at an adequate range of alternatives. We offer these comments on the SDEIS.

1491-001 The proposal, also known as the Raging-Cedar Powerline, due to its potential impact on these two watersheds, is designed to provide additional system capacity and reliability by constructing an additional circuit. The preferred alternative is constructing nine miles of new 500kV line with towers 135' high through the Cedar and Raging River watersheds. This proposal will have significant environmental impacts. The Sierra Club is still opposed to this project as proposed.

Impacts

1491-002 BPA lines have huge impacts on forests and related wildlife including loss and fragmentation of habitat. The City of Seattle has just recently protected the forests of the Cedar River Watershed, which is prime wildlife habitat and

1491-003 provides drinking water to over a million people. This linear clearcut proposed by BPA will seriously damage the forest and could impact the water quality.

1491-004 BPA has allowed existing corridors to become weed infested wastelands. Impacts of construction and operation will adversely affect water quality for a municipal

1491-005 water supply, affect compliance with the ESA, and diminish efforts to recover salmon and other listed species. Routes through rural areas are also disruptive those communities.

1491-001 Comment noted.

Comment noted.

1491-002 and -003 Comment noted.

1491-004 and -005 BPA and SPU are working together to control the spread of noxious weeds in the existing corridor and will continue to work together in the future on the proposed corridor. The existing corridor has had little or no effect on water quality in the CWR.

1491-006 BPA has begun to recognize the seriousness of the impacts this project would have, but should acknowledge the effects of cumulative impacts of transmission lines crisscrossing the forests of this region. Contrary to BPA's impression that this project poses low impacts to ecological and cultural resources, the cumulative effects of this and other BPA lines is significant. When combined with other loss of forest, these effects become quite significant.

Alternatives

1491-007 Appropriately, the new document looks at additional alternatives. Some of these would run through Maple valley, which would severely impact rural lands. Others would impact forests across the Cascades. All of the construction alternatives have serious impacts. None should be constructed as proposed.

1491-008 1491-009 1491-010 1491-011 1491-012 We strongly oppose the preferred alternative, due to its huge impacts on the ecosystem and a municipal watershed. We are also opposed to Alternative C as it has unacceptable impacts on forests and rural communities. Alternative D also has unacceptable impacts on ecological, recreational and community resources. Alternative B, by rebuilding in the existing corridor has fewer, but still significant impacts on those resources. Alternative A, by primarily using existing corridors, has less impact on residential areas than C. Double-circuiting all or most of the proposed route would be a better choice than most of the other alternatives.

1491-013 1491-014 BPA has still not demonstrated a compelling need for construction of a new line at this time. BPA must seriously consider the conservation/load management alternative, at least in the near term.

Mitigation

1491-015 If BPA pursues a construction alternative, it must fully mitigate for the impacts of constructing and maintaining a line, whichever route is selected. This is a required element of any federal project. Earlier, BPA had failed to provide adequate mitigation, thereby avoiding the true costs of alternatives. This is only partially corrected in the SDEIS. Additional measures are described, but some are inadequate or only vaguely mentioned without specifics. These must be explicitly described in the FEIS with binding provisions. In addition, all alternatives should be treated equitably in achieving a high standard of mitigation.

1491-016 In other cases, these measures are actually standard practices (sometimes called best management practices or BMPs) and not really project mitigation measures. They do not fully offset, reverse, or rectify the impacts of constructing the proposed project. Thus, BPA's suggestion that "maintaining environmental quality" and "minimizing impacts" are two of the purposes of this project is not convincing.

1491-017

1491-006 See response to Comments 394-090 and 394-104.

1491-007 and -008 Comment noted.

1491-009 Comment noted.

1491-010 Comment noted.

1491-011 Comment noted.

1491-012 Comment noted.

See response to Comments 1423-002, 1421-038-004, 1421-038-005 and 1421-038-006

1491-015, -016, and -017 Please see response to Comments 1420-001 and -002.

1491-018
1491-019
1491-020
1491-021

Habitat
BPA cannot externalize the costs of this project, as it has done with previous lines, and mitigating for habitat losses from powerlines is required. The loss of the forest is more than just a loss of timber revenue. It is a permanent loss of habitat that is rapidly disappearing - especially in the foothills of the Cascades in King County. The cost of such replacement must be included in the total cost of the preferred alternative, then compared among the alternatives. The sale of timber by the underlying landowner does not mitigate the long-term impacts of logging. Past practices of ignoring the permanent loss of forest are no longer acceptable.

1491-022
1491-023
1491-024

The Cedar River watershed encompasses a unique lowland forest that will be protected in perpetuity, thanks to the City of Seattle's vision and commitment. Surrounding remnants of the original forest, the second growth has been growing and developing for up to 100 years. Nowhere else in the county will we see such ancient forests - at low elevation and in large blocks. This is also a critical ecological connection to Tiger Mountain and Rattlesnake Ridge. Many forestlands in the Cedar River Watershed will approach old growth status with proper land management. While lands in the Raging River may be managed for timber, they will still provide age classes of over 40 years. In the powerline right of way, trees will never exceed a few years old. Due to conservation easements being developed in that valley, it should not be converted to urban uses. This and its location make this valley particularly significant for forest ecosystem conservation. Thus, BPA should mitigate for the difference in this type of forest, by acquiring and conserving for forestry an equivalent amount of land that would otherwise be converted to non-forest uses.

The impact of the BPA line will be in perpetuity, therefore the mitigation must be in perpetuity. The only reasonable solution is that BPA must replace the lost habitat.

1491-025
1491-026

The SDEIS alludes to acquiring replacement forest to mitigate for forests cut for the new line, but offers no specifics on location, size or quality. How can a reviewer determine if the mitigation is adequate for an alternative when there are no specifics? Construction is carefully spelled out and the mitigation is just a vague promise. Personal conversations with BPA staff indicate forest mitigation is planned only for the Cedar River portion. The Raging River is ignored, despite a long stretch of the proposed line bordering and then crossing the river. Clearcutting this close to a river is just not acceptable today.

1491-027

We have previously suggested lands that would be good candidates for offsite mitigation for loss and fragmentation of forests. At a minimum, mitigation should include two tracts. One is section 25 just south of the watershed. The other is protection of about 300 acres of lands along the Raging River where the lines parallel and/or cross the river. The latter would not only help to mitigate forest and impacts, but river and fisheries impacts as well. The Final EIS should be

1491-018, -019, -020, and -021 Please see response to Comments 1420-001 and -002.

1491-022 and -023 Comment noted.

1491-024 Please see response to Comments 1415-003, -004, and -005 concerning purchasing of lands outside the watershed.

1491-025, -026, and -027 Please see response to Comments 1415-003, and -004 and Comments 1485-006, -007, and -008.

1491-027 specific, stating that at least these lands will be acquired and managed to develop late-successional forest characteristics.

1491-028 It is disturbing that we have heard that BPA is looking at Land and Water Conservation Funds or Forest Legacy funds to acquire some of the replacement habitat land. These funds are limited and are for pro-active conservation, not to pay for required mitigation for a federal project. This is a BPA project with BPA impacts and mitigation must be paid for by BPA-- not robbing other critical conservation projects.

1491-028 See response to Comment 1423.

1491-029 BPA has committed to combining the new circuit and existing circuit on one set of towers where they cross the Cedar River. This addresses a critical need. However, the same approach should be taken at the Raging River crossing.

1491-030 The height of transmission lines at Cedar and Raging River crossings should be high enough to allow late successional forest to grow to 200' tall in the riparian zone of the river and to mature heights on the slopes above the river bottom. Given the topography on either side of the river, that should be feasible. BPA should also increase the height of the towers in that vicinity.

1491-029 and -030 Please see response to Comments 1485-006, -007, and -008.

Water Quality

1491-031 The proposed mitigation for the Cedar River watershed route, includes efforts to prevent toxic material entering the river. This is appreciated, but the standard for a municipal watershed must be high. Extraordinary provisions are needed. We support the City of Seattle's efforts to protect the water supply. There are also

1491-032 risks to the salmon and water quality of the Raging River, and appropriate mitigation should be applied to any activities in that valley, including the expansion of the substation.

1491-031 and -032 Please see response to Comments 1485-006, -007, and -008.

Vegetation Management

1491-033 The EIS contains vague language about best practices for vegetation management. This should be replaced with solid objectives of types of habitat and timeframes for achieving success. This should include eliminating scotch broom and other

1491-034 invasive weeds, restoring native habitat of varying types and initiating work simultaneously with construction.

1491-033 Please see response to Comment 1485-009.

1491-034 and -035 Please see response to Comment 1485-009. We may not be able to initiate work at the same time as construction. However, there are practices such as putting down straw and seeding with grasses that could reduce the spread of noxious weeds. Hydroseeding may also be an alternative.

1491-035 Without the changes noted above, our opposition to this project will continue. Thank you for this opportunity to comment. Please keep us apprised of any actions related to the project.

Sincerely,
/s/
Charles C. Raines
Director
Cascade Checkerboard Project

Kuehn, Ginny - DM-7

From: Charles Taylor [charles_taylor007@hotmail.com]
Sent: Saturday, March 01, 2003 1:23 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Line Project

RECEIVED BY BPA
PUBLIC... OLVEMENT
LOG#: KELT-1493
MAR 0 3 2003

Residence of:
34406 S.E. 257th St.
Ravensdale, Wa 98051

1493-001 1493-002 1493-003 1493-004 1493-005 1493-006

We are concerned about the proposed 500-KV power line being built so close to our house. Our water source is supplied from a well that is right next to the proposed sight. How is this going the effect our water? After talking to our real estate agent and home appraiser this would have a hugh effect on the current value of our home and would like to know if we will be compensated for the value loss? We will have to live with consent noise levels that such a large power line will create. We have Aesthetics concerns and don't want to look out my back door at a hugh steel tower. We have also noticed that when these powers lines have been built in the past that it has,and will attracted unwanted off road vehicles and hunters, Who create garbage, noise, safety concerns and no respect for others property. We are also concerned about the health risks from being exposed to such a high level of EMF.

Please contact us if you have any further Questions/Answers about our concerns. Phone # 360-886-2522 or 253-740-1194

Thank You

Charles A Taylor
Maria K Taylor

1493-001, -002, -003, -004, and -005 BPA gathers information regarding well locations along the project route through surveys, examination of title policies, and landowner interviews. If you have a well that is located along the project route, please share the specific well location information with BPA to ensure that safeguarding the well is addressed in the construction specifications, if the construction alternative is selected.

Please refer to the SDEIS, Section 4.11.2.5, Community Values and Concerns, Property Value Impact. King County was included in the studies regarding the impacts of transmission lines on property values. If an easement is acquired across your property, BPA's offer would be based on a professional real estate appraisal.

When BPA acquires rights-of-way for its transmission facilities, they are not made available for public use. Sometimes landowners and BPA can work together to place gates across access roads that BPA uses to access its transmission facilities.

1493-036 See response to Comment 1467-002.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

KEL-1494

MAR 03 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments WE HAVE 2 TRANSMISSION
1494-001 LINES NEAR OUR HOME, AND WE DO NOT
WANT ANOTHER. WE ARE CONCERNED THAT
1494-002 OUR PROPERTY VALUE WOULD DROP, OR THAT
IT MAY CAUSE US TO CONSIDER MOVING.
1494-003 THERE ARE JUST TOO MANY HOMES IN
THIS AREA.
THANK YOU.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name JEFF JACOBSEN

Address 18818 SE 287 ST KENT 98042

E-Mail Address JACOBSENGO@ATTBI.COM

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1494-001, -002, and -003 See response to Comments 1484-008 and -009.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1495
RECEIPT DATE:
MAR 03 2003

12619 SE 20th Place
Bellevue, WA 98005
February 25, 2003

To Whom It May Concern:

Hello, my name is Beth Hamilton. I am a fifth grade teacher at Woodridge Elementary School in the Bellevue School District in Bellevue, Washington. In school, we had a botanist from the Cedar River Watershed come talk to our 5th graders about the watershed. We also will visit and learn about the watershed in March. In addition, as a school we do "stream team" which is a project to help the city of Bellevue keep the streams safe and clean for the salmon in the fall. Therefore, my students are very knowledgeable and have strong feelings about our natural resources and natural areas. As a teacher and a resident of the area, I am concerned about a power line being placed in the sacred area of the watershed, as are my students.

1495-001

1495-002

1495-003

To further our learning inside and outside of school, my students have compiled information and opinions about the power line being put through the watershed. They have written letters to you, the Bonneville Power Administration, to voice their concerns. I hope you take the time to read and listen to their concerns. They may only be 10 and 11 years old, but they have great ideas and insight! Thank you for taking the time to read our letters.

1495-004

BELLEVUE SCHOOL DISTRICT
Beth Hamilton
Teacher

WOODRIDGE
ELEMENTARY

12619 SE 20th Place
Bellevue, WA 98005

Phone: (425) 456-6200
Fax: (425) 456-6204
hamiltone~~beth.hamilton~~@bsd405.org~~edu~~

Sincerely,

Beth Hamilton

Mrs. Beth Hamilton
Teacher

P.S. Replies can be sent to my name at the above address.

1495-001, -002, -003, and -004 Comments noted. We appreciate the time your students took writing to us. BPA is committed to protecting the CRW if a decision is made to implement Alternative 1.

PUBLIC INVOLVEMENT
LOG#: KELT-1496
RECEIPT DATE:
MAR 03 2003

12619 S.E 20th Place
Bellevue W.A 98005
February 14, 2003

To Whom It May Concern,

Hello, my name is Christie. I am in the fifth grade at Woodridge Elementary school. A little over a week ago we had a guest speaker come talk to us. He talked to us about how you and the rest of B.P.A. are thinking about putting a power line through the Cedar River Watershed.

1496-001 I think that is a bad idea! Why I think that is a bad idea is because you will clear cut 90 acres of trees. It is like all of a sudden someone cuts your house down so they can have more power. Would you like that? I don't think anyone would like that! Even though they are animals, they still have feelings!

1496-002 Another very important thing that building a power line could do is polute the water we drink! Do you want water that is clean and fresh or more power? We can live without power, but we can't live without water. We need it to be clean so we don't get sick! I want the water to clean! I think everyone else wants clean water too!

1496-003 Well, I hope my letter helped you change your mind! If you end up building the power line I hope you do things to protect the animals!

1496-004 The man who came and talked to us said it could cause a landslide so maybe you could do something to prevent that from happening! So, I hope that you take some of my advice and think about this decision carefully! Thank you for reading my letter, it means a lot to me!

Sincerely,
Christie Melby
Christie Melby

1496-001, -002, -003, and -004 BPA is committed to protecting the drinking water in the Cedar River and the animals that use the Cedar River Watershed. Though BPA needs to clear trees for the right-of-way, clearing and then planting with species useful for forage for deer and elk will benefit these animals. We will consider your comments and all the comments received on this project carefully.

RECEIVED BY
LOG: KELI 1497
MAR 03 2003

12619 S.E. 20th Place

Bellevue WA 98005

February 13th, 2003

To Whom It May Concern,

1497-001 Hi! My name is Abigail. I am in 5th grade and go to school at Woodridge Elementary. One day a man named Clay Antieau, from the watershed, came to talk to us about the Cedar river watershed, and that's why I am contacting you. When Clay left I got concerned about the power lines going through the watershed. I am concerned that this will hurt the animals and might make a fire.

1497-002 I am worried about you putting in a power line because it might hurt the animals that live there. You might hurt the animals that live there because you would have to clear cut 90 acers of trees. That's where birds live! They would then need to find a new habitat now that you're replacing them with power lines! I felt hat the animals should be able to keep their homes,…besides they were there first!

1497-003 When you put in the power lines I am worried that it might start a fire. If a fire wouid happen, animals might die and their homes would be destroyed. I feel that the animals should be kept safe with no threats from the power line.

1497-004 As you probably can tell, I am very concerned about you putting in a power line through the watershed wildlife system. I have some questions that might concern you putting in the power lines. How many power lines are you going to put in there? Why don't you put the power lines through the city? Why don't you build it around the watershed? Why don't we vote?

1497-005 And why don't we conserve the energy? Thank you for listening to my letter.

Sincerely,

Abigail Anna Elsyer

1497-001 BPA is proposing to construct one transmission line next to the existing BPA line through the watershed. BPA supports many conservation programs throughout the Northwest and has done a study that suggests that not enough energy could be conserved to remove the need for this new line. See Section 2.2.9 and Appendix J of the SDEIS.

1497-002, -003, and -004 BPA is concerned about potential impacts to wildlife and will purchase other lands that will be preserved for wildlife.

BPA is required to have firefighting equipment on hand during construction and will comply with any fire restrictions if there is high fire danger during construction.

BPA did consider other alternatives that would be build around the watershed, including alternatives that would require removing homes. Our preferred alternative was selected because, overall, it has the least potential environmental impacts.

1497-005 Thank you for your comments.

KELT- 1498

MAR 0 3 2003

12619 S.E. 20th place
Bellevue,WA 98005
Febuary 13, 2003

To Whom It May Concern,

1498-001 My name is Grace Gunarso. I am in the 5th grade at Woodridge Elementary School in the Bellevue District area. We had Clay Antieau, from the Cedar River Watershed, talk to us about the Watershead. I think that putting a powerline through the watershed would make the water dirty and could cause a fire.

It will cause a fire because trees might fall to the power line. For example the fire might go through any city and burn it down. I feel that we could lose alot of electricty by the fire.

1498-002 It could make the water dirty if the power line fell in the water. For example when it rains the dirt could go in the water. So if we drink the water it will not taste good as it was before.

1498-003 1498-004 I think it is not a good idea because it could make the water dirty or you could cause a fire. You could do half underground and half above ground. Or, you could make it though the city. Thank you for reading my letter.

Thank you,
Grace Gunarso
Grace Gunarso

1498-001, -002, -003, and -004 Thank you for your comments. BPA has had a transmission line in the Cedar River Watershed for over 30 years. This existing line has not caused dirty water or a fire. BPA is required to cut trees that might be a danger to the line. These "danger trees" need to be cut so that what you are concerned about will not happen.

BPA has considered putting the line underground, but it is very expensive and so it is not being considered. BPA also is considering putting the line through neighborhoods outside the Cedar River Watershed. These other routes also have impacts to people and wildlife.

KELT-1499

MAR 0 3 2003

12619 se 20th pla
Bellevue, WA 980
February 14,20

To Whom it May Concern,

1499-001 Hi my name is Danielle. I'm in 5th grade at Woodridg Elementary. I am writing to power because you want to pu a power line through the watershed. I am here to tell you what I think about that. I think you shouldn't put the powe line through the watershed because you might hurt animals or kill trees.

I think it might hurt animals. For example, when you cut down trees you can you can kill birds, squirrels, and other animals that live in trees will also be hurt. This is not good because they won't have homes.

1499-002 I think it's bad to cut down 90 acres of trees. This is bad because then we won't have trees for shade and to block the rain. Less air destroys animal's homes.

1499-003 I think you should put the power line through the under ground. This would save animals and trees by not cutting down trees or their habitats. Thank you for reading my letter.

Sincerely
Danielle, Danielle Ruby

1499-001, -002, and -003 Thank you for your comments. Please see response to Comment Letter 1498.

Trees that might pose a danger to the transmission line must be cut for safety reasons. Though trees would be cut, there are other trees close to the area and animals would likely move to those trees for shelter. BPA is proposing buying other land that would replace the wildlife habitat impacted by the proposed line. That land could not be developed and would provide habitat for animals forever.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1500
RECEIVED
MAR 03 2003

12619 SE 20TH PLACE
BELLEVUE, WA. 98005
FEBRUARY 10, 2003

To Whom It May Concern,

1500-001 **Hello, my name is Julian. I am in 5th grade in Bellevue. My teacher is Mrs.Hamilton. A man from the Cedar River Watershed came to my school and told us about the watershed. I live here in Bellevue and I think you should not put the power line there because you can hurt the animals or kill the plants.**

1500-002 **I think putting the power line through the watershed could hurt the animals when you chop the trees down. Bird's homes will be destroyed, then they will have to move. I think the birds should be able to keep their homes because they put a lot of hard work into their nests.**

1500-003 **I think you should not put the power line there because you will kill the plants when you chop trees down. The plants will die when you and the construction machines will walk and run over the plants and then they will have to grow again. It will take them a long time to grow and you will kill bugs that live in them. Some plants might be endangered plants too.**

1500-004 **By putting a power line through the watershed you would be killing plants or hurting animals. Instead you could do it**

1500-005 **differently. You can build around the watershed or you can build under the watershed. Thank you for listening.**

Sincerely,
Julian

Julian

1500-001, -002, -003, -004, and -005 Please see responses to Comment letters 1498 and 1499.

RECEIVED BY BPA
PUBLIC ... OLVEMENT
LOG#: KELT-1501
MAR 0 3 2003

12619 SE 20th Place
Bellevue WA 98005
2/14/03

To Whom It May Concern,

1501-001 Hi my name is Tyler. I'm 11 years old and I go to Woodridge Elementary school. We had a person from the watershed talk to us about what you want to do to the watershed. I think that putting a power line through the watershed is a bad idea because you could kill animals or cause a landslide.

1501-002 I think putting a power line through the watershed could kill animals. You could kill animals by destroying rare animal homes. For example, you could kill animals and they might become instinct or kill animals that are illegal to kill.

1501-003 If you put a power line through the watershed, then you could cause a landslide. If you cause a landslide then you will kill animals, destroy their homes, or mess up your plans for a power line.

Thanks for listening,

Tyler

T. for Tabraida

1501-001, -002, and -003 Please see responses to Comment letters 1498 and 1499.

BPA is proposing many mitigation measures to prevent damage to the drinking water supply and to wildlife habitat. Thank you for your comments.

KEL-1502
MAR 0 3 2003

12619 SE 20th Place
Bellevue, WA 98005
February 13th 2003

To Whom it May Concern,

1502-001 Hello, my name is Meagan Cuthill. I am a 5th grade student at Woodridge Elementary School. I am writing to you because I have heard of your idea of putting in a line of power through the Cedar River Watershed. My classmates and I are very worried about this. I am concerned about you hurting animals that live there and killing 90 acres of trees.

1502-002 Many animals and wildlife live at the watershed. If you build a power line through the watershed it would destroy animal habitats and they would not have anywhere to go. What if some people came up to you and said, "Oh sorry, but you can no longer live here because the people of Bellevue need more power." What would you say?

1502-003 Another thing, you would kill many trees and acres of plant life in the process of building the power line. Trees and plants are living creatures, not just us. It would also change the air we all breath. All that for power.

1502-004 I and others would feel very hurt if you put in a man-made structure. It would destroy tree and plant land. Also the animals would not have a place to live. So, please don't put a power line through the watershed. Many people are concerned about your idea. Maybe you

1502-005 could build the power line somewhere else or we could conserve energy. Those are only a few ideas.

Thank you for your time,
Meagan Cuthill
Meagan Cuthill

1502-001, -002, -003, -004, and -005 Thank you for your comments. Please see responses to Comment letters 1498 and 1499.

BPA has extensive experience with energy conservation in the Pacific Northwest and encourages energy conservation through programs with Northwest utilities. Conservation could not reduce the need for this project, but it is a good idea to reduce the need for energy in specific areas and at specific times of the day and year.

KELT- 1503

MAR 0 3 2003

12619 SE 20th place

Bellevue,WA 98005

To Whom it May Concern,

1503-001 Hi, I'm Chaz. I'm a fifth grader at Woodridge Elementary. On Monday February 3rd Clay Antieau came to our school from the watershed. He came to talk to us about how you want to put a powerline through the Cedar River watershed. I have not been to the watershed before but I know that it's a well protected area. I am concerned about the powerline going through the area. I am writing because you are going to wreck the animal's homes and pollute the water.

1503-002 One reason is because you will force animals out of their homes and feeding areas. For example, you will destroy bird homes because they live in trees. Also you will most likely destroy their watering areas. I feel that this is wrong. I think that because you don't want to destroy people's homes but what about the animals homes? If you put your powerline there they will have to find a new habitat. Do you even care about them?

1503-003 One other thing that could happen is you could pollute the water system. For example, you might cause mud to slide into the water. I don't think that you should not put those huge man made structures through the watershed.

1503-004 Please cosider this. And please, make the right choice about the powerline. Thank you for your time.

From,

Chaz DeMonbrun

1503-001, -002, -003, and -004 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

KELT- 1504

MAR 0 3 2003

12619 SE 20TH PLACE
BELLEVUE WA 98005
FEBRUARY 14, 2003

To Whom it May Concern,

1504-001 My name is Eli. Recently someone came to my school to talk to us about the BPA building a power line through the Cedar River Watershed. He tried to convince my classmates and I that this would be a bad thing. I think it would be okay to do this, but here is an idea so the BPA doesn't cut as many trees down. I love trees.

1504-002 I think you should use helicopters to lift the parts you need for a power line to the sights you want to build the power line. Then you wouldn't have to cut down trees to make new roads.

1504-003 There would be more habitats for the animals this way. Plus, trees provide oxygen and we need oxygen to live.

1504-004 I love trees. Humans are important and we need electricity. On the contrary, animals need homes too. So we need to make an even balance. Put a power line through the Cedar River Watershed but try not to cut as many trees. Thank you for your time.

Sincerely,
Eli
ELi

1504-001, -002, -003, and -004 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

BPA is proposing to use helicopters for construction in the Cedar River Municipal Watershed.

KELT-1505

MAR 0 3 2003

12619 20th Place
Bellvue Wa 98005
Febuary 10, 2003

TO whom it may concern,

1505-001 My name is Yuto and I am 10 years old. I go to Woodridge Elementary School. Mr. Antieau from the Cedar River Watershed came to Woodridge Elementary School to talk to the 5th grade students. He asked us if you should put a power line through the Cedar River Watershed. I am writing to you because I think you shouldn't put a power line through the watershed.

1505-002 One reasons why I think you shouldn't put a power line through the watershed is that you are going to cut down 90 acres of trees. I think if you need to cut trees you shouldn't put a powerline through the watershed. By killing trees, it could destroy aimal homes.

1505-001, -002, -003, and -004 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

1505-002 For example, if we lose trees birds and bugs could lose their homes and that will hurt them. If I was a bird or insect I would not like loseing my home.

1505-003 If you put a powerline in, it could pollute the H_2O. You could kill salmon and we drink that water. If we didn't drink water we would die. It would be sad to die and would not be good to drink polluted water.

1505-004 If I was in the BPA, even if it takes lots of money, I would not build the powerline through the watershed. I suggest building it underground. It would be much better to not cut trees or do bad things to the animal habbitat.

Sincerily,
Yuto

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-1506
RECEIPT DATE:
MAR 0 3 2003

12678 SE
20th Place
Bellevue WA
98005 February 14th 2003

To Whom it May Concern:

Hi my name is Sterling. I'm writing because I heard that you want to put a power line through the Cedar river water shed. I don't think that is a good idea

1506-001 because it can hurt animals and you will cut down 90 acres of trees permanently.

By cuting down trees it will destroy animals like squirrel and birds homes. This is bad because then

1506-001 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

they would have no where to live.
If you dont put the power line
through the Water shed it will save
animals by not destroying their home.
1506-001 : I dont think puting the power
line through the watershed : is a good
idea at all. I hope you dont put the
powerline through the water shed. ;
Thank you for reading my letter.

from,

Sterling

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT 1507
RECEIPT DATE:
MAR 03 2003

12619 5E 20th
Place Bellevue WA 98005

To: BPA

1507-001 I am a 5th grader at Wildridge Elementary and my name is Robert Gissard. I'm writing you because you want to put a power line through the water shed. I think this is a bad idea because you are going kill trees and hurt animals.

1507-002 I think it could hurt animals because in order to put in the in the power lines and poles you want to clear 90 acres of trees permanently. That could harm animals because you you'll destroy birds, squirrels, and other animal habitats. The water shed is one big natural habitat for many plants and animals.

1507-003 My conclusion is that it is a bad idea to put the power lines through the water shed because you would have to clear 90 acres of land permantly. So, I was thinking if it cost to much to put the line under ground. You put the power line big way under ground until its out of the water shed, then put it above ground.

Thank you,
Robert Gissard

1507-001, -002, and -003 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

PUBLIC INVOLVEMENT
LOG#: KEL-I-1508
RECEIPT DATE: MAR 03 2003

12619 SE 20th Place
Bellevue, WA 98005
febuary 13, 2003

To Whom It May Concern

1508-001 Hi my name is Tiffany and I am a fifth grader. I am writing this because I don't think you should put the Power line though the Cedar River Watershed because you can hurt the animals.

It will hurt the animals because they would lose their homes and they could get hurt. for example, a Bird could lose it's home because you could knock it's tree that it lives in.

I think insted of building the Power line through the water shed I think you should build the Powerline around the watershed. I think that because we don't want you to hurt the animals.

Thank You,
Tiffany

1508-001 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

PUBLIC INVOLVEMENT
LOG#: KELE-1509
RECEIPT DATE: MAR 03 2003

12619 Se 20th
Place Bellevue
WA 98005

February 14, 2003

To Whom It May Concern,

Hi my name is Kevin and I just wanted to let you know that I think you shouldn't put the power line through the Ceadar River. One reason is it won't give us clean water. Second, is we will loose salmon.

1509-001 Water - If you put the power line throug the Ceadar River Watershed because you might pollute the water and give out chemicals which is poisnas and dangerous. I would also mean we would have to built the watershed somewhere else beacuse the Ceadar River Watershed is polluted.

1509-002 Salmon - We will loose Salmon by chemicals, land slide which causes silt to kill the rare Salmon in the water. This is bad because the water will be polluted. This will kill the Salmon

1509-003 Why don't you ask people to conserve energy. Hope you do the right thing and take this into your cosideration.

1509-004

1509-001, -002, -003, and -004 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

PUBLIC INVOLVEMENT
LOG#: KELT-1510
RECEIPT DATE:
MAR 03 2003

1269 SE 20th Place
Bellevue Wa 98005

2-14-03

Dear BPA,

1510-001 My name is Joe Joe Conner. I'm from Woodridge Elementary School. Mr. Antieau is a Batanist from the Watershed, he Came to talk to us about the Watershed. I'm also apart of stream team, a group of kids that make sure the streams are clean. From What I see putting a powerline right through the Watershed could kill lots of trees and Probably polute the water.

1510-002 If you put the powerlines through the Watershed it could kill trees. When you have to go put your machienes in you will have to cut down trees. The Water needs trees because they give the water nutriouns.

1510-003 You could also polute the Water by making sawdust and maybe electrocuting the Water. If that happened, our Water wouldn't be healthy for us to drink. Our Water needs to be clean because if it isn't we will get sick.

1510-004 I don't think you should put the Powerline there but I think I know a Solution. You might be able to put the Powerline half way above ground and half way under ground. So you wouldn't have to pay as much. Thank you for your time.

Sincerly
Joe Joe

1510-001, -002, -003, and -004 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

12619 SE 20 place
Bellevue WA. 98005
Feb 13, 2003

MAR 0 3 2003

To Whom It May Concern,

1511-001 Hi my name is Courtney. I am a fifth grade student at Woodrige Elementry. At school we had Clay Antieau come and teach us about the Ceder River Watershed. We learned all about the plant life and wildlife there. I am writing to you because I am concerned about the animals and polluting the water if you build a powerline through the watershed.

The watershed is filled with wildlife that has lived there for many years. Putting a power line in there might disturb their natural life style. They might not even want to live there anymore. There aren't many wild places like the watershed and I think for the animals sake, do not interfere with that natural place.

1511-002 1511-003 1511-004 1511-005 I am also concerned about the water. Clay told us it might cause a land slide. If the dirt gets into the water it could contaminate it. Some of the rarest samon are being released into the rivers and lakes. If the water gets to dirty the samon will die and so will many other fish, frogs, and insects.

1511-006 I know we need energy but maybe if we used less we wouldn't need a power line. If we really need it, then we could build it around the watershed. Then it wouldn't bother any wildlife. I hope this letter gave you some other idea to get energy.

Sincerely,

Courtney

1511-01, -002, -003, -004, -005, and -006 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

PUBLIC INVOLVEMENT
#: KELT-1512
RECEIPT DATE:
MAR 0 3 2003

12619 S.E. 20th
place Bellevue WA
98005
February 13, 2003

To whom it may concern,

1512-001 Hello my name is Brian. I'm a fifth grader at Woodridge Elementary. I heard about the powerline going through the watershed. I think you should find a different way no matter what it takes. It's better then ruining the habitat of many animals. The animals make the watershed a natural area.

1512-002 The animals make the watershed a natural place. If you put in a powerline, some animals would have to leave. This is bad because animals make the water better because the fish eat the bugs.

1512-003 If you put in a powerline you'll contaminate the water, the fish will die, the bugs will fill the water with eggs, and the fish won't be there to eat them. So, the water will be full of bug eggs, which is bad for the water.

1512-004 Instead of making the powerline above ground, I suggest you put some underground. You could put the powerline so they're above ground until the watershed, then make them go underground through the watershed. It's the least frustrating way because it wouldn't be messing up the watershed. Thank you for taking time to read my letter.

Sincerely,

Brian

1512-01, -002, -003, and -004 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

PUBLIC INVOLVEMENT
INIT: KELT- 1513
DEPT DATE:
MAR 03 2003

12619 SE 20th place
Bellevue, WA. 98005
February 14, 2003

To whom it may concern:

1513-001 Hello, my name is Brian and I am a student at Woodridge Elementary. I am concerned about the power line going up and wouldn't want it going through the watershed. I learned about the water with stream team. As a class we go and check the water to see if it is good for the salmon. I learned about the watershed from a man named Mr.Antieau, a botanist, from the watershed. I have two main reasons why I don't want the power lines going up. One, is that it could hurt or kill animals and second, is that the construction would pollute the water.

1513-002 I think putting the power line through the watershed would hurt the animals!

1513-003 You would be hurting or killing them with man made structures that would be destroying there homes.For example, all the birds and squirrels would have to find new homes and habitats. You're cutting down 90 acres of trees. That's a lot of animal homes!

1513-004 This could kill the plants also that could be rare and hard to find. If I were an animal, I wouldn't want to find a new home and building an all new home.

1513-005 The water will be dangered too. It would either kill the fish or make them sick. This could mess up the food chain in the water. The fish also have to find new homes with different rivers until it all goes away. I hear that they are putting rare salmon in the river.

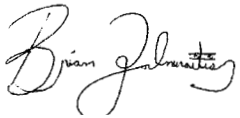
1513-006 This would pretty much wipe them out from the start! We, too, drink and use this water, this could hurt us. You could try to get it all out but then you would use too many chemicals to do that. I also fee! strongly about this because it would not only make salmon die or find new rivers, but this could hurt us too!

1513-007 So altogether it could kill animals, trees, fish, and pollute the water. I would hate for it to come up but if you had to, then maybe you could try to do it around

1513-008 the watershed. Or, half under ground and half on top to miss the watershed. You could even use other lines. Anything to keep this sacred area special.

Sincerely,

Brian



1513-01, -002, -003, -004, -005, -006, -007, and -008 Thank you for your comments. Please see responses to Comment letters 1498, 1499, 1500, 1501 and 1502.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

1. Please have your environmental studies look at

LIC INVOLVE
S#: KELT-1517
CEIPT DATE:
MAR 04 2003

2. I need more information about

3. I have these other comments The fish + wildlife in our area already benefit from a nearly pristine habitat within the watershed. Outside the watershed, particularly along routes A + C, the habitat is much more fragmented. The wildlife is much more in need of protection of the limited, fragmented habitat than the largely pristine habitat.
Choose Alternative 1 through the watershed!
Do not choose A or C - through fragmented habitat!

1517-001
1517-002
1517-003

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Jeff Mergenthal

Address 26537 SE 224th St.

E-Mail Address Maple Valley WA 98038

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1517-01, -002, and -003 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

PUBLIC INVOLVE
S#: KELT-1518
RECEIPT DATE:
MAR 04 2003

1. Please have your environmental studies look at

2. I need more information about

3. I have these other comments The King County Council is planning on adopting a version to the Critical Areas Ordinance that would prohibit all property owners from cutting ANY trees on 65% of their land. If King County considers ~~on~~ our lands to be so important, then it is totally inappropriate to even consider putting the BPA line through these same lands.

"NO" to Alternatives A-C!

"YES" to Alternative 1!

1518-001

1518-002

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Kathy Myers

Address 26537 SE 224th St

E-Mail Address Maple Valley WA 98038

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1518-001 and -002 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

1. Please have your environmental studies look at

LIC INVOLVE
KELT-1519
MAR 0 4 2003

2. I need more information about

3. I have these other comments

1519-001 Alternative 1: Minimal negative impact on humans, degrades a nearly pristine wildlife habitat (watershed)

1519-002 Alternatives A-C: Significant (and immeasurable) negative impacts on humans, further degrades an already fragmented + "at-risk" habitat (rural residential lands)

1519-003 Please select Alternative 1, through the watershed.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name RITA WEST

Address 16642 184th AVE SE; RENTON WA 98058

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1519-001, -002, and -003 Comment noted.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

1. Please have your environmental studies look at

INVOLVE
KELT-1520
RECEIPT DATE:
MAR 04 2003

2. I need more information about

3. I have these other comments PLEASE PUT THE LINE THROUGH THE WATERSHED. (PREFERRED

1520-001 ALTERNATIVE 1) WHEN ALL COSTS ARE CONSIDERED, INCLUDING COSTS TO THE AREA RESIDENTS THAT WOULD BE NEGATIVELY IMPACTED BY OTHER ROUTES, ALTERNATIVE 1 IS CLEARLY THE ONE WITH THE LOWEST TOTAL COST/

1520-002 IMPACT. REGARDLESS OF WHICH ROUTE IS TAKEN, PLEASE MAKE CERTAIN TO PAY A FAIR PRICE TO ANY DISLOCATED PERSONS.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name George Laudermilk

Address P.O. Box 329

E-Mail Address Hobart WA 98025

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1520-001 Comment noted.

1520-002 Relocations are subject to specific regulations under Public Law 91-646. The brochure, "Your Rights and Benefits as a Displaced Person," provides information for parties displaced from their residences, businesses or farm operations and can be obtained at the following Web site: http://www.fhwa.dot.gov/realestate/rights/index.htm. The purpose of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 is as follows: "The purpose of this title is to establish a uniform policy for fair and equitable treatment of persons displaced as a result of federal and federally assisted programs in order that such persons shall not suffer disproportionate injuries as a result of programs designed for the benefit of the public as a whole."

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

1. Please have your environmental studies look at

LOG INVOLVE
KELT-1521
DEPT DUE
MAR 04 2003

2. I need more information about

1521-001 3. I have these other comments There are salmon-bearing streams and
1521-002 many species of wildlife that would be harmed by
1521-003 Alternatives A & C. The rural residential areas already
1521-004 have "damaged" habitat, as compared to the watersheds.
Please do not degrade the natural habitat any further.
CHOOSE ALTERNATIVE 1 - THROUGH THE WATERSHED

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Gayleen Lauderdmilk

Address P.O. Box 329

E-Mail Address Hobart WA 98025

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1521-001 and -002 Comment noted.

1521-003 and -004 Comment noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

1. Please have your environmental studies look at

PUBLIC INVOLVEMENT
G#: KELT-1522
RECEIPT DATE: MAR 04 2003

2. I need more information about

3. I have these other comments Which ever alternative you choose, you should fully mitigate the damage caused by installing the new line. You can minimize damage by using helicopters to install new towers; don't cut new roads. Replace non-native plants in rights of way with native species. Mitigate by acquiring new forest lands. Other folks have suggested that you could acquire 400 acres along Raging River near Highway 18 and 600 acres near the Cedar River in Section 25, currently owned by Plum Creek Timber. These last acres are subdivided for development. Thank you for taking the time to consider my comments

1522-001
1522-002
1522-003
1522-004

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Joe Ginsburg

Address 12210 Densmore Ave N Seattle WA 98133-7729

E-Mail Address

Please mail your comments by July 22, 2002 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1522-001 See response to Comment 340-002.

1522-002 BPA is proposing to use helicopters for construction on Alternative 1 to reduce the need for new roads.

1522-003 BPA is working with agencies, landowners and tribes to determine the best plant mix for animals. Native species would be part of that mix.

1522-004 Please see response to Comments 1415-003, -004, and -005.

BONNEVILLE POWER ADMINISTRATION

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . ."

CONTROL #: KELT-1523
RECEIPT DATE: MAR 04 2003

1523-001 In 1947 THE City OF SEATTLE bought 90,400 ACRES, 143 Square miles for $2.31 AN ACRE RESULTING IN A closed CEDAR RIVER WATER SHED for Seattle. But it Also
• Obliterated Several Communities, Kerrestin and taylor

1523-002 • THE Lake School District #409 LOST TAX DOLLARS.

1523-003 • THE Citizens No longer Could Hunt, fish, Hike or enjoy the area.

1523-004 • The Seattle WATER Dept. has lowered the CEDAR RIVER'S water

1523-005 level to the degree that it No longer CAN PROVIDE deep WATER holes to cool the Steelhead. the Salmon

1523-006 RUNS HAVE DECREASED, the WATER levels ARE TOO LOW TO Support the fish

1523-007 • Due to the lowered WATER levels Summer Recreation IS GREATLY REDUCED.

1523-008 Both Bonneville Power Administration and the Seattle City WATER Dept. ARE Public Governmental Agencies Serving the Public. I STRONGLY believe that Public lands should be USED when ever possible for Public services. Use the CEDAR RIVER WATERSHED for the PROPOSED KANGLEY-ECHO LAKE 500 KV POWERLINE. Let the 1971's Decision to GO through the WATERSHED STAND in 2003

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name: Respectfully Submitted

Address: Laura A. Lorenz

E-Mail Address:

Please mail your comments by March 1, 2003 to:

Ms. Laura A. Lorenz
PO Box 208
Hobart, WA 98025-0208

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1523-001 Comment noted.

1523-002 Comment noted.

1523-003 Comment noted.

1523-004, -005, and -006 Comment noted.

1523-007 Comment noted.

1523-008 Comment noted.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

1. Please have your environmental studies look at

PUBLIC INVOLVEMENT
ID#: KELT-1524
RECEIPT DATE: MAR 04 2003

2. I need more information about

3. I have these other comments Please do not put this new project through Winterwood Estates. We support the Cedar River route.

Thank you.

1524-001

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name

Address

E-Mail Address

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

1524-001 Comment noted.

Feb 25-03

PUBLIC INVOLVEMENT
LOG#: KELI-1525
RECEIPT DATE:
MAR 04 2003

1525-001 I have attended meetings and spoken with your staff. Please take this article into account on Childhood Leukemia into account when you must decide to not go over a elementary school & homes in Winterwood. Children are in school six hours a day & should not have exposure to electrical fields all that time and then go home to more exposure

1525-002 Thank you, with hopes you make the only decision that makes clear sence for the safety of all.
Please go thru the Seattle Watershed its Power for them after all.

Rae Pence
24718-231 Ave. SE
Maple Valley, Wa.
98038

1525-001 Comment noted. Alternative 1 is BPA's preferred alternative.

1525-002 Comment noted.

LIC INVOLVEMENT
G#: KELI-1525a
CEIPT DATE:
MAR 04 2003

SUNDAY, FEBRUARY 9, 2003

THE SEATTLE TIMES **HOME / REAL ESTATE**

1525a

ASK THE EXPERT

Electromagnetic fields may be a health hazard

BARRELL HAY

Special to The Seattle Times

Q: How much danger are EMF transmissions in and around the house? My friend uses a Gauss meter to find electrical fields and tries to shield himself from this energy as much as possible, claiming it causes cancer. I had heard this is not true.

A: First we need to clarify some commonly misunderstood terminology, as we are talking about two distinctly different things: An electrical field exists around anything that "contains" electricity, even though it is not operating, such as the vacuum cleaner languishing in my daughter's room. A magnetic field is in place only if electricity is flowing — when I give up and go vacuum her room myself.

When I turn off the vacuum, the magnetic field disappears, and when I unplug it, the electrical field in the vacuum is gone, but still exists in the wiring inside the wall.

Several studies in the 1970s tried to show a link between living near power lines and childhood leukemia, among other illnesses. Many anecdotes still kick around today about disease "caused" by electric fields or magnetic fields.

The National Academy of Sciences reviewed the mountain of evidence in 1996 and determined that "the current body of evidence does not show that exposure to these fields presents a human health hazard."

Review by other U.S. governmental agencies and health authorities in other countries came to similar conclusions. But in 2001, The World Health Organization (WHO) listed EMFs in its Class 2B, "Possibly Carcinogenic to Humans" category, the lowest-level risk category. This was based on a small but statistically significant association between EMFs and childhood leukemia that could not be ignored.

The organization's rating system (not a complete list):

- Carcinogenic to humans: tobacco, asbestos.
- Probably carcinogenic to humans: formaldehyde, diesel exhaust.
- Possibly carcinogenic to humans: coffee, gasoline engine exhaust, electromagnetic fields.

The latest theory is that "contact currents" cause an undetectable current to flow through us when we touch an object such as a metal plumbing pipe, and that contact may be responsible for the link between EMF exposure and childhood leukemia.

This theory and more are being studied, and WHO expects results in 2 to 3 years. The organization has an excellent Web site (*www.who.int/peh-emf/project/en/*) with an unimaginable amount of information on this subject.

The Swedish government's view makes sense to me: In 1996 it found no basis for compulsory restrictions on EMFs, but said, "if measures generally reducing exposure can be taken at reasonable expense, an effort should be made."

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Kangley - Echo Lake Transmission Line Project

"I'd Like to Tell You . . . "

1. Please have your environmental studies look at

PUBLIC INVOLVEMENT
LOG#: KELT-1526
RECEIPT DATE: MAR 04 2003

2. I need more information about

3. I have these other comments I belive The displaced people who have
1526-001 lost property or had its use and value. impaired
Should be paid much more Than has been offered.
1526-002 * You have saved A lot of money by going this
route & Need to make This right.

☐ Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)

Name Lonnie CRABTREE

Address 23222 S.E. Kent Kangley R. Maple Valley 98038

E-Mail Address resurgent@msn.com

Please mail your comments by March 1, 2003 to:

Bonneville Power Administration
Public Affairs Office - KC
P.O. Box 12999
Portland, OR 97212

BONNEVILLE POWER ADMINISTRATION

1526-001 and -002 See response to Comment 1520-002.

February 28, 2003

Mr. Lou Driessen
Project Manager
Communications
BPA – KC-7
P.O. Box 12999
Portland, OR 97212

RECEIVED BY PUBLIC INVOLVEMENT
LOG#: KELT 1527
RECEIPT DATE: MAR 04 2003

RE: Comments on the Proposed Kangley-Echo Lake Transmission Project

Dear Mr. Driessen:

1527-001
1527-002
1527-003

I am writing to express my strong opposition to Alternative C of the Kangley – Echo Lake Transmission Line currently being considered in your agency's supplemental Environmental Impact Statement. A route along the Issaquah – Hobart Road makes little sense when other viable options exist such as placing the line in existing right- of-way inside the City of Seattle's watershed or by making upgrades to existing lines. I formally request the BPA as part of the supplemental EIS perform the following analysis. The negative environmental effects should be analyzed on a per unit basis. For instance, how many acres (sensitive areas) would be affected running the line through the watershed compared to running the line outside the watershed?

For the following reasons I object to a line through my neighborhood:

1527-004
1527-005
1527-006
1527-007
1527-008
1527-009
1527-010
1527-011
1527-012
1527-013
1527-014
1527-015
1527-016
1527-017
1527-018
1527-019
1527-020
1527-021
1527-022

- The line through the watershed is the shortest, most cost-effective route. Existing right-of-way exists within the City of Seattle's Watershed to accommodate a new line with minimal additional impact
- Maintaining the existing line in the watershed has never caused water quality problems.
- It has greater environmental impacts than the preferred alternative base on the magnitude of going around the watershed: more line-miles negatively impact more sensitive streams and wetlands
- It will destroy important habitat that supports a wide variety of species including: elk, deer, bear, coyote, eagles, heron, fish, amphibians, etc.
- The project cost is much higher outside the watershed due to project scale, land acquisition, potential vandalism, and mitigation requirements
- It will destroy the rural quality of my neighborhood, an attribute that King County is trying to enhance
- It will lower my property's value
- The line through the watershed is the least populated and therefore minimizes any potential human health risks associated with electromagnetic fields.
- The line through the watershed has the least environmental impact of all the alternatives. In comparison, the line through our neighborhood has more stream and wetland impacts, the same number of Cedar River crossings, and greater water quality impacts because more clearing would be required.
- While the line through our neighborhood affects hundreds of individual property owners, many of whom would lose their homes, the line through the watershed affects about half a dozen property owners.
- The economic costs should include the cumulative loss in property value to individual property owners.
- The power line through the neighborhood would provide an access to private properties adjacent to the right-of-way, creating the potential for vandalism, noise and garbage dumping adjacent to private property.

Sincerely, Sonia Preedy

Printed Name SONIA PREEDY
Mailing Address: 27112 SE 264 ST
(Required) RAVENSDALE WA 98051-9812

Phone (optional):

1527-023
1527-024

P.S. At the February meeting at the Maple Valley Community Center it was disappointing to hear property owners at Selleck-Kanaskat area tell their treatment by BPA. with no no significant rebuttal by B.P.A. It also was extremely disappointing to hear that the city of Seattle will receive property for using their easement while private property owners will only receive a one-time easement allowance.

1527-001 and -002 Comment noted.

1527-003 BPA has analyzed the impacts on a per unit basis for all of the alternatives. The impacts were quantified for distance (miles), area (acres) and other units such as milligauss and decibels. Please see the summary table of impacts in the SDEIS, Table 2-3, located from page 2-67 through 2-74.

1527-004 and -005 Comment noted.

1527-006 Comment noted.

1527-007 Comment noted.

1527-008 Comment noted.

1527-009 and -010 Comment noted.

1527-011 and -012 Comment noted.

1527-013 Comment noted

1527-014 See response to Comments 1484-008 and -009.

1527-015 Comment noted.

1527-016, 017, and -018 Comment noted.

1527-019 Comment noted

1527-020 The estimated cost to acquire land rights was included in the economic costs for all alternatives.

1527-021 and -022 See response to Comment 1474-011.

1527-023 BPA is trying to work with all property owners. The issue for property owners is often concerning the value they think their property is worth compared to the fair market value as obtained from other properties recently sold in the same area. BPA felt it was inappropriate to discuss the specifics of individual negotiations at a public meeting. BPA will continue to work with landowners to try to find a common solution.

1527-024 On the watershed, the City of Seattle has the responsibility to protect drinking water. This responsibility is monitored by the State Department of Health and the federal Environmental Protection Agency, as well as the public. The watershed also has an established Habitat Conservation Plan (HCP). The proposed acquisition of the properties is only one aspect of the mitigation plan to protect the watershed. BPA recognizes that the private properties in this area exhibit some of the same qualities as found in the watershed in regard to timber, vegetation, and wildlife, but the private properties do not have the same public responsibilities.

PUBLIC INVOLVEMENT
LOG#: KELT 1528
RECEIPT DATE:
MAR 04 2003

2-26-03
Maple Valley wa.

Bonneville Power Administration
Public Affair Office - K.C.
P.O. Box 12999
Portland Or. 97212

Dear Sir or Ms.

1528-001 I'm writing in regard to your taking the second line through the Seattle Water Shed. I was pleased you were considering that route. It would seem it would be much
1528-002 less costly, enviromently less intrusive, and adversely effect less people. At one of your meetings I heard people speak of your professional conduct and applaud it.
1528-003 I hope you will reconsider the amount of money you offered the five land owners & reconize your line leaves there land unable to develope as they had planned. I know
1528-004 that route saved you much money & time. I hope you will consider that and compensate them more fully

Sincerely,
Margaret R Crabtree

1528-001 and -002 Comment noted.

1528-003 and -004 See response to Comment 1527-023.

February 28, 2003

LIC INVOLVEMENT
G#: KELI-1529
CEIPT DATE:
MAR 0 6 2003

Department of Energy
Bonneville Power Administration
Attn. Mr. Lou Driessen, Project Manager
905 N.E.11th Avenue
P.O. Box 3621
Portland, OR 97208-3621

Re: Supplemental Draft EIS Comments on the Proposed Kangley-Echo Lake Transmission Project

Dear Mr. Driessen:

This comment letter is submitted in response to request for comments for the Kangley-Echo Lake Transmission Project Supplemental Draft EIS (SDEIS). I feel that although this NEPA document is better than the Draft EIS it still fails to disclose and describe impacts consistent with 42 USC Section 4321. The description of impacts must be described within adequate "context and intensity". Intensity depends on the magnitude and duration of an impact. In this case, the impacts relating to property values, surface water, views, geology and soils, wetlands, and fish and wildlife impacts have not been adequately described. A description of low, moderate, and high does not meet the requirements of NEPA as follows.

Sec. 1502.16 Environmental consequences.

1529-001 This section forms the scientific and analytic basis for the comparisons under Sec. 1502.14. It shall consolidate the discussions of those elements required by sections 102(2)(C)(i), (ii), (iv), and (v) of NEPA which are within the scope of the statement and as much of section 102(2)(C)(iii) as is necessary to support the comparisons. The discussion will include the environmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented. This section should not duplicate discussions in Sec. 1502.14. It shall include discussions of:

(a) Direct effects and their significance (emphasis added) (Sec. 1508.8).

(b) Indirect effects and their significance (emphasis added) (Sec. 1508.8).

(c) Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned. (See Sec. 1506.2(d).)

(d) The environmental effects of alternatives including the proposed action. The comparisons under Sec. 1502.14 will be based on this discussion.

1529-001 Most of these two comments quote the regulations, and as such we note the references. Concerning the listed categories of impacts, BPA believes each category referenced above has been adequately described in the EIS. BPA agrees that the proposed project and its associated management practices could have potentially significant impacts. That is why we immediately proceeded to produce an EIS rather than an Environmental Assessment. However, we believe the preferred alternative, and its associated mitigation and best management practices mitigate those potentially significant impacts to a level below the level of significance with the exception of impacts to forested wetlands due to right-of-way clearing and to the visual resource. In fact, we believe the proposed project represents an environmental net benefit to the CRW, and to the public. We disagree that it is improper to use relative terms such as "low, medium or high" to discuss the nature of the impacts. We believe making these assessments helps the public and decision-maker to be better informed concerning the nature of the various impacts upon the environment.

1529-002 The property owners along all proposed transmission lines outside the watershed hired an expert economist, Greg Easton of Property Counselors to review the BPA previous analysis contained in your Draft EIS. We also since have had numerous discussions with appraisers and realtors in King County that totally dispute your SDEIS conclusion that there would be low to moderate long-term impacts to property values expected (see Chapter 4 SDEIS). Alternative C, in particular, would displace 30 to 35 homes whereas Alternative A (Preferred Alternative) would displace two. Thirty to thirty-five homes in the Hobart area is a significant percentage of the entire community and hence the document should disclose there would be a significant adverse impact.

1529-003

1529-004 By using the rating of low, moderate, high based on the population of the area, or number of dwelling units the transmission lines would benefit understates the impacts. Again, the impacts must be described in context with the impacts and not what area is benefited (i.e., Seattle Metro area). For this reason, we are requesting that you re-analyze your impact analysis based on the affected environment it is affecting and not the entire Seattle Metro area.

1529-005 Please let us know if we can be of further assistance. If you have any questions, feel free to contact me at (425) 391-4700. Thank-you for your consideration in this matter.

Sincerely,

Carol A. Beck, J.D.
Environmental Consultant and Hobart Resident

Cc: Senator Maria Cantwell
Dino Rossi, State Senator, 5th Legislative District
Glenn Anderson, State Representative, 5th Legislative District
Cheryl Pflug, State Representative
Ron Sims, King County Executive
David Irons, King County Council
Larry Phillips, King County Council
Ava Frisinger, Mayor, City of Issaquah

1529-002 and -003 The SDEIS, Section 4.1, Land Use Impacts, identifies a high impact for Alternative C, where approximately 30 to 35 homes would be displaced. Alternative A has a high impact since up to 25 homes would be displaced. Alternative 1, the preferred alternative has a moderate impact, potentially displacing 2 homes.

1529-004 and -005 Several factors are considered in determining the impacts to properties including environmental and socioeconomic. Some of the socioeconomic impacts must be generalized until specific appraisals are conducted on the impacted properties. Also see 1484-008 and 1484-009.

Kuehn, Ginny - DM-7

RECEIVED BY ... PUBLIC INVOLVEMENT
LOG#: KELT-1530
RECEIPT DATE: MAR 0 6 2003

From: Don Parks [dlparks@jps.net]
Sent: Thursday, March 06, 2003 10:08 AM
To: comment@bpa.gov
Subject: Raging Cedar Powerline

Lou Driessen,

1530-001 We are very concerned about the proposal for running the Raging Cedar Powerline extension thru the Cedar
1530-002 River Watershed. It is not clear that conservation or other electrical grid revisions have been adequately pursued
1530-003 prior to making this proposal. If the powerline does penetrate the Watershed, the impacts must be mitigated with the acquisition of low elevation forest lands. The BPA must purchase such lands with their own funding. Any mitigation package must include Plum Creek Section 25 near the Cedar River and lands near Washington Highway 18 in the Raging River.

1530-004 If the project proceeds, construct no new roads. Ensure the maximum protection of riparian areas. Minimize the
1530-005 width of any new corridors of disturbance.

1529-006 Look for other alternatives than the construction of a new powerline. This is not a very responsible proposal.

Don Parks
Linda Parks
3127 181st Ave NE
Redmond, WA 98052

1530-001, 002, -003, -004, -005 and -006 BPA thoroughly examined a number of alternatives, including conservation and changes to the grid (see Section 2.2 of the SDEIS). Please see response to Comments 1415-003, -004, and 005. BPA would need to construct some new short spur roads to get to the new tower sites from existing roads. In addition, BPA would build new road segments to replace existing roads that proceed through wetlands. BPA and an independent contractor have looked at other non-transmission alternatives, as described in the SDEIS, and have determined they do not meet BPA or the region's needs. Non-transmission alternatives would only delay the need for the project by about 2-3 years. BPA thoroughly examined a number of alternatives, including conservation and changes to the grid (see Section 2.2 of the SDEIS).

Public Meetings

ORIGINAL

COMMENTS TO
KANGLEY-ECHO LAKE TRANSMISSION LINE PROJECT
Monday Meeting, February 3, 2003

PUBLIC INVOLVEMENT
RECEIPT DATE:
FEB 0 3 2003

Mount Si Senior Center
North Bend, Washington

Reported by: Betsy E. Decater, RPR
License No. 601-835-443

MR. RICHARD BONEWITS: I'd like to make a comment. I assure you I haven't read those five documents. That's one comment. And the second one is that I have downloaded the summary and gone through the summary with a fairly fine comb. And since you are going to be -- I'm not sure that the path is clear for you from here on, having, as I told you earlier, listened to some of my associates in other venues who may have some other things to say to you tomorrow or later. I would suggest that you put together a chart that shows the alternatives, something similar to what you did in the previous Environmental Impact Statement, the one that you showed us and ran through last year.

1420-001-001 At the back of that was a table of four or five charts, and I'm not suggesting that you take the time to try to put all the data that you put in those charts, but something that was rather simple that says that here are basically the alternatives, our preferred route and here are the other four, and maybe three or four bullets under each of those elements which address both the environmental impacts, the people impacts, the cost impact, and the mitigation.

1420-001-002 And when I have written to you or our group has written to you time and time again, we keep asking you to consider mitigation in terms -- in terms of what I call environmental or ecological equivalence and which is --

2

1420-001-001 Table 2-3 of the SDEIS summarizes the impacts and costs of the alternatives considered.

1420-001-002 BPA is concerned about mitigating environmental impacts whether inside or outside the CRW. Inside the CRW the issues are contaminating the drinking water for the city of Seattle and surrounding communities that also use the Cedar River Watershed for their supply and the impacts to the established Habitat Conservation Plan. As a result, BPA is proposing to use extensive best management practices and use special engineering techniques and construction practices to minimize impacts to the drinking water. BPA is also looking at purchasing lands to compensate for the lands that would be changed in character within the CRW and its HCP. BPA is also committed to minimizing impacts to the environment outside the CRW including the drinking water (likely wells) to individual residences and potential impacts to the creeks and rivers where low-growing vegetation would be left. BPA would use conventional designs and construction methods while also implementing best management practices to those areas outside of the CRW including those areas outside the CRW on the preferred alternative. BPA can minimize impacts to the environment to those properties outside the CRW by implementing conventional best management practices and conventional designs and construction techniques.

1420-001-002

correctly, which is to say, if you -- and this is a little bit of the conversation I had with you earlier, that if you were to offer the same mitigation on routes A, C, B, or D that you're offering for your preferred route, I'm certain that your costs for routes A, B, C and D would quadruple probably from where they are.

And I know you don't have time to get those numbers and I don't think -- and I know it isn't necessary to go to the extent of detailing those numbers, but if you did go to the extent to put a number out there, if you would just put a qualitative judgment on each of the numbers you have that says, here, here's what we put in the study as one figure, but if we had to do the same equivalent kind of things, then I think that would be useful. There's another chart --

MS. DIANE ADAMS: Let me stop you right there. Gene, do you want to respond?

MR. GENE LYNARD: What you're asking for is to compare apples with apples, and we don't have all of the apples. We have the apples for the preferred. We have a good handle on what the mitigation cost is for that. The different types of mitigation we're talking about here mostly is compensatory mitigation, and we don't know what that mitigation -- those mitigation measures come from the regulatory agencies, Corps of Engineers, King County, State

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Department of Ecology, and the other alternatives other than the preferred action, we have not designed those.

1420-001-002 MR. RICHARD BONEWITS: But you put numbers out there, cost figures, and I think you can easily extrapolate from the numbers you put out there that, hey, based on when we did this for the preferred route, the cost went up by a factor of two, you know. Would you understand what I'm saying?

MR. GENE LYNARD: Oh, I do. I think that's an excellent comment.

1420-001-002 MR. RICHARD BONEWITS: And apply that same logic to the other four, these numbers would be even higher. So it makes the case more strongly that you have chosen the right route by all measures on that account.

MS. DIANE ADAMS: So, Gene, is there a way that you can address that at this point?

MR. LANDER: Oh, yeah, we will address all comments in the final EIS, and that is an excellent comment.

MS. DIANE ADAMS: Super. We've captured that comment, then. Thank you. Any other questions from anybody else? And then we'll go back to Mr. Bonewits.

1420-002-001 MR. MARK STAR: I go by the name of Mark Star. I am a retired corporate pilot. I did spend 15 of my last 25 years of flying with power companies like Puget Sound Energy and so on, so I know a little bit about flying

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1420-001-002 The cost figures in the SDEIS include the best management practices anticipated for each route, using special design and construction techniques inside the Cedar River and Kent watersheds and conventional designs and construction techniques for those areas outside of the watersheds including those areas outside the watershed for the preferred alternative. The cost for each alternative also includes costs to process potential condemnation cases and to work with a great many more landowners and on some options, the removal of many homes. As noted in the SDEIS, the costs are greater for those alternatives outside of the CRW.

1420-002-001 In Alternative B, the existing double-circuit 345-kV line is replaced with a double-circuit 500-kV line. To meet the need, a 500-kV line is required. Unfortunately, it is not feasible to modify the existing line to add a 500-kV circuit on the other side. The existing structures are simply not designed to carry a 500-kV line. The only feasible approach is to tear down the existing line and replace it with double-circuit 500-kV, operating one side at 500-kV and the other at 345-kV.

power lines. But what really kind of bothers me a little bit, being a Depression kid, is the tearing down of a line bothers me.

1420-002-001 Isn't there any way in this overall program that that line up there with only power lines hanging on one side and the other side is vacant, to save that line or to use it in some manner?

MS. IVY TYSON: I can address that. We built that line as a 345 kV line and then that technology became kind of obsolete, so Bonneville doesn't build 345 kV lines anymore. We build 500 kV lines in replacement. The existing towers would not support putting a 500 kV line on them because of the strength of them and because of how much clearance they have from the line to the steel and issues like that.

So in order to upgrade it, we would have to tear it down and rebuild it. Did that answer your question?

MR. MARK STARR: Well, mostly. I'm sure you know a lot more about this than I do, but the very fact of just tearing it down bothers me. It's like building a new school and then 12 years later somebody wants to tear it

1420-002-001 down and build another new school. And I'm just fishing around to see if there isn't some way in the overall program of distributing power lines in the Northwest that that line can be saved, whether you give it to Puget Sound Energy or

5

1420-002-001

you do something with it to keep it.

MS. IVY TYSON: Right. Well, one of our alternatives is to keep it and build another parallel line to it.

MR. MARK STARR: And it would keep the line that has just one power line on it?

MS. IVY TYSON: Right. So, I mean, we have two alternatives: One is to tear it down and rebuild it, and one is to build a power line to it.

MR. MARK STARR: Well, that makes me feel better already.

MR. GENE LYNARD: And also that line is about 50 years old, too.

MR. MARK STARR: Well, I may be, too, and I'm built out of this stuff, and that stuff's built out of steel. It ought to last a hell of a long way yet. Gene, I'm just joking.

1420-002-002

The second comment I would like to make would be a lifesaver. To those of us that have had a lot of experience flying power lines, and I've flown a lot of power lines, the more of those bright bulbs you put up there, and they must be rather expensive compared to even putting a meeting on like this, the easier it is for us to see, particularly in inclement whether and so on when, oops, there's a power line, particularly that what I call a ground

6

1420-002-002 BPA will work with the FAA to determine spans that need to be marked for safety.

wire ^ ck, that big single line that's way up on top.

Because some pilots coming by there, they might not be that well acquainted with the line, will see maybe three or four, whatever they are, great big power lines sagging across the valley and they think that if they go over those big lines that are sagging across the valley that they're in the clear, but they're not, there's that line that you have going across there.

1420-002-002 And a very good friend of mine in Kittitas County ran into that line on May 18th, 1980, the same day the mountain blew its top, he ran into that high line up there and flipped his airplane over and killed him. And I'm speaking not just on his behalf, he was a very good friend of mine, but this has happened to a number of pilots that have hit lines. And those balls aren't all that expensive, and then we can say to Puget, let them know Bonneville Power has balls.

MS. IVY TYSON: Well, we always work with the FAA to mark the lines.

MR. MARK STARR: Well, yeah. I mean, beyond the FAA in an area of common sense. I've been around the FAA a lot, but beyond that, the lines up there, it is hard

1420-002-002 to see. Put on some goggles sometime when you're out crop-dusting like he was and try to see that line. It's hard to see.

7

1420-002-002 BPA will work with the FAA to determine spans that need to be marked for safety.

MS. DIANE ADAMS: Thank you. Mr. Bonewits, thank you for being so patient.

MR. RICHARD BONEWITS: Well, that's fine. I'm training for tonight. We're going to have a very controversial subject tonight, Critical Areas Ordinance, Sensitive Areas Ordinance to you, and be glad that you work for the federal government and not the private citizen of King County, because mitigation would really be expensive if you had to comply with it in every detail.

1420-001-003 But this point has to do with I want to ask the engineer or the planner, as they make their presentation tomorrow at the following meeting, to really stress the point of the relationship in terms of the year-over-year demand growth versus conservation.

You've made that in the past, and I know we're a small group and we're very informal here today, but that question needs to be answered before its asked for most people. It will just save you a lot of time. And if my recollection is right, what you've told us before suggests that we are such voracious hogs of power that our year-over-year demand growth is ten times, at least ten times larger than what we save in conservation. And if that's a true statement, you ought to say it. One of you ought to just say it.

8

1420-001-003 To the extent that consumers are applying demand side management (DSM) (conservation) measures, or the retail utility is sponsoring DSM programs, those effects have been incorporated into the electric demand forecast. In the examination of non-transmission alternatives, the consultants found, "The range of 412,000 MWh to 1,500,000 MWh of required energy reduction is high compared to the level of annual growth in the Puget Sound Area of approximately 1,000,000 MWh. The DSM programs would need to reduce energy each year from half to one and a half times the annual energy growth." See Appendix J, Section 6.4 and the response to Comment 1422-005-001.

MS. DIANE ADAMS: Why don't we go ahead and move into the formal comment period now, and we have two speakers signed up, Mr. Jon Zak and Mr. Richard Bonewits.

MR. RICHARD BONEWITS: Thank you. My name is Richard Bonewits. I'm chairman of the Greater Maple Valley Area Council. We serve as citizens advocates for the unincorporated portion of Tahoma School District. It means not including the City of Maple Valley. There are about 14,500 in the service area.

1420-003-001 Comment noted.

First I want to summarize. BPA has studied the issue of where to put another 500 kV transmission line to serve the Puget Sound region three times over the past three years, and three times they concluded that it should be through the Seattle Watershed because it is the shortest, least costly, does the least environmental damage, affects the fewest people and preserve their other existing routes. And this is one of the answers to one of your questions, part of the reason for leaving one of those other lines vacant or not touching it at this time around, it still gave them a little bit more growth for the future in case they missed their estimate.

1420-003-001 Comment noted.

But I've checked their estimate against the National Power Consumption, and their estimate is within -- he said 2 percent. The annual growth rate that's allowed is

normally a percent and a half to three, and you can find that at the Department of Energy report that comes out periodically.

1420-003-001 These three studies ought to be enough to convince people that the route through this watershed is the best route, but don't count on it. Citizens in this community need to stand up and speak in behalf of BPA's tentative decision to help ensure that when this line is built and energized it really is in the watershed. And I know we don't have many people here from North Bend today, and I was hoping to see a few more from this region or from Kittitas County, because I'm encouraging every one of you to come downtown to Seattle tomorrow and join us. We're going to be there.

1420-003-002 BPA has provided the technical detail, the supporting analysis in the SDEIS that they briefly reviewed with you. This line is needed to meet the region's power and way above the conservation savings that we have been touted so loudly by the politicians and the various people in Seattle and other places. Conservation is useful, but it does not offset our voracious appetite for electrical energy. Year-over-year energy demand exceeds conservation.

1420-003-003 Others following me will show you, not so much today, because so far Jon is the only one that came to follow me, but tomorrow we're going to expect to show you

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1420-003-002 Comment noted.

1420-003-003, -004, and -005 Comment noted.

1420-003-003

1420-003-004

1420-003-005

1420-003-007

1420-003-008

again the differences between land stewardship by the City of Seattle and people that live in the rural area, and you'll find that we compare very favorably with the City of Seattle in their stewardship of their wonderful watershed. We know they're doing a good job, but they just recently started it. They got into it because they anticipated being caught short by the Endangered Species Act and were urged to put that plan together about seven years ago.

And I'm proud that they did it, but damn well I want them to finish it up, get rid of all the 650 miles of roads in the watershed. It's many times more than the lines that you're planning to use. Others will describe the impacts tomorrow if this line is built outside the watershed. We'll also show you that the rural residents have done a better job at stewardship. And I want you to know that in our team we have over 1500 people that signed petitions that went to Bonneville last year and in four groups, roughly four to five groups, mainly two large ones, the one that I really act as the leader of and another group that thought that they were better off fighting the battle by themselves, but there were two others that joined us, and we were joined by the mayors of Issaquah, Maple Valley, the Covington City manager, and they all have written letters to Bonneville supporting the route through the watershed and irate about putting it anywhere else.

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1420-003-007 and -008 Comment noted.

1420-003-009

In addition to that, since Janette's here today and she works for King County council member David Irons, and he has been with us from day one, your King County councilman from this district. We have U.S. Representative Jennifer Dunn with us on this in our position, two state representatives, Glenn Anderson, Cheryl Pflug, and the members of the King County staff of Maria Cantwell. It took a while, but we got them. So I'm asking everybody here to stand up today and give your comments. Jon, you're next.

1420-003-008 Comment noted.

1420-004-001

MR. JON ZAK: My name is Jon Zak, and I live on two and a half acres in a development of about a hundred homes in Maple Valley. Our eastern property boundary will be the centerline of the proposed transmission line

1420-004-002

right-of-way line for Alternative C and we would lose the trees on one-quarter of our property. These trees are in a Native Growth Protection area. These trees range in size from two and a half to five foot in diameter breast height above the ground.

1420-004-003

Alternative C would completely destroy our privacy and our view of the trees in our backyard. It would

1420-004-004

destroy our experience of living in nature. This was the reason we bought this property. As part of Habitat Conservation Plan, the map was prepared showing the age of

1420-004-001 and -002 Comment noted.

1420-004-003, -004, and -005 Comment noted.

1420-004-004
1420-004-005
1420-004-006
1420-004-006

trees in the watershed. On BPA's preferred alternative route, the age of the trees is 10 to 30 years. The trees in my property in the Native Growth Protection zone make the trees in the watershed look like toothpicks.

I'd like to talk about what Seattle calls the pristine watershed and a legacy for the future. The watershed has been decimated by logging for about a hundred years. There are over 600 miles of gravel logging rods in the watershed. I would like to show you some pictures now. This is a picture taken from McClellan's Bute looking down into the watershed.

MR. RICHARD BONEWITS: Jon didn't explain that he's a mountain climber.

MR. JON ZAK: McClellan's Bute, you can see that as you're driving up I-90. There's another picture and you can see the cut and the erosion around that road. Another picture, just some of the logging roads. This was taken in June, so there's still a little bit of snow.

And there's Chester Morris Lake. You can see all the second- and third-growth trees. And this is a view of our backyard, so this is in an area that would have to be cut because these trees are endangering the power lines. And this is another view of our backyard.

MS. DIANE ADAMS: Jon, when did you take those pictures?

13

1420-004-006 Comment noted.

1420-004-006

MR. JON ZAK: Last June of 2002. And I've got some more pictures taken off the Seattle Public Utilities website. They didn't have enough pixels, so I couldn't blow them up, but this shows some road construction. And, you know, I don't think that heavy equipment is using vegetable oil.

MR. RICHARD BONEWITS: We didn't see any helicopters there either.

MR. JON ZAK: Here's a picture of Chester Morris Lake, and you can see they separated the good water from the bad water with that boom. And you can see more heavy equipment, you know, construction workers right around the lake shore. Some more heavy equipment building the road. And then here's showing some erosion on an existing logging road. That's it with the pictures.

1420-004-006

Pictures of the construction in the watershed by Seattle Public Utilities proves their hypocrisy. Seattle Public Utilities has one standard for themselves and another one for the BPA. I believe conservation organizations should be spending their time and efforts on something more critical than the Cedar River Watershed. How about George Bush's proposal for cutting trees in national forests to prevent fires? How about all of the clear-cutting on the Raging River Watershed just north of Tiger Summit along Highway 18? Activities like the

1420-004-006 Comment noted.

1420-004-006 passage of the Wild Sky Wilderness Bill and the addition of the Alpine Lakes Wilderness Area are far more important than a watershed that is off limits to the public.

1420-004-007 I would like Seattle Public Utilities to answer these four questions:

Number one: Where is the evidence that BPA has caused any harm to water quality or watershed operation in its 30 years of operating a power line in the watershed?

1420-004-008 Question two: What evidence does Seattle have that clearing an additional 91 acres for a second power line is more damaging to water quality than failure to impressively replant the 600 miles of logging roads already in the watershed?

1420-004-009 I did a calculation of the acreage of all the logging roads in the watershed. The total road acreage is over 2600 acres. An additional 91 acres for a second power line is only three and a half percent of the acreage of the logging that's already in existence, and this does not even include any acreage for existing clear-cuts.

1420-004-010 Question three: When is Seattle going to acknowledge to the public that it was ordered to develop an extensive water treatment system as the result of pathogen problems in 1992, part of those plans included the development and design of a water filtration facility?

1420-004-011 And the final question, number four:

1420-004-012 1420-004-007 Comment noted.

1420-004-013 1420-004-008 Comment noted.

1420-004-014 1420-004-009 Comment noted.

1420-004-010 Comment noted.

1420-004-011 Comment noted.

1420-004-012 Comment noted.

1420-004-013 Comment noted.

1420-004-014 Clearing 91 acres for a second power line would require one-tenth of one percent of the watershed's total acreage of 90,240. How can this small an amount of clearing have any impact on water quality?

1420-004-015 The Habitat Conservation Plan is a great idea. Too bad the Habitat Conservation Plan was not an idea in the City of Seattle. The City was forced to create a Habitat Conservation Plan to meet the requirements of the Endangered Species Act. How about the habitat of people living along Alternative C? Is the wildlife habitat inside the watershed more important for both wildlife and humans outside the watershed? The people who lose their property will be paying a price for Seattle's water. The City of Seattle will destroy the rural communities of Hobart and Ravensdale all due to their unfounded water quality issues. Thank you.

1420-004-016

1420-004-017

1420-004-018

ADDITIONAL WRITTEN COMMENTS:

1420-005-001, 1420-005-002, 1420-005-003, 1420-005-004 On Route B and D, Camp Waskowitz, owned by Highland Public District, has received historic status. Concerned that B and D will affect it. Why does the watershed get more preference than the camp? Kids?

1420-006-001 You have done the study three times and were

1420-004-014 Comment noted.

1420-004-015 Comment noted.

1420-004-016 Comment noted.

1420-004-017 Comment noted.

1420-004-018 Comment noted.

1420-005-001, -002, -003, and -004 The Camp North Bend (or Camp Waskowitz) Historic District was listed in the National Register of Historic Places and the Washington Heritage Register in 1993. Its area of significance is identified as "Conservation." Construction of Project Alternatives B or D would have an adverse effect on the district by adding to the land use, noise, and visual impacts that accompany the existing line. If one of these alternatives were selected, BPA would work with the State Historic Preservation Officer to take into consideration the impact and develop mitigation measures or otherwise resolve the adverse effect.

correct each time!

1420-007-001 Hang plenty of bright balls on all of your power lines, including high, hard to see ground wire, so pilots can see them easily. Retired corporate pilot with power company, oil lines, gas lines, etc. Thanks.

1420-008-001 I purchased my 5-acre piece in Hobart area based on BPA letter that you were dropping Alt. C from further consideration. Now I can't sell until I get an answer regarding.

1420-009-001 Concerned whether I would be compensated fairly for loss to market property value if an easement had to be acquired across my property. (Compensated for difference in property value due to the power line.) 1420-009-002

1420-010-001 Landowners that want to sell their properties are left in a position that until the Record of Decision comes out - may not be able to sell their properties.

1420-010-001 Is there anything that could delay the Record of Decision beyond August?

17

1420-006-001 Comment noted.

1420-007-001 BPA will work with the FAA to determine spans that need to be marked for safety.

1420-008-001 After BPA released a draft environmental impact statement in June 2001, BPA was asked and agreed to analyze in greater detail alternatives outside of the watershed, and to look at non-construction alternatives. BPA has conducted this additional analysis and concluded that Alternative 1 is still the preferred transmission line route. The final decision will be made by BPA's Administrator in a Record of Decision, scheduled for August 2003. People on the project mailing list will be sent notice of the decision.

1420-009-001 and -002 Please refer to the SDEIS, Section 4.11.2.5, Community Values and Concerns, Property Value Impact. King County was included in the study. If an easement is acquired across your property, BPA's offer would be based on a professional real estate appraisal.

1420-010-001 See response to Comment 1389-001.

1420-010-001 There are multiple things that could delay the Record of Decision, such as BPA choosing a different alternative other than the current preferred alternative, new information obtained from the comment period for the SDEIS that would result in more studies, drastic changes in BPA's economic health, a sudden downturn in anticipated load growth beyond currently anticipated, and many other unforeseen items. BPA is committed to use its best efforts to have a Record of Decision in August 2003.

1420-011-001
1420-011-002

Any concern about EMF contaminating the water quality?

1420-012-001

What is the age of the trees that would be taken in proposed right-of-way?

1420-013-001

What is cost of proposed in relation to other alternatives?

1420-014-001

The BPA plan is to double-circuit the line crossing the Cedar River in the Preferred Alt. Why not double-circuit the whole 5-mile route through the CRW?

18

1420-011-001 and -002 EMF has no impact on water quality. Water passing through magnetic or electric fields is no different from "unexposed" water.

1420-012-001 The trees that would be removed from the right-of-way for the preferred route vary in age from young plantations to stands that have trees upwards to 80 years of age.

1420-013-001 Please see Chapter 2 of the SDEIS for the costs of each alternative. See also Table 2-3.

1420-014-001 See response to Comment 1421-039-002.

CERTIFICATE

STATE OF WASHINGTON)
)
COUNTY OF KING)

I, BETSY DECATER, a Certified Shorthand Reporter and Notary Public in and for King County, Washington, do hereby certify that I reported in machine shorthand the above-captioned proceedings; that the foregoing transcript was prepared under my personal supervision and constitutes a true record of the proceedings.

I further certify that I am not an attorney or counsel of any parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

WITNESS my hand and seal in Sammamish, County of King, State of Washington, this 3rd day of February, 2003.

Notary Public in and for the
State of Washington, residing
at Sammamish

My commission expires 03-20-06

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ORIGINAL

COMMENTS TO
KANGLEY-ECHO LAKE TRANSMISSION LINE PROJECT
Tuesday Meeting, February 4, 2003

KELI-1421
FEB 0 5 2003

Seattle Center, Rainier Room
Seattle, Washington

Reported by: Betsy E. Decater, RPR
License No. 601-835-443

HANDWRITTEN COMMENTS:

1421-001-001 1421-001-002 I have a power line that goes through my property (Alt. A). We have enough problems already - I don't want a new line with higher K.V. (500-kV).

1421-002-001 1421-002-002 I have a concern about the additional "noise" as well as potential health issues. "Scary in a family neighborhood."

1421-003-001 1421-003-002 I object to taller towers due to the negative visual effect.

1421-004-001 1421-004-002 1421-004-003 1421-004-004 1421-004-005 1421-004-006 I object to a power line that is an alt (B or D) through homeowner properties that in essence would condemn my property, produce a 375 kV and double line 500 kV new line. Not only is this a health risk, noise pollution, equity issue and visual issue, and presently has eliminated my option to sell property until this issue is decided - (disclosure real estate issue) with potential lawsuits.

1421-005-001 People's issues are taking a backseat to wildlife issues!

1421-006-001 The CRW is in noncompliance with federal regulations

2

1421-001-001 and -002 Comment noted.

1421-002-001 and -002 Comment noted. Please see Section 4.13 of the SDEIS for information about noise impacts.

1421-003-001 and -002 Comment noted.

1421-004-001 and -002 Comment noted.

1421-004-003, -004, -005, and -006 See response to Comment 1389-001.

1421-005-001 BPA is conducting the environmental review on the proposed project on the human environment. The human environment includes both the social environment and the natural environment. The social environment includes such resources areas as land use, recreation, transportation, socioeconomics, noise, public health and safety, aesthetics, and cultural resources. Before BPA makes a decision on locating any of its major transmission facilities it looks at all environmental impacts, costs and how the alternative would affect the transmission system. Natural resources, including wildlife, are not favored over social resources in BPA's decision-making.

1421-006-001 Comment noted.

1421-006-002 requiring filtration systems. "Surface Water Treatment Rule" (refer to federal standards for drinking water)

1421-007-001 The CRW knew the filtration requirements in 1996. The Toll River filtration was completed in 2000 by Seattle Public Utilities. The CRW is using the BPA project, using political pull to have BPA pay for this filtration system.

1421-008-001 The new RIW would occupy an area equal to one-tenth of one percent of the CRW - (141 Square miles). Seems like a "minor" impact! Alts B and D would impact much greater area.

1421-009-001 1421-009-002 Selling a property with power lines, increasing tower height, higher voltage, additional lines, potentially makes my property unsalable.

1421-010-001 I've hade to put improvements to my property on hold until I know which route you'll build. As a result, the original estimate for my improvements has risen by 37%, while I've been on hold!! I can't write any of this off on my taxes - it's my loss due to your project.

1421-011-001 If BPA is concerned about people, why not design towers that are aesthetically pleasing rather than a

3

1421-006-002 Comment noted.

1421-007-001 Comment noted.

1421-008-001 Comment noted.

1421-009-001 and -002 See response to Comments 1420-009-001 and -002.

1421-010-001 See response to Comment 1389-001.

1421-011-001 BPA's primary concerns when designing our towers are strength and safety. Aesthetics is difficult to quantify. Some find our towers aesthetically pleasing, others do not.

negative visual impact?

1421-012-001 1421-012-002 1421-012-003 1421-012-004 1421-012-005 1421-012-006

This is all political for CRW and Sierra Club. I agree underground transmission lines would be the best way to go. I realize it's cost prohibitive. Then why force the line across other alternatives when human beings are impacted - financially, aesthetically, noise pollution, everything!

1421-013-001 1421-013-002

I live along Alt. B/D, served by the Sallal Watershed. Will you enforce the same mitigation measures (i.e., helicopter logging, micropyles, etc.) to protect this watershed?

1421-014-001

The Rocky Reach No. 5 line is directly over the electric box (generator) which delivers water to Mt. Si and Sallal homesites (Alt. B-D).

1421-015-001 1421-015-002

CRW's mission statement is in support of "people" and the environment/ecology. The Sierra Club supports CRW's mission statement. To achieve the mission statement, the Sierra Club is willing to use "aggressive grass roots action on an unprecedented scale to influence public policy." (See their website.) If they are in support of people, then why put people at risk? We the people along alternatives along

4

1421-012-001 and -002 Comment noted.

1421-012-003, -004, -005, and -006 Comment noted.

1421-013-001 and -002 BPA may use helicopter construction for alternatives outside the Cedar River Watershed and the watershed belonging to the city of Kent. Helicopter construction would be an option for the contractor who would determine if it would be economical to use a helicopter as compared to constructing roads and crane pads such that erosion would be kept to a minimum. BPA is committed to using the most efficient method of construction while minimizing erosion. In the Cedar River Watershed the issue is also associated with Seattle needing to build a $105 million turbidity filtration plant if BPA's project were to trigger a massive erosion event. No such concern about a filtration plant exists outside the CRW.

1421-014-001 Comment noted.

1421-015-001 and -002 Comment noted.

1421-015-002 the watershed don't have the empowerment to fight at the same levels.

1421-016-001 There's already an existing power line across the CRW. They report the water quality is outstanding - so do they

1421-016-002 have any studies or monitoring data to show that the power lines have caused sediment-turbidity of particles, erosion,

1421-016-003 contamination. How bad is it now? These structures don't have micropyles - weren't constructed with helicopters!!

1421-017-001 Commercial logging is banned in the watershed. Any

1421-017-002 money from timber cut in the watershed should go to restoration of the watershed to be conducted by the City.

1421-018-001 I believe you have addressed "all" of CRW's issues (helicopter logging, mitigation, plant replacement, etc.) The letters made it sound as if you have agreed to pay for the filtration system if needed. Is this true? Your letter

1421-018-002 states, "If BPA decides to build the line, we would mitigate for any impacts to the watershed to ensure a safe drinking water supply for the Seattle area."

1421-019-001 How close can homes be to the edge of the R/W?

1421-020-001 The DEIS does not identify the specific locations of

5

1421-016-001, -002, and -003 You are correct. The current water quality in the CRW is good.

1421-017-001 and -002 Comment noted. If BPA were to decide to construct the project through the Cedar River Municipal Watershed, it would purchase the land rights from Seattle Public Utilities, who own title to the CRMW. The disposition of any monies that would be obtained by SPU for the timber that would be removed to construct the line would be up to SPU, not BPA.

1421-018-001 and -002 BPA has not committed to purchasing a filtration plant. BPA has agreed to purchase insurance that could pay for a filtration plant in the event the project causes Seattle to need to construct such a filtration plant by order of the Department of Health. BPA is committed to safe guard Seattle's drinking water with multiple mitigation measures that would reduce or eliminate erosion.

1421-019-001 BPA's transmission line easements do not allow structures within the right-of-way. BPA does not control location of structures outside of its right-of-way.

1421-020-001 BPA has no information on where the staging area(s) would be located at this time. The selection of staging areas would be at the discretion of the contractor and would be approved by the landowner. No staging areas would be in the Cedar River Watershed.

1421-020-001 the staging areas - this makes the alternatives difficult to evaluate. You should at least have some alternatives for locations of staging areas.

1421-021-001 The way you've numbered/identified your alternatives is very confusing, 1, 2, 3, 4, A, B, C, D - you should have started over when you added alternatives.

1421-022-001 Mitigation lands not specifically defined.

1420-023-001 Double circuit over Cedar River but not over Raging River.

1421-024-001 Specific properties proposed as mitigation are not enough. Specific properties need to include properties along Raging River.

1421-025-001 Land mitigations need to be paid for by BPA.

1421-026-001 How do you mitigate for TV interference?

1421-027-001 If you put taller double circuit towers on each side

1421-027-002 of the Cedar River - you could allow the vegetation to grow taller near the Cedar than you would otherwise allow.

6

1421-021-001 BPA used numbers (1, 2, 3, and 4) to represent alternatives being considered in the Cedar River Municipal Watershed and letters (A, B, C and D) to represent alternatives being considered outside of the watershed. Since this labeling was used in the draft environmental impact statement (DEIS), BPA decided to continue to use it for the SDEIS.

1421-022-001 Please see response to Comment 340-002.

1421-023-001 Comment noted.

1421-024-001 See response to Comments 1415-003 and -004.

1421-025-001 See response to Comment 1415-005.

1421-026-001 Interference with television reception can be corrected by any of several approaches: improving the receiving antenna system; installing a remote antenna; installing an antenna for TV stations less vulnerable to interference; connecting to an existing cable system; or installing a translator. BPA has an active program to identify, investigate, and mitigate legitimate complaints.

1421-027-001 and -002 BPA is proposing to use double-circuit towers within the existing ROW on each side of the Cedar River.

1421-028-001
1421-028-002
1421-028-003
1421-028-004

The CRW provides drinking water to the entire City of Seattle and surrounding areas. This affects between 1.5 and 3 million people. These people are not trying to "confiscate" or otherwise impact the people (property owners) who are in potential alternative areas. This is an issue of power needs vs. Environmental/drinking water concerns. This has nothing to do with "property values." To inject the fear of sale value of a property into this issue ignores the basic premise, and is very selfish.

1421-028-001, -002, -003, and -004 Comment noted.

1421-029-001
1421-029-002

The need to conserve energy is very real, and a valid approach for this reason, the nontransmission alternative should be seriously considered. In that light, social policy in regards to commercial advertising in particular needs focus.

1421-029-001, and -002 Comment noted.

7

1421-030-001

OPEN MEETING Q&A:

UNIDENTIFIED MALE SPEAKER: Lou, you mentioned that you're in negotiations with the City, continuing to do that. Can you elaborate on those, what the status of those is and what the issues are there?

MR. LOU DREISSEN: We're -- I think really all I can say at this point is we're still talking with the City and the City's talking with us. And the City is very clear that they don't want this transmission line on their property. So the negotiations center around what kind of mitigation measures can BPA do to cross the watershed, associated particularly with the drinking water, impacts to the drinking water quality, and also with the Habitat Conservation Plan. So we're, like I said, talking, negotiating back and forth with Seattle City with those two large issues.

BPA recognizes that certainly from our standpoint we're trying to build an electrical system that is reliable and safe for the area. We also recognize that drinking water quality certainly is very important to the local citizens, and so it's a very large concern to us to make sure we don't impact the drinking water quality. And also that Seattle and the environmental community went through a large step to create a Habitat Conservation Plan on the

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1421-030-001 BPA is continually meeting with the city of Seattle concerning crossing the CRW with a new transmission line. The City and BPA are in negotiations. The issues for Seattle are impacts the transmission line could cause to their drinking water and to their Habitat Conservation Plan. BPA would implement best management practices to minimize impacts to the drinking water and the HCP. As a result, Seattle has made it clear they do not want the new transmission line to cross their watershed unless considerable mitigation and best management practices are put in place. As described the SDEIS, considerable best management practices for design and construction have already been agreed to. BPA has also purchased 350 acres, and would purchase more lands to help mitigate crossing of the watershed.

watershed, and that's also very important and then trying to find ways to mitigate for the impact that this project may have on that Habitat Conservation Plan.

So we're looking at not only construction mitigation, and certainly you probably heard about some of those already that includes special footing types on the watershed, micropyles, using helicopters to place structures in place as opposed to using a large crane to place, also using helicopters to take some trees out of the area, taking care of how the roads are placed and any new roads that are needed are placed and making sure that there's no erosion coming off the roads. And our best management practices, using silt fences and bales of hey at every disturbed area, if that's necessary. So we'll be studying every disturbed area and determining what needs to take place in those areas. I'm looking at using two double-circuit towers, for instance, for crossing the Cedar River Watershed, or the Cedar River itself, excuse me, in that canyon because, again, we're very concerned about the potential for erosion into the Cedar River because of the drinking water quality aspects and it also happens to be important to the corridor from the wildlife standpoint.

In addition to all that, we're looking at -- certainly BPA's already purchased 350 acres immediately adjacent to and north of the Cedar River as a possibility of

1 turning that over to the City of Seattle for compensation
2 for 90 acres that the right-of-way would take out of the
3 habitat, and we're also -- BPA is also looking at some other
4 properties as a potential, besides that 350 acres, also with
5 the potential of turning those properties over to Seattle.
6 So negotiations are still ongoing, which I think at this
7 point it's been ongoing for quite a while, and I think
8 that's a good sign that we're still talking to each other.
9 Certainly time is of the essence. I think one
10 thing that wasn't mentioned in much detail is that we are
11 looking at starting construction, if possible, and if
12 everything comes to a proper conclusion on the preferred
13 plan, we would like to start construction like in the August
14 time frame on the preferred plan with the energization,
15 completion of the project and energization by the end of
16 this year. As Brian mentioned earlier, BPA still thinks
17 it's important, not really from our standpoint but Seattle's
18 standpoint, King County's standpoint and to some degree also
19 Canada with the Canadian entitlement standpoint, that this
20 project is built and we build back in the reliability that's
21 needed in our system.
22 So the local area, including Seattle, really needs
23 this project. If it were to go to one of the other
24 alternatives, we would probably likely add another two years
25 on our schedule as a minimum because the only alternative

10

we've really -- transmission alternative we've looked at is the preferred plan where we've done detailed survey and engineering work and we're ready to move on that. If we were to turn to one of the other alternatives, we would have to do all of those aspects, all of the detailed design, all of the detailed engineering surveys, certainly some of the environmental surveys will also have to be done on some of those other alternatives.

1421-031-001 MS. CINDY DENSMORE: My first question is with the BC power. You said it was going to go back in 30 years -- I'm a little nervous here -- and that the power that we would have to give back, does that mean that you guys would have to buy power from BC?

MR. BRIAN SILVERSTEIN: No. So the benefits of building these storage dams in Canada in the 1960s is that --

1421-031-001 MS. CINDY DENSMORE: You're using their power, so when you give it back to them, do you have to buy power?

MR. BRIAN SILVERSTEIN: Either it's produced in the existing process or we would have to purchase it?

MS. CINDY DENSMORE: Yeah, you would have to purchase it, that's what I'm asking.

MR. BRIAN SILVERSTEIN: So I can't say specifically what a utility will do to produce that --

1421-01-031 MS. CINDY DENSMORE: So how cost effective is

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1421-031-001 The Canadian Treaty power is produced at dams in the U.S. (See Appendix I.) In an agreement from the 1960s, the Canadians sold their one-half share of the benefits to the United States for 30 years. Those sales are now expiring. Both the Canadian and U.S. utilities have been planning for this eventuality when determining their resource needs. According to published information, British Columbia is approaching load/resource balance, including the return of the Treaty power. U.S. utilities have planned to develop or purchase the power needed to meet the return obligation. British Columbia sells power to California mostly in the spring, summer and fall. During the winter cold weather event that triggers the need for the proposed line, British Columbia would also be seeing increased demands, and would use all of the power to meet their own needs.

1421-031-001

that?

MR. BRIAN SILVERSTEIN: I'm sorry, why don't you go ahead with the question.

1421-031-001

MS. CINDY DENSMORE: Well, I'm just wondering is it -- if you bought the power from BC instead of building this line, and then my other question is that -- I'm nervous -- we also sell energy to California, okay, why can't we -- sorry --

MR. BRIAN SILVERSTEIN: I can try and answer that. Because this is the least cost alternative for the Canadians. They want their power back that's produced in the United States. We have looked at other alternatives to returning the power over the transmission system. We spent more than ten years in discussions with the Canadians and an agreement was signed in 1999 to require the return of that power. That's what they would prefer because it's to their advantage to get the power returned.

1421-031-001

MS. CINDY DENSMORE: But are they going to sell that power to somebody else?

MR. BRIAN SILVERSTEIN: I don't think that's very likely in the wintertime. That's when they need it the most. They're a winter peaking area just like we are.

1421-031-001

MS. CINDY DENSMORE: Well, but for 30 years they have not used this power. Now all of a sudden they're going to use this power?

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MR. BRIAN SILVERSTEIN: I think part of the reason if you look at the forecast of the supply and demand situation in Canada, they are load resource balance, they are approaching load resource balance, so this is the point that they need that power back, that is correct.

MR. LOU DREISSEN: What's happened is the same thing in the Vancouver area, in particular, has happened in the Seattle area. So if you are familiar with King County and how its grown, Vancouver has grown very large also. So they're continuing to add load to their electrical demand. So they're in an similar situation really to what King County is currently. So they want to have the ability to be able to not only to sell power to California like they have or to the Northwest, we bought power from them also, but also to get that power back to them because they really need it in the Vancouver area, just like Brian said, during their winter just like we do in the Northwest.

MR. BRIAN SILVERSTEIN: Typically Northwest utilities both in the United States and Canada will sell to California in the summertime when their demands are peaking because of air-conditioning loads. In the wintertime the power tends to travel north. So there's really no reason to be selling large amounts of power into California in the winter. The direction is the other way when Vancouver and Puget Sound area loads are peaking during the cold weather.

13

1421-032-001

1421-032-002

1421-032-003

1421-032-004

MR. MICHAEL SHANK: Two questions. Lou, you admitted not having done a detailed analysis on all the other alternatives but having done so on the preferred, so my question is why haven't you, as you are kind of legally required to within processes that have been established for years, why haven't you spent the time on the nontransmission alternatives like you have on the watershed?

Secondly, you evaluated the nontransmission alternative under that understanding that you had $25 million, and so how would the $25 million be funneled into and how long would it last under a nontransmission alternative? You're required to explore that alternative not under the understanding that, okay, we're going to write a check to the watershed which is our preferred, how much would that check sustain us for a nontransmission alternative, you're required to check it out not under any kind of price quote which you have done, and I'm wondering -- the two questions: Why haven't you explored in the systems analysis, engineering analysis other alternatives like you did with the watershed? Because you claim all alternatives are on the table, but you just said five minutes later that you're ready to move and by the end of the year you'll be constructing. So there's some inconsistency there. But particularly the 25 million on the nontransmission, why did you use that as kind of a parameter

14

1421-032-001 and -002 BPA thoroughly examined non-transmission alternatives in the SDEIS. Please see Appendix J.

1421-032-003 and -004 The consultant's study examined non-transmission alternatives in terms of feasibility as well as economic effectiveness. In Appendix J, Section 1.2, they find "As illustrated in Figure 1, a 3-year deferral of the line would require 100% of the available load relief from the large aluminum smelter in the area, plus operation of all existing generation not expected to be on-line, plus load relief from 28% of industrial load in the area. To put the 28% industrial participation rate in perspective, we reviewed information from 13 utility DR programs, and found only four with participation rates above 5%." This finding is without regard to cost.

The EIS also considers the economics of each alternative. The $25 million figure was established as a reference to compare non-construction alternatives to the preferred alternative.

1421-032-004

to work within because that actually shouldn't have been there as a parameter.

MR. LOU DREISSEN: I'll try to answer the first one. Maybe Brian can answer the second one. For starters is BPA elected, and it's not required, elected to look at the preferred plan and do a detailed engineering and environmental and survey aspects to that alternative with the hopes, strictly with the hopes that we would be able to finish this project in the time frame that we thought it was needed.

From a legal standpoint, we do not need to do detailed engineering and those kind of aspects on every alternative. We need to do a reasonable search, and we've done that, and most of our search has been associated with what we consider a maximum impact. So we've looked at more than likely what will take place in those other alternatives so that we compare one alternative against another. We have looked at it from a cost standpoint, we've looked at every alternative so we can have a comparative analysis from one alternative to another, and if one of those alternatives were to be chosen, which is usually what BPA does in most of its projects, is that the detailed engineering and detailed survey doesn't happen until after a directed decision because there's a tremendous amount of costs associated with that, there's a lot of time associated with that.

So, again, from a timing standpoint, BPA elected to take the risk to do the detailed engineering and detailed survey studies during the time frame that we were doing the environmental analysis on all the alternatives, recognizing that in the end BPA may end up choosing one of the other alternatives, in which case all of these costs would be subcosts and we would need to do the same kind of an issue on the alternative that actually gets chosen.

So strictly BPA wanted the project -- saw that the project needed to be done within the time frame we're looking at. Actually, originally we were looking at the need for this project to be completed last year, so now we're looking at this year based upon the new load forecast and other aspects and also went back and added additional routes in our environmental process.

MR. BRIAN SILVERSTEIN: To respond to Michael's questions regarding the analysis of the nonconstruction alternatives, there are really two components to the analysis that the experts did for us. The first is a technical feasibility, what does it take to defer the need for a line and is that achievable, and the second is an economic evaluation of comparing that cost against the project.

The chart that I show here, which showed the amount of load reduction that's required for both the

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aluminum smelter and the large industrial loads, and the amount of generation that would need to be on line has no limitation on economics. That's simply a physical need of the system. Okay? And so their evaluation showed, for example, that demand reduction at industrial plants would need to be 28 percent of the load. Regardless of what we pay in the way of incentives, that is a huge, huge participation into band reduction programs. Typical response is on the order of five percent in industrial programs around the country based on their survey.

Now, the second part of the analysis does look at economics, and one of the things that we look at in the analysis is a cost comparison of various alternatives. As the consultants noted, the amount of payments that's available given the projected cost of the project is relatively small on a dollars per kilowatt basis. And even if you doubled or tripled or quadrupled the cost of the project looking at the other wires alternatives, you would get no where near the level of incentive payments that we've seen in other demand response programs around the country.

MR. MICHAEL SHANK: Just a point of clarification of what I was asking to your question, I wasn't recommending that you do similar involvement because I understand there was some contract -- potential contracting bids going out already on the watershed, which is actually undermining the

1421-032-004

1421-033-001

need for process, but I was just more interested in BPA's investment in all possible alternatives. It's obvious that you were invested in the watershed, and I was looking for equal investment distributed among several alternatives, not necessarily engineering and contracting, but just more time investment, money investment.

MR. LOU DREISSEN: Well, I think the fact that we've gone through and opened up our environmental process and come back with a supplemental draft EIS indicates that we're spending a lot of time and effort on all these other alternatives. I think we are looking at those on an equal basis, so we've spent a lot of time. We've hired several environmental consultants to go through those other alternatives to come up with detailed analysis from an environmental impacts perspective. But I think that short of doing the detailed engineering and surveying aspects on the preferred route, they're all being treated equally. We spent an equal amount of time on all of them.

MR. RICHARD CHAMPLIN: You mentioned that you drilled 1,170 holes, or something to that effect, in looking for cultural resources and indicated that perhaps two of them had some that you deemed were insignificant. I was wondering how do you determine whether something is insignificant and is that determination done in concert with the tribes that might be concerned about that?

18

1421-033-001 Cultural resources are evaluated for their eligibility for listing in the National Register of Historic Places. The criteria for eligibility are found in the Code of Federal Regulations, 36 CFR 40.4. BPA requires its cultural resource contractor to prepare determination of eligibility forms, which it then submits to the State Historic Preservation Officer for review. The Tribes receive materials about the cultural resources assessment and determinations of resource eligibility for their review.

MR. GENE LYNARD: We didn't drill the holes. We dug these holes with a shovel, our cultural resource contractor did, and the two items that were found, one was a spike related to the logging industry and the other was a trench, and neither were deemed to have any cultural significance.

1421-034-001 MR. HILLARY LORENZ: During your discussions with the City of Seattle, did they ever talk to you about an operation they called forebay cleaning at the Landsburg Diversion Site?

MR. LOU DREISSEN: No, I have not heard about that.

UNIDENTIFIED MALE SPEAKER: I have two questions, one very brief, this is great, but I have forgotten and it didn't jump out at me, how many -- going through the

1421-035-001 watershed, your preferred alternative, how many acres would be cleared with your additional 150 foot easement?

MR. GENE LYNARD: 91.

UNIDENTIFIED MALE SPEAKER: 91. Second thing, is this is very good, you read the cost of this, cost of that,

1421-035-002 do you guys ever have a piece of paper that says Alternative A, B, C, D and Alternative 1, 2, 3 cost, land clearing and so forth, or am I just missing it?

MR. GENE LYNARD: That's in our EIS Table 2.3. We have a summary table, Table 2.3, summary of impacts from

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1421-034-001 No, they have not. BPA is committed, if the preferred alternative is chosen, to use the extensive best management practices outlined in the SDEIS. BPA recognizes that this project may be held to higher standards than those used by Seattle in the past. BPA is very concerned about the potential impact to Seattle's drinking water.

1421-035-001 Approximately 86 acres would be cleared within the proposed right-of-way. Additional "danger trees" would be taken outside of the right-of-way. Danger trees are any trees that may pose a threat to the safe operation of the line.

1421-035-002 Please see Table 2-3 in the SDEIS which compares the various alternatives.

alternatives, and it's at the very bottom we have the cost for each of the alternatives.

UNIDENTIFIED MALE SPEAKER: Okay. Thank you. I just didn't have that.

MR. GENE LYNARD: And that's on the cd.

MR. CHARLIE RAINES: Good evening. I'm Charlie rains, and I'm speaking on behalf of the Sierra Club. We still have questions about the need for this line but will address those in our written comments. Tonight I'll focus on construction alternatives. BPA has proposed its new power lines through the Cedar River Watershed and the upper Raging River Watershed. The City has just completed their HCP which is protecting the forests of the Cedar River Watershed which is prime habitat for wildlife and drinking water for over a million people.

1421-036-001 and -002 Comment noted.

The Sierra Club is opposed to a linear clear-cut through the watershed that's proposed by BPA. This could seriously damage the low elevation forest and resulting impacts on fish and wildlife and water. BPA's corridors right now are weed infested wastelands and BPA has projected alternatives that would have eliminated the additional clearing by double-circuiting the existing towers. Due to public opposition and the grossly inadequate draft EIS, BPA has now written a new EIS. Appropriately, the document looks at other alternatives, some of which would run through

1421-036-003, -004, and -005 Comment noted.

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1421-036-005

Maple Valley which would severely impact rural lands, others would impact forests across the Cascades. None of the alternatives should be constructed as proposed.

If BPA chooses on the construction alternatives, it must be fully mitigated which is required by any federal projects. Unfortunately, the mitigations proposed in the EIS are not sufficient for any of the alternatives, in many cases just too vague. BPA says it will protect the water quality of the Cedar River Watershed. We urge you to continue your discussions with the City of Seattle to actually accomplish this. The EIS also alludes to acquiring replacement forests to mitigate for the forest cut for the new line but offers no specifics on location, size or quality. How can a reviewer determine if a mitigation is adequate for an alternative when there are no specifics?

1421-036-006

Conversations with BPA staff indicate forest mitigation is planned only for the Cedar River portion. The Raging River is ignored, despite a long stretch of the proposed line bordering and then crossing the river.

1421-036-007

Clear-cutting this close to a major salmon river is not acceptable today.

1421-036-008

We understand that BPA is considering acquiring Section 25 just south of Cedar River, but there's been no commitment to acquire the entire section nor that BPA would fund it.

1421-036-009

We understand that BPA is considering forest legacy or other conservation funds to acquire some of

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1421-036-006 and -007 BPA is planning to mitigate for crossing the Cedar River Watershed. The lands outside of the watershed are owned by private landowners and the Department of Natural Resources. BPA pays to cross their properties. Those landowners can use those moneys received from BPA to purchase other properties if they determine it necessary. BPA intends to closely examine the clearing needs along and near the Raging River and would use methods to minimize erosion potential to the Raging River, such as topping of trees, if feasible, and encouraging low-growing vegetation.

1421-036-008 and -009 See response to Comment 1415-003 and -004.

1421-036-009 that land. These are critical for other projects, and BPA should be paying for the impacts of their projects with their own funds.

1421-036-010 The EIS contains vague language about the best practices for vegetation management in the right-of-way. 1421-036-011 This should be replaced with solid objectives of habitat and time frames for achieving them. 1421-036-012 So we urge BPA to pursue conservation and other electrical system changes before 1421-036-013 building a new power line, if a line is constructed to fully mitigate any new or expanded corridor, including acquiring 1421-036-014 and protecting nearby forest lands. Until these issues are addressed adequately, we will continue our opposition to this project. Thank you.

MS. CINDY BERRES: Hi. My name is Cindy Berres, and I'm concerned about BPA's proposal to build a power line through the Cedar River Watershed, which the City has just recently protected from logging. I feel they should 1421-037-001 mitigate any new or expanded corridors by acquiring and 1421-037-002 protecting nearby forest lands along the Raging River and 1421-037-003 Section 25 near the Cedar River. Also I believe that there should be no new roads built and they 1421-037-004 should install the towers with helicopters. Thank you.

MR. MICHAEL SHANK: As there has not been 1421-038-001 sufficient time to review the 1800 page supplement draft environmental impact statement or the nontransmission

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1421-036-010 and -011 BPA is working with SPU to develop a vegetation management plan for both the existing and proposed rights-of-way. The plan will prescribe site-specific management practices that provide habitat, protect and restore aquatic resources, and control weeds.

1421-036-012, -013, and -014 Comment noted.

1421-037-001, -002, -003, and -004 See response to Comment 340-002.

1421-038-001 BPA is allowing 45 days for public/agency review of the SDEIS. We acknowledge that the document contains a lot of information, and that an EIS consists of two documents, i.e., the draft and final EISs. We anticipate releasing the final EIS on July 1, 2003, and a Record of Decision in August. To maintain this schedule, BPA cannot assure that comments received after March 1, 2003 will be considered in the FEIS.

1421-038-001

1421-038-002

alternative study, Biodiversity Northwest requests an additional 30 days to review and allow for public comment, both organizationally and citizens also needing more time for adequate review.

Assuming the new deadline of April 1st, 2003, all interested parties will have more accurate time to give proper examination to the stated articles and studies. Without the 30-day extension, BPA could be perceived as attempting to move pertinent information forward without sufficient public review. We hope that BPA complies. While Biodiversity Northwest will need more time to fully inspect the 1800 page SEIS and the nontransmission alternative, we would like to take this opportunity to encourage BPA to not proceed with the Cedar River Watershed like they're proceeding with the Columbia River, by backing out of contracts, commitments and promises.

With the watershed as the preferred alternative, how is the City of Seattle, environmental groups and citizens expected to believe the promises put forth in any BPA administered mitigation package if it is not legally binding? We understand from BPA's track record, example, the Columbia River, that the agency prefers to refrain from any legally binding commitment at all, and how, then, can we believe anything that you offer at the negotiating table unless BPA will agree to sign under the legally binding

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1421-038-002 BPA is committed, and legally bound to implement the mitigation measures that it inserts into its Record of Decision, pursuant to 40 CFR 1503.3 That federal regulation states, in part, “Mitigation (§ 1505.2(c)) and other conditions established in the environmental impact statement or during its review and committed as part of the decision shall be implemented by the lead agency or other appropriate consenting agency.”

1421-038-002 line?

Biodiversity Northwest encourages BPA to only

1421-038-003 discuss a mitigation package with the City if BPA is willing to be held accountable for their alleged promises.

1421-038-004 Biodiversity Northwest also encourages BPA to follow the legal procedures as stated in the Need for Process which are

1421-038-005 required agency of BPA, to seriously study all feasible alternatives and to be in compliance with scoping comments that request specific studies.

The SEIS at first look seems to fail in this regard, refraining from any feasible nontransmission alternative that is more comprehensive, incorporating entitlement negotiations, demand response programs, demand site management programs, generation and distributed

1421-038-006 generation, regional availability of natural gas, existing distributed generation, new distributed generation, renewal generation and emerging technologies. BPA's SDEIS appears to review only a handful of these possible nontransmission alternatives and has admitted to failing to produce anything comprehensive because of lack of time.

We're encouraging you to take the necessary time.

1421-038-007 Tom Foley states that these studies will need to take place in the next few years, and we're asking you to study them

1421-038-008 now. The rest of Biodiversity Northwest's comments will come after the public comment due date has been extended.

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1421-038-003 Comment noted.

1421-038-004, -005, and -006 BPA believes it has considered a reasonable array of non-transmission alternatives, including demand response programs, demand-side management measures, local power generation, and the availability of natural gas, solar and wind power as alternative energy sources. A study of non-transmission alternatives was undertaken as a direct result of scoping comments.

The examination of non-transmission alternatives was comprehensive in that it examined the three broad categories of measures: demand response, demand side management and generation. The measures were looked at individually as well as packaged together to take advantage of the best characteristics of each. Please see Appendix J.

1421-038-007 and -008 BPA is very concerned about the schedule for this project and has not extended the comment period.

Thank you.

MR. ELDON BALL: I am Eldon Ball, and looking through the information that were provided, I noticed that for Alternative B you have an existing 150-foot right-of-way with towers 150 feet high with a single circuit 345 kilovolt line. It's proposed if that alternative be used that it be replaced with 185 high double 500 kilovolt circuit line. Now, perhaps the cost of doing that in Alternative B is more than would be done by I think it's only nine miles on your preferred alternative versus I think it was 38 miles the other way. If you choose alternative -- the preferred alternative, then my question, and I think this should be thoroughly considered, why not replace the single circuit line that you have there within the existing I believe it's 150-foot right-of-way with a double circuit similar to what's proposed for Alternative B and that way you wouldn't need to require any new right-of-way? I would think that the damages would be far less. Thank you.

1421-039-001

1421-039-002

MR. RICHARD CHAMPLIN: May name is Richard Champlin. I noticed some comments up there on the wall that indicate that some people seem to think that this is a lot of tree huggers versus property owners, and it's kind of sad that some people have got that into their head, because this is not about that. Nobody's trying to take anybody's property away. This is about a forest, the Cedar River

1421-040-001

1421-040-002

1421-039-001 and -002 Rebuilding the existing line to a double-circuit line essentially provides no additional capacity to serve the Puget Sound load. This is because BPA must plan for an outage of the double-circuit line as required by the North American Electric Reliability Council (NERC). Whereas, if we build a single circuit line parallel to the existing line, the NERC Criteria (and more specifically the Western Electricity Coordination Council Criteria) does not require us to consider the outage of both single-circuit lines. See also response to Comment 1459-009.

1421-040-001 and -002 Comment noted.

1421-040-003

1421-040-004

1421-040-005

1421-040-006

Watershed, which threads the City of Seattle and surrounding areas, which is one of only a few in the entire United States that is so clean it needs no filtration system other than what nature has provided. This is also, whether it is indicated in the provided documentation by BPA or not, about an energy fatal brought about by regulation and a subsequent opportunistic energy fraud perpetrated by Enron and other companies.

We were told some time ago there was a shortage coming up, which I believe was manufactured, and that therefore we need to upgrade power. We are still being told this in spite of what has happened over the last year and a half. I have not forgotten about Enron and the way they scammed the entire Western United States. Evidently some have forgotten, but I hope you haven't. Because of this ongoing perpetuated threat of having our lights, our heat and our dialysis machines suddenly turned off, we're supposed to throw our entire concept of environmental stewardship out the door. We are supposed to be concerned now about energy shortages and quote, unquote national security more than we are about clean water.

If polluted water lost an entire species of salmon and other fish, the loss of habitat and further degradation of a fast disappearing forest and the insult to the people that might have hunted and fished there before we came is

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1421-039-003, -004, and -005 Comment noted.

1421-039-006, -007, and -008 Comment noted.

1421-040-006 not a threat to our national identity and pride, then what is it? Is it progress? I don't buy that.

1421-040-007 Please don't try to blackmail us with threats of blackouts. BPA needs to stop thinking about cheap and easy. They need to think about management and about respect for the concerns of the majority of us who do depend on this

1421-040-008 water, this shed, and who love this area for its beauty. Thank you.

MR. RON IVERSON: I'm Ron Iverson. I have property in the Hobart area which will be affected by Alternative C. I've been to probably ten meetings on this, and I guess I can sum it all up: BPA, you did it right the first time; and the second, democracy does work. I've been to eight meetings and get damn tired of people that have

1421-041-001 cultural diversity problems and things like that. First few meetings we had I thought this thing was resolved, and then March 26th Margaret (inaudible) had some comments and you probably got tired of listening to four people say they want to tear down the existing power line -- I'm not making this up -- abrogate the Canadian treaty, litigate, litigate, litigate with dollar signs in their eyes. I got tired of

1421-041-002 that. I was kind of ticked off about that.

But I think this product that you guys have put together is much better. I have looked at -- there certainly can be no argument on any of us if the water

1421-040-006, -007, and -008 Comment noted.

1421-041-001 and -002 Comment noted.

quality is going to be affected, we would all go away. If there's any compelling evidence that building a parallel line is going to degrade that water system, we would all say look at some other alternatives. There's no compelling evidence. And it looks like Seattle's concerns for water quality predates the proposed line. I think we all want something that has the least impact on people, the environment, and we can't throw out cost completely.

1421-041-003

So the bottom line, I think you guys have done a really good thing here. I have seen some things on poles and mitigation and so forth that I didn't see before, so my compliments to you. And, finally, I want to say something about Biodiversity Northwest, which is not exactly in your back pocket. I think Michael Shank and his crew look at things aggressively and, by gholly, their comments said deep six Alternative C. Michael, I do appreciate you being willing to take a look at all these things and get rid of one of the dumbest alternatives you can say. I said with the math that any third grader could figure out that was the worst alternative.

1421-041-004

MS DIANE ADAMS: Sir, let's keep our comments focused on the draft EIS, please.

MR. RON IVERSON: Final thing, I would say you did a good job. One compelling comment I heard from a lady was why would you use the power of eminent domain to screw up

1421-041-005

1421-041-006

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1421-040-003 and -004 Comment noted.

1421-040-005 and -006 Comment noted.

1421-041-006

private property when you have a good public property that's available at no impact?

1421-042-001

MR. ERIC ESPENHORST: My name is Eric Espenhorst, and I haven't been to quite as many of these meetings as the previous gentlemen, but I have read through quite a few BPA documents and I've been to several of these meetings. And I'd like to start by saying no one requested that BPA look any further into Alternatives B or D, and by doing so -- I mean, those cross Cascade lines were the original thing 20 years ago that got people riled up. BPA didn't pursue it then because it was a very environmentally harmful idea then, it's a very environmentally harmful idea now. No one asked you to look into it further, and I think by studying that one I feel that you are using this process simply to shake out even worse environmental alternatives and say, well, we looked around, we still have to go through the Cedar.

The supplement DEIS, I don't think the nontransmission alternative in there is a viable alternative. It's full of things that could happen, it's full of discussions of elements that don't work. It is not a rigorous alternative the way A through D and 1 through

1421-042-002

whatever are. One of the things that the neighbors agree on

1421-042-003

and we tree huggers on is that we don't want a transmission line through a place that's important to us. And the only

1421-042-001 There were several comments previously received requesting BPA specifically study routes B and D as viable alternatives to crossing the Cedar River Watershed. Those comments came from the city of Seattle, Tribes and environmental groups. Alternatives B and D are constructible, though very expensive. They do present their own environmental issues as indicated in the SDEIS. Alternatives B and D, if not chosen for this project, could still be used for some future transmission line project currently not planned.

Please see response to comments 1421-032-001 and 1421-038-006.

1421-042-002 and -003 Comment noted.

The analysis of non-transmission alternatives (Appendix J) does not reference and was not based on the Business Plan EIS.

1421-042-003

1421-042-004

1421-042-005

way you can achieve that while achieving the other goals that BPA has is by developing a nontransmission line alternative. This nontransmission alternative is not a viable one, particularly so -- particularly for two reasons.

One, it's still based on the old BPA business plan. Back in '94 you did an EIS which concluded that there were lesser -- there were alternatives that were viable that involved more energy conservation, changing rate structures, et cetera, these would save rate payers money and have fewer environmental impacts. BPA said we're not going to do that, so from my view everything BPA has done since then is based on the business plan is on the wrong foundation. We've seen BPA rates double since the business plan. That was not anticipated, but you say, oh, no, we're still in the business plan mode. You need a new mode, guys.

Secondly, the specific alternative for the -- I've already mentioned I think the alternative is too vague and the Appendix J that discussed it -- and I'm running out of time, three minutes for 1800 pages -- you're still -- the primary tool that the consultants used to evaluate the cost effectiveness of energy conservation is the good old fashioned rate impact, which looks at how a particular alternative will affect rates, which is not unreasonable, except that BPA does not apply that when it goes out and it augments its power with 20 percent market power and rates

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1421-042-004, -005, and -006 The analysis of non-transmission alternatives, Appendix J, examined six different economic perspectives. Ratepayer Impact Measure (RIM) - Transmission Company, while important, was only one of the measures. See Appendix J, Section 3. Even assuming societal costs and benefits were the basis for a decision, the non-construction alternatives can not meet the need. See response to Comment 1421-032-003.

double. BPA has a choice to look at societal costs and societal benefits and that is the choice that you should make.

1421-042-006 It's imperative -- you state that it is imperative to keep the transmission business lines looking at rates. That's not imperative. That's a choice. If you don't make a choice to look at all the societal costs and benefits, develop a nontransmission alternative that's viable, you're not doing the public any good and don't think that this is over. Thank you.

1421-043-001 MR. RICHARD BONEWITS: Well, I'm not going to ask you to justify the demand. I'm not going to ask you to change people's habit because we can't get them to turn the light bulbs off or put timers on the water heater. We've been through all of that a year ago. It's all in the book. Those answers are there.

1421-043-002 90 percent of the power demanded for this power line comes from Seattle and the suburban cities, less than one percent is used in the area within which it's running. A major BPA quadrangular transmission line grid already exists in this area, and believe me there's 130 kV, 230 kV and 500 kV lines already there. All proposed transmission lines cross sensitive rivers, either the Cedar or the Snoqualmie, many streams and wetlands and forested lands,

1421-043-003 all proposed routes have the potential for significant

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1421-043-001, -002, and -003 Comment noted.

1421-043-003 environmental damage.

In this -- in what you have planned, the approach you took, you made Seattle a beneficiary to a BPA construction management plan that the rural area citizens

1421-043-004 would love to have. It is more protective to the environment than your own past practices, your present practices or anything demanded by King County and certainly is not going to make what we call the Critical Areas Ordinance. Seattle is also beneficiary to a generous

1421-043-005 mitigation plan that more than compensates for the environmental damage of a second power line. Proposed route through the watershed -- outside the watershed, I should say, will result in more damage and you're going to see

1421-043-006 firsthand evidence, and some of you folks in Seattle that doubt that, we're encouraging you to get off the tour bus through the watershed. We have been on that, too, but we want you to come out and look at the rural area and we're

1421-043-007 going to show you that the trees are bigger on the outside than they are in.

Seattle raised water quality issues, but that's a red herring, too. No one is going to compromise water

1421-043-008 quality, no one is proposing to do anything about compromising. There's been an existing line in the watershed for 30 years and there's no evidence of a problem.

1421-043-009 In '92 the Seattle was ordered to come up with a

32

1421-043-004 and -005 Comment noted.

1421-043-006 and -007 Comment noted.

1421-043-008 Comment noted.

1421-043-009 design for a filtration plant. It has not been implemented yet. It was ordered to do so by the State of Washington. It is still not in place. It could more for itself by getting rid of the roads and doing what it says it's going to do in the Habitat Conservation Plan than it can about arguing with the 92 acres.

1421-043-010

1421-043-011 Now, the cost is an issue, and the studies clearly show the difference, and, therefore, isn't any doubt in my mind that when you go one level more in detail and put the mitigation to it, it may quadruple again and it's going to quadruple on the longer routes.

1421-043-012

1421-043-013 Lastly, if the folks at Seattle would like something to really look at, consider studying another alternative route: The Rocky Reach, the Renton line, you could energize that one and run it right down the middle of Lake Washington on pontoons with 180 foot towers on it. That might be more environmentally friendly.

1421-044-001 MR. RICHARD TINSLEY: Some places in the country have some pretty terrible water, but we're fortunate here in the Seattle are to have good water, so clean and pure that we don't have to build an expensive filtering plant for it. We want to keep it that way. For the last 50 years or so, Seattle has had a practice of buying up private lands in the watershed so they can maintain the purity of their water. And through this diligent effort they have managed to do so.

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1421-043-009 and -010 Comment noted.

1421-043-011 and -012 Comment noted.

1421-043-013 Such an option will not be studied because it is unfeasible. Pontoons would likely not support the heavy towers and the whole project would be expensive even if it were feasible.

1421-044-001

1421-044-002

1421-044-003

1421-045-001

The land is not open to the general public, it's not open for recreation, et cetera. They want to keep it for water quality, and as an added bonus we get the wildlife habitat and so on. I'm not convinced at all that this transmission line needs to be built, but if it is built, it should not be built in the Cedar River Watershed. If it is in the Cedar River Watershed, that will make more of an impact, you have your vehicles driving up and down for maintenance, you have the oil percolating into the ground, and there's more of a potential for polluting the water which would require us to build an expensive filtration plant. Don't put it in the watershed. Thank you.

MR. SCOTT TAYLOR: Hi, guys, I'm Scott Taylor. I am a tree hugging property owner. I live outside of Hobart over on Tiger Mountain, and I work in Seattle. So no matter what decision BPA makes, I get it one way or the other. If they go through the watershed and the water quality is compromised, I will drink it at work. If they go through my backyard and they compromise the water quality of my well, I get it at home. So I'm able to see both sides of the story.

I want to give you guys some compliments on your EIS. You guys went through an awful lot of work on identifying mitigation techniques. Specifically I was impressed about the vegetable oil instead of hydraulic fluids. That's pretty cool. I didn't know you could do

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1421-044-001, -002, and -003 Comment noted.

421-045-001 and -002 Comment noted.

1421-045-001
1421-045-002
1421-045-003
1421-045-004
1421-045-005
1421-045-006
1421-046-001

that. Helicopters, I knew about that; the micropile footings, that's awesome; temporary mats; minimize vegetation cutting. You guys have gone through an awful lot of -- I mean, there's a whole list on page S-4 of all the stuff you are going to do to minimize impact to the Cedar River Watershed, and I applaud you on that.

However, I would like to point out what I think to be a bit of political hypocracy. That list isn't there if you go through any of the alternatives, and that frankly pisses me off. If you guys are going to take helicopters and do micropile footings on this, which is the Cedar River Watershed, why not do it on hundred year old trees that are in my backyard. I have spotted owls, two of them, in my backyard right where this photo was taken. Your responsibility is not to Seattle, it's to the environment. And if you are guys are minimizing impact and going through this whole list of stuff that you can do just for Seattle, do it for all the other alternatives as well. Thank you.

MS. PAM TRUJILLO: Well, I have to agree with what Scott just said. If I could, I'd like to introduce myself, my name is Pam Trujillo. I'm directly affected with both options B and D. I am also a King County model horse farm. I am a King County wildlife refuge, which includes, just like Scott said, eagles, falcons, bats, owls, coyote. I have a herd of about 40 elk that actually sleep in my front

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1421-045-003, -004, -005, and -006 Please see response to Comment 1420-001-002.

1421-046-001 Comment noted.

1421-046-001

1421-046-002

1421-046-003

1421-046-004

1421-046-005

yard, among other things.

Additionally, I have a legal service that I provide in North Bend, but no matter what, as has been brought out here, we're all personally affected, whether it's the watershed in drinking water or whether or not it's our own personal lives. However, one thing I did want to bring out is, for example, as a personal homeowner, I back to a historical conservation reserve. And when you look at the Seattle City, and I don't know if there are any Seattle people here, I haven't heard from them, they offer visitation for 10,000 children to view natural habitat. However, Camp Waskowitz, which I back to, offers visitations for 6,000 children during the course of each year. That has not been addressed as being also an issue of habitat problems that may exist in the sense of how are children being affected. How's the environment from a family standpoint being affected?

But we have to look at not only the facts. I read on the website the Sierra Club mission statements, the Biodiversity mission statements and so forth, and it's very clear that their issues are for the rights of the general population. However, I have to also agree with Scott that if there are going to be certain mitigation issues and pylons and so forth directed, helicopters coming in to do this and that, we, too, as homeowners should get the same

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1421-046-002 and -003 Both Camp Waskowitz and the Cedar River Municipal Watershed have major BPA transmission lines located within their boundaries, and both would be impacted by project alternatives i.e., 1-4B would impact the CRMW, and Alternatives B and D would impact Camp Waskowitz. Should BPA select any of these alternatives, it would work with the landowner to minimize impacts. See also response to Comment 1420-005-001.

1421-046-004 and -005 Please see response to Comment 1420-001-002.

1421-046-005

opportunities.

I know for myself personally during the time that this has gone on, and I did want to mention one thing -- I'm running out of time here -- there was a request for a deadline extension. I received notification and anybody who's involved in this received notification in May. I feel that's adequate time for an extension, and I can tell you from a personal standpoint I have been put on hold as regard to anything to do with my property, whether it's remodel ventures, whether it's a sales venture, and if this continues to go on hold, I cannot offer my property without the potential of a lawsuit with this still being in a hold mode.

1421-046-006

I realize there's a lot of issues that all of us are affected with, we don't -- no one wants a power line, but the fact is we can't allow just emotion to lead this. It has to be a fact of whether or not we do need power, and I'm out of time. Anyway, I would like to say for the record that I don't feel an extension is in my best interest or in the best interest of the homeowners. There's adequate time to have read what's out there and to digest the EIS and today isn't the first day for that.

1421-047-001

MS. HELEN JOHNSON: My name is Helen Johnson, and I'm a 60-year-old grandmother from Hobart, and this is the last place that a 60-year-old grandmother from Hobart wants

1421-046-006 Comment noted.

1421-047-001 Comment noted.

to be. I've only given one other public speech, and it was right here last year and it was probably the same speech I'm going to give tonight. But this is important because I think sometimes that we get lost in facts and we forget about people.

I want to tell you a little bit about Hobart. Hobart is a very, very special place. It's made up of very special people. It's been here for a hundred years. It was here before the watershed. It was -- the watershed was

1421-047-001 donated to the City of Seattle by a member of a Hobart family. Now, if this isn't biting the hand that feeds you, I don't know what is. We're made up of many second and third generation families in Hobart. We've poured our heats and our souls into this land. Many of us grew up there, we were born there. We've stayed there and lived there and we've buried our loved ones in the Hobart cemetery, and now you want to tell us that it's all for nothing because you're going to destroy this little area all for the -- for more power for the City of Seattle. We don't need it, they do.

This is not a newly rich neighborhood made up of wealthy landowners. These are hard-working folks who have lived there all their lives and they have taken good care of

1421-047-002 this land for years. We don't even have a store out there except for one little mom-and-pop grocery store, and it's run by a third generation Hobart family.

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1421-047-002 Comment noted.

1421-047-003

1421-047-004

1421-047-005

1421-048-001

Last year I listened to some wonderful young people who give tours through the watershed and they say tourists love it, and we do, too. And we know why they love it, because we live there, we have the same animals, we have the same plants on this side of the fence. On our side of the fence on any day you can see the elk, deer, bear, cougar, possums, raccoon, coyotes, too many kinds of birds to list. And they don't know they're not supposed to be over here, so they live where we do too. And we take care of them. We take care of them better than the City of Seattle ever has.

We do have one thing in Hobart that the watershed doesn't have, and that's people, but I'm beginning to think that people really don't count much anymore. So I'm begging you to consider the consequences to the farms and the homes and the people before you make this decision and please do the right thing so the citizens of Hobart can get on with their lives. Thank you.

MR. HILLARY LORENZ: My name is Hillary Lorenz. My land is underneath proposed route Alternative C. I've been in public water since 1985 as an operator, carry a four-year degree in public water policy, and I worked in the late 1990s for two and a half years for Seattle Public Utilities at Landsburg out at Lake Youngs as a water treatment operator.

1421-047-003, -004, and -005 Comment noted.

1421-048-001 Comment noted.

1421-048-001

My job for Seattle Public Utilities at Landsburg was to raise and lower the gates of the diversion damn to take more or less water through the diversion pipe out of the Cedar River, transport it down to Lake Youngs where it was treated and sent on to the City of Seattle and other purchasers purveyors. During the two and a half years that I was there at Landsburg, the City of Seattle performed a practice they called forebay cleaning. And that's where we raise the gates on the Cedar River diversion damn, allow the water -- all of the water to go down the natural stream channel. We dried out the intake structure for the pipe that goes down to the transmission line that goes to Lake Youngs.

They entered that intake structure with a backhoe, rubber-tired backhoe, and they scooped sediment out of that. I read in here on the third item, page S-4, use of vegetable oil in place of hydraulic fluids within the Cedar River Watershed. I tell you now, they didn't use vegetable oil in that case, backhoe. If you go to Landsburg and you walk behind that diversion structure, you'll find thousands of cubic yards of sediment that they have piled up over the years from this regular practice of entering their intake structure.

These are the same people that are talking to you about concerns of water quality, having your vehicles on

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1421-048-001 BPA has received information from SPU: "Landsburg Raw (CPR-1) Turbidity Data (in pipeline downstream of diversion) 1993 to 2001 - Daily Readings." In reviewing this data we found there had been only one spike to 5 NTU on 12/29/96. If BPA decides to build this project, BPA plans to monitor water conditions in the vicinity of the project.

their land in the watershed, they are entering the actual intake structure with hydraulic equipment. I ask you that if you are going to continue negotiations or discussions with the City of Seattle you talk to them about flow studies and the turbidity studies that they have performed during the forebay cleaning. They will have it on record. They keep track of that sort of thing. They're required by law to keep track -- as they raise or lower the gates, they have to keep track of the gauging station where the river elevation is, they have to keep track of turbidity as they change the diversion on that river. So it's going to be on record, and I ask you to talk with them about their forebay cleaning practice. Thank you.

1421-048-001

MR. JON ZAK: My name is Jon Zak. I live on two and a half acres in a development of about a hundred homes in Maple Valley. Our eastern property boundary will be the centerline of the proposed transmission line right-of-way for Alternative C. We would lose trees on one quarter of our property. These trees are in a native growth protection zone. The trees range in size from two and a half to five feet in diameter breast height above the ground. We never would have purchased this property if we knew a power line would be in our backyard. Alternative C would completely destroy our privacy and our views of trees in our backyard. It would destroy our experience of living in nature. This

1421-049-001

1421-049-002

1421-049-003

1421-049-004

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1421-049-001 and -002 Comment noted.

1421-049-003, -004, and -005 Comment noted.

1421-049-004

1421-049-005

1421-049-006

was the reason we purchased this property. Part of the Habitat Conservation Plan, a map was prepared showing the age of trees in the Cedar River Watershed. On the BPA's preferred alternative route, the age of the trees is like 10 to 30 years. The trees on my property in the native growth protective zone make the trees in the Cedar River Watershed look like toothpicks.

I would like to talk about what Seattle calls the pristine watershed and their legacy for the future. This watershed has been decimated by logging for a hundred years. There are over 600 miles of gravel logging roads in the watershed. I would like to show you some pictures.

This is from a book published by the Sierra Club published in 1965, it shows some old growth along the Sock River. You're not going to see any of that on the Cedar River. There's another picture of the Sock River forest. This is a picture of a trail in the Ashland Curtis Grove on the way to Snoqualmie Pass. This is a picture of the Cedar River Watershed, Chester Morris Lake. There's quite a bit of difference. Here are more pictures. Look at the road cuts and erosion. Chester Morris Lake and see the clear-cuts and logging roads.

And this is our backyard. Another shot of our backyard. These are some pictures off the Seattle utilities website, some of the erosion on the travel roads. Here's

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1421-049-006 Comment noted.

1421-049-006 Comment noted.

1421-049-006

some of the heavy equipment. Like Hillary said, they are not using vegetable oil. Here's more heavy equipment, people working right around Chester Morris Lake. That's all the pictures. If anybody wants to see them, I'll have them later. Anyway, thank you.

1421-050-001

MS. LISA TAYLOR: Hi, I'm Lisa Taylor, and I'm a resident of Tiger Mountain. My husband is Scott, we live at the north end of Alternative C. My grandfather grew up on the Olympic Peninsula, as did my father, and I grew up in southeast Bellevue and Eastern Washington. I think for those of us who live this long in this community have our hearts broken by what has happened to our environment. And I applaud the City of Seattle and all the other environmentalist groups, of which I am a frequent donator, for their efforts to recover these areas.

However, I'm also a property owner, and strangely when I bought my property, I thought that I would be the owner of that property, that I would have the responsibility and the right to protect my old growth forest. My husband and I clear blackberries by hand and we plant native species along our seasonal creek. Since we purchased our home four and a half years ago, we discovered that we had properties that were illegally subdivided and spent our savings to buy those properties to avoid lawsuits and to protect that forest area. We subsequently discovered that King County

1421-050-001 Comment noted.

1421-050-001

1421-050-002

1421-050-003

1421-050-004

overlooked certain aspects of the construction of our home and it would require being underpinned in our foundation, that was a second mortgage. We then discovered that we may be seeing power lines in our community that could cause erosion or damage to our home or even loss of our community.

Now I hear that we have environmental laws that may be put into practice in King County that will prevent me from even replanting the blackberries that choke the north end of my seasonal creek. So I'm wondering, feeling like an ant stepping -- trying not to be stepped on by the giants, if my property is an environmental jewel that must be protected at all costs, if I am a part of a rural economy that should be protected by our Growth Management Act or if I'm a resource to be used by the urban areas for their landfills and their power lines.

So I'm not sure what to say anymore except that I'm getting really tired and I'd like BPA to make their decision and I'd like them to make it soon. As an environmentalist, I believe the best option is through the watershed and I urge the City of Seattle to continue their negotiations and let's no be penny wise pound foolish. There are a lot of private properties out there that were formerly forest industry that can be added to that watershed. I think you would find enormous support from the local community, as well as perhaps BPA, to continue to add

1421-050-002 Comment noted.

1421-050-003 and -004 Comment noted.

1421-050-004

to the legacy of that watershed by bringing properties out of private forest production and maintaining our rural character. We would absolutely support that kind of mitigation. I hope you can come up with an answer that will work for all of us. Thank you.

1421-051-001

UNIDENTIFIED MALE SPEAKER: I just -- I'm a novice at this, but I'm interested to find out, because it hasn't been mentioned, I have not read it if it's in there, where are the funds coming from that are going to be paying for whatever alternative is chosen?

MR. BRIAN SILVERSTEIN: Bonneville borrows the cost of capital projects such as transmission lines from the treasury as we do for all the other projects that Bonneville might do for fish and wildlife enhancement, for replenishment of the core and bureau generation facilities on the Columbia River. So we borrow the money from the treasury and repay that money through the rates that are paid through the use of our transmission facilities.

UNIDENTIFIED MALE SPEAKER: The US Treasury.

MR. BRIAN SILVERSTEIN: That's right, the United States Treasury.

UNIDENTIFIED MALE SPEAKER: Thank you. I'm

1421-051-001

curious how much money you've spent on the consulting reports that have gone into this EIS and the supplement to the EIS and if you would make a fraction, even ten percent

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1421-051-001 To date, our environmental studies, including the EIS, draft and supplemental DEISs, and final EIS have exceeded $1 million. The funds to pay for these costs come from BPA's customers, since BPA is self-financed. BPA does not receive the appropriations that other government agencies typically receive, but recoups its operating and maintenance costs through it rates. The team that BPA has retained to assist in the environmental analysis are experts in their respective fields and were hired by BPA to undertake an objective analysis of the environmental impacts of the proposed alternatives. Their impact ratings were based on objective factors that were identified for each resource, and are contained in their technical study reports as well as in the EIS. With respect to BPA funding an independent review of the environmental analysis that was undertaken for the proposed project, BPA does not feel that this would be necessary.

1421-051-001

1421-052-001

of that money available to the citizen groups to do an independent review of this. Because the consulting firms, and I know these consulting firms, and they are not doing independent research, they are doing advocacy for your preferred action.

So it's a two-part question: How much have you spent on consultants and would you be willing to make even 10 percent of that available to the public, to public groups to do an independent review?

MR. GENE LYNARD: As far as the environmental, the cost for the environmental work to date, we're over a million dollars.

UNIDENTIFIED MALE SPEAKER: And part B of the question?

MR. LOU DREISSEN: Part B, I don't think BPA would be interested in pursuing, giving any monies to private groups to review our documents.

UNIDENTIFIED MALE SPEAKER: I'm shocked.

MR. JON ZAK: Last year some of the environmental organizations were talking about double-circuiting, and I understood you explained how because of redundancy it wasn't feasible. Then I was surprised to hear Lou mention double-circuiting across the Cedar River. So I don't know if that's an exception to the rule or if you could do that why can't you do it through the five-mile stretch through

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1421-052-001 See response to Comment 421-039-001.

1421-052-001

the Cedar River Watershed.

MR. BRIAN SILVERSTEIN: The reason that we're concerned about putting the two circuits on the single tower or what's called double-circuiting is because of the risk of a single event, a wind storm, ice, snow loading or landslide taking out both circuits at the same time. There's a brochure at the back that explains the planning criteria that Bonneville and all utilities use in North America for planning their grids, and they require us to consider loss of a double-circuit as a single event.

There is an exception. There's a footnote to the table that says for certain very short occurrences, such as crossing of a river, it's acceptable to use double-circuit towers and not have to consider that from your evaluation. It's on that basis that we made the decision that would be acceptable to use the two double-circuit towers to cross the Cedar River, but clearly it would not be an exemption for the nine-mile project.

1421-053-001

MS. HELEN JOHNSON: Well, I have a couple of questions. We hear conflicting things about Seattle's water. Last year I believe the King County council woman told us they had two infractions, and then we have people telling us that their water is so pure that they don't need a filtration system. I know for a fact that they were in

1421-053-002

the watershed last year asphalt paving roads, and I believe

1421-053-001 and -002 Comments noted.

1421-053-002

they were doing work on bridges and the mess they're making at Landsburg is just incredible.

So, you know, I mean, I'm not so sure that their water is so pure and I'm not sure Seattle doesn't have an ulterior motive here. I'm just curious if you're really going to do all that much damage because they're already doing damage.

MR. LOU DREISSEN: Well, I don't really at this point want to talk for Seattle, but I'll try to give you my understanding of the situation is that Seattle is mandated to provide a level of drinking water quality associated with rules that the Department of Health has in place. So what those rules indicate is that they can't exceed five turbidity units two or more times per year.

So Seattle monitors the water very closely at their outtake point. So anytime that the water turbidity gets to about a level of three and a half to four turbidity units, they start really looking at shutting their system down. And they shut their system down a dozen or two dozen times a year, depending upon the storm activity that goes on. So their five turbidity units is a fairly pure level, and that -- the turbidity could well exceed 50 to a hundred turbidity units during a storm event. So they monitor that water very closely.

And the events that you were describing, I

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1 don't -- you know, I don't know all the events that have
2 happened out there, but I know one, for instance, is that
3 they had a beaver damn break and during a storm event they
4 can monitor that water very closely as the turbidity rises.
5 But as in this case here, it was a slide, it was a part of
6 the beaver dam breaking, they had no forewarning when that
7 turbidity hit their outtake point. So they clearly exceeded
8 the five turbidity units at that event.
9 The difference is that they are exempt from
10 natural causes, and that was determined a natural cause. So
11 they're exempt from that, so it's okay. And I believe the
12 other events have been the same way. The landslide there in
13 the reservoir, upper reservoir was naturally caused, caused
14 by the earthquake activities. So those kind of activities
15 are exempt from the regulations.
16 What is not exempt are predictable events,
17 predictable meaning by construction, for instance, by our
18 transmission line construction. They're also very concerned
19 anytime you have to do road construction inside the
20 watershed because, again, those are predictable events. You
21 could have two main events happen or more without triggering
22 the need for having to build a turbidity filtration plant.
23 The other issue that a lot of people get mixed up
24 with is that they are building what some people call a
25 filtration plant currently. That filtration plant will not

take care of turbidity. It takes care of bugs in the water. So that filtration plant costs them a lot of money, well over a million dollars, or a hundred million dollars. They don't want to spend another hundred million dollars or more for a turbidity filtration plant. So really that's what the issue is is turbidity in the water. So that's what everybody is concentrating on currently, everybody meaning Seattle and also obviously that's BPA. So we're trying to prevent erosion, we're trying to prevent turbidity in the water.

1421-054-001 MR. RICHARD BONEWITS: I want to answer Helen's question. I am a user of Seattle water, and like many of the rural areas, I have Seattle water supplied to me through a purveyor. I can speak to the subject of quality. I don't have any question about Seattle's water management. I know that watershed manager, I know some of the people that work there, I even know Mrs. Pager, who I have worked with in other venues, and they're all very concerned about maintaining water quality. So that's not the issue.

But there is an issue at least as far as I'm concerned about taste. And, in my own case, the answer to it was simple, put a filter in my house. That's what we do, we filter Seattle's water. And that's what a lot of people find they have to do because, as they pointed out, there's times of the year the turbidity, for various reasons, some

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1421-054-001 Comment noted.

1421-054-001

of them natural, some of them are not natural, that there's more turbidity in the water that adds taste to it. But as far as the coordination of fluorination, it goes on, it's monitored daily. So they do an excellent job. I never question that.

1421-055-001

MR. SCOTT TAYLOR: I just want to ask Lou a point of clarification. You implied that they would -- a hundred million dollar plant for turbidity filtration, but I was under the impression their current filtration plant, the one that takes the bugs out, at least when I read the RFP before it was constructed, was they were bidding on a plant that had an optional component that could be added on top of that so it wouldn't necessarily require a second filtration plant to take the turbidity out, they would simply execute on the option that they already planned to do before, yes or no?

MR. LOU DREISSEN: What you are saying is very correct. So what I'm talking about is adding another plant to the existing plant. So they provided for that option, so to add to that existing plant would be another hundred to hundred and ten million dollars. So that's what everybody is trying to avoid.

1421-056-001

UNIDENTIFIED MALE SPEAKER: First, just before the question, I think it's important to acknowledge as -- I'm Dave Atcheson with Biodiversity Northwest. We asked in our comments on the draft environmental impact statement for

1421-055-001 The cost of adding to the currrently planned "filtration bug killing plant" with a turbidity plant is $105 million (estimated), which is what is currently being used for a dollar figure. The currently planned filtering plant will not filter turbidity so that component would have to be added on.

1421-056-001 Comment noted.

1421-056-001

1421-056-002

Bonneville Power Administration to issue a supplemental draft environmental impact statement that would study other alternatives, and we specifically asked for more study of the nontransmission alternative.

So I think it's important to acknowledge that they did that and thank you for doing that. We'll have our comments, detailed comments on those submitted in writing, and I think other folks made good points about that. I just wanted to acknowledge that. My short question is: In the cost effectiveness determination for putting the new transmission line in, it's actually -- it's actually going to be beneficially economic to BPA and the rate payers because of the loss savings because that line will be more efficient -- there won't be as much loss of energy through heat; is that correct? So what I'm wondering is does that actually mean that BPA comes out ahead financially? Is this line a money maker for BPA?

MR. BRIAN SILVERSTEIN: No. In fact, it's not a money maker for Bonneville, but it is a money maker for consumers. And the reason is is that in our transmission rates, we include the cost of the wires and the cost of operating and maintaining that equipment. But the losses, the energy that's lost through heat of the wires, heating of the wires, must be replaced by the electric customers, by the retail utilities. So they benefit directly because if

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1421-056-002 The preferred alternative would reduce losses by approximately 11 MW on peak. This would result in annual energy savings of 48,180,000 kWh, valued at nearly $2 million per year. This is cost-effective from a total resource cost and societal perspective. Retail utilities and others who use the BPA transmission system return energy losses to BPA. Therefore the retail utilities, and their consumers, would benefit. It does not make money for BPA.

1 this line saves energy and the amount is significant, at the
2 time of normal peak it's about 11 megawatts of peak power,
3 that means that the total losses on the system will be
4 reduced and the amount that the retail utilities have to
5 return to us to replace that is reduced by 11 megawatts. So
6 their consumers benefit. But there's no financial
7 consequence to Bonneville transmission. I might say our
8 friends on the other side of the house in our power business
9 line, they and their customers will, in fact, benefit.
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CERTIFICATE

STATE OF WASHINGTON)
)
COUNTY OF KING)

I, BETSY DECATER, a Certified Shorthand Reporter and Notary Public in and for King County, Washington, do hereby certify that I reported in machine shorthand the above-captioned proceedings; that the foregoing transcript was prepared under my personal supervision and constitutes a true record of the proceedings.

I further certify that I am not an attorney or counsel of any parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

WITNESS my hand and seal in Sammamish, County of King, State of Washington, this 4th day of February, 2003.

Notary public in and for the
State of Washington, residing
at Sammamish

My commission expires 03-20-06

BETSY E. DECATER
NOTARY PUBLIC
STATE OF WASHINGTON
COMMISSION EXPIRES
3-20-06

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ORIGINAL

COMMENTS TO
KANGLEY-ECHO LAKE TRANSMISSION LINE PROJECT
Tuesday Meeting, February 4, 2003

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1422-001-001

1422-002-001

FIRST MEETING 12:00 - 3:00 NONTRANSMISSION ALTERNATIVES:

MALE SPEAKER: What is the contingency that pushes Covington over?

MR. BRIAN SILVERSTEIN: So the information about a particular contingency is not included in the EIS for security concerns. If you are interested in seeing that report, you can sign a waiver of that and get a copy of that, but I can't discuss that here.

MS. SUE KUEHL: Just this morning I received an e-mail from our account exec at TBL letting us know that there's negotiations going on right now with Power X to try to make some kind of arrangement or agreement to send more energy southbound through the northern intertie to alleviate some of the northbound congestion. How does that affect all this stuff that you are looking at?

MR. BRIAN SILVERSTEIN: So we've been in negotiations with the Canadians regarding the return of the entitlement for about two and a half years now. Actually, we've probably spent 15 years negotiating the return of the entitlement, recognizing that beginning in 1998, I think it was, we had to start making the returns. We have not reached any agreement other than what's in the exchange of notes from 1998. So we are still obligated to return that power with the same level of reliability for which we have

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1422-001-001 This is discussed in Appendix H. For security reasons, parties must sign a nondisclosure agreement to receive a copy of Appendix H.

1422-002-001 BPA negotiated with British Columbia for more than 10 years to develop the details of the Treaty power return. The March 29, 1999, Entity Agreements codify the obligations. See Appendix I for a description of the Treaty. While there have been ongoing discussions between BPA and Powerex at all levels, no new agreement was reached. The Canadians are entitled to have the power returned to meet their own needs.

to serve loads in the Northwest. There is no other agreement other than the one from 1998 and no new agreements have been reached. I checked this with the account executive yesterday, with the power account executive.

1422-002-002 MS. SUE KUEHL: I'm just curious if there is an agreement that's reached, does that reduce your need for the Kangley-Echo Lake line?

MR. BRIAN SILVERSTEIN: If somehow an agreement would be reached that would, say, limit the return obligations, then the need for Kangley-Echo Lake potentially could be put off by two to four years. But the need is still there because the load is still growing in the Puget Sound area.

1422-003-001 MR. KURT CONGER: Does the high Ross return to Seattle, that's factored into this study to determine how load is going into this?

MR. BRIAN SILVERSTEIN: Yes, the high Ross return is included in our studies.

1422-003-001 MR. KURT CONGER: I'm going to see if I got the right answer at the end of this. It appears that if more time were available, we could look at a fairly wide range of demand site alternatives to the Kangley-Echo Lake line. But given the times frames we're faced with right now, am I correct in concluding that the analysis shows that it's very unlikely that we would be able to defer

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1422-002-002 See response to Comment 1422-002-001. If you take a look at the Puget Sound Area load bar graph in the EIS you will notice that if the Canadian Treaty return is eliminated (the purple part at the top of the bar graph, page 1-5) the need for the project only changes by two years, from 2004 to 2006.

1422-003-001 Terms of the High Ross agreement are incorporated into the planning studies. The High Ross return from Canada slightly reduces the power flowing from south to north. The amount of demand response required is much larger than utility programs have achieved in the past. See response to Comment 1421-032-003. The short time makes it even less likely that these large amounts can be found.

1422-003-001

1422-004-001

construction of that line using the demand alternatives that you analyzed?

MR. BRIAN SILVERSTEIN: My interpretation is that if we had more time, more alternatives and greater quantities would be available, but my belief is we might be able to push it out for a couple of years. It just means we would have to build the line a couple of years later than our current schedule.

MR. FOLEY: One of the things if you had more time, you might be able to see whether or not some of these plants were built, for example, and that would -- so I think we would be -- there's always value in delay if you don't -- you know, if you don't run into a problem with not being able to meet load. So you've got this trade-off obviously.

UNIDENTIFIED FEMALE SPEAKER: I wasn't here in the beginning, so maybe you guys covered this. I'm just curious in relationship to all those questions about could you delay the project, it's my understanding that Bonneville has a curtailment plan in place now for -- with local utilities so that if the line reached certain loadings that local utilities would have to get some of the industrial customers to shut off even this winter. Is that still in place?

MR. BRIAN SILVERSTEIN: Yes, the curtailment plan is in place, and the curtailments would, in fact, be

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1422-004-001 The Puget Sound Area Load Curtailment Plan is still in place.

shared by local utilities and BC Hydro in proportion to the amount of power that they're moving through the area.

MR. KURT CONGER: But is it accurate to say that there are agreements in place for retail customers to shut off?

MR. BRIAN SILVERSTEIN: So I do not know what plans the retail utilities may or may not have in place. They are obligated to find the curtailment, and I don't know how they're going to get it.

1422-004-001 UNIDENTIFIED MALE SPEAKER: What happens if you don't get it?

MR. BRIAN SILVERSTEIN: The question is what happens if you don't get it. Again, the curtailment plan would actually be put in place before a contingency occurred because we'd have to be sure that if we had an outage we don't bring the whole region into a blackout. So at basically the control centers would issue an order to reduce transmission schedules, and utilities would have to follow that. And as far as I know, utilities do not generally disobey an order from one control center to another.

1422-005-001 UNIDENTIFIED FEMALE SPEAKER: So what range of megawatts are we talking about?

MR. BRIAN SILVERSTEIN: The question is how many megawatts, what range. It's difficult to say. If you look at the numbers in the study, the overload is 122

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1422-004-001 Retail utilities will likely take whatever steps are needed, including load curtailment, to avoid an area-wide blackout.

1422-005-001 For the winter of 2003-04, 381 MW of load reduction or additional generation within the Puget Sound Area is required. Two years later, the amount increases to 841 MW. See Appendix J, Section 2.4.

1422-006-001

megawatts at Covington, which is about 380 megawatts spread throughout the area. So depending upon the actual loading at the time, it would be somewhere -- could be a little bit less than that, could be a little bit more. One of the problems is these are based on using computer models to precisely predict the amount of megawatts. We generally can't be that precise and correct, so we typically have to over-drop loads to be sure we're safe and under the limits.

UNIDENTIFIED MALE SPEAKER: So the question I have is given that there would be significant savings as a result of the new line in terms of energy losses, why was the value of those savings not calculated in when you were calculating how much you would spend on incentives for nontransmission alternatives?

MR. SNULLER PRICE: When we were looking at the incentive levels, we were looking at the differential in the transmission business lines revenue requirement, which is another way of saying that is we were looking at the incentive payment as a direct alternative to the money that would go to a transmission line, so just looking at the change in revenue requirement.

Now, if you look at how the transmission -- TBL's revenue requirement is calculated, the loss savings are not a component of the TBL revenue requirement. So that's why the incentive level was based on that just as a

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1422-006-001 Transmission customers return energy losses to BPA - the costs are not included in the rates. Therefore, the savings are not included in the Ratepayer Impact Measure (RIM) - Transmission Company Cost Test. The savings are considered in the Total Resource Cost (TRC) Cost Test and Societal Cost Test. See Appendix J, Section 3.1. Because the loss savings are a benefit to consumers that offsets the cost of the line, under the latter two measures the savings would ***reduce*** the incentives available for non-transmission alternatives.

1 direct substitute for the transmission lines.
2 MR. BRIAN SILVERSTEIN: So let me try that.
3 So if you look at it just from a transmission business line
4 perspective or transmission -- right, from our perspective,
5 we do not get compensated directly for the losses. The
6 losses are returned by the retail utilities. But if you
7 look at the analysis that they did for total resource costs,
8 for instance, delivery price of power or the societal costs,
9 the value of those lost savings are, in fact, included in
10 the analysis.
11 So I think that they are correctly accounted for,
12 and I think one way to look at it, if you look at it from
13 those perspectives, the loss savings are really offsetting
14 against the cost for the transmission lines. So, in fact,
15 the transmission lines cost zero, or, in fact, it saves
16 money for consumers as a whole.
17 Thank you very much.
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CERTIFICATE

STATE OF WASHINGTON)
)
COUNTY OF KING)

I, BETSY DECATER, a Certified Shorthand Reporter and Notary Public in and for King County, Washington, do hereby certify that I reported in machine shorthand the above-captioned proceedings; that the foregoing transcript was prepared under my personal supervision and constitutes a true record of the proceedings.

I further certify that I am not an attorney or counsel of any parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

WITNESS my hand and seal in Sammamish, County of King, State of Washington, this 4th day of February, 2003.

Notary public in and for the
State of Washington, residing
at Sammamish

My commission expires 03-20-06

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ORIGINAL

COMMENTS TO
KANGLEY-ECHO LAKE TRANSMISSION LINE PROJECT
Wednesday Meeting, February 5, 2003

KELT-1429
FEB 0 6 2003

Maple Valley Community Center
Maple Valley, Washington

Reported by: Betsy E. Decater, RPR
License No. 601-835-443

1429-001-001 MS. FLORENCE TOLLEFSON: My name is Florence Tollefson, F-l-o-r-e-n-c-e, capital T-o-l-l-e-f-s-o-n, and I live in Maple Valley in the Hobart area. And we have for months and months now heard one alternate choice after another one. The last one expressed in the letter was to go through the Cedar River Watershed. That is my choice also.

1429-001-002 The lady at the desk had information on alternate sources. That is not of any kind of interest to me whatsoever because eventually they're going to have to come back and put a line in somewhere sometime. So put it through the watershed now and forget all the other stuff because it's too expensive and it will affect neighborhoods, you know, in very dramatic negative ways. So I am not interested in anything else but to go through that watershed and that's that.

1429-002-001 MS. SANDY WILDERMUTH: I was at the last meeting, and it occurred to me that I was talking with people here who were all in the same bucket. It was the choir singing to the choir. There was no one here from the City, there were no decision-makers here to listen to it and it seemed like everyone here all supported the watershed option, whichever one that is. So I wondered who do we really need to be speaking to in order to voice our desires for that option?

1429-003-001 MS. SONIA PREEDY: Our property is bordered on the south by your current power line. If you put in Option C,

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1429-001-001 and -002 Comment noted.

1429-002-001 Seattle has given BPA its comments in meetings and in writing. People concerned about commenting about the alternatives can come to BPA's public meetings, write to BPA, comment to their elected officials (local, state, and congressional) and write the Mayor of Seattle. BPA will study all the comments and use those comments along with the information in the EIS to make a decision.

1429-003-001 Comment noted.

The activities that you describe taking place on your property involve criminal trespass (illegal dumping, performing unwanted recreational activities and holding parties), and should be pursued by the County Sheriff's Office. Any help you could obtain for law enforcement, such as license plate numbers, names/address from any discarded mail, pictures and/or typical times of occurrence would aid law enforcement in arresting those who are responsible.

then the western side of our property would also have an easement along it. The reason we object to that option and feel that it should go in the watershed is we have such a difficult time with the public using the easement for recreational, dumping, partying on, and it's very hard to
1429-003-001 get them to leave at times, they're rude. And we contact the police, the police tell us that we're to hold the people until they can get there, and you can't do that. And so this really puts an onus on the property owner because they believe that this is government property and belongs to the public.

MR. DAVE PIMENTEL: Howdy, gentlemen. It's been a little while. Just got in from Oregon. We weren't even planning on being here, but I'm glad we showed up and just sat down really basically. When we went through the whole deal last year, we felt that we had some stiff opposition
1429-004-001 from downtown, so to speak, and what I want to know is what is -- what's it like? What's the atmosphere on the other side like right now? You know, what do we, who oppose Alternative C, what's our best path to take to make sure that the position is held that you're preferred alternative goes through?

MR. LOU DRIESSEN: I assume that you're talking about downtown Seattle, not downtown --

MR. DAVE PIMENTEL: That's correct.

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1429-004-001 See response to Comment 1429-002-001.

MR. LOU DRIESSEN: Well, you call it opposition, I'll call it differences of opinion. There's folks around that are concerned about the impact this line could have crossing the watershed. They're concerned about the impacts to the drinking water, they're concerned about the impacts to the Habitat Conservation Plan, which Seattle went through a lot of effort to put that into place.

So those folks are still concerned. The issue hasn't gone away. We're working with Seattle at this point and we're meeting like on a weekly basis with Seattle trying to figure out a way to where we can take care of most of their concerns. So as part of that, BPA has gone through this detailed engineering and surveying analyses, we were able to figure out where the new towers are going to go, for instance, and where any of the new access roads are going to go. And with that information, we were able to determine exactly what kind of mitigation measures from an environmental perspective need to take place.

So as a result of that, we were able to determine that we will not be filling in any wetlands, for instance, so that was a big issue. We were able to minimize clearing outside of the right-of-way. We were able to minimize clearing inside of the right-of-way to the extent BPA has determined that it's okay for one span just to cross the Cedar River, for one span it would be okay to double-circuit

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such that a new line would go inside the existing right-of-way that's out there now, and we would put in two double-circuit structures and put both lines, existing line and new line, on those two double-circuit structures. And by doing that, no clearing will need to take place across the Cedar River.

So these are all fairly large concessions. Another fairly expensive method we just started using at BPA, we said we are going to use specialty footings inside the watershed, we are going to use what we call micropyle footings, and it's something that is evolving as we go along. The design of that is evolving as we go along, so we intend to use those.

Also, we intend to use a helicopter to place structures. So that normally we would have to use a large crane to go out there and install the structures, we don't need a large crane if we use a helicopter. So we will use helicopters after the footings are in the place to put the structures in place and use the helicopter also to string the line. We're going to use a helicopter to help do some of the logging out there. So these are all trying to minimize and possibly even eliminate any potential erosion that would take place out there. So that's a concession on the drinking water quality aspect.

On the Habitat Conservation Plan we're working

with U.S. Fish and Wildlife, and (inaudible) and Seattle, all three of those parties to see what we can do to minimize impacts to the Habitat Conservation Plan. BPA has purchased 350 acres immediately north of the watershed with the idea that that acreage should be handed over to Seattle to help compensate for the 90 acres that we would be taking as a result of this project.

BPA is looking at other properties outside the watershed adjacent to the watershed with the intention of turning those properties over to Seattle if we're able to come to some agreement. BPA is also looking at buying insurance, for instance, to counteract the potential of if something were to happen, even though the odds are so small, that something were to happen and the drinking water would be degraded such that Seattle would need to build a filtration plant that we would have insurance in place that would help pay for that.

So the other aspect is the environmental community is still concerned about problems in the area, and we're trying to work with the environmental community at this point also.

1429-005-001 UNIDENTIFIED MALE SPEAKER: Alternative A affects the community that I live in, and you made a comment that you didn't think that you could take it down long enough to do whatever, you know, to put up the new line. I'm kind of

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1429-005-001 Alternative A consists mainly of three parts: One part goes from Covington to the north where an existing line would be taken down and replaced with a new double-circuit line, which would carry both the existing line and the new line. Part two goes around the existing BPA substation with new right-of-way and would require removing some homes. Part three would be between Kangley and Covington where there is an existing vacant right-of-way available where the new line could be constructed. You are referring to Part three where the new line could occupy vacant right-of-way that has been vacant for many years. BPA recognizes a new line within this vacant right-of-way would have high impacts to adjacent homeowners.

1429-005-001

1 confused by that because my understanding was that you were
2 actually going to put a third line using the additional
3 right-of-way that you've had since about 1942, which now
4 most everybody uses as a nice screen to their property. And
5 so I'm a little confused by what you said. If you have to,
6 quote, take it down, why would you do that if you're going
7 to just put up another line?
8 MR. MIKE KREIPE: The proposal there is you're
9 talking about the Covington Maple Valley 230 kV line. The
10 proposal there is to take that -- because our right-of-way
11 is only -- it only can take either a single structure,
12 either double circuit or single circuit, we will take a
13 single circuit down and replace it with a double circuit,
14 put the existing line back on one side and build a new line
15 on the other side. So essentially we're not going to put
16 two parallel structures there, or one set of structures, the
17 old and the new line. So you have to take the old one down
18 before you put the new one up.
19 UNIDENTIFIED MALE SPEAKER: So you already have
20 two?
21 MR. LOU DRIESSEN: There's two parts to this,
22 basically -- actually, there's three parts to this
23 Alternative A. So Alternative A would start at Kangley, for
24 instance, and from Kangley to Covington there's a vacant
25 right-of-way that's available. Near Covington there's two

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existing lines already in that right-of-way, but there's a vacant portion on the right-of-way. This new line would utilize the vacant portion.

What Mike's talking about is from Covington to the north.

UNIDENTIFIED MALE SPEAKER: No. I'm talking about the piece that goes through Winterwood Estates.

MR. LOU DRIESSEN: Right through there Alternative A would utilize the vacant right-of-way which is on the north side of those two lines.

UNIDENTIFIED MALE SPEAKER: Right. And that's the area where you have went and cleared all the trees and --

MR. LOU DRIESSEN: That's correct. A lot of trees have grown up inside of our right-of-way there and people use that like for backyards and will definitely impact the folks that live alongside that right-of-way.

UNIDENTIFIED MALE SPEAKER: So that's not the part you're talking about taking down. You would, in fact, put a third line in there.

MR. LOU DRIESSEN: That's very correct.

UNIDENTIFIED MALE SPEAKER: But when it turns and goes through Covington, then you would still only maintain two towers. Is that what you are saying?

MR. MIKE KREIPE: The part I was talking about was the section right here where we have one circuit we would

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replace with a double circuit. I think the part you're talking about is here where there's a single circuit and we will add a circuit on that right-of-way, so they're both part of the same plan. So it's --

MS. DIAN ADAMS: Does that answer your question, sir?

UNIDENTIFIED MALE SPEAKER: You would have in that area where it goes through three sets of towers?

MR. MIKE KREIPE: That's correct.

1429-006-001 UNIDENTIFIED FEMALE SPEAKER: Once this is completed, how many years do you anticipate this will hold the amount of power that's needed?

MR. MIKE KREIPE: Well, I've gotten that question tonight from a couple of people. In fact, we had it a year ago in some of the questions, which I wrote a response. The line we have through there now starts in Monroe to Echo Lake to Raver, that's the north-south line. It was built in the late '60s, early '70s, so it's approaching 30 years. It has provided good service. It's hard to look at the future and know what growth's going to be. Actually, load growth now is much less than it's been in the last 30 years. We had six to seven percent load growth for a long time, we have two percent load growth now.

I would suggest -- my experience, I've had 30 years in planning, I would suggest that it would last at

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1429-006-001 The existing line on the Cedar River Watershed was built in the late 1960s and has served load growth in the area for nearly 35 years. The new line should serve the area for at least another 30 years and maybe longer depending on the availability of new power generation technologies.

least as long, but there are things happening in the power supply business, distributed generation, fuel cells, you hear about them in the news. They have been around a long time, a lot of people are trying to figure out how to mass produce them. When they are mass produced, they will be cheaper. You could very likely have your own power supply produced by gas in your own home. It could happen. 20, 30 years, the load growth is all handled, at least at residence with those devices. It could happen at some point that no new transmission, major grid type transmission is needed. But I would say that line, short of that happening, that line should last 25 or 30 years.

UNIDENTIFIED FEMALE SPEAKER: I was just wondering, you were talking about you were going to be minimizing the amount of timber you'll be taking down in the watershed to try and help them out to meet some of their environmental goals, I guess. Well, on my land that's in preferred alternative 1, anyways, I asked them to minimize the amount of trees that they took down on one of my lots should they come across there because I spent a lot of money in developing a 20-acre piece there that I have a creek that goes through there also that was of great concern to King County as to a hundred year flood plain.

So I had to have a lot of engineering done having to do with that hundred year flood plain, and that cost a

1429-007-001 and -002 Comment noted.

1429-007-002

1429-007-003

1429-007-004

lot of money, not only my engineer but King County's engineer looking at it, redlining it back and forth and so on and so forth. And so, anyways, the -- and it was zoned RA-5 for one house per five acres, but also it's also based on, you know, a certain amount of drainage per square foot of the house and how many trees are left and so on and so forth.

So I asked them to try and minimize the amount of trees that they would take off of my property, also for the impact of value to my other lots because that would open up the whole line to view all of my lots which would impact the value of my other lots. And anyways the forrester, the other BP real estate specialists assured me that they would try to take care of that.

And anyways the forrester came in there and she just cleaned that whole lot 100 percent off and even went into the other lot, was taking some trees off of it too and gave no consideration into that. So I don't understand why, you know, BP can give consideration to one, to the watershed, and they can't give consideration to the other.

MR. LOU DRIESSEN: Let me try to address that a little bit. The consideration that I'm talking about inside the watershed is, for instance, on the normal basis of a new transmission line to go through an area that has timber on it, we would take any tree that would potentially fall into

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1429-007-003 and -004 Due to the height of the trees within the proposed right-of-way, very few trees can remain within the 150' right-of-way with the exception of very deep drainages and canyons. For the selection of danger trees outside of the right-of-way, the stable tree criteria would be used on all properties along the preferred route. Trees that were deemed not to pose a threat to the new transmission line would be left. Consideration is given when danger trees are selected to impacts regarding landowners from this clearing.

that line. So in this case here we determined that BPA would take some risk and that outside the right-of-way -- inside the right-of-way we would not allow any trees to grow unless it's in a deep canyon. So on flatter terrain or on sloping terrain, we would not allow any trees to grow inside of our right-of-way.

Outside the right-of-way, we're going to take a look at it from a -- more from a maintenance standpoint, take a look at trees that could potentially fall into the line because they're diseased or because they're heavily leaning toward the line. So there are still going to be trees taken in the watershed outside the right-of-way, there will be trees taken, but not as many as there would have been otherwise if we were to take every tree that would potentially fall into the line. So I don't know what the situation is on your property, but I would hope that they would use a similar kind of thing on your property also. So inside the right-of-way we're not allowing any trees to grow inside the right-of-way unless they're trees that -- while you couldn't call them trees, shrubs.

1429-007-005 UNIDENTIFIED FEMALE SPEAKER: I understand on the right-of-way and they said maybe they could replant some shrubs, but I'm talking about the trees outside the right-of-way, she was calling every tree a dangered tree. That lot was scalped when she got through with it, and so a

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1429-007-005 See response to Comment 1429-007-003.

1429-007-005

few trees left on the lot next to it, so --

1429-008-001

MR. RICHARD BONEWITS: Thank you, Diane. My name is Richard Bonewits. I'm chairman of the Greater Maple Valley Area Council. Area residents are pawns in this BPA 500 kV transmission line location issue. As several of the speakers that are here tonight were at Seattle yesterday and spoke to the environmental people and to Council Member Margaret Pagler who also is on an environmental committee with me for watershed planning for this area, they're going to tell you, they will be able to tell you if you want to talk to them that some Seattle residents have willingly or unwittingly developed an extraordinary but limited interest in protecting a relatively small part of the environment of King County, the Seattle watershed.

1429-008-002

We want to give Seattle people credit for their recent discovery of the environment, as reflected in their Habitat Conservation Plan that Lou mentioned. They were forced into it knowing that they were going -- they were

1429-008-003

going to be facing ESA. They were requested to get it out and get it done so they could show some progress before ESA was laid down as a requirement.

1429-008-004

But as you will hear from others here, clear-cut logging of more than 70,000 acres over the last 90 years with the intended construction of 650 acres of logging road is not exactly environmentally friendly. Many of you have

1429-008-001 Comment noted.

1429-008-002 and -003 Comment noted.

1429-008-004 Comment noted.

1429-008-004

done a better job preserving your streams and wetland. And even after having a 500 kV line across the watershed for more than 30 years, some Seattle residents and politicians have decided that the power line should go outside the watershed and one of those routes is over your head. We don't know which one, but one of them is.

1429-008-005

We have confronted them with the information also that they have been aware of all the time. Lou mentioned three things they're concerned with. There are really principally two: One's the environment and the other is water quality. They mentioned water quality. In the case of the water quality issue, there was a fecal coliform incident in 1992 after which the State Department of Health ordered them to develop a water filtration facility design and implementation plan and told them the next incident they were going to implement it.

This was before Bonneville thought about the studies that led up to their scoping studies two, three years ago and came back last year. Some of us knew about this before them. In fact, Laura's son is a water quality specialist operating for Seattle at times in the past, very familiar with the requirements. The studies were done, the designs were complete, the ionization plant is being built right now. I live near it, it's half a mile away, mile away, not quite a mile, but the filtration plant has not

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1429-008-005 Comment noted.

1429-008-005

1429-008-006

been built. Still holding up on it.

So if there's another fecal coliform incident, the theory that the Department of Health will be on their tails to get that filtration plant built whether or not the power line goes through the watershed or not. They know that, but the story still keeps coming out and that's what you'll see in the press. But to Seattle's credit, many of its people did participate in these public meetings, including Councilman Margaret Pagler last night. There has been no participation from most of the other cities in the region which share BPA's electrical power, not from Bellevue, Kirkland or thereabouts.

Bonneville has done its job. It's doing its job. There are four groups in your community who have gathered more than 1500 petitions opposing routes outside the watershed who are here tonight. One of them is Dave and his wife back there, and the other one is one that I have sort of led all the way through it, but we've kept coordinated together on this and working together to get those signatures, and I want to give them kudos and I also want to give kudos to some of our elected representatives.

Jay is here representing Cheryl Pflug, he works for her. Sara is here, works for Glen Anderson, another state representative, and Neal behind here works for Councilman David Irons. They have been with me, behind me

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1429-008-006 Comment noted.

1429-008-006

1429-009-001

1429-009-002

every step of the way for the planning for the opposition. We've also had our congressman behind us and we have even had -- been able to enlist a little help from Maria Cantwell's organization, at least they're involved with touching us daily. Your elected representatives have weighed in on your behalf. This is your last time to speak, and that's why I am here today. If you want to talk about this issue, this is it. I'm asking you to all follow that up with written comments and send a copy of those to Post Office Box 101, Maple Valley 98038. I'll see that the politicians get them.

MR. SCOTT TAYLOR: I'll try to be brief. You guys are looking for some feedback on how you did on the distribution of the EIS. I particularly really thought the CD ROM, I'm a computer person, so it worked very well for me. If you are looking for more suggestions, I highly recommend that you put the full text of the EIS on the website. I could not get it on the website, I could only get a summary. It's a pretty large download, so if you had a page where you had the full EIS in sections and you could download PDF's, that would be great.

So I had an interesting conversation with one of the directors from the Sierra Club yesterday, and normally they and I see very, very eye to eye. I consider myself an environmentalist, but in this one particular issue we have

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1429-009-001 BPA appreciates the feedback. We wanted to put the SDEIS on our web page, but BPA's security office suggested that we not do so. We hope that we are allowed to put these documents on our Web site in the future.

1429-009-002 Comment noted.

1429-009-002

1429-009-003

1429-009-004

1429-009-005

been at a bit of loggerheads. The Sierra Club does not want to see any kind of activity through the watershed; whereas, I actually think that's the preferred alternative.

So we actually chatted for at least a half an hour yesterday, and we were actually able to find some common ground, and I would like to share some of that. While we disagree on the exact route which one should go, we're both very much stewards of the environment. If BPA can consider themselves also stewards of the environment, I think that you guys can make everybody happy, or at least minimize the damage.

Specifically, if you guys actually choose to go through the watershed, I want to see some of the things that the Sierra Club wants to see. I want to see Plumb Creek added to the watershed and forked over as part of the mitigation. There's also a hundred acres of property near the Raging River that can be added as well. You guys are also double-circuiting a section across the Cedar River. Both myself and Sierra Club would like to see that across the Raging River as well.

So I think that there are some extra mitigation steps that you guys can have to make everybody happy. And, likewise, the Sierra Club agrees on my point that if you guys go through anything like Alternative C or A or B or D that you take the same mitigation measure for that

1429-009-003 Please see response to comments 1415-003, -004, and -005.

1429-009-004 Please see response to Comment 1415-006.

1429-009-005 Please see response to Comment 1420-001-002.

1429-009-005

environment that you are through the watershed, specifically, micropylings, helicopters, vegetable oil. All the things that you would do for the watershed, we require that you do outside the watershed as well, and I'd like to see you add that to the costs that you have put forth in your EIS. Thank you.

1429-010-001

MS. LAURA LORENZ: I'm a resident of Hobart for over 40 years, and my comment is going to be very brief. In 1947 the City of Seattle bought 90,400 acres of land -- the Seattle city bought 90,400 acres of land for $2.21 an acre for their watershed, and as a result they closed the watershed so nobody could enter it. But it also obliterated several communities, Harriston and Taylor, School District 409, which is Tahoma, lost tax dollars for support of their school district. The citizens no longer could fish or hunt in this area or use it for recreation in any way. The Cedar River got drained, and I mean really drained. In the summer you can't find enough cool spots for the big fish to live and you can't recreate in it any longer because it's too shallow frequently if you have a dry summer.

1429-010-002

Both BPA and Seattle are public entities, and I strongly suggest and believe that public entities or organizations should be used when -- public lands should be used for public uses at any time they can do it instead of going through private lands. So if BPA can go through the

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1429-010-001 and -002 Comment noted.

1429-010-002

watershed, I'm for it. They have already gotten what they needed there and they have it and we have sat fast enough, let's let them use the public land and let the private people have a little bit of peace and let 1971's decision to go through the watershed stand in 2003. Thank you.

MR. JON ZAK: Good evening. My name is Jon Zak. I live on two and a half acres in a development of about a hundred homes in Maple Valley. Our eastern property boundary would be the centerline of the proposed transmission line right-of-way for Alternative C. We would lose the trees on a quarter of our property, and these trees are in a native growth protection area. The trees range in size from two and a half to five foot in diameter. We never would have purchased this property if we thought the power line would be running through our backyard. Alternative C would completely destroy our privacy and our views of trees in our backyard. It would destroy our experience of living in nature. This was the reason we bought this property.

On the BPA's preferred alternative route, the one through the watershed, the age of the trees is like 10 to 30 years. The trees on our property in our native growth protection zone make the trees in the watershed look like toothpicks. I've got some pictures here to show you of some old growth. This is the Curtis Grove on the way up to Snoqualmie Pass. Some more pictures I showed Seattle but to

1429-011-001 1429-011-002 1429-011-003 1429-011-004 1429-011-005 1429-011-006

1429-011-001 and -002 Comment noted.

1429-011-003, -004, and -005 Comment noted.

1429-011-006 and -007 Comment noted.

1429-011-006

1429-011-007

1429-011-008

let them know what big trees look like. You may not be aware of what the watershed looks like, so here's a picture of the upper watershed. You can see there's a couple of big trees standing outside and it's been logged for almost a hundred years, 70,000 acres.

Here's another view, there are 621 miles of logging roads. See Chester Morris Lake and more clear-cuts and old logging roads on the other side of the lake. And then here you see a big road cut and more clear-cuts. This is our backyard. There's another picture of our backyard.

This is off the Seattle Public Utilities website. This was some work that they did. See this logging road? It's starting -- sedimentation that's running towards the river. Here's some other work they were doing right around Chester Morris Lake with the heavy equipment, probably not using vegetable oil in the hydraulic systems. Other pictures show heavy equipment, so -- well, the pictures of the construction in the watershed by Seattle Public Utilities proves their hypocrisy.

Seattle has one standard for themselves and another one for the BPA. I would like Seattle Public Utilities to answer a couple of questions: Number one, where is the evidence that BPA has caused any harm to the water quality or watershed operation in its 30 years of operating a power line in the watershed?

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1429-011-008 Comment noted.

1429-011-009 And, number two, clearing 91 acres for a second power line would require one-tenth of one percent of the watershed's total acreage of 90,240. How can this small an amount of clearing have any impact on water quality?

1429-011-010 The Habitat Conservation Plan is a great idea. How about the habitat of people living along Alternative C?

1429-011-011 Is wildlife habitat inside the watershed more important than habitats for both wildlife and humans outside the watershed?

1429-011-012 The people who lose their property will be paying a price for Seattle's water. The City of Seattle will destroy the rural communities of Hobart and Ravensdale all due to unfounded water quality issues. I wonder what history will say about this. Thank you.

1429-011-013 MS. HELEN JOHNSON: I didn't plan on speaking tonight, but my name is Helen Johnson and I live in Hobart and I consider it a privilege to live in Hobart. It's a very special, unique place. It's been there over a hundred years. It was there before the watershed. We have descendants left of the original homesteaders there. They have spent all their lives there. They were born, lived their whole lives there, graduated from school there. They stayed there on the land that they loved, we poured our hearts, our souls into it. We buried our loved ones in the Hobart cemetery. And we have taken much better care of that land than Seattle ever dreamed of doing.

1429-011-014

1429-012-001

1429-012-002

21

1429-011-009 and -010 Comment noted.

1429-011-011 and -012 Wildlife habitat is important inside and outside the CRW. The area inside the CRW does have a Habitat Conservation Plan approved by USFWS and NMFS. BPA would also seek to minimize impacts to the wildlife habitat outside the CRW by minimizing clearing and construction particularly near and across streams and rivers. As noted in the SDEIS, BPA has labeled Alternative 1 as the preferred route recognizing the ability to mitigate impacts to the wildlife inside the CRW and the impacts to people and wildlife outside the CRW. See Table 2-3 for comparisons.

1429-011-013 and -014 Comment noted.

1429-012-001 and -002 Comment noted.

1429-012-003

1429-012-004

1429-012-005

1429-013-001

We bought right up against the watershed. The only thing that separates us is a fence. We have the same plants, same animals, same endangered species. And the environmentalists are worried about the watershed, but they don't care if you're on the wrong side of the watershed. They don't care about the species over there. It just doesn't make any sense to come to an area like that and destroy it all for some power for Seattle. Because we don't need the power, Seattle does.

And, you know, it's just we've been there too long, we're too hard working. We just want to be left alone to live our lives. As far as I'm concerned, Hobart should be off limits to everybody but the people that live there, including the government and including King County. And the only extinct -- or people that are endangered of being extinct there are the people, not the animals, it's the rural homeowners.

MS. ALEDA MORGAN: I'm Aleda Morgan, and I'm on the preferred route, alternative number one, and you-all seem to think that we're only talking about the watershed being affected here. Well, there's at least five people on this route that are being affected. And I moved there in 1976 with my husband, this was the farm of my dreams here, and anyways my husband passed away 16 months after we purchased this property. And so, anyways, then he was a

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1429-012-003 and -004 Comment noted.

1429-012-005 Comment noted.

1429-013-001 Comment noted.

truck-driver and we had our own truck. So, anyways, I got into the truck and started driving the truck save the property so I wouldn't lose my farm, and, you know, to support my family.

And, anyways, I managed, I was concerned back in 1980 -- he passed away in '78. I bought it in '76, he passed away in '78, I was concerned that I may lose the farm, so I decided to subdivide it back in '80. And so I subdivided it into some five acre tracts in case I wasn't able to do the trucking or in case I was to get hurt or in case I would have to sell some of it and wouldn't lose the whole place.

1429-013-001

But, anyways, I never had to sell any of it. I'm trying to move along fast. But then it came to King County in '97 decided that they were going to take the right to subdivide a 20-acre piece away from us, so I decided to subdivide that in '97 and it took almost five years to do it and a hundred thousand dollars. So, anyways, then Bonneville comes along on March 22 of 2000 and starts informing me that they're planning on this Alternative 1, they have got two other alternatives they're thinking about but they want to go through Alternative 1.

1429-013-001

So, anyways, I go ahead and give them the okay to go ahead and to survey my property to, you know, do what they need to do because I figure if they're going to go

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1429-013-001 BPA apologizes for the disruption that this project has caused people along the project routes. It is our intent to treat people fairly and with respect.

1429-013-001

1429-013-002

through, they're going to go through, there's not going to be a lot I'm going to be able to do about it and in the hopes that they're going to pay me for my losses.

Anyways, so far to date they came to me, they did an appraisal on October 25th to 27th and they finally got it back to me on March 8th of 2002, and they want to buy this property. I mean, they have been trying to buy our property out there -- I mean, you-all think this has been going on since June for you. Shoot, this has been going on since March of 2000. We've been in hell since March of 2000, I'll guarantee you that.

And so, anyways, they come along and ruining one five acre tract of mine, I mean totally ruining it, and then they're ruining over half of another five acre tract. They came and offered me in March -- well, I wouldn't meet with them in March because I was going on vacation. They come along in April, they offered me $160,000 for two five acre tracts that they're ruining. There still will be a building spot on one of them, but it had over 500 feet of building of house feet and now from the right-of-way to the corner of the property line it is 180 feet.

On the other corner, there's a hundred -- 244 feet, excuse me, and they want to pay me -- I put in a road that cost me over $75,000. I put in power and phone that cost me $40,000. I mean, I'm not a rich woman, I'm not a

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1429-013-002 and -003 BPA apologizes for the disruption that this project has caused people along the project routes. It is our intent to treat people fairly and with respect. Please refer to Section 4.11.2.5, Community Values and Concerns, Property Value Impact. If you are aware of any sales in your area that are comparable to your property, please send them to BPA and our appraisal staff will investigate them for comparability.

big developer, I still truck every day to pay for this and this is my retirement. This is the only retirement that I have. So they're not just affecting the watershed here, they are affecting my life. There is other people that they're affecting that their homes. There is a person who has a home there. They have come in there and offered them practically nothing for their home. The woman has had a stroke since this has been going on, the pressure is intense. I had to contact a lawyer in April so they would quit calling me on the phone while I was driving a dumptruck trying to back up, not to driver over top of people while I was backing up. I had to get a lawyer to write them a letter to tell them to quit calling me on that phone because that's the phone I get my work on, so I have to answer the phone. I finally got to recognize the ID number, so I didn't answer it anymore. 1429-013-003

So I -- you know, this is not just about the Seattle watershed. And I asked you people in June to please, you know, not leave us five people out there at the mercy of Bonneville, because I'll tell you what, they're at our door every day, they insisted upon appraisal of the other lady's house during Christmas. Her husband way was away while they had a family member that was sick, and I had to call them up and say you don't need to be bothering her at Christmastime, you can wait until after Christmas, but,

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1429-013-003

you know, and they finally let her do that. But it's been a battle. Every day it's a battle. It's a battle with them, and they plan on stealing our property and I truly mean that.

1429-014-001

MR. ROBERT GARLAND: I'm Robert Garland. I'm the president of the Winterwood Estates Homeowners Association, and we have several of our residents here tonight. We are affected by the A transmission line. That transmission line, if put through, will make the last lady's problem look like Sunday school play because there will be about 15 to 20 percent of our residents that will be directly affected either through the fact that the power lines will take out all the trees and have power lines within 30 feet of their house or will take down all the trees and expose the power lines that are there now and ruin the view and the value of the property. So there is -- we have 364 homes in our community and every single division of our community will be affected because of the way the power line runs through at an angle.

1429-014-002

1429-014-003

We support the BPA's approach to trying to affect the least amount of people possible. All of the other, at least A and C, it appears, will have a tremendous impact on lots of people, not just five, and it will have a devastating effect even perhaps on one school which is in our community. This power line will not run very far from

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1429-014-001 and -002 Comment noted.

1429-014-003 Comment noted.

1429-014-003

that school.

1429-014-004

I've talked to different people, I've talked to people who are in management with the power company in Idaho, in Mississippi, and both of them said that when they put through power lines of 500 megavolts that they had to buy every single property within any reasonable proximity to those lines because the magnetic -- the field that is generated would mean that anytime you touched a piece of metal in your house you would get shocked.

And so he said that -- they all told me that they had several problems in that regard, they had to buy all of the properties. The likelihood is if this line would go through any place but the Cedar River Watershed is that the lawyers will tie up BPA for at least ten years. And so there won't be any transmission starting next year, it will start maybe ten years from now because there are too many people that are affected by this to allow it to just happen.

1429-014-005

1429-014-006

And so I would urge BPA to hang in there and take the approach that affects the least amount of people and affects the least amount of environment because when you start affecting people and the trees and the property by the hundreds and thousands, then you've really had a big impact. Thank you.

1429-015-001

MS. RAE PEARCE: Well, I thought I wasn't going to need to talk, but after what you just said, I have to.

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1429-014-004 and -005 BPA has determined that the proposed 500-kV transmission line would require a right-of-way 150 feet wide, along with necessary access roads. If the Record of Decision identifies that a route, other than the current preferred route were to be selected, it would not be possible to construct this year. Many activities including specific surveys, design, additional environmental analysis, appraisals as well as negotiations for land rights with landowners would need to be completed.

1429-014-006 Comment noted.

1429-015-001 Comment noted.

1429-015-001

Magnetic fields are dangerous to the public. I think if you can go over the watershed, it's got to be that way. We can't impact schools, we can't impact people's homes. I've had a childhood leukemia, you don't want to go there, and I think we just need to protect the general public.

There's a lot fewer people impacted, and it's tragic for those that are, but it seems that, you know, they're the powerful people. We all don't like government shoved down our throat, but I think they have really done their work, they have really done their studies, and you have to look at the least number of people affected. You cannot go over schools, you can't go over neighborhoods like that. The property that other people are talking about around the watershed that own property aren't -- it isn't inhabited with population to the extent that the schools in Winterwood is. We just have to look at that.

1429-016-001

MR. RON IVERSON: As many of you know, I'm a Hobart area homeowner or landowner. I talked last night and I'll just summarize and say BPA did it right the first time. They did it right this time, only this time they did it -- I really want to compliment you. The way your construction stuff and the fact that you're using vegetable oil instead of motor oil, I don't know how you can do any more mitigation than that. This is a real nice document, but it's hard to read.

1429-016-002

28

1429-016-001 and -002 Comment noted.

1429-016-003

1429-016-004

1429-016-005

1429-016-006

1429-016-007

1429-016-008

1429-016-009

And I asked, you know, where's the summary of the cost, and they have even done a nice job with that because it's in there. And this lady has got them back there and you really ought avail yourself of something that's readable. Going through the watershed versus Alternative C through Hobart and Ravensdale, impact on all these things is much higher than that. Land use, high impact on Hobart, none on the watershed. Water quality, groundwater high impact. Where are all the Greenies?

High impact on groundwater going to Alternative C. Vegetation, low in the watershed, really high in other places. Visual, my God, nobody's going to be bothered by going through the watershed. It sure bothers me going through my backyard. Cultural resources, God, the guy last night was just disappointed. They dug 1100 holes, right, 1170 holes and they only got two things that were even close. God, maybe they got a good one, maybe they got an artifact. No, they got a railroad spike. And the poor guys haven't been able to find any spotted owls, but they're going to keep looking, right?

Public health, safety, high impact, all these versus the watershed versus Alternative C. So this is a really good document. My hats are off to you guys. I got one question to ask you that I was confused about last night. They say the technology is advanced so well that the

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1429-016-003 and -004 Comment noted.

1429-016-005 Comment noted.

1429-016-006, 007, and 008 Comment noted.

1429-016-009 BPA is following the U.S. Fish and Wildlife Service protocols for surveying for the northern spotted owls. Those surveys call for surveys to be conducted over a two-year period during the nesting period of the spotted owl (March 15th through June 15th), unless the project would be constructed in the year the first survey would be conducted. Surveys were conducted during the nesting period in 2002, and they are scheduled for 2003 as well. If any spotted owls are identified, BPA would comply with timing restrictions so as not to disturb the protected species.

1429-016-009

1429-016-010

efficiency of putting this second line through will more than take care of the cost of the line. Is that right?

MR. MIKE KREIPE: The energy losses.

MR. RON IVERSON: Yes. In other words, they're saying the technology will be so much better that the economic value and the loss savings is greater than the cost of the line.

MR. MIKE KREIPE: It's really not due to technology. If this were to happen 20 years ago, the same situation of today, it's just the physics of how losses occur in the system.

MR. RON IVERSON: Final thing is: What's the bottom line on cost. If you read this baby, would you rather spend 23 million bucks of your taxpayer money or double that to 50 million going through Alternative C? Look at all these costs. I really empathize with the lady here who's losing some of her property and so forth. But I heard that Sierra guy talk last night, and he wants to litigate. The longer this thing hangs on, the worse it's going to be for everybody. So slimy litigators, I have no use for that outfit, and I listened to them afterwards and I appreciate what you guys are up against. Are they're going to give her a section of land? Hell no. Are they going to give me any land? Hell no. But this guys holding out they'll give a whole section 25 and he's holding these guys

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1429-016-010 Comment noted.

1429-016-010

hostage for that. So be aware that some of the environmentalists, these Greenies will really be anti-Greenies as far as I'm concerned.

1429-036-001

MR. HILARY LORENZ: My name is Hilary Lorenz. My property would fall under Alternative C. Last night I spoke about forebay cleaning at the Landsburg Diversion Site. I wanted to read from a -- the Draft Final Landsburg Master Plan. This was put out by Seattle Public Utilities. This is from their executive summary. On page 7 of that, it says, Presently the Landsburg intake forebay is cleaned once yearly during a shutdown of the intake. Deposited silt, sludge and organic debris are removed by SPU crews using hand tools and power equipment. That's just Seattle's documentation of what they do in forebay. I have two other documents I'd like to speak from, both of them are generated either by SPU or for SPU, Seattle Public Utilities.

One is an executive summary from their Cedar River Facilities Planning Project where they discuss the potential construction of filtration facilities at the Lake Youngs. The facilities planning project consisted of a series of tasks that addressed various technical aspects and planning considerations relating to the implementation of ozone treatment for SPU's Cedar River water flood. Prudent planning also resulted in consideration of granular media filtration and other particle removal technologies.

1429-036-001 Comment noted.

1429-036-002

1429-036-003

1429-036-004

The summary conclusion in this executive summary says that SPU is planning to implement substantial improvements to its water treatment and supply facilities at the Cedar River source. These projected improvements are based on multiple barrier approach to public health protection and feature the addition of ozone disinfection compatible with addition of filtration facilities at New Lake Youngs intake and roll water pump station. Additional treatment facilities, including filtration, may be justified if, one, regulations change; two, there are new health effects data; three, long-term costs can be minimized through alternative delivery and public/private partnerships.

And I would suggest that they're looking for reduced costs with partnerships maybe with BPA. One other document I want to read from, the Seattle Water Department, Cedar River Surface Water Treatment Rule Compliance Project, dated January 1996. In the executive summary of that under pilot study objectives, they studied -- in this document they studied two treatment regimes. One was ozone treatment only, which is what they are progressing with now. The other alternative was ozone/filtration. Ozone/filtration, the additional benefits of filtration combined with ozonization including turbidity and particle removal providing a further barrier to parasite removal,

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1429-036-002 and -003 Comment noted.

1429-036-004 Comment noted.

disinfection by-product precursor removal, case in order reduction, as well as increased system operational flexibility must be balanced against the added cost for filtration. Optimum filtration conditions should provide effective removal of contaminants in the most cost effective manner. That's from 1996 they're looking at cost effective manner of filtration.

1429-017-001 MS. JOANNA PAUL: I'm Joanna Paul, and I'm in the area of number one. We will lose our home if BPA comes this way. None of this was our idea. We lived in the Burien area and were purchased 25 years ago after 14 years by the Port of Seattle. We have done this once before. We moved out to where we thought we could get away from the airplanes and everything else. We had no idea that a power line was going to come in. Having a power line come through is not the issue. The issue is our property. They will be taking two and a half acres that our house is on and we have over seven. There is no compensation for that. None of this was our idea. This has caused us a great deal. It has caused me a stroke, closing a business and they have undervalued our property by at least a hundred thousand dollars.

Now, I don't know about you, but a hundred thousand dollars is a lot of money to me. And we also feel

1429-017-002 that we've been harassed. We get calls several times a day. Not only are we called but then they come out -- and when I

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1429-017-001 See response to Comment 1429-013-002.

1429-017-002 and -003 BPA apologizes for the disruption that this project has caused people along the project routes. It is our intent to treat people fairly and with respect. We have offered to buy the lot and house in an effort to negotiate an agreement. We do not have authority to condemn more property than is needed for the transmission project. We can condemn only the necessary right of way. Our measurements indicate that the house would be approximately 18 feet from the outer edge of the right of way and approximately 71 feet from the nearest conductor of the power line, if the line is built.

1429-017-002

1429-017-003

1429-017-004

1429-017-005

1429-018-001

speak of them I'm referring to BPA -- there's notes left on my door, my car windshield. One phone call is enough. And when we say we're not going to take their offer, which is a hundred thousand dollars less, at least, we're told they will condemn us and they will not only condemn us but then they will take just what they need, not our house, so the power lines will sit seven feet from our house.

You're talking about how dangerous it is. It's dangerous to us. I have no problem with the routes. I have a problem with not receiving fair compensation. None of this was my idea. BPA literally showed up on my doorstep in December and said they wanted to do this. If they get away with this, if they condemn our property, if they take what they want to take and not pay for it, keep it in mind because it's our property this time, it may be yours next time.

MR. GEORGE McFADDEN: My name is George McFadden. I live in Issaquah. I want to speak this evening about minimizing environmental damage and the public participation process. Having reviewed some of these options, I believe that the shortest route through the watershed is probably the one that also is the least environmentally damaging. I understand that you have many people that see that differently, including the City of Seattle. But I also want to point out in terms of public participation, when the City

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1429-017-004 and -005 See response to Comment 1429-013-002.

1429-018-001 and -002 Comment noted.

1429-018-002

of Seattle abandoned the 16 road inside the watershed, they put heavy equipment in the stream, they removed a roadbed, they put more sediment in their water supply than this project will ever hope to do.

1429-018-003

The people who live along Dead Dog Road, I'm sure the City has told you that they have a fourth practice application file, you can comment till Friday. They're going to put gravel packs along Dead Dog Road to haul rock into the watershed and then they're going to haul logs out. I'm sure the City of Seattle has informed the neighbors.

1429-018-004

I'm sure they have held public meetings, and I'm sure they have allowed you to comment. That is the process and it should happen. It could be a little disingenuous if they don't. Thank you very much.

1429-019-001

UNIDENTIFIED MALE SPEAKER: I guess my question is why is BPA so resonant in providing these folks that are being affected with the proper compensation -- why is BPA so resonant in apparently providing proper and fair compensation to these people that are being affected. You know, that in itself gives you a bad black eye after all the good work you've done on your study. And I guess I wonder why you would be so miserly with five or six people when you can accomplish what needs to be done and affect the least amount of people and look like heroes except that all of a sudden you come up looking rather stingy.

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1429-018-003 and -004 Comment noted.

1429-019-001 and -002 See response to Comment 1429-013-002.

1429-019-001

1429-019-002

And I guess that's a big concern to me to think that you would be that way, because like she said, it could be our property next. And if you go through Winterwood Estates, you're not going to have just five people on you. And like I said, you just might as well fold up your tent because the lawyers will tie you up for at least ten years or more.

MR. LOU DRIESSEN: Well, I'll try to address that a little bit. It's just a fact of life in this business here is that nobody wants transmission lines. No matter where we go, there's going to be people that are not going to like what we're doing. From a fair compensation standpoint, that process and what we go through is that we have often our own appraisers go out there and they appraise the property and they take a look at that and they present that appraisal to the landowner.

And if the landowner doesn't like it, we offer to have it done by an independent appraiser, and in this case this year the independent appraisers were brought in and they appraised the property, and that value was presented to the people. And those appraisals are based on fair market value of similar properties that have sold in the area on a recent basis.

As a federal agency, BPA has difficulty in there's some rules in place, laws in place that we cannot pay a lot

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more than fair market value for properties. It has to be some reason for us paying more than fair market value. So we try to take a look at properties and try to pay fair market value. Now, if there's no arrangement made between BPA and that landowner, then people talk about the word condemnation, and, yes, that's an avenue that BPA can take and will take. We don't like doing that.

But as part of that process, then, it gives BPA the right to go in and construct the line. But then BPA does not put the value on the property. That, then, is determined in court and the court will rule on what that value ought to be. That value is sometimes less, sometimes equal or sometimes more than what BPA has offered the landowner.

So I hope that addresses your question. But as far as the community where you're at, it's even more difficult because in there BPA already has the right-of-way, so there will be no value, there will be no payments in that sense to those landowners who live immediately adjacent to Alternative A just east of Covington.

MR. SCOTT TAYLOR: I'm afraid he kind of took most of my question there, so I'll ask a little bit of a follow up. In the event that you need to go to an independent

1429-020-001 person for evaluation of property, how does that process work? How do you choose the independent evaluator of the

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1429-020-001 BPA's offer is based on either a staff appraisal, or a contract appraisal. BPA's contract appraisers must be certified in the state where the property to be appraised is located. BPA's staff appraisers are not required to be state certified, but have chosen to be certified in at least one of the states within BPA's service area. Both BPA's contract appraisers and staff appraisers must adhere to the "Uniform Standards of Professional Appraisal Practices," as well as the "Uniform Appraisal Standards for Federal Land Acquisitions." BPA requires that any contract appraiser be state certified and maintain a positive professional reputation, and must be familiar with the property types being appraised.

1429-020-001

1429-020-002

1429-020-003

property?

And part B of my question is: In areas where you do currently have easement but you increase or impact the area, for instance, I've got fairly large towers running through the north side of my property, but if you decided to make even bigger towers, how do you handle situations like that where you clearly impact the value of my property but you already have that easement?

MR. LOU DRIESSEN: I think there's a couple of questions there. One, we choose an appraiser hopefully that the landowner agrees with also, but it needs to be an appraiser that's recognized, so -- by the appraisal community. The second question if BPA already has the right-of-way, then in most cases BPA also has the right to certain construct -- in the case of Alternative A, construct a transmission line. There used to be a transmission line there one time. It's a long time ago, trees have grown back, but nonetheless BPA has the right-of-way there and has the rights to construct another line there.

BPA would like to see what impact that it has on the landowner there, only in the sense that if there's any like crops growing there, impacts to like crops. So in these cases here, there's no crops there. There are trees there and in a lot of cases BPA maintains that those trees belong to BPA. In your case there where there is an

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1429-020-002 and -003 The language in the transmission line easement document identifies what can be constructed. If the rights have already been acquired with the original easement, no additional compensation will be offered.

existing transmission line there now, BPA in most cases has a right to tear that line down and put a larger line in place if that was possible.

The compensation there would be based upon where perhaps the new towers were to go. So if the towers were to go on your property and they weren't on your property before, there could be some compensation associated with that. But there would be no more compensation than that, and that's just the nature of the thing where BPA bought the rights a long time ago and then people look at that and the land values weren't near what they were back then what they are today, but yet BPA has the rights to construct and operate and maintain those lines.

1429-021-001 UNIDENTIFIED FEMALE SPEAKER: Anyways, Lou, are you aware, I'm sure you're aware that I'm holding an appraisal here, the original appraisal that was appraised, and on the inside of the appraisal, the part that I'm not supposed to have, here it has 25 acres, at that time I had a 20 acre piece and a 5 acre piece because the subdivision was not completed at that time, so that's how they looked at it, instead of two five acre pieces, but they put on the inside of that land, timber and improvements was worth -- 25 acres was worth $750,000. Well, that breaks down to 30,000 an acre.

Then they go to the front of this, and they then

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1429-021-001 The BPA staff appraisers have reviewed the Kangley-Echo Lake Project appraisals with a value of $25,000 per acre for rural residential home sites. We could not find a discrepancy as far as a value of $25,000 per acre. However, on the appraisal summary table, there is a "total value of property," including land and improvements. The value per acre could be misconstrued if the value of the improvements was not itemized separately from the land. The total property value includes land, improvements (if any), uneconomical remnants (if any), timber, etc. If you would like to review the appraisal prepared for the landrights needed by BPA on your property, BPA's appraisal staff is available to answer any of your questions.

1 put total appraised value or the appraisal value per acre
2 there is $25,000 an acre on the front, but yet on the inside
3 you're telling me my land's worth 30,000. But they're
4 offering me 25 on front. And then on top of it, I don't
5 know if the rest of you are aware, he was talking about
6 hired appraiser. Well, their appraiser for my property is
7 their on-staff appraiser, Tom Walcott, and he is not
8 licensed by Washington. Portland, he is out of Portland.
9 He's not licensed in any other state to appraise. He does
10 not have to be licensed because he's federal.
11 I called the Department of License, Real Estate
12 Appraisal Section and talked to Mr. Ralph Burkdoll. And,
1429-021-001 13 anyways, I asked him doesn't Tom have to be licensed to
14 appraise here, and he said, Well, if he's federal, no, he
15 doesn't, but he has to go by the appraisal guidelines. But
16 it's also very hard for Tom Walcott, who's in Portland, and
17 when he came and sat at my table, I asked him, I said, do
18 you know certain regulations, certain things in King County
19 that are going on, and he did not know. He could not come
20 up with the right answers for that.
21 And I've been told that an appraiser cannot come
22 in out of an area that he's not familiar with and properly
23 appraise anyone's property. And then when I talked to you
24 in June, I asked you about, okay, I'm going to have an
25 appraiser appraise my property. So I used the same

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1429-021-001

appraiser, I paid for him. I hired him, I paid for him, and I had him appraise my property, the same one that you people had hired to appraise the other people's properties, and you still weren't happy with the appraisal that he came up with because it came up quite a bit higher than your appraisal, so --

MR. LOU DRIESSEN: I do not know the details in your situation there.

UNIDENTIFIED FEMALE SPEAKER: You're not aware of any of these details, none of these real estate specialists have ever told you about any of this?

MR. LOU DRIESSEN: They have told me about some of the items, yes.

UNIDENTIFIED FEMALE SPEAKER: Well, then, maybe you and I need to talk.

MR. LOU DRIESSEN: I'll talk to our realty department about your situation.

1429-021-001

UNIDENTIFIED FEMALE SPEAKER: Do you have any comment on -- why Tom Walcott -- you sat here and told these people that you use an outside appraiser. You didn't use an outside appraiser on my property. Why Tom Walcott?

MR. PAUL WOOLSON: Tom Walcott is a skilled appraiser working for the federal government. I don't know, Tina, that this is the vehicle --

1429-021-001

UNIDENTIFIED FEMALE SPEAKER: Well, you told these

1429-021-001

1429-021-001

1429-021-002

1 people that you are using a licensed appraiser. You're
2 making your guys look good again. They have no idea. They
3 have no idea.
4 MR. PAUL WOOLSON: Tom Walcott is a skilled
5 appraiser working for the federal government. Whether we
6 use a fee appraiser or whether we use a staff appraiser, the
7 appraiser still has to follow the same regulations, it's
8 called "Use Pap," they still have to follow the same
9 appraisal practices, and Tom Walcott did.
10 UNIDENTIFIED FEMALE SPEAKER: But how can he be
11 familiar with this area?
12 MR. PAUL WOOLSON: And there was a disagreement
13 with value, Bonneville Power and the property owner are
14 still negotiating, and there's still a possibility we might
15 be able to reach a settlement, Tina. And I think that's all
16 we're still trying to do.
17 UNIDENTIFIED FEMALE SPEAKER: I still want to talk
18 with you people too, but I want these people to know what's
19 going on. Bonneville is not all the good guy that they are
20 making themselves out to be. They intended to go through
21 this watershed, they plan on going through this watershed.
22 None of you people, I don't care what they tell you, have
23 ever been of risk of them going through your property.
24 I have rebar in my property. I have cement just
25 off my property that they have poured and tested for holding

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1429-021-002 Comment noted.

1429-021-002

1429-021-002

these new towers that they're going to put. If any of you want to come to my place, I'll be glad to show you the rebar, the tower test spots they already poured. They have poured every fourth tower test spot. They plan on going through here. They just don't want to condemn the watershed because then they will look like the bad guy, and they can have my property, I don't care. They can have it. I don't want to hold up progress, but I just want to be paid, compensated for it. I don't want any more people displaced. I'm sorry.

MS. DIANE ADAMS: And I understand your concern and I think your comment has been recorded and heard by BPA. They clearly continue negotiation, I guess --

UNIDENTIFIED FEMALE SPEAKER: Well, they need to hear it, then. The rest of the people need to know what's going on with us five people because they haven't heard it. They haven't. They might have heard us, but they're really not listening and they don't want anybody else to know.

MS. DIANE ADAMS: Well, you've been heard tonight. I guarantee it. There is one more question and we will recess back into the open house.

MR. DAVE PIMENTEL: Well, excuse me, after that, you know, I hate to even ask this question. My concern is -- and, you know, that's some fresh information that really brings light how the government works, and it's true

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1429-022-001

1429-022-001

and I believe you. However, I still have a question.

Is it true that after this comment period on March 1st, you know, you're going along here saying we're going through the watershed, we want to go through the watershed and on March 2nd you could say, Ha, alternative C, and we would have no recourse at that point. How would that work, if -- you know, I'm not presuming that you'll do that. But could that happen? And, if so, how would that change the whole scheme of actions that would take place?

MR. LOU DRIESSEN: Well, I think I addressed that earlier, that that is a possibility and I want people to know that. I want to warn people about that, is that BPA has gone through an extensive process here and each time we've come back to you folks we have the same solution, that is, Alternative 1 as being our preferred. That could still change.

MR. DAVE PIMENTEL: What can change that? The political powers downtown?

MR. LOU DRIESSEN: The political powers of other folks is a possibility or something else that comes along that we currently don't know about. Just looking at the whole aspect of, you know, cost to the system and environmental issues, the administrator will take a look at all of those aspects and determine which route looks the right route to go with.

44

1429-022-001 BPA is allowing 45 days for public/agency review of the SDEIS. We acknowledge that the document contains a lot of information, and that an EIS consists of two documents i.e., the draft and final EISs.

1 MR. DAVE PIMENTEL: You guys aren't new at this
2 game. You've been doing this for a long time.
3 MR. LOU DRIESSEN: We've been doing this for a
4 long time, and I think we're trying to show you that we're
5 trying to do at least a good job. So we're looking at all
6 the aspects, we've laid all of those aspects out in this
7 document here. They're the same issues that our
8 administrator will take a look at, our team will come up
9 with a proposal for the administrator, and then the
10 administrator will decide.
11 But part of that is also outside of the scope of
12 this document, and that is the discussions with Seattle, for
13 instance, and some other factors. So right now this looks
14 like the best route to go and that's the direction that
15 we're heading into. But please do not take this as our
16 final decision because a final decision will not come until
17 the earlier part of August. So we will also be coming out
18 with a final EIS in July. There again, there will be a
19 proposal in a document, but it still will not be the final
20 choice. The final choice will be when we put a record
21 decision together.
22 And as far as BPA trying to look like the good
23 guy, I don't think we have ever tried to look like being the
24 good guy. We are trying to do what we consider to be the
25 right thing. We are looking at actual factors associated

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with this project from an environmental standpoint, a cost standpoint, from impact to people standpoint. Like I indicated earlier, there's going to be people impacted by this project no matter where we go, and a lot of those folks are going to be at least disappointed, if not angry.

1429-023-001

MS. HELEN JOHNSON: I just had kind of a comment, it pertains to a little bit what this lady was talking about back here. I didn't do a very good job on my speech tonight, so I wanted to make sure that BPA is aware of the fact that Hobart area is made up of several little farms that are close to a hundred years old and I -- it's a very unique area. I think if we pushed it, there may even be some historical value there. And I know I'm familiar with the area that this lady lives in, and I don't want Hobart to look like that. And I am aware of your situation and so, please, take note you've got to save this little area, you have to. It's one of the few remaining places like this left, and to destroy it just for power is -- it just can't happen. You can't allow it to happen. Thank you.

1429-023-002

1429-024-001

MR. RICHARD BONEWITS: I have a question about process. It was brought up and you answered most of the questions that I think people had, but one of them is is there -- when you issue the final impact statement, there is no comment period following that, is there?

MR. GENE LYNARD: No, there isn't, and that's

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1429-023-001 and -002 Comment noted.

1429-024-001 After the FEIS is released, people can comment on the FEIS, but there is no formal comment period. Comments received on the FEIS are summarized in the Record of Decision.

why it's called a final document. But if we do get -- we won't make any decision for 30 days, and if we get any comments after the final on the final we summarize those and put those in the record of decision.

MR. RICHARD BONEWITS: The second point, Helen, find some cultural artifacts on your property.

MS. HELEN JOHNSON: I've got some railroad spikes probably or logging spikes.

1429-025-001 UNIDENTIFIED MALE SPEAKER: Do the comment sheets carry as much weight commentwise as people writing individual personal letters?

MR. GENE LYNARD: Absolutely. It doesn't make any difference how they come in, e-mail or letters or --

1429-026-001 MR. DAVE PIMENTEL: What's your history on situations like this where you've got a preferred alternative and then the comment period closes? What percentage of completed projects end up being the preferred alternative versus going in some other direction after the comment period, for example?

MR. LOU DRIESSEN: I'd like to answer that, but I don't think I want to answer that due to the situation that we're in on this project right now.

UNIDENTIFIED MALE SPEAKER: I got a question --

MR. DAVE PIMENTEL: Hold on. Excuse me, sir.

MS. DIANE ADAMS: Hang on, please.

1429-025-001 Yes.

1429-026-001 Typically the preferred alternative is the alternative implemented if an alternative other than no action is chosen, but the agency could pick a different alternative based on comments received and other circumstances.

MR. DAVE PIMENTEL: He failed to answer my question.

MR. SCOTT TAYLOR: He doesn't have to answer it.

MR. DAVE PIMENTEL: I would like to know why he can't answer that simple question.

MS. DIANE ADAMS: Lou, do you want to repeat your response?

MR. LOU DRIESSEN: I do not want to answer that question because it may jeopardize our discussions with Seattle. Thank you.

1429-027-001 UNIDENTIFIED MALE SPEAKER: I'm just looking at the map here, and it looks like Alternative 2 would cure the whole problem.

MS. DIANE ADAMS: I think what the gentleman is looking at here is going Alternative 4A instead of 4B. Was that correct, sir?

UNIDENTIFIED MALE SPEAKER: Yes, yes. It doesn't look like there's any housing in that area at all.

MR. GENE LYNARD: Alternative 2 begins at this point here and goes up. Alternative 2 wouldn't require any homes to be taken.

UNIDENTIFIED MALE SPEAKER: That's what it looked like to me.

MS. DIANE ADAMS: And that alternative is still on the table; is that correct?

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1429-027-001 Alternative 2 was originally suggested as an alternative because it avoids existing homes. The city of Seattle, prefers that if a line has to cross the CRW, that it be next to the existing 500-kV line to minimize the overall impacts to the CRW. Alternative 1 is next to the existing line.

1429-028-001

MR. LOU DRIESSEN: All the alternatives are still on the table.

UNIDENTIFIED FEMALE SPEAKER: When we went to Seattle last time, we were told that if they put the bigger power lines on the Highway A that the people would have to live 350 feet away from the power lines. Now they're telling me you only have to be 75 feet away from it. When we built there, it was a law we had to be 150 feet away from it. Now, why, what's the problem? What happened between Seattle this spring or summer till now?

MR. LOU DRIESSEN: I think there may be some difference of perception. I'm not sure where you're getting these numbers. It may be the difference between the right-of-way width and the distance away from the transmission line itself. I believe that the right-of-way that we have in your area there, there's an existing 230 kV line -- well, it's 345 kV line energized a 230 and that line will be torn down and a new line would be put in its place, double circuit, with one side would handle the existing line and then the other side would be the new line. That right-of-way is 150 feet wide.

For the new larger towers, new larger line, 150 feet wide would be adequate for that new line. Houses can be constructed immediately adjacent to that right-of-way, and in a lot of cases houses are adjacent to that

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1429-028-001 Homes can be built adjacent to the transmission line right-of-way. The existing right-of-way you are referring to is 150 feet wide and is wide enough for the new line. Transmission lines are usually constructed in the middle of the right-of-way. That means homes need to be at least 75 feet from the center of the lines to be outside the right-of-way.

right-of-way. So we're not advocating at this point of needing more right-of-way than what's out there, so that's one reason why that route was chosen, because the right-of-way width is adequate the way it is right now.

UNIDENTIFIED FEMALE SPEAKER: Why did they tell us that then --

UNIDENTIFIED FEMALE SPEAKER: 350 feet?

MR. LOU DRIESSEN: I don't know where that came from.

MS. DIANE ADAMS: Lou, is there any follow up that can clarify that for her?

MR. LOU DRIESSEN: I think I just did. I don't know where that three hundred and whatever feet came from at that time. The right-of-way there is 150 feet wide and we're not looking for anything additional outside of that. So whatever happens outside of that right-of-way it's up to the landowner. So if there are houses there, they would remain, and if they want to build a new house, that would be fine also. It just can't be inside of 150 foot right-of-way.

MS. DIANE ADAMS: Did answer that your question?

UNIDENTIFIED FEMALE SPEAKER: I guess it has to be.

1429-029-001 UNIDENTIFIED MALE SPEAKER: If you go through the Covington area, there's a small airport just adjacent at

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1429-029-001 The location of the airport was identified in the Land Use, Recreation, Transportation Technical Study Report in Appendix L, and identified on Figure 13 in that report. The Crest Airpark appears to be located approximately 3/4 mile south of Alternative A, at is closest point. The EIS concluded that since the towers would be less than 200 feet high, that they would not enter navigable airspace, therefore, Alternative A would have no long-term impact on this or any other airport in the vicinity of the project.

1429-029-001

Crest Air Park. Has that ever been addressed? Does the power line in any way enter into the air traffic pattern?

MR. MIKE KREIPE: I think we looked at that and the airport is to the south of the corridor. On the corridor is the Raver-Tacoma line, the big double circuit, I think it's on the north side, and the new structure would be on the north of it. Actually, if it's a single circuit, it will be shorter than the double-circuit towers to the south of it. So it will be below what's already there.

MR. LOU DRIESSEN: BPA does work with FAA on those kinds of issues and make sure that there isn't a problem.

1429-030-001

UNIDENTIFIED MALE SPEAKER: It's my understanding that the federal government looks at the BPA as an agency, that they have said to you guys that they no longer want to invest any money, that it's kind of up to you guys to create your own investing dollars and funding for the future, that's my understanding.

MR. GENE LYNARD: Self financing.

1429-030-002

UNIDENTIFIED MALE SPEAKER: Right. Going back to the gentleman's comment where he was talking about the increase in power demands currently is running about 2 percent, it looks like to me in the future it's 2 percent, and the question came up about you were talking about technological advancement, fuel cells, et cetera. Does the BPA take any funding and put in those?

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1429-030-001 and -002 BPA supports the use of fuel cells and other distributed generation alternatives to meet future power needs. BPA's Energy Efficiency Organization has two programs to promote these technologies. The first is the Energy Web, which integrates the utility electrical system, telecommunications system, and the energy market to optimize loads on the electrical network, reduce costs to consumers and utilities, facilitate the integration of renewable resources, increase electrical system reliability and reduce environmental impacts of load growth.

The second is BPA's Fuel Cell Development Program, which has the goal of accelerating the commercial availability of residential-scale fuel cell systems to meet the distributed power needs of our customers. Because they generate clean, efficient, environmentally-friendly power, fuel cells are a promising source of supplementary electricity to meet future demands. Potential applications include: on-site generation in remote locations, solving power quality or reliability problems, improving system efficiencies where both electricity and hot water are needed, offsetting the need to build new power lines and other applications where environmental impact is the focus. While fuel cells have great potential, they'll need a few more breakthroughs before they can reliably and cost-effectively defer transmission upgrades.

MR. MIKE KREIPE: We have a pilot program, I can't remember the numbers exactly, it was more than ten sites -- we bought equipment and we're siting them in ten locations to learn about them. It's part of our looking at new technology and determining how it really operates and whether they're mature to go into further.

MR. LOU DRIESSEN: This is for the fuel cell technology.

1429-030-002 UNIDENTIFIED MALE SPEAKER: Are you close enough to be able to defer these kind of projects at all? Are you close enough to any kind of breakthrough there where you are able to say we don't need to do anything?

MR. MIKE KREIPE: Take the fuel cell because it's probably the most important thing to talk about here. I do a little bit of reading in that, and they were -- of course, it was the power source in the space programs way back to the '60s. Of course, they're -- it's very expensive, I mean, that isn't the issue there, they needed the power source. It's been 34 years since we know about and working with these. I know ten years ago it was forecast that they would be commercial now.

I know in the last few years people admitted it's taking so much time. There are demonstration sites out now, so it's being sold, it seems to be running -- it's getting to fruition a lot slower than what was expected ten years

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ago. I don't know if it's going to slow down some more. It's kind of an unknown. All I can say is it's not come as fast as it's been expected, but I hope it's still going to come, I still expect it to come. It's just going to take some more time.

MR. LOU DRIESSEN: BPA is also involved with other research associated with making our transmission grid more efficient. So we, for instance, placed a newer technology, certainly new to us, in Maple Valley Substation that allowed us to defer construction of new facilities. So it's a type of equipment that makes our facilities much more efficient under certain circumstances. So we're also continually looking at our existing system and trying to figure out ways to make it more efficient using existing technology.

For instance, in the late '80s and early '90s, BPA had the project of looking to bring another transmission line across the Cascades into Seattle. And by constructing a new substation in Ellensburg area we were able to defer that new line, and right now it's still not on our books as being needed. So we're continually looking at new technology and looking at our existing system to see how we can make it better. We don't like to spend money building new facilities any more than anybody else does.

MR. MIKE KREIPE: And just so -- part of what Lou was talking about was FACS devices. It's come up in these

meetings before. I wanted to make sure you understood that.

WRITTEN COMMENTS:

1429-031-001 1429-031-002 Property owner cannot maintain the ROW when open to the public. Vandalism, dumping, and dangerous activities occur on a frequent basis.

1429-032-001 Maps need descriptive layers to show routes and property lines.

1429-033-001 Have lived 50 years next to RTA, don't want the project to be delayed as the property owners want to get on with their lives.

1429-034-001 Alternate C crosses over my house. I am planning an extensive remodel. Already have permits and materials. If you were me, what would you do?

1429-035-001 1429-035-002 Seattle Public Utility has trashed watershed. Now they want to trash private owners' properties on Route C.

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1429-031-001 and -002 When BPA acquires rights-of-way for its transmission facilities, they are not made available for public use. Sometimes landowners and BPA can work together to place gates across access roads that BPA uses to access its transmission facilities.

1429-032-001 Comment noted.

1429-033-001 Comment noted.

1429-034-001 The landowner needs to continue with their planning and construction. If BPA were to chose a route that would directly impact a residence, then BPA would pay for the value of the home at that time. Improvements to the home would increase its value and BPA would pay for that fair market value.

1429-035-001 and -002 Comment noted.

CERTIFICATE

STATE OF WASHINGTON)
)
COUNTY OF KING)

I, BETSY DECATER, a Certified Shorthand Reporter and Notary Public in and for King County, Washington, do hereby certify that I reported in machine shorthand the above-captioned proceedings; that the foregoing transcript was prepared under my personal supervision and constitutes a true record of the proceedings.

I further certify that I am not an attorney or counsel of any parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

WITNESS my hand and seal in Sammamish, County of King, State of Washington, this 5th day of February, 2003.

Notary Public in and for the
State of Washington, residing
at Sammamish

My commission expires 03-20-06

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ORIGINAL

COMMENTS TO
KANGLEY-ECHO LAKE TRANSMISSION LINE PROJECT
Thursday Meeting, February 6, 2003

KEL I-1430
FEB 1 0 2003

Tahoma Senior High School
Kent, Washington

Reported by: Betsy E. Decater, RPR
License No. 601-835-443

1430-001-001

1430-001-002

1430-002-001

1430-003-001

MS. MARGARET CRABTREE: And I think Alternative 1, I prefer that because there's less disturbance. There's already an existing one across from it, less disturbance to the environment and the people and it will be less cost. I think that should be important and really considered.

KATHY MYERS: My name is Kathy, with a K, Myers, M-y-e-r-s. I just wanted to state my support for the preferred Alternative 1. I think that is by far the wisest choice.

UNIDENTIFIED MALE SPEAKER: Yeah. On your preferred route going through the watershed, then, the way I understand it, if that's turned down for some other reason, then the process is go back all the way through the whole scope of what we've been going through the last four years?

MR. LOU DRIESSEN: No. We've done everything, at least from our opinion, that we need to do. We've identified all these different alternatives, and it's a matter of choosing one of those alternatives. So we do not need to go back and redo all of the scoping meetings and the environmental NEPA process anyway.

So it's just a matter of when -- the administrator get's to decide which option does he choose. So it could be any one of the options, any one of the routing options or the no-action, which means we do nothing, or the option that Mike was describing earlier and that's what we call the

2

1430-001-001 and -002 Comment noted.

1430-002-001 Comment noted.

1430-003-001 This assumption is incorrect. BPA has conducted its environmental review on 9 build alternatives, a non-transmission alternative and a no action alternative. BPA's Administrator will select one of these alternatives at the conclusion of the environmental review, currently expected in July 2003. The administrator is expected to make his decision on the project sometime in August.

nontransmission alternative.

MR. GENE LYNARD: I would add, if one of the other alternatives would be chosen other than the preferred, there would be a lot of environmental work that would need to be done. We would -- for the preferred, we recognized it as a preferred early on and we knew we had endangered species in the area, so we prepared a biological assessment and we initiated consultation with the National Marine Fishery Service and the Fish and Wildlife Service. We have also conducted a culture resource survey along the whole length of Alternative 1 and dug 1170 holes as part of our responsibility under the Archeological Protection Act. And on B and D, for example, in the National Forest, we would have to do -- survey for survey and managed species in addition to endangered species. There would be a lot of work involved in that.

1430-003-002 UNIDENTIFIED MALE SPEAKER: Then assuming that all the routes are still on the table, can you give me a ranking in terms of what route after Route 1 would be looked at next?

1430-003-003

MR. LOU DRIESSEN: We don't rank the different alternatives. I think if you will look at the document, there's a table in there, Gene.

MR. GENE LYNARD: Yeah, Summary Table 2.3 in the EIS is a summary of all the impacts of all the different

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1430-003-002 and -003 BPA does not rank the options in that way. It would have to take a look at all the factors to determine the next likely option. Table 2-3 compares all the options, including cost.

resource areas along with the cost of each alternative.

1430-003-004 UNIDENTIFIED MALE SPEAKER: Is some of it, then, done by cost only then?

MR. GENE LYNARD: We have looked at the cost, what each alternative would cost and then that cost information is in that same table, it's Table 2.3, which is in here. It's also in the CD contained in the summary.

MR. LOU DRIESSEN: So we -- BPA and other utilities have tried to rank different alternatives some years ago, and we found that that doesn't really work because the rankings are based upon what your perspective is. So if your perspective is from a landowner, then you're going to weigh it one way. If your perspective is from not wanting to take any trees out from a wildlife habitat standpoint, you're going to weigh it another way.

So what we've done is we've outlined what we consider the impacts are for every alternative, and you can come up with your own conclusion about which one you think is best, including, like Gene says, also from a cost standpoint. So that table includes all the different impacts from all the different categories and also from the cost. And then you can take a look at that and I think you'll see why we chose the preferred route as being the preferred.

1430-004-001 UNIDENTIFIED MALE SPEAKER: Yeah, I was just

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1430-003-004 See responses to Comments 1430-003-002 and -003 and 1429-020-001.

1430-004-001 People can comment on the final EIS, but no public meetings will be held. BPA has 30 days after the final before the Administrator can sign a Record of Decision, which will designate BPA's decision about the project. BPA will notify the public of the decision.

1430-004-001

1430-004-001

looking to clarify what you were talking about. I think what John was alluding to is you're going to get a lot more resistance, especially from this group, if we feel it's coming through the alternate that's going to effect us. So we're trying to get a handle on is there going to be another comment period if you decide to go with another route or are you going to just go and start building it?

MR. GENE LYNARD: No, there won't be another comment period.

UNIDENTIFIED MALE SPEAKER: So how do we know, then, if our alternative or the one that's going to effect us is going to be considered, if it doesn't -- you can't explain or guarantee what it's going to cost, you don't really have what parameters you're going to decide about. So we're going to go home thinking we are safe, and then all of a sudden there's going to be trucks pulling up. That's the concern I have.

MR. GENE LYNARD: Well, the Environmental Impact Statement, what it does is it contains all the impacts that would happen for each alternative. It's a full disclosure document. The administrator is not required to select the least impact alternative. The administrator will be looking at the cost of the project, looking at how each one of these affects the system, and he'll be looking at what impacts would be created by his decision. And that information is

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1430-004-001 BPA can comment on the final EIS, but no public meetings will be held. BPA has 30 days after the final before they can sign a Record of Decision, which will designate BPA decision about the project. BPA will notify the public of the decision.

in the EIS.

But the part is when are you going to know, after the administrator does make a decision, we publish his decision in what's called a record of decision. And that record of decision will contain his decision, plus all comments that have come into the agency since the final was produced. They will be summarized.

UNIDENTIFIED MALE SPEAKER: When the decision is made I don't really care about. My concerns are if you make a decision other than the main one, I want to have time to comment on it and gather the troops to oppose it. And you're telling me I'm not going to have that opportunity and you're not offering the criteria you're going to use. You're saying it's an impact statement, but they don't have to go by it. So I'm going to leave here the same way I came in, not knowing what you are going to choose, and basically it's going to come to a political thing, you can't even say it's going to be close, or environmental impact or who has the most political clout.

1430-004-002

MR. LOU DRIESSEN: Well, that's why I mentioned earlier, I don't want people to get the misconception that the final route is chosen. What we have done, though --

UNIDENTIFIED MALE SPEAKER: But the final route being chosen doesn't really mean anything because you're going to choose it without giving us a chance to respond to

1430-004-002

1430-004-002 Please see response to Comment 1430-004-001.

1430-004-002

it.

MR. LOU DRIESSEN: No, you are responding to it by coming to these meetings. That's why we have the scoping meeting, that's why we've had this meeting. That's what these meetings are all about, we're getting your comments, and we know that Alternative A and C --

1430-004-003

UNIDENTIFIED MALE SPEAKER: Well, I can tell you that most of my neighborhood is not here because the fact is that you are going with the preferred route and they assume you're going to go that way. If it goes somewhere else, you're going to get a lot more resistance and they're not going to have a chance to speak.

MR. LOU DRIESSEN: I'm not sure you were at our scoping meeting this last time because this room here was filled with people who were opposed to Alternative C and Alternative A. I think we've gotten the message pretty clear about if we were to choose Alternative A or C there's going to be a large opposition to either one of those alternatives. And that's what these meetings are all about, so that's all included. And that's why there's such a huge volume here, because it includes all the comments. We've gotten a tremendous amount of comments on these different alternatives. So I think we understand what the issues are.

1430-004-003

UNIDENTIFIED MALE SPEAKER: Okay. I'll take your word for it. But if it goes through A or C, you'll see some

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1430-004-003 Comment noted.

1430-004-003

1430-004-004

people jumping up and down.

MR. LOU DRIESSEN: We fully expect that.

MR. GENE LYNARD: And we are taking comments on the EIS, and we hope we get them, up until March 1st. We'll take input at any time, but for it to be included in the final EIS we need them by March 1st.

UNIDENTIFIED MALE SPEAKER: Yeah, you claim that you haven't decided which route you're going to take, but I think you guys have pretty much cut and dry you're going to go with the preferred route because you're already trying to buy off the property owners out there. I don't know what you guys are worried about. It looks like it's going to go right through the property.

You guys have said that's your preferred route. You've had your people out there, I don't want to say harassing us, but I am one of the property owners which this line is going to affect, you're going to take a house, you know, destroying our livelihood which we have built there. So I think you guys pretty much made a decision, and to say these other routes, I don't believe it for one instance, since I know for a fact you guys have been trying to buy land from these people and us for practically pennies on a dollar.

I mean, I'm just pretty much can't believe you guys are up there saying you have alternative routes and you

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1430-004-004 BPA has identified Alternative 1 as the proposed route for this line. BPA is willing to take the risk to survey and acquire land rights along Alternative 1 so that the line could be constructed after the Record of Decision, with as little delay for energization as possible. BPA acknowledges that the final decision will not be made until the Record of Decision, which is scheduled for August 2003. If the decision is made to choose another route, then energization would be delayed by several years.

1430-004-004

already basically -- by doing that you have already decided which way you're going to go. I mean, doesn't that make sense? You don't go around and pay somebody a bunch of money for their land and then say, hey, we're going to go this way.

MR. LOU DRIESSEN: As I mentioned earlier, that's the risk that BPA was willing to take, that there's a lot of efforts that went into the preferred route because we think that this project is necessary for this area and we need to get this project done. And if we don't do this effort in parallel with what the environmental process is, then we would not be able to energize this line when we think this line needs to be energized. So if we were to wait until the record decision and then go through and do the survey and engineering work and the environmental detail associated with that and then construct, you're looking at another two years down the road.

So we think this project is needed as soon as possible. We, in fact, were trying to build this project last year and we weren't able to do that because we needed to go back and, like Gene mentioned, reopen up our document again and look at the different alternatives. So we put a lot of effort into this preferred alternative, and I don't think any one of us is denying that, including working with the landowners along there and including buying properties,

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because we have bought some properties along in there.

We've also bought 350 acres north of the Cedar River Watershed as mitigation for crossing the watershed. So a lot of effort has been put into the project, and BPA is willing to forego all of that if the decision is go to with one of the other alternatives. So I want to make it clear again, we have not made the final decision. It's always possible that one of the other routes gets chosen. So until August, when we will make a final decision, all the different options, all the different routing options are still on the table. They're all still viable, they're all still possible.

MR. CLOYD PAXTON: Well, my name is Cloyd Paxton. Let's talk about the effects of EMF. To whom it may concern, I pray it's BPA, magnetic field is a moving charge of particles which might enforce acts on electric current forced and exerted on a given object, like human's bodies, machinery, animals, so on and so forth. That's in Webster.

1430-005-001 Page 23, Book of the EMF National Institute of Environmental Health Sciences, like the Hanford atomic generator that produced electricity, science knew how to make electricity but did not know how to get rid of the breaking up of the atomic nucleus. So we have lots and lots of radioactive material in large lit vats and containers that causes nausea, vomiting, headaches, diarrhea, loss of hair,

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1430-005-001 Comment noted.

teeth -- destruction of white blood cells and hemorrhages. Now, that's also proven back in 1920 as a fact. Still we don't know what to do with radioactive radiation water that's leaking into our stream.

Let's talk about melatonia efforts or effects in laboratories. In the book EMF, melatonia is the hormone secreted by the penal gland in adverse proportion to the amount of light received by the retina important to regulating the biorhythm in the eye of a person. And isn't it ironic, I say isn't it ironic that my wife has Uveitis, it's an inflammation of the uvea, and it's inside the eyeball of the eye.

Now, doctors call that bird-shot eye, which has no meaning in Webster's language. She's blind. Her driver's license has been taken away because of her blindness. The inflammation is on her retina. We live within 175 feet of that middle line of power, that power line. We are going under the power line at all times. Since the 40 years we have been, had heart surgery twice, two angioplasty operations. Now my heart rhythm is off beat, it don't beat right now. Had it checked here just not too long ago and it's missing a beat.

Why all this is happening to me I don't know. But why we take care of the spotted owl, the fish and the bugs and that kind of environment but there are no laws for

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1430-005-001

1430-005-002

1430-005-002 Comment noted.

1430-005-002

1430-005-003

1430-006-001

people telling them how far they should stay away from the EMF power lines. I say it takes the course of time to really know what it's doing to the people. Like the Hanford project, I hate to think of the 500 kV's running across my property -- right now it's 230 or 240. I am worried about and frightened of the 500 kV. How much more can we take? Man can destroy hisself, like it says in the Bible.

Now, I wonder about that power line, the power line that's right by my place. There's a strand of about 2,000 feet, it goes across the Maple Valley River over across -- or across the Maple Valley Highway, across the river and on the other side is a stretch of about 2,000 feet. I have seen that baby when they had an earthquake and looked like that thing was flopping around like galloping gerty, and what's going to happen when they put a 190-foot pole up there? I don't know. It worries me, basically, with all that 500 stuff coming. That's all I got to say.

MR. JON ZAK: Good evening. My name is John Zak. I live on two and a half acres in a development of about a hundred homes in Maple Valley. Our eastern property boundary will be the proposed transmission line right-of-way for Alternative C. On BPA's preferred alternative route, the age of the trees is 10 to 30 years. The trees on my property range in size from two and a half to five foot in diameter. The trees on my property make the trees in the

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1430-005-003 Comment noted. BPA's tower design standards exceed seismic loading standards so our towers will withstand earthquakes.

1430-006-001 Comment noted.

1430-006-001

1430-006-002

1430-006-003

1430-006-004

watershed look like twigs. I would like to talk about this Cedar River Watershed. This watershed has been decimated by logging for about a hundred years. There are over 600 miles of logging within the watershed. I would like to show you some pictures.

I hiked up McClellan's Butte looking into the Cedar River Watershed. You can see I'm standing in some trees that have been there forever and looking down into the logging. This is another picture looking at some of the road cuts. There are 621 miles of gravel logging roads in the watershed. And Seattle complains about erosion, but how much erosion is caused by all the road cuts from the logging roads?

Picture looking down at Chester Morris Lake. See the different ages of the trees. Logging roads on the hillsides of the second and third growth timber. A similar picture. I'd like to show a picture of some old growth trees. This is what the watershed should look like. This is the Ashland Curtis Grove on the way up to Snoqualmie Pass. Another picture of the Ashland Curtis Trail from the Ashland Curtis Grove.

This is a picture of our backyard. Here's another picture of our backyard. It will go through our eastern property boundary and all these trees will have to be taken down. And here's some of the -- this is some of the work

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1430-006-002 and -003 Comment noted.

1430-006-004 Comment noted.

that Seattle Public Utilities has done on the watershed. That's actually on their website, it's public information. See a logging road, all of the erosion?

1430-006-004 I have another picture of equipment right around Chester Morris Lake. And BPA will be using vegetable oil in their hydraulic systems. I wonder what Seattle will be using? Here's more equipment. Here's a picture of Chester Morris Lake. You can see the bad water and the better water.

Pictures of the construction in the Cedar River Watershed by Seattle Public Utilities proves their hypocrisy. Seattle Public Utilities has one standard for themselves and another one for the BPA. I would like Seattle Public Utilities to answer these three questions:

1430-006-005 Number one, where is the evidence that BPA has caused any harm to the water quality or watershed operation in its 30 years of operating a power line in the watershed?

1430-006-006 Two, what evidence does Seattle have that clearing an additional 91 acres for a second power line is more damaging to water quality than failure to progressively replant the 600 miles of logging roads already in the watershed?

1430-006-007 Three, clearing 91 acres for a second power line would require one-tenth of one percent of the watershed's total acreage of 90,240. How can this small amount of

1430-006-005 Comment noted.

1430-006-006 and -007 Comment noted.

1430-006-007

clearing have any impact on water quality? That's it. Thank you.

1430-007-001

MS. TINA MORGAN: I might need an extra minute or something, but right now I want to speak on behalf of Bonneville. I spoke on behalf of ourselves. We live on Alternative Route No. 1, and we have pretty well accepted the fact that we feel that Bonneville is going to come through our properties and will eventually be able to meet an agreement with the watershed and come through the watershed. So we have pretty well resigned to the fact that they are coming through our properties.

1430-007-002

And, anyways, and my opinion of the watershed trying to hold Bonneville up for 230 million, and I don't know how much it is now, if it's even become higher than that, for a filtration system that just because they want Bonneville to buy it to go through the property, I mean, to go through their watershed. So I don't agree with what the Seattle watershed is trying to do with Bonneville. They spent a lot of money on environmental issues and their money that they want for this filtration plant could be spent to help save the fish, to save other environmental issues, so -- and Bonneville is very sensitive, I feel, from what I've read, to environmental issues.

1430-007-003

And I also -- I hauled logs out of the Seattle watershed after my husband passed away in 1978, and I did so

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1430-007-001 Comment noted.

1430-007-002 Comment noted.

1430-007-003 Comment noted.

1430-007-003

1430-007-004

until 1992 until they closed the watershed down. And sometime in the '90s I actually quit hauling in the watershed, particularly I'm not exactly sure on the day they shut the watershed down to logging, but I will tell you we had over a hundred trucks coming out of there a day and we were creating a cloud of dust over that watershed that you could see all the way to Seattle, and they weren't too worried about the filtration system at that time.

So I really do feel that Seattle is holding Bonneville up. And as far as impact goes to other people's properties, this probably makes the most sense to go this way, they're impacting the fewest amount of people. But what we're asking for is -- where we're at is you guys have been living this since sometime last year. We've been living this since March 22nd of 2000. And, anyway, that was our first contact.

BPA contacted me March 22nd, and I'm assuming probably the rest of the folks, about their proposal routes about the new 500 kilowatt line. Preferred route at the time was Alternative No. 1 at that time also, through the watershed. They would also affect five private property owners, and I am one of them.

Starting in the winter of 2000/2001, they asked for a letter of permission to enter my property, which I signed on December 8th of 2000. BP started that process of

1430-007-004 Comment noted.

1430-007-004

1430-007-005

surveying and staking their proposed right-of-way across our property. Well, I want to finish this. I spoke for BP, now I want to speak for me.

Anyways, on September 11th of 2001, they contacted us about appraising our land. BP sent out an appraiser to our properties, to my property, anyways, on the 25th and the 27th, 2001. During that time, I was very cordial and friendly towards all of the BP folks that came by, and I even showed them where there was already stakes in the ground to save them time on surveying my property. And I actually have a survey -- antique survey post that's from the early 1900s when they came through my land that they have used for satellite pinpointing.

Anyways, they assured me they would pay me fair compensation. I gave them total access to my property. April of 2002, BP contacted me about the appraisal on my property was complete as of March 8th, 2002. I'm reading faster. They were ready to present me with the appraisal and also were prepared to write me a check at that time. They also have said that they are not in the habit of necessarily buying property, but then in another time they said they do that all the time, so I'm not sure which one they do.

They are affecting two buildable five acre parcels of mine. There will be no building site left on one of the

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1430-007-005 See response to Comments 1429-013-002.

1 five acre parcels, they're taking over half of the other
2 five acre parcel for easement -- for their easement leaving
3 an area of 180 feet from their easement to the property line
4 to build on. Who wants to build on 180 feet from a power
5 line? The major value of this five acre parcel has been
6 lost. Okay?
7 The BP appraiser for the loss on these two lots
8 offered me $160,000 at that time. So I decided to have my
9 own property -- at that time I told them I would have it
10 appraised myself by an appraiser. So I had it appraised at
11 that time, and, Lou, I told him that's what we were doing at
12 the summer meetings, and he said that he would wait for that
1430-007-005 13 appraisal. So, anyways, that appraisal was completed and I
14 turned it in to Bonneville, and they weren't obviously happy
15 with that appraisal because that appraisal came in about a
16 hundred thousand dollars higher than what they had appraised
17 my land to be.
18 Anyways, and the other thing, on the appraisal,
19 they said on the front of their appraisal that they were
20 valuing my land at $25,000 per acre on the front page of
21 their appraisal, but on the inside of the appraisal, the
22 part of the appraisal I'm not supposed to really have, they
23 valued my land as the true value of timber, land and
24 improvements at $30,000 an acre. So I don't quite get why
25 it's 25 on the front page and then 30,000 on the inside.

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1430-007-005 See response to Comments 1429-013-002. BPA did not agree with the conclusion of value presented by the appraiser that you hired. If you would like to discuss the differences in the appraisals with BPA's staff appraisers, please contact us.

1430-007-005 BPA staff appraisers are not required to be state certified. However, all BPA staff appraisers have chosen to be state certified in at least one of the states within BPA's service area. BPA appraisers follow the Uniform Standards of Professional Appraisal Practices and follow all applicable federal guidelines. Also see response to Comment 1429-021-001.

1430-007-005

And their appraiser, Tom Walcott, is the one who did it. He's their in-house appraiser. He's not licensed in the State of Washington or even Oregon. BP informed me that federal government appraisers do not have to be licensed. BP's Tom Walcott is totally unfamiliar with King County land values and does not live here and work here in our day-to-day real estate market. I had a talk with Ralph Burkdoll from Washington State Department of License and Real Estate Appraisers about this. He said he would like to look at their appraisal.

So what I'm asking for I don't think -- I'm asking for fair. We are all asking for fair compensation for our property. And we are afraid that -- you know, we are sure they are going to go through our property and we are -- you know, have recited ourselves to that fact, but we need to have fair compensation for our property and we need -- you folks are going to be off the hook, we've all believed, truly believe, of course, the final decision won't be, but as soon as the final decision comes down, if we haven't sold our properties before then, they will condemn us. And we have been told this. They tell us that every day.

Every time they call us, "We're going to condemn you, we're going to condemn." We're told this constantly. Anyways, you have no idea when you give an easement you have no rights left on your property. You can only use it for

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1430-007-005 BPA apologizes for the disruption that this project has caused people along the project routes. It is our intent to treat people fairly and with respect.

pasture basically, you have no rights, if they let you use it for pasture. They will permit you to grow some products on it, some crops or something, as long as they're within a certain size and so on and so forth. But you have to get a permit from them to do that. You have to pay for a permit, unless they waive this permit.

1430-007-005 You have no idea what you're giving up when they take an easement from you, and all we want to do is be paid for the damages and for that compensation. And I'm sorry if I took a little bit too long, but I thought I started out on BP's side as far as where they need to go, but we need to be compensated and we are asking in that neighborhood, there's only five of us, for your help and for your support. And the state representatives that you have had on board, we need help from those state representatives because I don't feel at this time that we're going to get a fair shake unless we get some help. Thank you.

MR. DON BRIGMANN: I got most of my frustrations out before, but I just wanted to reiterate basically what this woman is saying. If we are going to be spending these many millions of dollars for the thing, why can't you just go offer them a hundred thousand over, no matter who it effects, unless you're talking a hundred homes. I understand you are talking five to ten properties. So why don't we just go from 100,000 over property value and half a

1430-008-001

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1430-008-001 BPA must follow Public Law 91-646, 49 CFR Part 24, as well as the federal acquisition guidelines.

1430-008-001

1430-009-001

mill more and it's done and that seems like a fair thing to do. No matter who gets it. I mean, I'm opposed to you taking my house. But my house is worth well over three hundred thousands, and if it goes through the backyard, it takes all my trees down, I'm looking right at the line, it would go down at least a hundred thousand dollars, fifty thousand dollars in property value. So I would be basically a hundred thousand more in mortgage than the home would be worth. So no matter who it goes through, I agree with what she's saying. They should be fairly compensated, and if it's that important a thing and it's such a small amount of homes, overcompensate.

MR. STEVE BRUNNETTE: Like I said, I'm a property owner, and Tina has pretty much said what I've kind of felt all along, they are going to come through our land. And we have a house, we actually have two homes in which it is going to effect. We have a barn underneath one of the right-of-ways right now which is an existing line and they're going to take that, too. It's too close to the line, it will start a fire and burn down the other line, that's going to be gone.

We have a horse that's been living there, and I can't have a building over 10-by-10, so I don't know where he's going to go. And we have a rental house there, and it's a business. That's kind of our retirement. We figured

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1430-009-001 and -002 See responses to Comments 1429-013-002 and 1430-008-001.

1430-009-002

on -- that's why we built two homes, and we're going to be losing that. And we got kids going to college and I, like I said, we didn't plan on this, this is just something that happened.

1430-009-003

And we've had two appraisals, nobody's offered us a dime. I don't know what's going on, you know. They're paying rent on property, we are getting paid, they are paying the rent. But we don't know what's going on. They going to come by like gestapo in the nighttime and just take it. We don't know. We don't know anything that's going on.

We had Jill Gaston, I don't know if she's still in charge of the project, but she was the one doing it. Next thing I know I got two other guys out there. Another appraisal, same appraisal person, we don't know what's going on. We just feel if Covington's got a problem with power, go some other place, find it some other place, not in my place. Thank you.

1430-009-004

MS. LISA TAYLOR: Hi. I'm Lisa Taylor, and I live at the south end of Tiger Mountain and I'm a member of the Tiger Mountain Ranchettes Landowners Association. Got to love that '50s name. I think these folks are probably tired of seeing me, and I think that they have gotten the message that the communities outside the watershed will oppose with all vigor installation of lines on our property.

1430-010-001

1430-010-002

I believe very, very much in the need for a

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1430-009-003 BPA has contracted for an appraisal of your property with a local appraiser. Upon receipt, we will be in a position to make you an offer on your property. BPA has been negotiating with other landowners along the preferred route for options to purchase transmission line easements, since the decision has not been made to construct.

1430-009-004 Comment noted.

1430-010-001 and -002 Comment noted.

1430-010-002 continuity in rural King County as this is being really quickly. I find it interesting that the county finds my property to be a precious environmental jewel but yet the City of Seattle seems to think it's a highly developed urbanized community. I thought it was my yard.

1430-010-003 So I would like to offer some words of maybe not support, maybe not advice but certainly opinion towards -- directed towards BPA. Our communities support what needs to be done here. I have researched and so has my husband at great length nearly every organization and every document that you guys have brought up. We have looked at your regulatory requirements, the mechanical engineering need gets it, I understand why those are needed to maintain a healthy power grid. Unless we can deliver on-site power as alternative energy resource in the next six months, I don't see us getting out of this.

So given that, I think that your preferred alternative is the clear answer. Also in the time that I've spent with my community in discussing this, and clearly we've been doing so since May of last year at great length, I discovered that there was a large amount of property owned

1430-010-004 by Plumb Creek, a timber company, to the south of the watershed that is between the watershed and Seattle's tap. I also understand, and this is fact that, you know, others need to verify for themselves, don't take my word for it,

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1430-010-003 Comment noted.

1430-010-004, -005, and -006 BPA has an option to purchase 640 acres from Plum Creek immediately south of the watershed in the Kangley/Selleck area. This property could be divided into 20 acre parcels. BPA would prevent commercial or residential development on this property if it is acquired.

that the water table in that area is very shallow. This property has been subdivided for five acre lots. Should these properties be developed, the Puget Sound is suddenly going to find septic drain fields and chem lawns in their water table for their water supply. The City of Seattle needs this property. I believe it is in the best interest of my community for them to acquire this property.

1430-010-005

1430-010-006

Additionally, the 350 acres that the BPA has offered I think is also of benefit. I think additionally the community is probably going to ask for and support in your negotiations with the City of Seattle that a buffer be placed along the Raging River in order to protect that area more fully and that those lines there be double-circuited to cross the river as you have with the Cedar.

1430-010-007

So in the end, I believe that our communities would back a negotiations with Seattle that would increase the protection of that area in order for you to get on with your project. I believe that is ultimately in the best interest of the City of Seattle, the local community and the Bonneville Power Administration. I am somewhat frustrated with the City of Seattle in their discussions regarding the water filter. We've also spent time researching this and the data seems to say to me that the City of Seattle has needed a turbidity filter, will need a turbidity filter and just doesn't have the cash for one. I do think they are

1430-010-008

1430-010-009

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1430-010-007 and -008 Comment noted.

1430-010-009 Comment noted.

1430-010-009

1430-010-010

1430-010-011

1430-010-012

1430-011-001

putting you in a bad spot, and I don't support them in that.

So in conclusion, I hope your negotiations with Seattle go well. I think that that's absolutely the answer. If it doesn't, I absolutely require on behalf of the members of my community that all other alternatives receive the same amount of mitigation that the City of Seattle would receive since you're crossing my drinking water. I also would like that any funds purchased -- or, excuse me, any lands purchased for mitigation for this project come from BPA's budget and not from other conservation funds that may be earmarked for other conservation efforts by the local community.

Lastly, when private properties or even properties owned by corporations are involved, I encourage BPA to work with those folks to come to an equitable agreement regarding acquisition. So I wish you luck. I hope that we come up with an answer that actually works for all of us. Thank you.

MR. THOMAS BIGFORD: My name is Thomas Y. Bigford, and I'm representing myself and my son Jeremy Bigford that's here tonight. And we're at 23330 SE 270th right off the Issaquah Hobart Road. I want to congratulate everyone that got up and spoke before me. Every issue that I was going to bring up has already been said, so thank you very, very much all of you. I'm very impressed with each and every one of

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1430-010-010 and -011 All alternatives would receive the appropriate level of environmental mitigation. On the watershed, the issue is associated with surface drinking water for the city of Seattle and some other local communities, along with the potential of Seattle needing to install an expensive turbidity filtration plant as a result of excessive amounts of turbidity caused by construction of this project. In addition the watershed has a Habitat Conservation Plan established with the USFWS and NMFS. This project needs to mitigate for potential impacts to the HCP. Private properties also have environmental concerns which BPA would address locally on that property, such as minimizing impacts to wells used for drinking water and minimizing impacts to creeks used by endangered fish species by keeping low-growing vegetation. Concerning where the funds come from for the purchase of lands to mitigate impacts to the watershed, those funds will be from BPA. BPA would likely buy more property than is necessary and would be selling those remaining portions. BPA is looking at other agencies to see if they would be interested in purchasing those remaining portions from BPA with whatever fund they have available, which may be from conservation funds.

1430-010-012 Comment noted.

1430-011-001 Comment noted.

1430-011-001

you. I concur with your choice. And if it becomes our alternative route, I would be adamantly opposed to it. Thanks ever so much.

1430-012-001

MR. JOHN HUSON: I just wanted to express my approval of the preferred Alternative 1 and also if there is any kind of extension to this process beyond what we have here, I want to express some dismay and hope that it ends here, and we will fight to the end, wherever that end might be. Thank you.

1430-013-001

MR. RICHARD BONEWITS: My name is Richard Bonewits. I'm chairman of the Greater Maple Valley Area Council. We've been in this battle for the community for three years. We know these people almost as well as we know our own family. This is the last of many meetings. I have been to at least 10, possibly 11, I've lost count, which were conducted by Lou and his crew in support of this power line project over the last three years. You haven't heard half of the questions that have been raised and you haven't heard half the answers, but they have given good answers, solid answers every time. We have checked them on the power lines, Lisa said, the power demand requirements, we've checked conservation and we've checked alternative energy forms and a whole bunch of other things. The factors haven't changed.

BPA came to the right conclusion the first time

1430-012-001 Comment noted.

1430-013-001 and -002 Comment noted.

1430-013-001 three years ago, and two times since, the power line is needed. There's no question in the engineers' in our group's mind, and we had some 35 and 40 people from this community that we took to Seattle last year, engineers, lawyers, people that live in the area, all kinds of people.

1430-013-002 All routes will incur some environmental damage, quite a bit as a matter of fact. All of them cross one or the other major salmon bearing rivers, streams, wetlands and so on.

1430-013-003 There isn't even a question of a doubt the Seattle Public Utility watershed route is the least costly, the least damaging and affects the fewest people. And I want to tell you that last year this group of ours, a few of them here tonight, but we really operated with what I call an opposition steering group, about ten people maximum, it had

1430-013-004 environmentalists, as I said, lawyers, engineers and project managers, people with experiences similar to yours. Over 1500 people in our area signed petitions opposing all routes outside the Seattle Public Utilities watershed.

1430-013-005 Your elected representatives here in the City of Maple Valley, Covington and Issaquah joined us in letters and comments to Bonneville in opposition to routes outside the watershed. Your state representatives, both of them from District 5, my district, have supported me, are constantly in touch with me by e-mail, "Do we need to put any more muscle into it, Dick?" And they're ready to go to

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1430-013-003 and -004 Comment noted.

1430-013-005 Comment noted.

bat for you here.

Jennifer Dunn has been involved in it, our state or our U.S. Representative from District 8, and even Senator Cantwell has sent emissaries to meetings and my house and met with some of the people that are here and they are still in contact with us. Don't stop with your comments now, public. I'm telling you, don't leave it here with just words that you've spoken.

1430-013-005 I want you to write to Bonneville and I want you to put a carbon copy in the mail, Post Office Box 101, Maple Valley 98038. I will get it, I will see that all of these politicians and including, I failed to mention, our own county councilman for the District 13 -- District 12, rather, Dave Irons, his aid is here tonight again with us, the two state representative aids were with us last night, we had Senator Cantwell's aid with us the night before in Seattle. So don't stop here. Write your comments and send me a copy of it.

The other thing I want to leave Bonneville with two -- I want to say this to you: You have been knowledgeable, professional and courteous, and Diane has been a great facilitator. I have given her a hard time. She's tried to control me, that's pretty tough. There are two messages I want to leave with you: Provide equal consideration for avoiding construction damage to all routes

1430-013-006

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1430-013-006 BPA has looked at the potential mitigation costs needed for all the alternatives and those costs are reflected in the overall costs depicted for each alternative as stated in the SDEIS. The SDEIS has already acknowledged that those alternatives outside the CRW would be more expensive than the preferred alternative.

1430-013-006

and mitigation thereof. If you do that, the result you've already come to in this impact statement says that the costs are far higher in Routes A, C, B and D. Anyone with half a brain can see that if you were to give us the peanut oil or the vegetable oil and the hydraulic system and the helicopters and the pooper scoopers and all the other things that you have to do to satisfy Seattle, your Route A would probably be over a hundred million, probably we'd see C and D up somewhere around two hundred million and Route C would be up around a hundred and fifty. So don't forget those when you make your final decision.

1430-013-007

And this last one is for your administrator to take home for you. Don't destroy the great amount of public goodwill that you've created, you've built. Recognize that your compensation offers are low. I own real estate in this area and I know what the value of Tina's land is. You need to recognize the right value for destroying two parcels of land. She's told you she will sell it to you. Just do it. It's a pittance in comparison with what you need. So, please, that will be clearly in the message that you get in writing from us. Thank you.

1430-014-001

MR. CLOYD PAXTON: I would like to know why Governor Locke is not entering this project here? I mean, all the people that's got power lines on their property, they don't get any compensation for what they have got and

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1430-013-007 Comment noted.

1430-014-001 Comment noted.

1430-014-001

it looks to me like the taxpayers shouldn't have to pay taxes on that land. The King County ought to take care of them taxes. That is no good to us, you know what I mean, as far as you might be able to drive over it, but you can't raise cattle on it or do a lot of things you want to do on it. So why don't King County pay the taxes on all this land?

I mean, it's just certain ones that's going to get it, but they're the ones that are valuable, you know what I mean, they need it. So I'd like to know why we couldn't get together with Mr. Locke or something like that or whoever it takes and get our taxes paid by King County or whatever, you know, free. It should be free. That's all.

MR. LOU DRIESSEN: Maybe Cindy can answer the governor's office. We got to put you on the spot sometime, Cindy.

MS. CINDY CUSTER: For Bonneville I work with elected officials and the state agencies and the legislature, so I talk to your representatives not frequently but at least keep them up to speed on what's going on and I do work with Governor Locke's staff person who deals with energy issues. And he is very aware of this project, he saw your petitions and is keeping a close eye on what's going on. He's chosen at least at this point not to take a public stand, but he's certainly aware of what's

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1430-014-001
1430-015-001
1430-015-002
1430-015-003
1430-015-003

1 happening with the line.
2 MR. CLOYD PAXTON: Well, I think it would help
3 BPA, you know what I mean?
4 MS. TINA MORGAN: Well, I'm of the opinion that
5 maybe BP, on his comment, maybe share in some of the taxes
6 seeing is how they take a lot of rights away from the
7 property owner because they pay a one-time fee for the
8 easement and then have the rights to use it therefore and
9 tell the property owner what they can and cannot do. So it
10 does seem a little unfair to me for a one-time payment and
11 Bonneville uses it forever, gets to make money off the power
12 that goes across there, even though you call it nonprofit.
13 But, I don't know, there seems something wrong with that
14 system to me. But my actual question for myself was I was
15 wondering how much money to date or do you have any idea has
16 this controversy with Seattle Watershed caused you?
17 MR. GENE LYNARD: Well, as far as the
18 environmental effort, the cost of environmental documents
19 and the meetings and hiring of consultants, we're over a
20 million dollars in the last three years. This is an unusual
21 project and this is a particularly expensive environmental
22 effort.
23 MS. TINA MORGAN: I see. But since you had your
24 original preferred and then when watershed -- when the
25 watershed threw a monkey wrench into your project, I was

31

1430-015-001 and -002 You may want to contact your local taxing authority(ies) and provide them with a copy of BPA's easement document, and inquire whether a reduction in your property taxes is possible.

1430-015-003 The costs would be about $10 to $13 million more than conventional construction including special designs and construction techniques and purchasing properties.

1430-015-003

just wondering what the costs have been involved since at that time, if you have any idea, and what you anticipate them to be until your final decision.

MR. GENE LYNARD: Well, we were -- I had a budget to do all the environmental work and the budget was a million dollars. And we would have been well under that had we produced a final last year. But since we went this additional -- undertook this additional effort, hiring additional contractors, doing additional work, we are probably up 1.2 when we're done.

1430-015-004

MS. TINA MORGAN: I was just curious. And then Joanna Paul here, one of the people in our neighborhood, she wanted to know, she asked me to ask the question for her, who makes the ultimate final decision of which way you will go?

MR. LOU DRIESSEN: Well, the project team looks at all the factors and then they make a decision that's a suggestion that goes to the administrator. Then the administrator decides in the end. So it's the BPA administrator that makes the final decision. She is asking where the administrator is located at, the administrator is located at Portland, Oregon at BPA headquarters.

MR. GENE LYNARD: By the name of Steve Wright.

1430-016-001

MR. JON ZAK: And you're in negotiations with Seattle on the preferred alternative, do you discuss

1430-015-004 BPA's Administrator will make the decision on this project.

1430-016-001 and -002 Some discussions have taken place about decommissioning roads. Those discussions are continuing and no commitment has been made.

1430-016-002

decommissioning logging roads as a method of mitigation?

MR. LOU DRIESSEN: Yes. They have brought that to the table, so that's part of the discussions along with other things.

1430-016-002

MR. JON ZAK: Thank you. I would also like to thank Dick Bonewits for all the work he's done on this so far for the people in Maple Valley.

1430-017-001

MR. RICHARD BONEWITS: I want to answer Cloyd's question. The Governor has been notified by our group about this. All 13 King County councilmen have been notified about it. The Governor did have, through the Department of Ecology, have the regional manager call me and wonder what the deal was, and I spent about two hours one day giving him the background, education.

My position with politicians goes like this: You're either for us or shut up, and you get most -- those are your two choices, either come out actively helping or at least recognize there's more than one side. And for all of you to understand this, I want you to clearly understand what he told me, because this is not the first time that I've been involved with Bonneville, they're generally a professional group, and this is a professional group, but let me tell you, Seattle has told us clearly they do not intend to take this going down. That's why your letters are necessary. You need to keep it up. You need to talk to

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1430-017-001 Comment noted.

1430-017-001

your neighbors. You need to get them to write them, whether you're under A, you're under C, and we have been up and talked to the people under B and D. So, please, write your letters.

1430-018-001

UNIDENTIFIED MALE SPEAKER: I got here kind of late and I didn't feel worth throwing any speeches, I've talked too much already, one thing I want to ask, make sure I got it clear, I've got some friends in California in the engineering business, and part of that fiasco was the lack of transmission. They haven't made any investment, and so you just hear about Enron, but it's really cost them because of the lack of transmission. I know you guys haven't had a chance because of all the things you have to put up with too, but as I understand this thing, if we put this line through, we will save five megawatts; is that right?

That means you're not going to have to buy five megawatts which falls to the benefit of the taxpayers. Now, all the folks that are Greenies, you know, Planet Earth and all that kind of stuff, and alternative energy, which I buy myself, I throw some extra bucks in where I live, why would they not recognize that it's really imperative to get the project because it will pay for itself? Am I missing something?

In other words, if you get this thing through, the efficiency you're going to have because of this new line is

1430-018-001 Comment noted.

1430-018-001 Comment noted.

1430-018-001

1430-018-001

1430-019-001

1 going to save you five megawatts, which is a couple of
2 million bucks at today's prices if the thing goes up. So
3 this thing is going to be a heck of an investment; is that
4 right?
5 MR. GENE LYNARD: That's five megawatts annually.
6 UNIDENTIFIED MALE SPEAKER: So I hope you use that
7 when you're talking to the folks in Seattle. One thing I
8 have gotten from some of these people like Sierra Club and
9 these other guys with other agendas and the Seattle people
10 that are bitching about water, you're not going to touch
11 that, is this thing does make sense and you do have to make
12 an investment for the rate payers on transmission lines. So
13 I think you ought to use that. I don't think anybody that
14 I've been at any of these meetings is anti-environment.
15 We're all pro environment. And if you took a pole here, you
16 would probably say has BPA chosen the most environmentally
17 sound alternative? I don't know anybody that says no. So I
18 hope you use that when you are talking to Seattle. And I
19 want to echo Dick's things, I think you guys are very
20 professional.
21 MS. CLOYD PAXTON: I understand that you have
22 bought 350 acres next to the watershed for Seattle, where no
23 one even in Seattle knows where the watershed is at, but
24 these five people that have five homes that you're going to
25 be using, I can't understand why you can't pay them the

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1430-019-001 and -002 BPA did take advantage of an opportunity to acquire 350 acres from the Trust for Public Land. The preferred alternative crosses this parcel, it has potential mitigation benefits, and can be resold if the decision is not to construct this route. See response to Comment 1429-013-002.

amount that they're supposed to be getting and -- because you've already bought the 300 acres, where do you get off

1430-019-002 not paying them for their home that they're living in? They have sacrificed a lot.

UNIDENTIFIED MALE SPEAKER: Whenever we talk to you people on the phone and talk about the price, you know I'm one of the property owners, so I'm one of the bad guys, I guess, but there's always the possibility what if Seattle

1430-020-001 city says, Guess what, we're not going to let you come through. Now, I've always heard you guys say we're going to condemn your property, and I also heard you guys have the same power to condemn the watershed property; is that correct?

MR. LOU DRIESSEN: That's correct.

UNIDENTIFIED MALE SPEAKER: What kind of process

1430-020-001 does that do and what does it do to the time period in which it could be completed?

Say, example, they say we're just not going to let you come through here no matter what you do, and so you guys

1430-020-002 go around and go, all right, we're going to condemn it. Then what happens then? I mean, has this ever happened? Do you guys -- I'm sure that has happened somewhere along the line because you always hear about the county condemning

1430-020-003 this piece of property for some little trail or something, and we don't know what the heck is going on. So, I mean,

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1430-020-001, -002, and -003 BPA has the power of eminent domain, or the power to condemn. BPA works closely with landowners to come to a satisfactory agreement if possible. If negotiations are not successful, and the decision has been made to construct a project, BPA would use its power to condemn to secure the necessary land rights. This would apply to land rights needed from any landowner along the route to be constructed, including the City of Seattle, if the preferred route is selected. BPA generally requires six months to acquire rights to property.

1430-020-003

maybe you can give us some information on that if you could.

MR. LOU DRIESSEN: BPA does have the right to condemn other local communities like the City of Seattle or any other governmental entity. BPA as a federal agency is able to do that. And BPA is able to do that with the City of Seattle, so that is one option that is on the table for BPA. That is certainly something that we look at. Time frame wise, it would really depend when we would start that process, but that process could be started early enough to where we could start construction this year. So it is an option that's being looked at. It's an option, you know, BPA doesn't like to use, but it is an option BPA can use.

1430-021-001

MR. CLOYD PAXTON: I would like to ask Mike about is it Kaiser down there at Tacoma that has them big melting pots and they have to keep that aluminum pot hot all the time to keep that -- how big of pots are them and why couldn't they put them in smaller billets, buildings? They don't use that, they're out of business, right?

MR. MIKE KREIPE: Yes.

1430-021-001

MR. CLOYD PAXTON: So that takes a lot of juice, it looks to me like, to keep the pots going. Why can't you put that in smaller billets and reuse it some other time?

MR. MIKE KREIPE: It's got to do with the -- the pot lines are made up of 50 or 70 cells, each one has a voltage drop of about a half a volt, large, large current.

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1430-021-001 The aluminum smelter at Kaiser is shut down and will be dismantled. The aluminum smelter process is continuous in that bauxite is added while the finished aluminum is being poured from the pot. The pots must be kept energized in order to keep the process going. The conductors on our lines are all 2.5 inch or smaller. The blue haze you see is corona, a result of the high voltage stress around the conductors and hardware. The blue haze is not heat being given off by the line.

So that's the way -- they're hooked up in series and they need -- and they have a certain delivery voltage for the whole thing, so that's essentially -- they have to have enough of them to equal the delivery voltage. Could they make them smaller? I don't know a lot, but I know enough to be dangerous. I don't know enough about the design and whether they can modify that in ways, but that seems to be consistent with all the plants. They all have the pot lines that are 50 to 75 megawatts apiece. It's pretty standardized. I don't know if it's old technology.

1430-021-001 MR. CLOYD PAXTON: I used to work in a foundry and I know they do that, they can take it down and they can take, in a foundry, out of the bull ladle and put it into billets and, you know, put it in blocks and then put it back in when they want to use it. That way they can shut the heat down. But you talking about these big lines that's going over that they lose a lot of heat, you take that line like out there where I live on Petrovisky, and that thing must be about that big around, four inch, I suppose, huge.

MR. MIKE KREIPE: An inch to two inches.

1430-021-001 MR. CLOYD PAXTON: Well, you can see a blue haze off of that when it rains. You know, it looks like about 20 inches. Is that heat that's going -- that you're getting rid of or the lines are getting rid of?

MR. MIKE KREIPE: That's actually the ionize --

the effect of the high voltage, stress voltage right at the conductor, it's many thousands of volts and ionizing there right around it. If you get sharp points, that's why you notice all the connections are rounded, they have shields around them, if you get sharp points where it will build up on that point and you'll see the purplish bluish lights. It's fairly benign, but it's just a result of the high voltage stress at that point.

MR. LOU DRIESSEN: It is a loss. And so when these transmission lines get constructed, we try to make sure that these little blurs that Mike's talking about, that they don't occur on conductors. But also Mike is trying to explain that there's heat loss on those lines, but actually those lines are fairly efficient. So the actual losses on the 500 kV line are 2 percent or less?

MR. MIKE KREIPE: Yeah, two.

1430-021-001 MR. CLOYD PAXTON: What if you have bigger lines, do you have less problems?

MR. LOU DRIESSEN: The more kVs you go, the lower your losses are. So that's one reason why a lot of utilities try to put up higher kV lines. But even at low loss, it still has a loss, you know, it's still a loss. And that small loss is about five megawatts per year.

1430-022-001 MS. TINA MORGAN: Yeah, to touch back on Steve's question, I think what we'd really like to know from the

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1430-022-001 and -002 BPA does have the right of condemnation. This includes private properties and the city of Seattle. Seattle is aware of this.

1430-022-001

1430-022-002

neighborhood that we're in is you have continually told us that if we don't deal with you in the way that you want us to deal that you are going to condemn our properties. We get told that -- Jill wasn't like that, she wasn't necessarily telling that to us every day. But since you've had a few new people, we hear that quite often.

And we would like to know if you're treating Seattle in the same manner because they're not wanting to cooperate with you. Are you giving them the same continual threat of condemning them as you're giving us? I think we'd really like an answer to that.

And have you told them outright that you will, you know, quite possibly condemn them or are you actually considering a possible condemning of Seattle watershed for your line? We'd really like you to tell us where you're going with that with the Seattle watershed because we hear it every time we talk to one of your representatives.

MR. LOU DRIESSEN: In our discussions with Seattle, the condemnation issue has come up several times. So they know we have that right and that we're -- that we can exercise that right. So it is on the table with Seattle. We haven't told them that we will condemn them one way or the other. As long as negotiations are continuing, which they are, we are not looking at exercising that. So, yes, that discussion has taken place with Seattle.

1430-023-001

UNIDENTIFIED MALE SPEAKER: Is there ever going to be a record of the public comments that we could look up?

MR. GENE LYNARD: The final EIS will have all the comments that we received on the draft document back in 2001 as well as the supplemental draft that we're releasing now, and they will all be in Chapter 10 of the final EIS.

HANDWRITTEN COMMENTS:

1430-024-001

I prefer Alternative 1 (preferred option) because of its less cost and least disruption to the environment.

1430-025-001

If you build on the common leg of C2 & A, on the vacant right-of-way, my property, which these alternatives would cross, would take an immediate $70,000 hit.

1430-026-001
1430-026-002

Did the SDEIS look at the differences between Alts. in loss of energy from the lines?

41

1430-023-001 The public comments received on the DEIS and SDEIS are in the FEIS.

1430-024-001 Comment noted.

1430-025-001 Comment noted.

1430-026-001 and -002 The SDEIS did not report the loss savings for all of the alternatives. However, we have the information from studies. The loss savings for the other alternatives range from 4 to 11 MWs fewer losses than without the project.

CERTIFICATE

STATE OF WASHINGTON)
)
COUNTY OF KING)

I, BETSY DECATER, a Certified Shorthand Reporter and Notary Public in and for King County, Washington, do hereby certify that I reported in machine shorthand the above-captioned proceedings; that the foregoing transcript was prepared under my personal supervision and constitutes a true record of the proceedings.

I further certify that I am not an attorney or counsel of any parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

WITNESS my hand and seal in Sammamish, County of King, State of Washington, this 7th day of February, 2003.

Notary public in and for the
State of Washington, residing
at Sammamish

My commission expires 03-20-06

BETSY DECATER
NOTARY PUBLIC
STATE OF WASHINGTON

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Chapter 3 Response to Comment Topics	
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Canadian Treaty	1492-007
Cedar River pack trail	1487-030 thru 038
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consultation with tribes	1434-006, 1487-002, 1487-005, 1487-006, 1487-010, 1487-039, 1487-046
cross-Cascade, cross-mountain line	1492-008
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drinking water - CRW	1492-032,033,034, 035; 1400-001, 1415-006, 1484-005, 1485-007, 008; 1496-001, 1527-024
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Bonneville Power Administration

PO Box 3621 Portland, Oregon 97208-3621

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