

9.0 Public Comments on the Draft EIS

9.1 Public Involvement Opportunities

BPA mailed the Draft EIS to about 250 agencies, groups, and individuals. A list of agencies and organizations to whom the Draft EIS was sent is provided in Chapter 8. Commentors were invited to send comment letters directly to BPA, to complete a comment form, attend an open house and make oral comments to BPA staff, or make comments by toll-free telephone numbers. A 45-day review period ended on March 21, 1994. An open house format public meeting was held in Boardman on February 24, 1994 to review and receive comments on the Draft EIS.

This chapter contains written comments, comment forms, and oral comments made at the open house. Each comment is followed by a BPA response. Comments are organized by topic.

9.2 Comment Coding Method

Comments from the public open house, comment forms and comment letters were coded. Each comment was given a distinctive code. Comments made at the open house were given the prefix PM followed by a number. For example, the code PM-3 signifies public meeting comment number 3. A similar method was used to classify letters. Each letter received was given a number in the order received. Comments begin with the number 8 and end with the number 21. Often a comment letter contains several comments. If this occurred, comments were given sequential numbers beginning with the letter number, e.g., 8-1, 8-2, 8-3.

Comments were further organized by topic based on the nature of comments received. The following outline was used to organize and respond to public comments:

Comment Categories

1. Process Comments
2. Decision Recommendations
3. Proposed Action
4. Environmental Impacts
5. Consultation, Review and Permit Requirements
6. New or Corrected Information

9.3 Comments and Responses

The following pages contain individual comments and responses arranged according to the comment categories shown above. Responses directly follow each comment.

Copies of all comment letters are enclosed after the comments and responses.

| Code | |
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| PM11 Kathy Neal | <p style="text-align: center;">1. PROCESS COMMENTS</p> <p>COMMENT: I like the format/process for the meeting.</p> <p>RESPONSE: Comment noted.</p> |
| 14-6 Sharon Barrick | <p>COMMENT: Thanks for the informal format - it was informative and I felt I could express my opinion freely!</p> <p>RESPONSE: Comment noted.</p> |
| <p>2. DECISION RECOMMENDATIONS</p> | |
| 8-1 M. Pepper | <p>COMMENT: Wheel the power.</p> <p>RESPONSE: Comment noted.</p> |
| 9-1 W. C. Hendrix | <p>COMMENT: Wheel power over BPA lines. I support Coyote Springs.</p> <p>RESPONSE: Comment noted.</p> |
| 11-3 J.K. Palmer | <p>COMMENT: The City of Boardman supports the project.</p> <p>RESPONSE: Comment noted.</p> |
| 13-1 Robert J. Boss, M.D., President - Boardman Chamber of Commerce | <p>COMMENT: The Boardman Chamber of Commerce wishes to go on record as unani- mously supporting the Coyote Springs Cogeneration Project. The project reports have been reviewed. The attention to detail regarding the local environment and other impacts on the community have been reviewed. It is felt that this project is a welcome edition (sic) to the community. On behalf of the Chamber of Commerce, and as local voters, we wish to strongly support this project</p> <p>RESPONSE: Comment noted.</p> |

| Code | 2. Decision Recommendations Continued |
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| <p>14-5 Sharon Barrick</p> | <p><u>COMMENT:</u> Coyote Springs Project will begin the process of finally unlocking the potential of this region. I look forward to the prospect of the development, because I believe that people here will meet the challenge to grow and change in a positive way. I hope this project is endorsed for immediate approval since everyone is served well by it. . . will provide economic diversity at a time when our state and region needs it most.</p> <p><u>RESPONSE:</u> Comment noted.</p> |
| <p>PM12 Bob Vandecar</p> | <p><u>COMMENT:</u> This is a good project and should proceed.</p> <p><u>RESPONSE:</u> Comment noted.</p> |
| <p>PM13 Sharon Barrick</p> | <p><u>COMMENT:</u> Good Idea - One that we can be supportive of in good conscience</p> <p><u>RESPONSE:</u> Comment noted.</p> |
| <p>PM14 Sam Edwards</p> | <p><u>COMMENT:</u> The project should not be subverted by personal environmental agendas.</p> <p><u>RESPONSE:</u> Comment noted.</p> |
| <p>PM15 Gary Neal</p> | <p><u>COMMENT:</u> Wheel ahead.</p> <p><u>RESPONSE:</u> Comment noted.</p> |
| <p>PM5 Robert Forstenberg</p> | <p><u>COMMENT:</u> The building trades and affiliates are looking favorably on the project and are planning to help build it.</p> <p><u>RESPONSE:</u> Comment noted.</p> |
| <p>PM6 Bob Vandecar</p> | <p><u>COMMENT:</u> As a resident of Boardman, I support the project.</p> <p><u>RESPONSE:</u> Comment noted.</p> |

| Code | 2. Decision Recommendations Continued |
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| 14-4 Sharon Barrick | <p>COMMENT: I believe this project represents an opportunity for us to develop greater diversity in our energy options, and that is good.</p> <p>RESPONSE: Comment noted.</p> |
| PM1 Bob Vandecar | <p>COMMENT: Power is needed if the economy is to progress. The Coyote Springs Cogeneration Project provides for this.</p> <p>RESPONSE: Comment noted.</p> |
| PM7 Bob Vandecar | <p>COMMENT: With less hydroelectric power available these days, CT's like Coyote Springs Cogeneration Plant can replace reduced hydro power.</p> <p>RESPONSE: Comment noted.</p> |
| PM9 Sharron Barrick | <p>COMMENT: We now have coal and hydroelectric power plants, but not much natural gas fueled generation. Gas power plants will provide diversity and needed competition.</p> <p>RESPONSE: Comment noted.</p> |
| <h3>3. PROPOSED ACTION</h3> | |
| <h4>3.1 Proposed Action - Coyote Springs Plant</h4> | |
| 18-1 Tom Meehan, Oregon Department of Energy | <p>COMMENT: On January 5, 1994 PGE amended its application to EFSC for a site certificate. The primary change was to include the possibility of using a "zero discharge system" for managing wastewater rather the using the Port of Morrow's existing industrial wastewater disposal system. That change has implications for cooling tower drift as well as the quantity and quality of solid waste that would need to be disposed.</p> <p>RESPONSE: PGE's proposed action remains to dispose of wastewater by ground application through the Port of Morrow's wastewater disposal system. The Oregon DEQ approved wastewater disposal by land application</p> |

| Code | 3.1 Proposed Action - Coyote Springs Plant |
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| <p>18-2 Tom Meehan Oregon Department of Energy</p> | <p>in early July, 1994. PGE is no longer considering a zero discharge wastewater disposal system.</p> <p>COMMENT: The project has changed since the DEIS has gone to print. You asked if I would identify the more important changes . . . On January 5, 1994 PGE amended its application to EFSC for a site certificate. The primary change was to include the possibility of using a “zero discharge system” for managing wastewater rather the using the Port of Morrow’s existing industrial wastewater disposal system. That change has implications for cooling tower drift as well as the quantity and quality of solid waste that would need to be disposed.</p> <p>In addition, in January 1994 PGE submitted to ODOE: a report on further site-specific seismic hazard evaluation, and ecological monitoring program (revised), additional information to supplement Exhibit U of its application, and clarification on the availability and sources of water for the project.</p> <p>RESPONSE: The FEIS contains updated discussions on these topics.</p> |
| <p>21-1 T. Walt-Gen. Manager, PGE</p> | <p>COMMENT: After the DEIS was prepared PGE made two significant decisions relating to the Coyote Springs project. First, the decision has been made to change the plant design so that the NO_x emissions from the project are 4.5 ppm. (NO_x emissions are discussed on page 3-12 of the DEIS.) This reduces the NO_x emissions from the project by one half. The second significant change is that PGE has committed to utilize a zero discharge system if a suitable plan for mixing the Coyote Springs wastewater with the Port of Morrow’s wastewater is not approved by Oregon DEQ. In the event that a zero discharge system was utilized at Coyote Springs the portions of the DEIS relating to water usage and wastewater discharges would not be up-to-date.</p> <p>RESPONSE: The text of the FEIS has been revised to reflect these decisions.</p> |
| <p>21-5 T. Walt-Gen. Manager, PGE</p> | <p>COMMENT: There are several references in the DEIS about Coyote Springs being outside the City of Boardman. Please be advised that the Port of Morrow is in active discussions with the City of Boardman about annexing the Coyote Springs site into the City.</p> |

| Code | 3.1 Proposed Action - Coyote Springs Plant |
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| <p>21-5 T. Walt-Gen. Manager, PGE</p> <p>20-2 Joan Cabreza, Environmental Protection Agency</p> | <p><u>RESPONSE:</u> This is correct. The proposed site is within the City's urban growth boundary and the City of Boardman has agreed to annex the subject site. At the time of this writing, the City is in the final stages of documentation of the annexation. The process should be complete by early summer (Palmer, City Manager, City of Boardman, telephone communication, May 18, 1994).</p> <p><u>COMMENT:</u> Alternatives - The DEIS provides a clear description of the proposed Coyote Springs cogeneration project. EPA is concerned, however with the lack of alternatives for power generation....These alternatives are absolutely necessary in order to evaluate the comparative merits of other possible options. Other alternatives should be presented in the FEIS or a supplemental DEIS so the public can identify the least environmentally damaging option. EPA recognizes that PGE's 1992 Integrated Resource Plan (IRP) identifies a wide range of new energy sources that will be needed in the future. However, this does not preclude a thorough alternatives analysis. Since the IRP has already indicated a need for power that has "operating, cost and environmental characteristics of gas-fired, combined-cycle CTs (page 2-2), " the alternatives analysis should include different plant locations, transmission alignments, water well locations, access and other site-specific options.</p> <p><u>RESPONSE:</u> BPA met with EPA and discussed why the scope of the Coyote Springs DEIS did not include an analysis of other energy resource options or alternate plant sites. A letter to EPA describing BPA's reasons for deciding on the scope of the Coyote Springs EIS is enclosed following EPA's comment letter. EPA has expressed satisfaction with BPA's explanation, and no longer contends that the EIS must review alternate energy resources or plant sites.</p> <p>An expanded discussion of the role of environmental factors and alternate energy resources considered in formulating PGE's IRP has been provided in Section 3.1.1 - How the Proposed Action was Defined.</p> <p>Transmission line alignments that were considered in developing the proposal are described in Chapter 3 of the FEIS in Section 3.1.4, Alternate Transmission Line Routes.</p> |

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| <p>18-4 Tom Meehan Oregon Department of Energy</p> | <p>3.2 Proposed Action - Transmission System</p> <p>COMMENT: The second to the last sentence of the first paragraph on page. 3-1, section 3.1, is unclear. It would be helpful if the EIS would explain what BPA would do if there is not enough transmission capacity for the second unit. How would BPA recover the costs associated with a complex upgrade if one were needed?</p> <p>RESPONSE: The text of the FEIS has been modified to enhance clarity where noted. As indicated in the revised text, integration of the second Coyote Springs unit could be accommodated in a number of ways. If PGE requests additional transmission services, BPA will need to consider environmental factors, the needs of PGE as well as other BPA customers, and cost recovery options before a decision is made. BPA recovers the cost of system improvements through such means as direct cost reimbursement as well as through its transmission service rate structure.</p> |
| <p>21-4 T. Walt-Gen. Manager, PGE</p> | <p>3.3 Proposed Action - Gas Pipeline</p> <p>COMMENT: Page 3-2 of the DEIS discusses the PGT line being built to Coyote Springs. The inference is that the lateral line to Coyote Springs will be sized to transport 41 billion BTU/day. The contract with PGT is for 41 billion BTU/day (enough gas for one unit a Coyote Springs). The pipeline is sized to carry about 100 billion BTU/day (enough gas for both units at Coyote Springs).</p> <p>RESPONSE: The text of the FEIS includes this information.</p> |

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| <p>20-3 Joan Cabreza, Environmental Protection Agency</p> | <p style="text-align: center;">4. Environmental Impacts</p> <p>4.1 Cogeneration Plant Impacts</p> <p>COMMENT: Wetlands - Page 4-2 states, "The current land use of the proposed power plant site is vacant. The parcel was once operated as a gravel quarry, but the quarry has since been filled. . . ." This statement seems to imply that the gravel mining operation has ceased. However, later, on page 4-7 it states, "Because the (gravel mining) pond is created by an active mining operation, it is not regulated by either the Corps or the Oregon DSL." These statements do not provide a clear impression of the current land use for the gravel mining pond. The final EIS should address this topic, as there (are) potential 404 permit implications if the pond is not longer used for gravel mining. BPA should contact the Army Corps of Engineers on this issue to clarify the situation. Before the final EIS is issued, the jurisdiction of the mining pond should be explained in detail. For further information, please contact Jim Goodzward at the Corps in Portland at (503) 326-5500.</p> <p>RESPONSE: BPA has contacted Jim Goodzward as requested. The text of the FEIS has been changed to include a history of mining activity at the gravel pond. The current land use of the proposed power plant site is zoned for Medium to Heavy Industrial on the Port of Morrow Industrial Master Plan. It is the site of aggregate mining. Mining by Ready Mix Limited has been an ongoing activity for 15 years (verbal information from the Port of Morrow). As the mining operation moved east, the western portion was filled in. This western portion is now the proposed site for the cogeneration project. Discharging fill into the gravel mining pond that is currently being mined generally is not a regulated activity under Section 404 of the Clean Water Act.</p> |
| <p>15-1 Rick Gove Columbia Basin Institute</p> | <p>COMMENT: This section attempts to explain how water for the Coyote Springs Cogeneration Project will be acquired. However, it is very unclear in its explanation and needs clarification. For instance, the first paragraph on page 5-10 states the water will be supplied from "three deep and shallow groundwater wells." It then goes on to state that two new wells are in the application stage. There is no connection between these two statements as they are presented. Is the Coyote Springs Plant</p> |

| Code | 4.1 Cogeneration Plant Impacts |
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| | <p>dependent upon the wells under application? Are the current wells described in the first sentence supposed to provide all the water from the wells under application? Are the current wells described in the first sentence supposed to provide all the water or is the plan to supplement the water requirement with water from the wells under application? If the wells under application are denied, will the three mentioned wells be able to provide adequate water for the life of the project? If not, where will the water come from? (See Cumulative Impacts section.)</p> <p>RESPONSE:</p> <p>The water supply for the Coyote Springs Cogeneration Project has changed since the DEIS was prepared. The water needs of the project will be supplied from existing Port of Morrow wells. The plant is not dependent on wells under application. The City of Boardman will provide a backup water supply of 2,000 gpm from their Ranney Collector.</p> <p>The Port of Morrow transferred its Carlson Sump wells 1 and 2, and Port wells 3 and 4 from irrigation or industrial use to municipal use, and plans to supply the Coyote Springs Plant from these wells. Carlson Sumps 1 and 2 and Port Well 3 are alluvial and collectively have water rights totaling 7.3 m³/m (1,910 gpm). Port Well 4 is a deep basalt well and would supply the remainder of the plants water needs 2.9 m³/m (758 gpm). The City of Boardman has made a commitment to provide up to 7.3 m³/m (2,000 gpm) to the plant from their Ranney Collector. This provides the ability to manipulate water delivery based on the price or quality of water desired. The City well also provides a backup supply source. The capacity of these wells is sufficient to meet Coyote Springs Cogeneration Project requirements.</p> <p>The Port had previously filed for two additional alluvial groundwater wells, referred to as Port Wells 6 and 7. According to Port personnel (Gary Neal, Port of Morrow Director, personal communication, April 27, 1994), the Port has deferred their plans to install these two wells. An application for one basalt aquifer groundwater permit (Port Well #5, with a permitted rate of 0.17 m³/s (6 cfs) has been filed to augment the Port's existing total water supply. This well is not related to the Coyote Springs Plant.</p> <p>The water supply discussion of the FEIS incorporates this new information.</p> |

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| <p>15-2 Rick Gove Columbia Basin Institute</p> | <p><u>COMMENT:</u> The section goes on to state in the third paragraph that the deep basalt aquifer well permit has been granted with conditions; one of them being that if the water is lowered more than 25 feet, the well would not be used until water levels recover. If this occurs, will the Coyote Springs Plant be required to obtain water from another source? If so, what is the source and what are the impacts? It is common knowledge and more than reasonably foreseeable that the groundwater aquifers in this area are rapidly depleting. Therefore, there should be much more detail in this section concerning exactly what groundwater aquifers are being depended on and to what extent, and what will happen if these groundwater sources cannot provide the water required by the Coyote Springs Cogeneration Project.</p> <p><u>RESPONSE:</u> The previous comment response explained how the water supply for Coyote Springs Plant has changed since issuance of the DEIS. The basalt well (Port Well #5) referred to above will augment the Port’s existing total water supply. This well is not a proposed water source for the plant. The alluvial aquifer wells that will supply the Coyote Springs Plant are not subject to the permit conditions and restrictions of the basalt aquifer wells.</p> <p>The water supply discussion of the FEIS was rewritten to remove reference to Port Well #5 as it no longer is required by Coyote Springs.</p> |
| <p>15-3 Rick Gove, Columbia Basin Institute</p> | <p><u>COMMENT:</u> The Cumulative Impacts - Groundwater section is lacking in substance and needs to be significantly developed. . . . 1) There should be specific references to other actions which will cause cumulative impacts and an explanation of why this new action presents the threat of a cumulative impact. . . . “past, present, and reasonably foreseeable future actions” must be considered in an incremental sense. This demands a closer look at all past permits granted which commercial and industrial users and all past permits granted which allow groundwater withdrawals from the aquifers in this area. Another very important issue which must bear closer scrutiny is the proximity between the groundwater wells that the Coyote Springs Plant withdrawals will come from and the designated critical groundwater areas in the Boardman area. Such an analysis should also consider the current status of the groundwater aquifers to be used by the Coyote Springs Plant and if they are in danger of reaching a critical state of depletion.</p> |

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| <p>15-3 Rick Gove, Columbia Basin Institute</p> | <p>RESPONSE: As described in the response to comment 15-1, Coyote Springs Cogeneration Project's water needs will be supplied by existing Port water wells which have been transferred from irrigation or industrial use to municipal use. Three of the four wells draw water from the alluvial aquifer. No increase in withdrawals from these sources is anticipated to accommodate the Coyote Springs Plant. The Boardman Ranney collector is also alluvial.</p> <p>The alluvial aquifer is very transmissive and is hydraulically connected to the Columbia River such that impacts from pumping are generally very localized and do not result in significant changes in water levels. Water level declines are possible in the basalt aquifer if total pumping from all basalt aquifer wells exceeds the natural recharge to the aquifer. This condition has occurred elsewhere in the region which resulted in the designation of the Ordinance Critical Groundwater Area (OCGA), located just east of the proposed facility location. The OCGA pertains to the basalt aquifer and does not include the shallow alluvial aquifer.</p> <p>Potential present and future cumulative impacts associated with groundwater withdrawals may include declines in groundwater levels in either the shallow alluvial aquifer or the basalt aquifer. Water level declines could result in reduced yield in adjacent wells, reduction in natural groundwater flow to the river, or changes in vegetation patterns in areas where groundwater is close to the ground surface.</p> <p>To assess the significance of potential present and future incremental impacts due to pumping, an inventory of groundwater rights has been prepared for both alluvial wells and basalt wells located near the Coyote Springs Cogeneration Project, including all Port of Morrow wells (see Table 5-13). The information was obtained from Oregon Water Resources Department files and the Port of Morrow. The Port of Morrow controls 93 percent of the total permitted groundwater withdrawals near the Coyote Springs Plant. This does not include the City of Boardman's appropriation. The City of Boardman has a surface water right for 1 m³/s (36 cfs), of which 6,600 gpm (14.7 cfs) is reported to be developed. Although the City has a surface water right, some of this appropriation is supplied by groundwater from the alluvial aquifer because the City uses a Ranney collector adjacent to the Columbia River.</p> <p>As shown in Table 5-13, 70 percent of the Port's permitted appropriation is from the alluvial aquifer and 30 percent is from the basalt aquifer. The</p> |

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| <p>15-3 Rick Gove, Columbia Basin Institute</p> | <p>total Coyote Springs Plant demand will make up 22 percent of the total Port-owned alluvial aquifer appropriation. As stated previously, the Coyote Springs Cogeneration Project demand will not result in an increase in alluvial aquifer pumping in the area since the wells supplying the project have been used historically by the Port for its other operations. In fact, there will be a net 4.5 cfs reduction in pumping during the summer as a result of transferring the water right at the Carlson Sumps from a 6-month agricultural right to a 12-month municipal right. Furthermore, the cooling and blowdown wastewater generated by the Coyote Springs will be reused to irrigate crops at the Port of Morrow land application sites. The Port presently beneficially reuses a total of nearly 1 billion gallons of water per year, which results in significant conservation of water that would otherwise be obtained from the Columbia River or groundwater.</p> <p>While not directly associated with the Coyote Springs Cogeneration Project, the Port of Morrow's new basalt well (Port Well # 5) will make up 41 percent 10 m³/m (2,693 gpm) of the total permitted basalt aquifer withdrawals near the plant (Table 5-13). The OWRD has responsibility and authority to review and approve all requests for groundwater appropriations. The review process includes an assessment of whether the aquifer can support the additional pumping without injuring senior water rights holders. The OWRD has determined that Port Well #5 will not create unacceptable present or future impacts and has issued a favorable technical review of the Port's application. Further, OWRD has stated that there are sufficient water rights within the Port of Morrow to support the project.</p> <p>If unacceptable impacts due to pumping are observed in the future, the OWRD has the authority to limit further appropriations and reduce the total pumping demand based on seniority of water rights. This authority has been exercised at the Ordinance Critical Groundwater Area. The OWRD is not considering expanding the OCGA.</p> <p>In conclusion, there is no information that indicates that the proposed groundwater withdrawals for the project would result in unacceptable present or future cumulative impacts. This conclusion is supported by the following:</p> <ul style="list-style-type: none"> • The Coyote Springs Plant will derive its water supply from existing permitted shallow aquifer water sources at the Port of Morrow. |

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| <p>8-2 M. Pepper</p> | <ul style="list-style-type: none"> • The OWRD has stated that there are sufficient water rights available at the Port to supply the project. • There will be a net 0.13 m³/s (4.5 cfs) reduction in pumping from the alluvial aquifer during the summer months when low flow in the Columbia River is a concern for fish protection reasons. • OWRD has issued a favorable technical review of the Well #5 permit application. • The number of groundwater users near the Coyote Springs Cogeneration Project are limited; the Port controls 93 percent of the groundwater rights within a mile of the project. • OWRD has the responsibility to monitor future impacts caused by overpumping and will limit further appropriations if it is found that senior water rights holders are being adversely impacted. <p>COMMENT: I assume the plant will have backup storage of diesel or #6 oil for use in the event of a gas curtailment. If so, what are the potential adverse impacts of that? How will the owners prevent leakage of those tanks and how will they respond to (i.e. clean up) a tank rupture? Will the owners file prevention and contingency plans?</p> <p>RESPONSE: PGE originally planned to construct diesel storage tanks at the north edge of the plant site. They planned to provide oil spill containment around the tanks to contain the oil in case of a rupture. Air emission modeling revealed that particulate emissions, while using diesel fuel, exceeded significance thresholds. Extensive air quality sampling over a period of at least one year would be needed to demonstrate that actual emissions, as contrasted with modeled emissions, would meet particulate standards. Rather than delay the plant schedule to complete extensive air sampling, PGE deleted oil backup from its proposal and presently the plant has no backup fuel source. In the event of a gas curtailment the Coyote Springs Plant would be shut down.</p> <p>PGE is currently conducting air quality sampling studies. If the new air sampling studies show that the plant may operate with oil and still meet particulate emission standards, PGE will seek a revision to its Air Contaminant Discharge Permit from the Oregon DEQ. An amendment</p> |

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| <p>14-2 Sharon Barrick</p> | <p>to PGE's Oregon Energy Facility Site Certificate would also be requested to allow use of diesel fuel and on-site oil storage. Oil spill prevention and containment plans would be a part of the Oregon Site Certificate amendment process. If large oil storage tanks are later installed at Coyote Springs, they would be subject to the Clean Water Act, which is administered by DEQ. A SPCC Plan would be required, and must be prepared by a licensed professional engineer. The SPCC Plan would be kept at the Coyote Springs Plant site.</p> <p>COMMENT: I strongly favor the concept of cogeneration plants utilizing natural gas. It represents an alternative source of energy to fossil fuels which generate higher levels of "greenhouse" gases. People who share my concern for global warming and greenhouse effects will agree that alternatives to coal and petroleum combustion deserve consideration, since natural gas produces less greenhouse gases...</p> <p>RESPONSE: Comment noted.</p> |
| <p>14-3 Sharon Barrick</p> | <p>COMMENT: It appears that PGE does not plan CO₂ offset mitigation at this time, but is noteworthy that Boise Cascade and Potlatch Farms are developing almost 12,000 hectares (30,000 acres) of tree farms nearby, which will produce substantial O₂ output. Indeed anyone who flies over this so-called high desert area, viewing the green circles below must conclude that corporate farms are producing significantly greater amounts of oxygen than the native flora... I realize that I am citing other, outside industry, in our community, but isn't that the point of environmental studies? How connected everything is?</p> <p>RESPONSE: The benefits of tree/vegetation planting in relation to CO₂ emissions comes from the CO₂ they take from the atmosphere during photosynthesis, not the oxygen they emit, although oxygen is certainly beneficial. The net CO₂ sequestration capabilities of crops versus native scrub brush is probably close to the same. Crops grow faster, are harvested sooner and thus returned to the atmosphere sooner than native vegetation.</p> |
| <p>PM4 Sharon Barrick</p> | <p>COMMENT: Boise Cascade/Potlatch Farms is planning to plant poplar trees (eventually 30,000 acres) in Morrow County. The plantation is about 6 km (4 miles) from Boardman in the Three Mile Canyon area. The CO₂ emis-</p> |

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| <p>15-4 Rick Gove Columbia Basin Institute</p> | <p>sions from Coyote Springs and CO₂ used by the tree farm are interactive and may cancel each other.</p> <p>RESPONSE: Coyote Springs CO₂ should not be associated with Boise Cascade and Potlatch poplar groves for the following reasons. (1) The general assumption behind carbon sequestration is that CO₂ will be taken out of the atmosphere by vegetation and permanently stored in trees or structures. Poplars (cottonwoods) and other fast growing trees are harvested 6 years after planting, and are then used to make paper products which are usually disposed of and returned to the atmosphere within 5 years of production. Thus poplar trees do not create long-term carbon storage and should not be considered for carbon sequestration. (2) Typically, those who invest in carbon sequestration are the ones who receive credit for the carbon they capture. Because Boise Cascade and Potlatch will be planting the poplars, they will most likely want to receive credit for their efforts. (3) 12,000 hectares (30,000 acres) of vegetation will consume between 15,000 tons and 150,000 tons of CO₂ per year. Coyote Springs will generate 1 477 000 tonnes (1,625,000 tons) of CO₂/year. At best the poplars will consume only 10 percent of Coyote Springs' CO₂ emissions.</p> <p>COMMENT: There needs to be an identification of the different types of cumulative impacts that may result from this action. The analysis must then give detailed information as to how the proposed action will impact the discussed area (groundwater), considering the proposed action in an incremental sense with the other identified actions discussed in Point #1 (15-3).</p> <p>RESPONSE: Section 5.1.4 of the Draft EIS reported cumulative impacts in the following categories: global warming, transmission capacity, groundwater, regional energy resource needs, tax revenues, housing supplies and natural gas supplies. Greater quantification of groundwater and global warming cumulative impacts has been provided in the FEIS. BPA's response to question 15-3 provides detailed information on cumulative impacts to groundwater resources.</p> <p>Cumulative alluvial aquifer water withdrawal attributed to the Coyote Springs Project when added to other water uses in the area, is not expected to jeopardize the continued existence of endangered or threatened Snake River salmon species. This conclusion is supported by the Biological Assessment of Beak Consultants, Inc. (see Appendix C), and testimony of John J. Pizzimenti, a scientist who specializes in environ-</p> |

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| <p>15-5 Rick Gove Columbia Basin Institute</p> | <p>mental impact studies to fish on regulated rivers for Harza Northwest, Inc. John Pizzimenti testified on behalf of PGE's with regard to their application to the Oregon Energy Facility Siting Council.</p> <p>Water use attributed to the Coyote Springs Plant together with existing water uses having a hydrological connection to the Columbia River would conservatively reduce Columbia River flow by about 1.4 m³/s (50 cfs). Compared with the spring runoff during juvenile migration in the Columbia River of 7300-9700 m³/s (260,000-343,000 cfs) in 1983, both the Coyote contribution of 0.17 m³/s (6.0 cfs) and the cumulative reduction of 1.4 m³/s (50 cfs) in flows are insignificant. Furthermore in Pizzimenti's testimony he concludes "there is no evidence that main-stream flow is the primary determinant of salmon survival in most years in the Snake and Columbia rivers, and especially in the John Day pool."</p> <p>COMMENT: The second paragraph of the groundwater section goes on to state that the well may face restrictions in future years. The preceding paragraph states that future groundwater rights may be restricted because of the rapid rate of decline of Columbia River aquifers. However, the analysis provides the reader with absolutely no information as to how the Coyote Springs Project will operate if the groundwater aquifer it is withdrawing from is depleted to the point that the Coyote Spring Plant's right is limited or eliminated due to claims of senior right holders. Clearly if this DEIS states that this possibility exists, it is reasonably foreseeable that such an event will occur. Yet, the cumulative impact section simply raises the issue and fails to supply any substantive information concerning what water source the Coyote Springs Plant will use and what the impacts of the unmentioned water source would be on the threatened and endangered fishery.</p> <p>RESPONSE: The text referenced is from the Cumulative Impact Section of the DEIS. Cumulative impact predictions involve a degree of uncertainty, and therefore receive much factual debate. The challenge in preparing the cumulative impact section of an EIS is to decide if an impact is reasonably foreseeable or merely speculative. Reasonably foreseeable impacts are reported in an EIS, speculative impacts are not.</p> <p>As mentioned previously, the water source for Coyote Springs Plant has changed since publication of the DEIS. The cumulative impacts discussed in the DEIS were thought foreseeable considering that the water</p> |

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| <p>15-6 Rick Gove, Columbia Basin Institute</p> | <p>for Coyote Springs Plant then was to come from the basalt aquifer. Water level declines are possible in the basalt aquifer if total pumping from all basalt aquifer wells exceeds the natural recharge to the aquifer. This condition exists just east of the plant site and has resulted in the designation of the Ordinance Critical Groundwater Area, and the imposition of strict groundwater restrictions by the Oregon Water Resources Department.</p> <p>However, under current plans nearly all of Coyote Springs Project's water requirements will be supplied from Port of Morrow alluvial aquifer wells. In addition, the City of Boardman has agreed to provide 2,000 gpm of water from its Ranney collector (also alluvial) as backup to the Port of Morrow wells should an unforeseen condition require it. Thus Coyote Springs Project is no longer dependent on the basalt aquifer and would likely be unaffected by restrictions that might be imposed on it. It seems reasonable to conclude that the plant's water supplies are secure. The cumulative impact discussion (Section 5.1.4) has been revised accordingly.</p> <p>A wide range of recovery plans have been promoted for protecting threatened or endangered salmon in the Columbia River. Dropping the John Day pool level significantly 12 m (40 ft.) is one option that has come to BPA's attention. BPA along with the Corps of Engineers and the Bureau of Reclamation are planning to issue the System Operation Review (SOR) DEIS in late July 1994. The SOR DEIS evaluates different Columbia River operation strategies for effects on threatened and endangered salmon species. The SOR DEIS includes two alternatives in which the John Day pool would be lowered marginally 1.5-3 m (5-10 ft.) to either the level of irrigation intakes or the minimum level required to operate the navigation lock. Dropping the John Day pool 12 m (40 ft.) is not currently under consideration, and thus is not considered reasonably foreseeable.</p> <p>COMMENT: Other types of potential cumulative impacts which should be analyzed and discussed are impacts to local water supplies, the potential of impacts to critical groundwater areas located nearby, impacts to deep aquifers which may result from drawdowns in the shallow aquifers, impacts to other fish and wildlife in the area which are dependent on the groundwater or hydrological connected surface water, impacts on irrigation operations in the area which may result from depleted groundwater aquifers, and impacts on Columbia River flows due to the</p> |

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| <p>15-6 Rick Gove, Columbia Basin Institute</p> | <p>hydrological connection. Again, these impacts must be considered in light of past, present and reasonably foreseeable future actions which also impact the groundwater resource.</p> <p>RESPONSE: Based on a capture zone analysis conducted by CH₂M HILL, estimated areal extent of pumping effects from the shallow wells (Port Well 3 and Carlson Sumps 1 and 2) at their permitted rates, are within the Port's property boundary. Furthermore, these wells that would supply the Coyote Springs Cogeneration Project will be pumped at rates similar to their current rates, and therefore not generate new impacts. Therefore, impacts to local water supplies such as domestic and irrigation wells are not anticipated.</p> <p>Potential impacts to critical groundwater areas are discussed in Comment No. 15-3.</p> <p>Impacts to the basalt aquifer from drawdowns in shallow aquifer are likely to be minimal and localized because of the characteristics of the shallow alluvial aquifer as described above. In addition, the basalt and shallow alluvial aquifers are two distinct aquifers with limited hydraulic connection (except possibly where uncased boreholes interconnect them).</p> <p>As described in Exhibit O of PGE's Facility Siting Application, there are two ways for alluvial wells to impact streamflow in the Columbia River. First, removing water from the alluvial wells could reduce the volume of water naturally entering the Columbia River from alluvial aquifers. Secondly, river water could recharge the aquifer due to pumping the aquifer. However, given that the average annual streamflow on the Columbia River in this area is on the order of 122,000,000 acre-feet/year (discharge from the McNary Dam, Columbia River Water Management Report, Water Year 1989), Coyote Springs Project water requirements are less than 0.005 percent of the Columbia River flow. Therefore, impacts to the Columbia River flow due to pumping are insignificant.</p> <p>Messner Pond and wetlands along its borders are the most noteworthy wildlife habitat near the plant site. Map 8 illustrates the boundary of the wetland bordering Messner Pond. Water needs of the Coyote Springs Project will be provided from existing wells at existing rates of withdrawal. Thus no change in wildlife habitats or populations are</p> |

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| <p>15-7 Rick Gove, Columbia Basin Institute</p> | <p>anticipated. PGE will conduct an Ecological Monitoring Program (Appendix E) for the Coyote Springs Project which will provide early notice and cause corrective actions to be undertaken if unanticipated wildlife impacts occur.</p> <p>COMMENT: One area which BPA surprisingly does not analyze as a cumulative impact is the potential impact on BPA's ability to generate hydropower due to interruptions in surface flows of the Columbia River. This impact has a definite measurable effect on BPA rates. The ability for BPA to produce cheap hydropower is reduced when water is withdrawn from the Columbia, its tributaries or shallow aquifers which have a hydrological connection to the river or tributaries, because there is less water going through the turbines. To meet its firm load requirements in low water years, BPA must then replace this lost cheap power with much more expensive power produced by thermal resources. This cost is passed on to the region's ratepayers in the form of rate increases.</p> <p>The DEIS provides no analysis of the potential impact on electric rates from the above described potential loss. Withdrawing water for the production of thermal power, at the cost of decreasing the potential for cheap hydropower should be analyzed. Though it may well be an acceptable trade-off in this case, without analysis and research the decision maker has no basis to make an informed decision. Even if it is an acceptable trade-off, it is nevertheless an impact which BPA should be calculating any time it is analyzing the impacts of an action which may potentially impact Columbia River flows, especially in a cumulative type of analysis.</p> <p>. . . . For a calculation of the potential lost hydropower and how much it will cost BPA ratepayers, the DEIS should contain the following analysis. Assuming that the entire water requirement of the Coyote Springs Plant is supplied by groundwater wells which have a hydrological connection to the Columbia River, the annual amount of water withdrawn from the river will be 4,300 acre-feet. This amount of water in the John Day pool, when dropped through turbines, would produce just over 1 million kilowatt hours of electricity. If the withdrawal is made for Coyote Springs, BPA will then have to replace the 1 million kilowatt hour loss by purchasing an equivalent amount of electricity from more expensive thermal resource power producers. According to BPA's 1993 Final Rate Proposal, such purchases have an average cost 60.64 mills per kilowatt hour. Thus, the annual cost to replace this</p> |

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| <p>15-8 Rick Gove, Columbia Basin Institute</p> <p>16-3 Edmund V. Clark Ida-West Energy Co.</p> | <p>withdrawal will be just over \$63,000. Projected over the 30-year life of the project, replacement power will cost BPA and consequently its ratepayers \$1.9 million in 1993 dollars.</p> <p>RESPONSE: The commentor is correct in pointing out the omission of an analysis of lost hydropower due to reduced Columbia River flows and the effect of this loss on BPA rates. The calculation provided in the response is essentially correct. The cost of replacement power would probably average less than 60.64 mills, but assuming the worst case, lost hydro-power revenues could range from \$60,000-\$70,000. PGE will pay BPA wheeling charges ranging from \$3-4 million annually for each of the Coyote Springs units. The revenue impact of the Coyote Springs Project on BPA rates will thus be positive. BPA uses a rule of thumb to calculate the impact of expenditures and income on rates: each \$100 million dollar change in finances contributes one mill to BPA's rates. Thus no discernible change in rates will result from Coyote Springs wheeling revenues.</p> <p>COMMENT: For each type of cumulative impact identified, there should be a detailed discussion of such things as the quantity of water being used and the quantity of water other actions are using or are proposed to use. Using these real numbers, calculations and estimates should be made that give the decision maker more substantive knowledge of the potential resulting impacts.</p> <p>RESPONSE: BPA responses to previous CBI comments were made in as quantified a manner as was possible. We believe that the commentor has made several good points and that the responses and changes to the EIS provide the decision maker with more substantive knowledge than was previously the case.</p> <p>COMMENT: Air quality impacts are discussed at the bottom of S-7. Only the more significant potential impacts should be discussed in the Summary. It may be confusing to the public to mention methane as it's done here since the Coyote Springs Project will normally release no methane directly to the atmosphere. Section 6.10 of the DEIS does a good job of discussing potential fugitive methane emissions and that should be adequate. It would be appropriate in the paragraph, however, to mention that CO₂ is a greenhouse gas and is formed in the combustion of methane. It may also be worthwhile to mention that CO₂ emissions at</p> |

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| <p>16-4 Edmund V. Clark Ida-West Energy Co.</p> | <p>the Coyote Springs Cogeneration will be minimized through: (1) The use of advanced power plant technology to achieve a high efficiency and thereby minimize CO₂ per unit of electricity produced, (2) providing steam from the power plant to local food processors to allow the shut down of the food plant boilers, and (3) using natural gas as a primary fuel. The ratio of carbon to other atoms is lower in natural gas than coal and other hydrocarbon fuels which reduces CO₂ emissions per kWh generated.</p> <p>RESPONSE: The summary of air quality impacts on page S-7 has been rewritten in response to this comment.</p> <p>COMMENT: Under Global Warming, the DEIS states: Greenhouse gases contribute to Global Warming. This statement is very misleading in that the study of greenhouse gases and their effect on climate change is subject to substantial controversy and uncertainty and it gives the reader the impression that it is a fact. A March 1992 Gallop poll found that only 17% of climatologists said they believe human-induced warming has occurred and 53% said they remain convinced that jury is still out on global warming. (The Electricity Journal, February 1994, page. 68).</p> <p>RESPONSE: The text of the FEIS, page S-9, has been changed to reflect this comment.</p> |
| <p>16-6 Edmund V. Clark Ida-West Energy Co.</p> | <p>COMMENT: Please refer to the statement: Water use from the shallow aquifer in the Columbia Basin could affect recovery plans for threatened or endangered salmon. This statement is misleading because the amount of water used by the Coyote Springs Project is insignificant to the total flows in the Columbia and therefore its effects on threatened and endangered salmon is also insignificant.</p> <p>RESPONSE: See BPA's response to the Columbia Basin Institute.</p> |
| <p>16-8 Edmund V. Clark Ida-West Energy Co.</p> | <p>COMMENT: Please refer to the last sentence on page 3-11: Good combustion controls will be used to limit SO₂ emissions. The combustion controls planned for Coyote Springs will have no effect on the plant's SO₂ emissions. Any sulfur in the fuel will be emitted as SO₂.</p> <p>RESPONSE: Good combustion controls reduce the amount of fuel required thus limit SO₂ emissions.</p> |

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| <p>16-9 Edmund V. Clark Ida-West Energy Co.</p> | <p><u>COMMENT:</u> In discussing CO₂ at the top of page 3-12, current control technologies are described as ineffectual for CO₂. This is misleading and confusing, because CO₂ emissions are simply a function of the carbon content of the fuel. Actually, the project has plans that will be effective in minimizing CO₂ emissions: (1) Maximizing plant efficiency (2) the use of natural gas rather than a fuel with a higher carbon content, and (3) provisions for cogeneration.</p> <p><u>RESPONSE:</u> The text of the FEIS has been changed to reflect this comment.</p> |
| <p>16-10 Edmund V. Clark, Ida-West Energy Co.</p> | <p><u>COMMENT:</u> On Page 5-19 and at a couple of other locations in the document it is stated: Emissions of NO_x and N₂O from the facility would be controlled by best available control technology. NO_x emissions are controlled by combustor design and SCR, however, the N₂O (nitrous oxide) emissions are actually increased by the use of SCR. (Gas Turbine Selective Catalytic Reduction Procurement Guidelines", EPRI GS-7254, May 1991, pp. 2-6).</p> <p><u>RESPONSE:</u> The text of the FEIS has been corrected.</p> |
| <p>18-10 Tom Meehan Oregon Department of Energy</p> | <p><u>COMMENT:</u> The conclusion that the cooling tower drift would not have adverse impact on Messner Pond was based on a specific drift rate and a specific concentration of total dissolved solids (TDS) in the cooling tower water. If PGE uses a zero discharge system, the concentration of dissolved solids in the cooling tower water may be much higher than this level. Thus, the conclusion that there would be no adverse impact to Messner Pond may no longer be true. ODOE has asked PGE to redo its cooling tower drift impact analysis assuming a zero discharge system. We have not seen the results and have not determined that there would be no adverse impact to Messner Pond.</p> <p><u>RESPONSE:</u> A copy of the cooling tower drift analysis is included as Appendix I. The new analysis considers drift due to the higher concentration of minerals that would occur in a zero discharge system. Oregon DEQ has approved wastewater disposal using the Port of Morrow land disposal system. The zero discharge system is no longer under consideration.</p> |

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| <p>18-11 Tom Meehan Oregon Department of Energy</p> | <p>COMMENT: PGE has submitted an "Ecological Monitoring Program" by letter dated January 5, 1994 to ODOE.</p> <p>RESPONSE: A copy of the monitoring plan has been included as Appendix E.</p> |
| <p>18-12 Tom Meehan Oregon Department of Energy</p> | <p>COMMENT: We were unaware that PGE had done a Biological Assessment (BA) on federally listed threatened and endangered species. We appreciate BPA including it in the DEIS. I would appreciate you keeping me advised on USFWS and NMFS responses to the assessment.</p> <p>RESPONSE: "No effect" determinations were made regarding project impacts to threatened or endangered salmon species and the peregrine falcon. No effect determinations do not require a response from USFWS or NMFS. A not "likely to effect" determination was reached regarding impacts the bald eagle. This determination was mistakenly sent to the USFWS office in Olympia, Washington. We recently sent the BA to the USFWS Portland office. We will inform you of their response.</p> |
| <p>18-13 Tom Meehan Oregon Department of Energy</p> | <p>COMMENT: It would be helpful if the EIS would explain who receives and reviews PGE's stormwater pollution plan.</p> <p>RESPONSE: The SWPP for the Coyote Springs Plant are reviewed and approved by Morrow County. The county has approved the SWPP Plan for Coyote Springs. A copy of the plan and the county's approval letter are in Appendix G. A copy of the Erosion and Sedimentation Control Plan is published as Appendix H.</p> |
| <p>18-17 Tom Meehan Oregon Department of Energy</p> | <p>COMMENT: With regard to Vegetation/Wetland Impacts page 5-20, See comment for cooling tower, page 5-7.</p> <p>RESPONSE: See previous responses.</p> |
| <p>18-4 Tom Meehan Oregon Department of Energy</p> | <p>COMMENT: The discussions on water, well water use and wastewater are no longer accurate. The most recent information I have from PGE (letter dated January 3, 1994) shows that water for the project would come from several existing wells (both shallow alluvial and deep aquifer) operated by the Port, and from the City of Boardman. See ODOE Proposed Order, page 14, 15. Also, PGE on January 5, 1994, amended its appli-</p> |

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| | <p>cation to EFSC to provide for a “zero discharge system” as an alternative to discharging project wastewater to the Port’s current industrial wastewater disposal system. PGE did this because of the uncertainty as to whether the Port may legally dispose of the wastewater under Oregon DEQ regulations. At this time, PGE has not decided which wastewater disposal method it will use. See ODOE Proposed Order page 16, 17, 41, 42, 45, 46.</p> <p>RESPONSE: The referenced discussions have been revised to reflect PGE’s current plans. The ODOE Proposed Order is published as Appendix D.</p> |
| <p>18-5 Tom Meehan Oregon Department of Energy</p> | <p>COMMENT: If PGE should use a “zero discharge system” for wastewater disposal, it would generate an estimated ten tons per day of dewatered sludge. See PGE Amendment and ODOE Proposed Order, page 41, 42, 45, 46.</p> <p>RESPONSE: DEQ approved disposal of Coyote Springs Project wastewater via the Port of Morrow land application system in July 1994. The zero discharge system is no longer under consideration.</p> |
| <p>18-6 Tom Meehan Oregon Department of Energy</p> | <p>COMMENT: PGE has done more site-specific seismic hazard analysis at the request of DOGAMI. The report was done by Ebasco, dated January 1994, and transmitted to ODOE by letter dated January 20, 1994.</p> <p>RESPONSE: BPA has obtained a copy of the Ebasco report, and has modified the text of the FEIS to reflect its findings. The report has also been added to the references list in Chapter 10.</p> |
| <p>18-7 Tom Meehan Oregon Department of Energy</p> | <p>COMMENT: In 1993, the Oregon Fish and Wildlife Commission listed the Snake River spring/summer chinook salmon and Snake River fall chinook salmon as threatened as provided under Oregon law.</p> <p>RESPONSE: The text of the FEIS recognizes Oregon’s listing of these species.</p> |
| <p>20-4 Joan Cabreza Environmental Protection Agency</p> | <p>COMMENT: Water Quality - It is the goal of the Clean Water Act to restore and maintain the chemical, physical and biological integrity of the nation's waters. The final EIS should clearly demonstrate that project implementation will comply with state Water Quality Standards. State Water Quality Standards establish designated uses for a water body (or water</p> |

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| <p>20-4 Joan Cabreza Environmental Protection Agency</p> | <p>body segment), support the uses with water quality criteria, and where necessary, protect that water quality with an antidegradation policy. Baseline water quality data at the project level are key in the evaluation of projected impacts. Therefore, data from relevant sampling efforts should be included as part of the "affected environment" discussion.</p> <p>The discussion should be included as part of the "affected environment" discussion. The discussion should identify the amount and quality of available resource information, including data gaps and needs. When baseline water quality data are not available, assessments based on extrapolation from comparable watersheds or professional opinion should be carefully explained. The final EIS should provide a quantitative basis to judge whether physical and chemical parameters, such as temperature, turbidity, and sediment accumulation, will be kept at levels that will protect and fully support designated uses and meet Water Quality Standards under each of the action alternatives. The state's identification of water bodies with impaired uses (found in the state 303(d) report), as well as the magnitude and sources of such impairment, should also be included.</p> <p>RESPONSE:</p> <p>It is BPA's practice to write its EIS's so as to be understood by nontechnical readers. Technical data is typically summarized and referenced or included in appendices. Quantitative data on water resources that was used in assessing project cooling tower impacts is summarized below and included in Appendix I.</p> <p>The project area is included within the area of the Lower Umatilla Ground Water Management area as defined in Oregon's 305(b) Report, 1992. Groundwater investigations began in 1990. High nitrogen levels have been detected in groundwater samples. The ongoing investigations concentrate on human activities that impact groundwater quality and the potential connection between alluvial groundwater and surface water. The technical report describing these investigations will be published this year (1994). The study is being carried out by Oregon's Department of Environmental Quality to address Oregon's Water Quality Assessments as required by EPA. These baseline data are not available currently but will be published in Oregon's 305(b) Report later in 1994.</p> <p>Beak Consultants completed an analysis of cooling tower drift effects on water quality in Messner Pond (Appendix I). No adverse impacts to water quality in Messner Pond are expected. Potential impacts from cooling tower drift for an optional "zero discharge system," would have caused</p> |

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| <p>20-4 Joan Cabreza Environmental Protection Agency</p> | <p>the highest total dissolved solids (TDS) levels, and would have caused: excess algae and plant growth from high nutrient loading, and riparian plant stress from salt deposition. The report indicates that these conclusions are based on conservative assumptions that are not likely to occur. PGE is no longer considering the zero discharge system as DEQ approved their proposed land application wastewater disposal method in July 1994.</p> <p>PGE has committed to full mitigation in that event the adverse impacts from cooling tower drift are identified. Mitigation measures are part of the conditions imposed in the Oregon Department of Energy Proposed Order, January 10, 1994, page 31 (Appendix D). PGE's Ecological Monitoring Plan (Appendix E) will monitor effects to Messner Pond and surrounding vegetation both before and during operation of the Coyote Springs Plant.</p> <p>PGE has formulated several environmental impact monitoring plans to assure that impacts to water resources do not exceed anticipated levels and comply with applicable environmental standards. PGE's National Pollutant Discharge Elimination System Stormwater Discharge Permit is in Appendix G. The Project Erosion and Sedimentation Control Plan is in Appendix H.</p> <p>The text of the FEIS contains a summary of these documents and refers readers to reference documents and appendices for technical information.</p> |
| <p>20-6 Martha Sabol Environmental Protection Agency</p> | <p>COMMENT:</p> <p>1) The EIS needs to address the relationship and impacts of the cogeneration project to the City of Boardman wellhead protection program currently under development. Specifically, the EIS needs to address the impacts the project will have on the wellhead delineation results. EPA provided funds to the City in 1991 to begin developing a wellhead protection program. These funds were used to delineate capture zones around the three Ranney collectors that supply water to the City. This study is described in "Final Report - Wellhead Protection Demonstration Project, Boardman, Oregon" October 1992, by CH2M Hill. The EIS indicates that the City will provide water to the project via current wells, and possibly from drilling additional wells. The impact of this water use on the delineation boundaries should be addressed in the FEIS.</p> |

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| <p>20-7 Martha Sabol Environmental Protection Agency</p> <p>20-8 Martha Sabol Environmental Protection Agency</p> | <p>RESPONSE: Martha Sabol’s comments regarding the City of Boardman Wellhead Protection Project were brought to the attention of PGE, who contracted with CH2M Hill to help analyze the impact of Coyote Springs Project water use on Boardman’s Wellhead Protection Area (WHPA).</p> <p>The water source for the plant has changed since issuance of the DEIS. These changes are described in Chapter 3 of the FEIS under the heading “Water and Sewer Systems.”</p> <p>PGE and CH2M Hill met and discussed the Coyote Springs project with Barry Beyeler of the Boardman Public Works Director. Following this meeting Barry wrote a letter to Martha Sabol concluding, “the City of Boardman is confident that ... PGE will ... protect our wellhead area. Further, this may serve as a model for proposed future industrial development.” Descriptions of wellhead protection work that has been conducted and how the wellfield will be protected through the proposed wellhead protection ordinance have been included in the FEIS as recommended by Martha Sabol.</p> <p>COMMENT: Describe the impact to ponds and wetlands from increased ground water pumping....</p> <p>RESPONSE: The ponds and wetlands are surface expressions of the water table in the alluvial aquifer. Pumping by the Port of Morrow from the alluvial aquifer will continue at existing levels when the cogeneration facility begins operating, and no new alluvial aquifer wells are planned. New Port Well #5 will be constructed in the basalt aquifer and is not expected to induce drawdown in the alluvial aquifer or have an impact on the pond and wetlands.</p> <p>COMMENT: A discussion concerning potentially designated wellhead protection areas should be added to Section 4.1.8 “Protected Areas”.</p> <p>RESPONSE: Wellhead protection has been added to the “Protected Areas” Section of the FEIS.</p> |

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| <p>21-3 T. Walt-Gen. Manager, PGE</p> | <p>COMMENT: Page S-10 of the DEIS notes that a shortage of temporary housing facilities in the area could occur if the two Hermiston cogeneration projects and the Coyote Springs project peak construction periods occur concurrently. While this is true, the construction schedules for the three projects are not coincident so the impact on temporary housing is not anticipated to be significant.</p> <p>RESPONSE: The commentor is correct. The Coyote Springs Project's construction schedule calls for the Coyote Springs Project to be completed prior to January 1996, the earliest date construction could begin on the Ida-West Project near Hermiston. The other cogeneration project referred to is proposed by U.S. Generating Co. of Bethesda, Md. This proposed project could begin construction as early as January 1995. The construction schedule for Coyote Springs and the U.S. Generating Co. project would overlap, although peak construction times likely would be offset. If for some unforeseen reason schedules for these projects should change and become coincident, the temporary housing supply of the area would be insufficient.</p> |
| <p>PM10 Sam Edwards</p> | <p>COMMENT: I am concerned about mist from the cooling tower creating fogging or icing conditions which would affect freeway traffic.</p> <p>RESPONSE: The frequency of cooling tower fogging and icing events were predicted by dispersion modeling. Meteorological data used in the modeling was from the Pendleton airport. The data was modified to mimic the river's influence on Boardman weather patterns: the dew point was depressed by 75 percent and nighttime winds changed to easterly. The assumed dew point depression of 75 percent represents worst case conditions and generated conservative model results. The models predicted that the cooling tower will not cause icing during any part of the year. The DEIS text on page 5-16 that says "fogging is not expected to occur on I-84" remains valid.</p> |
| <p>PM8 Sharron Barrick</p> | <p>COMMENT: Comparing the CO₂ emissions from a power plant that uses coal versus natural gas, natural gas has less CO₂ emissions.</p> |

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| <p>PM8 Sharron Barrick</p> | <p>RESPONSE: Natural gas-fired combustion turbines emit less CO₂ per average MW than any other type of fossil fuel-fired generation facility. Cogeneration units emit even less if offset emissions from steam host boilers are considered. Renewable resources have zero CO₂ emissions, however, most renewables are not cost effective at this time.</p> |
| <p>16-2 Edmund V. Clark, Ida-West Energy Co.</p> | <p>COMMENT: The fifth paragraph on Page S-5 discusses EMF. The last sentence should be rewritten: Scientific evidence has not established a cause-and-effect relationship between electric or magnetic fields and adverse health effects, so specific health risks are unknown. This ambiguous declaration is of little help to the public. A more definitive statement such as that made by John Castagna of the Edison Electric Institute would be more helpful to the reader: "In 1993, government agencies and review committees in Denmark, Finland, France and England, reviewed the published EMF health effects research, including Scandinavian studies, and stated that EMF does not pose a significant health risk." (Electric Light and Power, February, 1994.)</p> <p>RESPONSE: The comment is noted, but we prefer to leave it the way we have stated it.</p> |
| <p>18-9 Tom Meehan, Oregon Department of Energy</p> | <p>COMMENT: The ODOE Proposed Order, page 22, requires that the applicant design and construct the facility to address any estimate of peak ground acceleration which exceeds that covered by seismic zone 2B.</p> <p>RESPONSE: Reference to the ODOE Order (Appendix D) has been added to the discussion on Seismic Hazards.</p> |
| <p>18-14 Tom Meehan, Oregon Department of Energy</p> | <p>COMMENT: The third paragraph on page 5-9 (Surface Water) is no longer correct. See comment about zero discharge system for page 3-9, 10.</p> <p>RESPONSE: PGE's proposal to use the Port of Morrow land application system to dispose of project wastewater was approved by Oregon DEQ in July 1994. PGE is no longer considering a zero wastewater discharge system.</p> |

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| <p>18-15 Tom Meehan, Oregon Department of Energy</p> | <p><u>COMMENT:</u> This discussion on groundwater (page 5-10) is no longer accurate. Water for the project may be coming from more than three wells. Also, Waterwatch has protested the Oregon Water Resources Department (SRD) approval of the proposed new deep basalt aquifer well discussed in paragraph three. Thus there is some uncertainty as to the ability to use water from this well. I asked PGE, the Port and WRD to make certain that there would be enough water for the project without relying on water from this new well. They have indicated that between the Port's already permitted wells and the agreement with the City of Boardman to provide the Port water which could be used for the project, there would be enough water. See proposed Order, page 14, 15; PGE letter to ODOE dated January 3, 1994.</p> <p><u>RESPONSE:</u> The water needs of the Coyote Springs Cogeneration Plant will now be provided by existing Port of Morrow wells. The text of Chapter 3, The Proposed Action and Alternatives, has been revised to describe planned water and sewer systems. No new wells are needed for Coyote Springs.</p> |
| <p>18-16 Tom Meehan, Oregon Department of Energy</p> | <p><u>COMMENT:</u> The values for drift rate and TDA (page 5-16, Second paragraph) may no longer be correct, if a zero discharge system is used. See comment for cooling tower, page 5-7.</p> <p><u>RESPONSE:</u> PGE is no longer considering a zero wastewater discharge system.</p> |
| <p>18-18 Tom Meehan, Oregon Department of Energy</p> | <p><u>COMMENT:</u> Solid Waste Disposal. See comment for page 3-12.</p> <p><u>RESPONSE:</u> PGE is no longer considering a zero wastewater discharge system.</p> |
| <p>21-2 T. Walt, Gen. Manager - PGE</p> | <p><u>COMMENT:</u> The DEIS notes (Page S-7) that a ". . . bank swallow colony on the plant site would be impacted by the proposed plant". The Site Certificate proposed by EFSC requires that PGE construct a fence and signs to protect the bank swallow nesting colony from disturbance during construction. The colony is outside the area affected by plant operation.</p> <p><u>RESPONSE:</u> The text on the bank swallow has been rewritten to indicate the bank swallow nesting colony is not located on the plant site.</p> |

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| <p>18-19 Tom Meehan, Oregon Department of Energy</p> | <p>4.2 - Transmission System Impacts</p> <p>COMMENT: Construction of the transmission line will require removing vegetation which exceeds 12 feet in height and all Russian olive trees (which occur along the southern edge of the Messner Pond area) from the corridor. This would represent a small loss of habitat for wildlife. However, PGE’s proposal to plant and maintain trees between Messner Pond and the project site would make up for this loss.</p> <p>RESPONSE: The removal of Russian olive trees in the transmission line corridor, and a resulting habitat loss has been included in the FEIS.</p> |
| <p>18-20 Tom Meehan, Oregon Department of Energy</p> | <p>COMMENT: The Oregon Department of Environmental Quality has adopted noise regulations in OAR Chapter 340, Division 35. It is my understanding that noise levels from the transmission line will be consistent with the applicable provisions of those regulations. If this is correct, it would be useful for the EIS to say this. If this is not the case, I would appreciate you advising me.</p> <p>RESPONSE: The transmission line will meet the Oregon noise standard of 50 dBA. This was stated on page 5-38. The FEIS consolidates these two discussions.</p> |
| <p>18-8 Tom Meehan, Oregon Department of Energy</p> | <p>COMMENT: We appreciate BPA’s attention to, and discussion of EMF in the DEIS. Although the EFSC has not adopted any rules relating to possible EMF health effects, ODOE and EFSC consider this an important issue and are monitoring it.</p> <p>RESPONSE: Comment noted.</p> |
| <p>18-21 Tom Meehan, Oregon Department of Energy</p> | <p>COMMENT: The discussion of the impact of the three proposed power plants on BPA’s transmission system, and what might be done to address the issue, was very useful.</p> <p>RESPONSE: Comment noted.</p> |

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| <p>16-5 Edmund V. Clark, Ida-West Energy Co.</p> | <p>COMMENT: In discussing the transmission capacity for the project and BPA's need to install additional transmission capacity by the year 2000, it will be important to the public to understand whether this additional capacity can be accomplished within or adjacent to existing high voltage transmission corridors.</p> <p>RESPONSE: The text of the summary has been expanded to amplify this likelihood. This topic is more thoroughly discussed under the heading 5.1.4 Transmission Capacity - Cumulative Impacts.</p> |
| <p>12-5 Robert K. Arvedlund, Federal Energy Regulatory Commission</p> | <p>COMMENT: The application before FERC does not identify a fibre optic cable with the pipeline. This should be verified prior to the final environmental impact statement.</p> <p>RESPONSE: PGT has verified that it plans to place a fiber optic cable in the pipe excavation trench to provide communication services for operation of the pipeline.</p> |
| <p>17-2 David Schultz, Pacific Gas Transmission Co.</p> | <p>COMMENT: We would like to suggest that you include more environmental information and analysis on the proposed PGT pipeline extension to the plant site. An augmented review of the pipeline component of the project in the FEIS would allow the Federal Energy Regulatory Commission the option of choosing to use the FEIS as a part of its compliance with NEPA.</p> <p>RESPONSE: Discussions on the Coyote Springs Extension pipeline have been expanded in the FEIS, however FERC has recently changed their environmental review plan. PGT's Coyote Springs and Medford lateral pipelines have been removed from the EIS for the new Tuscarora Gas Company pipeline to Reno. FERC plans to issue an Draft Environmental Assessment (EA) / Finding of No Significant Impact (FONSI) on the Coyote Springs and Medford lateral pipelines. The Final EA/FONSI would be issued in the fall of 1994, after a 30-day public review period.</p> |

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| <p>14-1 Sharon Barrick</p> | <p>4.4 Other Environmental Impacts</p> <p>COMMENT: I have to say that I was relieved to see no threatened or endangered species listed as “at risk” as a result of this project. It is my belief that we are stewards of the land and must monitor such issues, balancing them to favor the environment and wildlife when conflicts arise.</p> <p>RESPONSE: Comment noted.</p> |
| <p>PM2 Sharon Barrick</p> | <p>COMMENT: I am reassured by the EIS’s description of environmental impacts.</p> <p>RESPONSE: Comment noted.</p> |
| <p>20-5 Joan Cabreza, Environmental Protection Agency</p> | <p>COMMENT: Monitoring - The FEIS should include a discussion of monitoring for each resource category determined to be significant through the scoping process, including fisheries and water quality. A well designed monitoring plan will address how well the preferred alternative resolves issues and concerns by measuring the effectiveness of the mitigation measures in controlling or minimizing adverse effects. On page 5-7, the fish, wildlife, and vegetation monitoring plan is mentioned. EPA would like to see this plan in the final EIS, not “before construction begins.” A commitment should be made to monitoring these resources. The monitoring plan should include types of surveys, location an frequency of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in plan implementation, and availability of results to interested and affected groups. The EIS should describe the feedback mechanisms which will use monitoring results to adjust standard operating procedures, and monitoring intensity at first detection of unexpected, adverse effects. This ensures that mitigation strategies will improve in the future an that unforeseen adverse effects are identified and minimized.</p> <p>RESPONSE: Several new appendices have been published in the FEIS. These appendices describe impact mitigation and monitoring plans that PGE will undertake to reduce the impact of the Coyote Springs Cogeneration Project. The Oregon Department of Energy “Proposed Order” in the matter of PGE’s application for site certificate (Appendix D), defines environmental conditions and standards that have been imposed by the</p> |

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| 20-5 Joan Cabreza, Environmental Protection Agency | state of Oregon. The Ecological Monitoring Program is in Appendix E. The Oregon Department of Environmental Quality - Air Contaminant Discharge Permit is in Appendix F. The National Pollutant Discharge Elimination System Permit approved by Morrow County is in Appendix G. The project Erosion and Sedimentation Control Plan is in Appendix H. |
| <h2>5. Consultation, Review and Permit Requirements</h2> | |
| 11-1 J.K. Palmer, Boardman City Manager | <p>COMMENT: The proposed project... is in complete compliance with zoning and consistent with the City of Boardman Comprehensive Plan.</p> <p>RESPONSE: Comment noted.</p> |
| 11-2 J.K. Palmer, Boardman City Manager | <p>COMMENT: Water, domestic wastewater and public safety issues related to the proposed plant have been thoroughly developed, discussed and satisfactorily resolved.</p> <p>RESPONSE: Comment noted.</p> |
| 12-5 Robert K. Arvedlund, Federal Energy Regulatory Commission | <p>COMMENT: We note that two letters from the U.S. Fish and Wildlife Service, Portland Field Office, included as attachments in your biological assessment (dated November 16, 1992 and October 19, 1993), identifies the FERC as lead agency for the proposed action. We would like to clarify for the record that FERC is not the lead agency for the instant proposed action, i.e. the cogeneration plant. As a cooperating agency, the FERC's primary interest in the Coyote Springs Cogeneration Project is the cumulative impacts of the proposed action as related to the pipeline which will deliver natural gas to the cogeneration plant.</p> <p>RESPONSE: You are correct, this reference to FERC is not accurate. The abstract in the front of the EIS clearly indicates that BPA is the lead agency but this letter was sent prior to release of the EIS. BPA has sent the Biological Assessment to both NMFS and USFWS under a separate cover letter. This cover letter also identifies BPA as the lead agency for the EIS.</p> |

| Code | 5. Consultation Requirements |
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| <p>19-3 Roy Loghry, Corps of Engineers</p> | <p>COMMENT: Section 6.16 - The segment titled Section 404 should be rewritten thus: This section of the Clean Water Act is regulated by the U.S. Army Corps of Engineers. Fill and removal is regulated by the Oregon Division of State Lands under the Oregon Removal Fill Law. Generally, water filled depressions created in dry land incidental to construction activities and pits excavated in dry land for purpose of obtaining fill or sand, are not considered waters of the U.S. unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States (preamble to 33 CFR 320-33-/ page 41217 under Section 328.3: Definitions).</p> <p>RESPONSE: Section 6.16 of the FEIS has been rewritten as suggested.</p> |
| <p>20-1 Joan Cabreza, Environmental Protection Agency</p> | <p>COMMENT: Based on our review, we have rated the draft EIS EC-2 (Environmental Concerns - Insufficient Information). A copy of our rating system is enclosed. EPA is concerned that there is only one action alternative, and no site specific options with which to chose a least environmentally damaging alternative. The National Environmental Policy Act stipulates that a thorough alternatives analysis is an integral part of the EIS. . . . This rating and a summary of our comments will be published in the Federal Register.</p> <p>RESPONSE: BPA's project environmental coordinator met with John Bregar to go over EPA's concerns. Actions that BPA planned to take in response to EPA's comments were summarized in an April 28, 1994 letter (enclosed following EPA's comment letter). BPA's has made changes in the FEIS and has published several additional appendices that provide supporting data and PGE monitoring plans. BPA responses to individual EPA comments (in this section of the FEIS) explain how the FEIS has been modified. Based on communication with EPA, BPA expects that EPA's rating of the FEIS will be "Lack of Objection."</p> |
| <p>20-9 Martha Sabol, Environmental Protection Agency</p> | <p>COMMENT: Delete section 6.17.2. The critical aquifer protection program under the Safe Drinking Water Act expired in 1988. However, the Sole Source Aquifer Program is still in effect for anyone desiring to petition EPA to designate an area as sole source.</p> <p>RESPONSE: The referenced section has been deleted.</p> |

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| <p>19-4 Roy Loghry, Corps of Engineers</p> | <p><u>COMMENT:</u> Add the following to the last of the first sentence in section 6.18.1, "in the absence of Congressional consent and approval of the plans of the Chief of Engineers and Secretary of the Army." <u>RESPONSE:</u> The FEIS has been rewritten as suggested.</p> |
| <p>10-1 Jerry Anderson</p> | <p>6. New or Corrected Information</p> <p><u>COMMENT:</u> Map 8 identifies Horn Butte (#13) area of critical environmental concern as being across the river in WA State. Map 9 identifies this area (#14) both in Washington State and in Gilliam County, Oregon. Horn Butte (BLM) is located in Gilliam Co. Oregon, Section 11, Township 2N, RANGE 22E. <u>RESPONSE:</u> Map 8 in the DEIS did incorrectly locate Horne Butte in Washington. Map 9 identified Horne Butte correctly as being in Oregon. The commenter confused State Route 14 in Washington for Horne Butte. To avoid this confusion, we have deleted State Route 14 from the revised map. Also the maps referred to have been changed. A new Surface Water and Wetlands map was added in the FEIS so the maps you refer to now been renumbered (one number larger).</p> |
| <p>10-2 Jerry Anderson</p> | <p><u>COMMENT:</u> Page 4-12, paragraph 5 - Carty Reservoir is southwest of the project site. <u>RESPONSE:</u> The text of the FEIS has been revised as noted.</p> |
| <p>10-3 Jerry Anderson</p> | <p><u>COMMENT:</u> Table 5-8 Boardman Research Natural Area. This area is located on the Boardman Bombing Range. The 3 NRA's are at least 5-miles from the project site and some are close to 10-miles. See map 8 (#2). <u>RESPONSE:</u> Comment noted. The referenced map has been changed.</p> |
| <p>10-4 Jerry Anderson</p> | <p><u>COMMENT:</u> On Map 8 Lindsay Grasslands (#18) is actually located on the Pacific Gas Pipeline Route, not in the Boardman Bomb Range. Map 9 shows the correct location.</p> |

| Code | 6. New or Corrected Information |
|---|---|
| <p>12-3 Robert K. Arvedlund, Federal Energy Regulatory Commission</p> | <p>RESPONSE: The referenced map has been changed.</p> <p>COMMENT: Page 3-17, paragraph 3: Change the sentence beginning with “FERC must issue a permit. . . ” to read: FERC must issue a Certificate of Public Convenience and Necessity for the proposed pipeline project.”</p> <p>RESPONSE: The FEIS incorporates this recommended wording change.</p> |
| <p>12-4 Robert K. Arvedlund, Federal Energy Regulatory Commission</p> | <p>COMMENT: Page 4-40, paragraph 6: Change “early 1994” to “the fall 1994”.</p> <p>RESPONSE: This wording change has been noted. BPA has also updated the discussion to reflect FERC plans to separate PGT’s Coyote Springs and Medford laterals from the EIS on the Tuscarora pipeline to Reno, Nevada. The FEIS notifies readers of your plan to release an Environmental Assessment/FONSI for the Coyote Springs/Medford lateral in the fall of 1994, following a 30-day public comment period.</p> |
| <p>16-1 Edmund V. Clark, Ida-West Energy Co.</p> | <p>COMMENT: Revise the second paragraph of Page S-1, first sentence to make it clear that PGE has asked BPA to transmit power for phase I of its Project only.</p> <p>RESPONSE: The text of the FEIS has been written to clearly indicate BPA is currently considering whether to wheel power for only Phase I of the Coyote Springs Cogeneration Project. Should PGE at a future date ask BPA to wheel power from the second unit, BPA would conduct electrical system studies to determine if sufficient transmission capacity exists to integrate the second unit. If capacity were found to be insufficient, options to increase capacity would be developed. (Also see Section 5.1.4, Transmission Capacity - Cumulative Impacts.)</p> |
| <p>16-7 Edmund V. Clark, Ida-West Energy Co.</p> | <p>COMMENT: Page 2-3, The last paragraph on page 2-3 should be updated in the FEIS to reflect the current status of the Hermiston Power Project. Negotiation of the PPA was completed in March 1994.</p> <p>RESPONSE: Comment noted. The text has been updated.</p> |

| Code | 6. New or Corrected Information |
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| <p>17-1 David Schultz, Pacific Gas Transmission Co.</p> | <p>COMMENT: Page S-1, 3rd paragraph, 3rd sentence, change, "a spur" to "a pipeline extension"; Page S-2, Section S-2, 3rd paragraph, change "28.5-km (17.7-mile) to "29.8-km (18.5-mile)"; change "near Stanfield" to "the Canadian/Idaho border" and on Page 1-1, map add pipeline to map.</p> <p>RESPONSE: The text of the FEIS incorporates these recommended changes.</p> |
| <p>18-2 & 18-3 Tom Meehan, Oregon Department of Energy</p> | <p>COMMENT: The first sentence on page S-1, Summary. in the second paragraph is unclear. It appears some words were omitted. ON page 3-1, section 3.1 the second to the last sentence of the first paragraph is unclear.</p> <p>RESPONSE: The text of the FEIS has been modified to enhance clarity where noted.</p> |
| <p>19-1 Roy Loghry, Corps of Engineers</p> | <p>COMMENT: The second sentence of the segment discussing Existing Land Use (Section 4.1.1) needs to be revised. The quarry still exists (or at least in part) according to your consultant, Chris Thoms.</p> <p>RESPONSE: The referenced text has been revised.</p> |
| <p>19-2 Roy Loghry, Corps of Engineers</p> | <p>COMMENT: In the segment that discusses Surface Water (Section 4.1.2) under the heading Water Resources (page 4-7) the discussion of gravel mining ponds is not consistent with the comments in Section 4.1.1.</p> <p>RESPONSE: The text of the FEIS has been changed.</p> |
| <p>19-5 Roy Loghry, Corps of Engineers</p> | <p>COMMENT: The National Wetland Inventory Map should be reviewed for the project area. A copy of that map is attached as an enclosure and indicates more wetland associated with Messner Pond than shown on Map 4.</p> <p>RESPONSE: A new Surface Water and Wetlands map (Map 8) has been added in the FEIS. It combines information taken from the National Wetlands Inventory Map and BPA field delineated wetland boundaries. Wetlands identified on the 1982 wetland inventory maps have been altered.</p> |

| Code | 6. New or Corrected Information |
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| <p>12-1 Robert K. Arvedlund, Federal Energy Regulatory Commission</p> | <p>COMMENT: Page 1-2, paragraph 3: Change the sentence beginning with “FERC will prepare an EIS. . . ” to read: FERC will prepare an EIS for PGT’s second Expansion Project which proposes 1) 104 miles of new 12-inch-diameter pipeline in Oregon (Coyote Springs Lateral and the Medford Lateral) ; and 2) the upgrade of two compressor stations located in Idaho and Washington.”</p> <p>RESPONSE: A letter dated June 10, 1994 from Robert Arvedlund of the FERC Environmental Review and Compliance Branch, states that PGT amended its application to FERC on May 31, 1994. This amendment legally separated PGT’s relationship with Tuscarora Gas Transmission Company. Linkage between the Coyote Springs and Medford laterals and the Tuscarora pipeline having been severed, PGT and FERC decided to complete an Environmental Assessment (EA) on the Coyote Springs and Medford Laterals. An EA/FONSI is scheduled for completion this fall after a 30-day comment period.</p> <p>Discussions on FERC’s environmental coverage plans have been updated in the FEIS.</p> |

**Public
Comment
Letters**

Comment Letters

PGE/BPA Coyote Springs Cogeneration Project - Draft EIS

| | |
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| BPA INVOLVEMENT | |
| Coyote - 02-008 | |
| 2-8-94 | |
| AREA: L | DISTRICT |

You may use this form to comment on the draft EIS or Summary, or you may comment by letter, phone, or in person at the open house. Use the back of this sheet if you need more room.

"I'D LIKE TO TELL YOU ..."

- Of the two choices offered: (1) power from the Coyote Springs Cogeneration Plant would be wheeled (transported) over BPA electrical transmission lines, or (2) No Action (would not wheel the power); I prefer: wheel the power

008-1

- You could improve the choices by: _____

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|---|----------|
| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG #: | |
| RECEIPT DATE: | |
| 2/1 | 94 |
| AREA: | DISTRICT |

- Environmental impacts would be less if you: _____

- I didn't understand: _____

- I also have these comments: I assume the plant will have back-up storage of diesel or #6 oil for use in the event of a gas curtailment. If so, what are the potential adverse impacts of that? How will the owners prevent leakage of those tanks and how will they respond (i.e. clean up) to a tank rupture? Will the owners file prevention and contingency plans?

008-2

Your comments will be addressed in the final EIS. Thank you.

Comment Letters

PGE/BPA Coyote Springs Cogeneration Project - Draft EIS

Name M. PEPPER

Address 6 BEACH DR VANCOUVER WA 98661

Please use the enclosed postage-paid envelope or send by March 21, 1994 to:

*Bonneville Power Administration
Public Involvement Manager - ALP
P.O. Box 12999
Portland, OR 97212
(800) 622-4519*

Comment Letters

EGE/BPA Coyote Springs Cogeneration Project - Draft EIS

| |
|---------------------------------|
| PROJECT NUMBER Coyote 27-009 |
| DATE 2-8-94 |
| COMMENTS |
| DISTRICT |

W

You may use this form to comment on the draft EIS or Summary, or you may comment by letter, phone, or in person at the open house. Use the back of this sheet if you need more space.

"I'D LIKE TO TELL YOU..."

1. Of the two choices offered: (1) power from the Coyote Springs Cogeneration Plant would be wheeled (transported) over BPA electrical transmission lines, or (2) No Action (would not wheel the power); I prefer:

Wheel power over BPA Lines.

I support Coyote Springs

009-1

2. You could improve the choices by: _____
3. Environmental impacts would be less if you: _____
4. I didn't understand: _____
5. I also have these comments: _____

Your comments will be addressed in the final EIS. Thank you.

Comment Letters

PGE/BPA Coyote Springs Cogeneration Project - Draft EIS

Name

A. C. Hendrick

Address

R-1 B 31A Boardman, OR, 97818

Please use the enclosed postage-paid envelope or send by March 21, 1994 to:

Bonneville Power Administration
Public Involvement Manager - ALP
P.O. Box 12999
Portland, OR 97212
(800) 622-4519

Comment Letters

PG&E/BPA Coyote Springs Cogeneration Project - Draft EIS

You may use this form to comment on the draft EIS or Summary, or you may comment by letter, phone, or in person at the open house. Use the back of this sheet if you need more room.

"I'D LIKE TO TELL YOU..."

1. Of the two choices offered: (1) power from the Coyote Springs Cogeneration Plant would be wheeled (transported) over BPA electrical transmission lines, or (2) No Action (would not wheel the power); I prefer: _____

2. You could improve the choices by: _____

| | |
|--------------------|---------------|
| RECEIVED BY BPA | |
| PUBLIC INVOLVEMENT | |
| LOG #: | COV01E002-010 |
| RECEIPT DATE: | |
| 2-14-94 | |
| AREA: | DISTRICT: |

3. Environmental impacts would be less if you: _____

4. I didn't understand: _____

5. I also have these comments: Map 8 identifies (13) Horn Butte area of Critical Environmental Concern as being across the river in WA State. Map 9 identifies this area (14) both in WA state and in Gilliam Co Oregon. Horn Butte (BLM) is located in Gilliam Co. Oregon Section 11, Township 2N Range 22E. Page 4-12c paragraph 5 - Carty Reservoir is southwest of the project site.

010-1

010-2

Your comments will be addressed in the final EIS. Thank you.

OVER

Comment Letters

PG&BPA Coyote Springs Cogeneration Project - Draft EIS

Also on Map 8 (18) Lindsay Grasslands. actually located on the Pacific Gas Pipeline Route, not in the Boardman Bomb Range. Map 9 shows correct location.

010-3

Table 5.8 Boardman Research Natural Area

This area is located on the Boardman Bomb Range. The 2 NRAs are at least 5 miles from project site and some are close to 10 miles. See Map 8 (2)

010-4

Name Jerry Anderson Morrow SWCD

Address P.O. Box 127 Heppner, OR 97836

Please use the enclosed postage-paid envelope or send by March 21, 1994 to:

Bonneville Power Administration
Public Involvement Manager - ALP
P.O. Box 12999
Portland, OR 97212
(800) 622 4519

Comment Letters



City of Boardman

TOWN SQUARE
P.O. BOX 229
BOARDMAN, OREGON 97818
TELEPHONE (503) 481-9252

February 10, 1994

Bonneville Power Administration
Public Involvement Manager - ALP
PO Box 12999
Portland, OR 97212

In re: EFBG

The Boardman City Council, at the regularly scheduled February 1, 1994 meeting directed that the following comments be submitted on behalf of the City regarding the Coyote Springs co-generation project.

011-1 The proposed project, which will build a Portland General Electric plant upon a Port of Morrow site, is in complete compliance with zoning and consistent with the City of Boardman Comprehensive Plan.

011-2 Water, domestic wastewater and public safety issues related to the proposed plant have been thoroughly developed, discussed and satisfactorily resolved.

011-3 The City of Boardman supports the project.

Respectfully,


J. K. Palmer
City Manager

RECEIVED
CITY OF BOARDMAN
FEBRUARY 16 1994

COYOTE-02-011
2-16-94
L

Comment Letters

Federal Energy Regulatory Commission
Washington, D.C. 20426

OFFICE OF PIPELINE AND PRODUCER REGULATION

FEB 17 1994

In Reply Refer To:
OPPR/DEMEA/ECB
Pacific Gas Transmission
Company
Docket No. CP93-618-000

Mr. Ken Barnhart, EIS Coordinator
Bonneville Power Administration
Post Office Box 3621
Portland, Oregon 97208-3621

| | |
|---|----------|
| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG # 100-2-12 | |
| RECEIPT DATE: 2/22/94 | |
| AREA | DISTRICT |

Dear Mr. Barnhart:

We have reviewed your "Draft Environmental Impact Statement (DEIS) for the Coyote Springs Cogeneration Plant" and have the following comments:

Page 1-2, ¶ 3: Change the sentence beginning with "FERC will prepare an EIS..." to read: "FERC will prepare an EIS for PGT's second Expansion Project which proposes 1) 104 miles of new 12-inch-diameter pipeline in Oregon (Coyote Springs Lateral and the Medford Lateral); and 2) the upgrade of two compressor stations located in Idaho and Washington." 012-1

Page 3-17, ¶ 2: The application before FERC does not identify a fibre optic cable with the pipeline. This should be verified prior to the final environmental impact statement. 012-2

Page 3-17, ¶ 3: Change the sentence beginning with "FERC must issue a permit..." to read: "FERC must issue a Certificate of Public Convenience and Necessity for the proposed pipeline project." 012-3

Page 4-40, ¶ 6: Change "early 1994" to "the fall 1994". 012-4

We also note that two letters from the U.S. Fish and Wildlife Service, Portland Field Office, included as attachments in your biological assessment (dated November 16, 1992 and October 19, 1993), identifies the FERC as lead agency for the proposed action. We would like to clarify for the record that FERC is not the lead agency for the instant proposed action, i.e. the cogeneration plant. As a cooperating agency, the FERC's 012-5

Comment Letters

2

primary interest in the Coyote Springs Cogeneration Project is the cumulative impacts of the proposed action as related to the pipeline which will deliver natural gas to the cogeneration plant.

We appreciate the opportunity to review and comment on your DEIS. If you have any questions regarding the above comments, please contact Alisa Lykens, Project Manager, at (202) 208-0766. Thank you.

Sincerely,



Robert K. Arvedlund, Chief
Environmental Compliance and
Project Analysis Branch

cc: Tom Cottingham, BLM, Klamath Falls District Office

Comment Letters

Boardman-North Morrow County

CHAMBER OF COMMERCE

February 23, 1994

Bonneville Power Administration

P.O. Box 1
Boardman, Oregon 97818
(503) 481-3014

RE: COYOTE SPRINGS CO-GENERATION PROJECT

To Whom It May Concern:

The Boardman Chamber of Commerce wishes to go on record as unanimously supporting the Coyote Springs Co-Generation Project.

The project reports have been reviewed. The attention to detail regarding the local environment and other impacts on the community have been reviewed. It is felt that this project is a welcome addition to the community. On behalf of the Chamber of Commerce, and as local voters, we wish to strongly support this project and feel free to let us know if there is any further information from the local community we can give to you regarding any question about this project.

013-1

Respectfully,

Robert J. Bass
Robert J. Bass, M.D.
President, Boardman Chamber of Commerce

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG #

RECEIPT DATE:

3-7-94

REA: DISTRICT

OREGON

Comment Letters

I appreciate the opportunity to put my "two bits" in regarding the Coyote Springs Project at Boardman. Our entire church congregation was invited to read the Environmental Impact Statement provided by the BPA, not that our pastor has a bias either way, but because it is something responsible, caring members of a community do.

014-1

I have to say I was relieved to see no threatened or endangered species listed as "at risk" as a result of this project. It is my belief that we are stewards of the land and must monitor such issues, balancing them to favor the environment and wildlife when conflicts arise.

014-2

In fact that is one reason I strongly favor the concept of cogeneration plants utilizing natural gas. It represents an alternative source of energy to fossil fuels which generate higher levels of "greenhouse" gases. People who share my concern for Global warming and greenhouse effects will agree that alternatives to coal and petroleum combustion deserve consideration, since natural gas produces less greenhouse gases than fossil fuels. I learned an interesting fact from your EIS; according to one study performed by JC Sheppard, in the Journal of Geophysical Res., methane produced from natural gas pipelines and mining operations amounts to less than 10% of methane emitted from natural sources such as forest floors, swamps, tundra, tennites and cows!

014-3

It appears that PGE does not plan CO₂ offset mitigation at this time, but it is noteworthy that Boise Cascade and Potlatch Farms are developing almost 30,000 acres of tree farms nearby, which will produce substantial O₂ output. Indeed anyone who flies over this so-called high desert area, viewing the green circles below must

Comment Letters

conclude that corporate farms are producing significantly greater amounts of Oxygen than the native flora, sage, ragweed, russian thistle, tumbleweed, and wheatgrass.

I realize that I am citing other, outside industry, in our community, but isn't that the point of Environmental Studies? How connected everything is?

I believe this project represents an opportunity for us to develop greater diversity in our energy options, and that that is good. Coyote Springs project will begin the process of finally unlocking the potential of this region. I look forward to the prospect of this development, because I believe that people here will meet the challenge to grow and change in a positive way. I hope this project is endorsed for immediate approval since everyone is served well by it: the addition of 440 average megawatts of power, an offset to Trojan's closure, a new source which will allow us to meet energy needs in the Pacific Northwest, networking industrial needs already existing in our industrial park, the Port of Morrow, and stimulating growth in an area of Oregon that will provide economic diversity at a time when our state and region needs it most.

014-4

Thank you,



(respectfully,)

Sharon. A. Barrick

Comment Letters

PGE/BPA Coyote Springs Cogeneration Project - Draft EIS

You may use this form to comment on the draft EIS or Summary, or you may comment by letter, phone, or in person at the open house. Use the back of this sheet if you need more room.

"I'D LIKE TO TELL YOU..."

014-5

1. Of the two choices offered: (1) power from the Coyote Springs Cogeneration Plant would be wheeled (transported) over BPA electrical transmission lines, or (2) No Action (would not wheel the power); I prefer: #1 - I strongly support

this project!

2. You could improve the choices by: _____

3. Environmental impacts would be less if you: _____

4. I didn't understand: _____

COYOTE - 02
3-7-94
DISTRICT

5. I also have these comments: see enclosed

Your comments will be addressed in the final EIS. Thank you.

*Thanks for the informal format -
It was informal & I felt I
could express my opinion freely. ~~see~~*

Comment Letters

Columbia Basin Institute

CBI

TO: Bonneville Power Administration
FROM: Rick Gove, Columbia Basin Institute
DATE: March 18, 1994
RE: Coyote Springs Cogeneration Project DEIS Comments

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG # 104615-2
RECEIPT DATE: 3-18-94
REA: DISTRICT

Upon review of the Coyote Springs Cogeneration Project DEIS, CBI submits the following comments.

ENVIRONMENTAL CONSEQUENCES

Groundwater

This section attempts to explain how water for the CSCP will be acquired. However, it is very unclear in its explanation and needs clarification. For instance, the first paragraph on page 5-10 states the water will be supplied from "three deep and shallow groundwater wells." It then goes on to state that two new wells are in the application stage. There is no connection between these two statements as they are presented. Is the CSCP dependent upon the wells under application? Are the current wells described in the first sentence supposed to provide all the water or is the plan to supplement the water requirement with water from the wells under application? If the wells under application are denied, will the three mentioned wells be able to provide adequate water for the life of the project? If not, where will the water come from? (See Cumulative Impact section.)

015-1

The section goes on to state in the third paragraph that the deep basalt aquifer well permit has been granted with conditions; one of them being that if the water is lowered more than 25 feet, the well would not be used until water levels recover. If this occurs, will the CSCP be required to obtain water from another source? If so, what is the source and what are the impacts? It is common knowledge and more than reasonably foreseeable that the groundwater aquifers in this area are rapidly depleting. Therefore, there should be much more detail in this section concerning exactly what groundwater aquifers are being depended on and to what extent, and what will happen if these groundwater sources cannot provide the water required by the CSCP.

015-2

CUMULATIVE IMPACTS

Groundwater

This section is lacking in substance and needs to be significantly developed in three different areas. First, there needs to be particular identification of other past present and reasonably foreseeable actions; second, particular types of cumulative impacts must be identified; and third, the analysis must

015-3

P.O. Box 3795 • Portland, OR 97208 • (503) 222-6541 • FAX: (503) 222-6436

Comment Letters

provide a greater level of detail for each identified impact.

1. There should be specific references to other actions which will cause cumulative impacts and an explanation of why this new action presents the threat of a cumulative impact.

The definition of "cumulative impact," stated on page 5-48, spells out what a cumulative impact analysis should analyze in order to determine if there will be such impacts. The definition states "the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." Despite the acknowledgment of this clearly stated definition, the DEIS on the very next page offers a very simplistic sentence in the groundwater impact section which states "The Coyote Springs Plant, together with other proposed power plants and industrial developments in the Columbia Basin, could impact groundwater resources." The sentence is vague, overbroad and fails to provide any substantive information by which the decision maker can make an informed decision as to what potential impacts may result from further withdrawals from the shallow groundwater aquifers in the Boardman area.

The definition specifically states that "past, present, and reasonably foreseeable future actions" must be considered in an incremental sense. This demands a closer look at all present water withdrawal permits pending, including irrigation, residential, commercial and industrial users and all past permits granted which allow groundwater withdrawals from the aquifers in this area.

Another very important issue which must bear closer scrutiny is the proximity between the groundwater wells that the CSCP withdrawals will come from and the designated critical groundwater areas in the Boardman area. Such an analysis should also consider the current status of the groundwater aquifers to be used by the CSCP and if they are in danger of reaching a critical state of depletion.

015-4

2. There needs to be an identification of the different types of cumulative impacts that may result from this action. The analysis must then give detailed information as to how the proposed action will impact the discussed area (groundwater), considering the proposed action in an incremental sense with the other identified actions discussed in Point #1.

The DEIS only identifies one type of cumulative impact in the groundwater section. It is in the paragraph which states that because the shallow aquifers have a hydrological connection to the Columbia River, there is a potential impact on threatened and endangered species. Although this is the only statement in the groundwater section which even approaches the level of sophistication required for a cumulative impact analysis, it is still lacking the necessary detail upon which an informed decision on the proposed action can be made.

Comment Letters

The second paragraph of the groundwater section goes on to state that *the well may face restrictions in future years*. The preceding paragraph states that future groundwater rights may be restricted because of the rapid rate of decline of Columbia River aquifers. However, the analysis provides the reader with absolutely no information as to how the CSCP will operate if the groundwater aquifer it is withdrawing from is depleted to the point that CSCP's right is limited or eliminated due to claims of senior right holders. Clearly if this DEIS states that this possibility exists, it is reasonably foreseeable that such an event will occur. Yet, the cumulative impact section simply raises the issue and fails to supply any substantive information concerning what water source the CSCP will use and what the impacts of the unmentioned water source would be on the threatened and endangered fishery.

015-5

Other types of potential cumulative impacts which should be analyzed and discussed are impacts to local water supplies, the potential of impacts to critical groundwater areas located nearby, impacts to deep aquifers which may result from drawdowns in the shallow aquifers, impacts to other fish and wildlife in the area which are dependent on the groundwater or hydrological connected surface water, impacts on irrigation operations in the area which may result from depleted groundwater aquifers, and impacts on Columbia River flows due to the hydrological connection. Again, these impacts must be considered in light of past, present and reasonably foreseeable future actions which also impact the groundwater resource.

015-6

One area which BPA surprisingly does not analyze as a cumulative impact is the potential impact on BPA's ability to generate hydropower due to interruptions in surface flows of the Columbia River. This impact has a definite measurable effect on BPA rates. The ability for BPA to produce cheap hydropower is reduced when water is withdrawn from the Columbia, its tributaries or shallow aquifers which have a hydrological connection to the river or tributaries, because there is less water going through the turbines. To meet its firm load requirements in low water years, BPA must then replace this lost cheap power with much more expensive power produced by thermal resources. This cost is passed on to the region's ratepayers in the form of rate increases.

015-7

The DEIS provides no analysis of the potential impact on electric rates from the above described potential loss. Withdrawing water for the production of thermal power, at the cost of decreasing the potential for cheap hydropower should be analyzed. Though it may well be an acceptable trade-off in this case, without analysis and research the decision maker has no basis to make an informed decision. Even if it is an acceptable trade-off, it is nevertheless an impact which BPA should be calculating any time it is analyzing the impacts of an action which may potentially impact Columbia River flows, especially in a cumulative type of analysis.

3. For each type of cumulative impact identified, there

015-9

Comment Letters

should be a detailed discussion of such things as the quantity of water being used and the quantity of water other actions are using or are proposing to use. Using these real numbers, calculations and estimates should be made that give the decision maker more substantive knowledge of the potential resulting impacts.

For example, the impacts which CBI has identified in the previous section #2, should have such basic information as: how much water is being withdrawn for the Coyote Springs Project?; how much water are the two other proposed cogeneration projects in the area using?; are there any other past present or reasonably foreseeable future withdrawals that are or will be taking water from these wells or the Columbia River?; and if so, how do all these actions, in an incremental sense, impact the groundwater resource?

015-7

For a calculation of the potential lost hydropower and how much it will cost BPA ratepayers, the DEIS should contain the following analysis. Assuming that the entire water requirement of the CSCP is supplied by groundwater wells which have a hydrological connection to the Columbia River, the annual amount of water withdrawn from the river will be 4,300 acre-feet. This amount of water in the John Day pool, when dropped through turbines, would produce just over 1 million kilowatt hours of electricity. If the withdrawal is made for the CSCP, BPA will then have to replace the 1 million kilowatt hour loss by purchasing an equivalent amount of electricity from more expensive thermal resource power producers. According to BPA's 1993 Final Rate Proposal, such purchases have an average cost 60.64 mills per kilowatt hour. Thus, the annual cost to replace this withdrawal will be just over \$63,000. Projected over the 30 year life of the project, replacement power will cost BPA and consequently its ratepayers \$1.9 million in 1993 dollars.

In a cumulative comparison with other power projects and other water withdrawals in the Columbia Basin, this proposed action will have a definite if not substantial incremental contribution to public costs to the region in the form of higher electricity rates. CBI has calculated the lost hydropower and its cost for the Hermiston Generating Project, another cogeneration facility proposed in the same area, to be \$2.1 million over the 30 year life of that project. There is another project being proposed in Hermiston which will require roughly the same amount of water and will thus have a similar impact on the Federal Columbia River Hydropower System. There are also some proposed cogeneration plants in Washington, some of which will require Columbia River withdrawals. BPA must begin to acknowledge the cumulative potential costs of these seemingly small individual withdrawals which are being imposed on purchasers of BPA electricity.

Respectfully submitted,


Rick Gove
Columbia Basin Institute

Comment Letters



WEST ENERGY COMPANY P.O. Box 7867, Boise, Idaho 83707 • 1199 Shoreline Lane, Suite 310, Boise, Idaho 83702 • (208) 336-4254 FAX (208) 336-9795

March 21, 1994

Bonneville Power Administration
Public Involvement Manager - ALP
P.O. Box 12999
Portland, OR 97212

RE: *Comments on draft EIS for Coyote Springs Cogeneration Project*

Dear Sir/Madame:

This letter provides our comments on the Coyote Springs Cogeneration Project's draft Environmental Impact Statement (DEIS), Document DOE/DEIS-0201, January 1994. In general, the document adequately discussed the impacts and potential impacts of the Coyote Springs Cogeneration Project. Our comments, listed by page number, are set forth below.

Page S-1

016-1

The second paragraph, first sentence must make it clear that PGE has asked BPA to transmit power for phase I of its Project only.

Page S-5

016-2

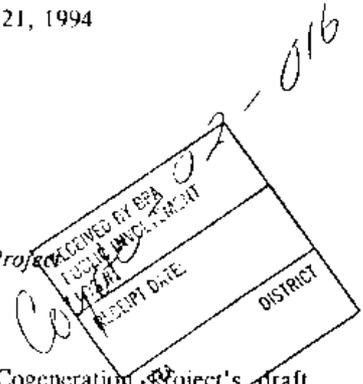
The fifth paragraph discusses EMF. The last sentence should be re-written: *Scientific evidence has not established a cause-and-effect relationship between electric or magnetic fields and adverse health effects, so specific health risks are unknown.* This ambiguous declaration is of little help to the public. A more definitive statement such as that made by John Castagna of the Edison Electric Institute would be more helpful to the reader: "In 1993, government agencies and review committees in Denmark, Finland, France and England, reviewed the published EMF health effects research, including the Scandinavian studies, and stated that EMF does not pose a significant health risk."¹

Page S-7

016-3

Air quality impacts are discussed at the bottom of S-7. Only the more significant potential impacts should be discussed in the Summary. It may be confusing to the public to mention

¹ Electric Light & Power, February, 1994.



Comment Letters

COMMENTS

Coyote Springs Cogeneration Project

Draft DEIS

March 21, 1994

Page 2

methane as it's done here since the Coyote Springs Project will normally release no methane directly to the atmosphere. Section 6.10 of the DEIS does a good job of discussing potential fugitive methane emissions and that should be adequate. It would be appropriate in this paragraph, however, to mention that CO₂ is a greenhouse gas and is formed in the combustion of methane. It may also be worthwhile to mention that CO₂ emissions at the Coyote Springs Cogeneration will be minimized through: (1) The use of advanced power plant technology to achieve a high efficiency and thereby minimize CO₂ per unit of electricity produced, (2) providing steam from the power plant to local food processors to allow the shut down of the food plant boilers, and (3) using natural gas as a primarily fuel. The ratio of carbon to other atoms is lower in natural gas than coal and other hydrocarbon fuels which reduces CO₂ emissions per kWh generated.

Page S-9

Under Global Warming, the DEIS states: *Greenhouse gases contribute to Global Warming.* This statement is very misleading in that the study of greenhouse gases and their effect on climate change is subject to substantial controversy and uncertainty and it gives the reader the impression that it is a fact. A March 1992, Gallop poll found that only 17% of climatologists said they believe human-induced warming has occurred and 53% said they remain convinced the jury is still out on global warming.²

016-4

The second paragraph under Global Warming is not appropriate because the potential effect of greenhouse gases on climate change is global, therefore, the fact that three projects are being sited in the Boardman-Hermiston area is not relevant to the impact on climate change. The paragraph also states that the projects will emit a fairly large amount of greenhouse gas. The reader really has no way to ascertain whether the term "fairly large" is significant to potential effects on climate. In reality, the contribution to atmospheric CO₂ from the three projects in the Boardman-Hermiston area is insignificant when compared to existing fossil fuel capability worldwide plus the numerous large new coal-fired projects planned for China and other countries throughout the world, not to mention the large contribution from natural sources.

In discussing the transmission capacity for the project and BPA's need to install additional transmission capacity by the year 2000, it will be important to the public to understand whether this additional capacity can be accomplished within or adjacent to existing high voltage transmission line corridors.

016-5

² The Electricity Journal, February 1994, p. 68.

Comment Letters

COMMENTS

Coyote Springs Cogeneration Project

Draft DEIS

March 21, 1994

Page 2

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016-5

² The Electricity Journal, February 1994, p. 68.

Comment Letters

COMMENTS

Coyote Springs Cogeneration Project

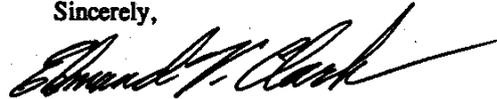
Draft DEIS

March 21, 1994

Page 4

Thank you for the opportunity to comment on the Coyote Springs DEIS. Please telephone if we can clarify any of our comments.

Sincerely,



Edmund V. Clark
Vice President
Thermal Projects

cc: R. Goranson - BPA, Walla Walla

c:\doc\cisk\up\poo3-21.com

Comment Letters

PGT

Pacific Gas Transmission Company

RECEIVED BY BPA
PUBLIC INVOLVEMENT
DOE: COYOTE-02-017

March 18, 1994

RECEIPT DATE:
03-22-94

REA: DISTRICT

Mr. Kenneth A. Barnhart
Project Environmental Coordinator
Coyote Springs Cogeneration Plant
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208

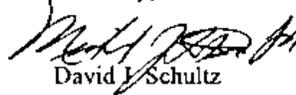
Dear Mr. Barnhart:

PGT has reviewed the Draft Environmental Impact Statement Coyote Springs Cogeneration Project, Morrow County, Oregon, dated January 1994, DOE/DEIS-0201, and provides the attached comments.

In addition to our specific comments, we would like to suggest that you include more environmental information and analysis on the proposed PGT natural gas pipeline extension to the plant site. An augmented review of the pipeline component of the project in the Final Environmental Impact Statement (FEIS) would allow the Federal Energy Regulatory Commission the option of choosing to use the FEIS as a part of its compliance with NEPA.

Thank you for the opportunity to comment. If you have any questions regarding our comments, please contact John McCullough, Senior Environmental Planner, 415/973-0927.

Sincerely,



David J. Schultz
Project Manager
PGT 1995 Construction Program

Attachment

cc: Bob Arvedlund, FERC

Comment Letters

COMMENTS ON BPA DEIS Coyote Springs Cogeneration Project

- Page S-1, 3rd para.,
2nd sent. change "a spur" to "a pipeline extension"
- Page S-2, Sect S-2,
3rd para. change "28.5-km (17.7-mile)" to "29.8-km (18.5-mile)";
change "near Stanfield" to "the Canadian/Idaho border"
- Page 1-1, map add pipeline to map
- Page 1-2, 3rd para change "Second Northwest Expansion Project" to "1995
Construction Program"; change "140 km (90 miles)" to "169
km (105 miles)", add "no new" before "compressor"; delete
last sentence.
- Page 2-1, last sent. Sentence is incomplete
- Page 2-2, 3rd para change "Stanfield" to "Canadian/Idaho border"
- 4th para Update this paragraph as follows:
- The Federal Energy Regulatory Commission (FERC) must review and approve all interstate pipelines. FERC requires that certificate applications for review and approval of new pipeline projects include "Resource Reports" containing environmental information. PGT has provided these reports to FERC in its certificate application and to BPA for use in the preparation of this EIS. The FERC may undertake an additional environmental analysis of the pipeline and/or incorporate this FEIS as part of its compliance with NEPA.
- Page 3.2, 1st para change "28.5 km (17.7 mile)" to "29.8 km (18.5 mile)";
change "Stanfield" to "Canadian/Idaho border"
- Map 1 after Page 3-2
change pipeline route as shown
- Map 2 after Map 1 add pipeline route as shown
- Page 3-8, last para Sentence beginning with "Buswork..." is repeated
- Map 3 after Page 4-2
change pipeline route as shown

Comment Letters

- Map 4 after Map 3 change pipeline route as shown
- Map 5 after Map 4 change pipeline route as shown
- Map 6 after Map 5 change pipeline route as shown
- Page 4-3, 3rd line Is traffic count "3100" correct for Columbia Ave.? It seems high.
- Map 7 after Page 4-4
Map shows #14 but not defined in legend; there is no #13 recreation site shown on map; change pipeline route as shown
- Page 4-14, Employ. The number of 9.5 percent unemployment (July 1, 1992) conflicts with PGT RR which states 1993, Jan of 13.5; perhaps a different base was used; that's a big jump for six months
- Page 4-20, last word
For clarification, join this sentence "The..." with the previous sentence and connect the two sentences with the word "where"
- Map 8 after page 4-36
change pipeline route as shown;
- Map 9 after page 4-40
Map identifies a location for Hillside milkvetch but plant list in Appendix does not show this species as recorded; map shows Robinson's onion near plant site, but DEIS states that it was not found and is probably extinct
- Table 5-1 Possible duplicate entry for "Soils"
- Map 11 change pipeline route as shown
- Page 5-28, 3rd para
Line 4 change "This" to "These"
- Page 5-30 delete blank spaces in bullets
- Page 5-38, 1st para
Word is missing after "fencing"

Comment Letters

| | |
|------------|--|
| Table 5-12 | Correct table as shown on enclosed copy |
| Page 10-3, | Delete space in CO definition |
| Page 10-5 | Definition for "EIS" should read "Abbreviation for Environmental Impact Statement" |
| Page 10-7 | Historic Preservation. Add to end of sentence " ,relating to historic resources." |
| Page 10-8 | Loop. Hyphen missing in the word "outgoing." |
| Page 11-3 | Index. Pacific Gas Transmission Company is listed twice. |

Comment Letters

Oregon

RECEIVED BY BPA
MUNICIPAL IMPROVEMENT

DATE: COVOTE-02-018

RECEIPT DATE:

3/31/94

REG: DISTRICT

DEPARTMENT OF

ENERGY

March 30, 1994

Ken Barnhart-EFBG
BPA
P. O. Box 3621
Portland, OR 97208

Dear Ken:

At BPA's public meeting on the DEIS for the Coyote Springs Cogeneration Project, I mentioned that the project had changed since the DEIS had gone to print. As a result, there are differences between the DEIS and the ODOE Proposed Order which was issued on January 10, 1994. You asked if I would identify the more important changes to assist you in preparing the FEIS.

018-1

On January 5, 1994 PGE amended its application to EFSC for a site certificate. The primary change was to include the possibility of using a "zero discharge system" for managing wastewater rather than using the Port of Morrow's existing industrial wastewater disposal system. That change has implications for cooling tower drift as well as the quantity and quality of solid waste that would need to be disposed.

In addition, in January 1994 PGE submitted to ODOE: a report on further site-specific seismic hazard evaluation, an ecological monitoring program (revised), additional information to supplement Exhibit U of its application, and clarification on the availability and sources of water for the project.

I assume that PGE will also offer comments on the DEIS which will assist you in addressing the recent changes to the proposed project. You should be able to obtain each of the documents mentioned above from PGE.

My specific comments follow. If you have any questions or need another copy of the ODOE Proposed Order, please give me a call at 503-378-6916.

Sincerely,



Tom Meehan
Energy Facilities Analyst
Facility Regulation Division

c. Tom Walt, PGE

Barbara Roberts
Governor



625 Marion Street NE
Salem, OR 97310
(503) 378-4040
FAX (503) 373-7806
Toll-Free 1-800-221-8035

Comment Letters

March 30, 1994
Page 2

p. S-1, Summary. The first sentence in the second paragraph is unclear. It appears that some words were omitted. 018-2

p. 3-1, section 3.1. The second to the last sentence of the first paragraph is unclear. It would be helpful if the EIS would explain what BPA would do if there is not enough transmission capacity for the second unit. How would BPA recover the costs associated with a complex upgrade if one were needed? 018-3

p. 3-9 and 10. The discussions on water, well water use and wastewater are no longer accurate. The most recent information I have from PGE (letter dated January 3, 1994) shows that water for the project would come from several existing wells (both shallow alluvial and deep aquifer) operated by the Port, and from the City of Boardman. See ODOE Proposed Order, p. 14,15. Also, PGE on January 5, 1994 amended its application to EFSC to provide for a "zero discharge system" as an alternative to discharging project wastewater to the Port's current industrial wastewater disposal system. PGE did this because of the uncertainty as to whether the Port may legally dispose of the wastewater under Oregon DEQ regulations. At this time, PGE has not decided which wastewater disposal method it will use. See ODOE Proposed Order, p. 16,17,41,42,45,46. 018-4

p. 3-12, Solid Waste. If PGE should use a "zero discharge system" for wastewater disposal, it would generate an estimated ten tons per day of dewatered sludge. See PGE Amendment and ODOE Proposed Order, p. 41,42,45,46. 018-5

p. 4-5 and 6, Seismic Hazard. PGE has done more site-specific seismic hazard analysis at the request of DOGAMI. The report was done by Ebasco, dated January 1994, and transmitted to ODOE by letter dated January 20, 1994. 018-6

p. 4-13, Fish and Wildlife. In 1993, the Oregon Fish and Wildlife Commission listed the Snake River spring/summer Chinook salmon and Snake River fall Chinook salmon as threatened as provided under Oregon law. 018-7

p. 4-22 to 25 and 5-38 to 40. We appreciate BPA's attention to, and discussion of EMP in the DEIS. Although the EFSC has not adopted any rules relating to possible EMP health effects, ODOE and EFSC consider this an important issue and are monitoring it. 018-8

p. 5-5, Seismic Risk. The ODOE Proposed Order, p. 22, requires that the applicant design and construct the facility to address 018-9

Comment Letters

March 30, 1994

Page 3

any estimate of peak ground acceleration which exceeds that covered by seismic zone 2B.

018-10

p. 5-7, Wildlife. The conclusion that the cooling tower drift would not have adverse impact on Messner Pond was based on a specific drift rate and a specific concentration of total dissolved solids (TDS) in the cooling tower water. If PGE uses a zero discharge system, the concentration of dissolved solids in the cooling tower water may be much higher than this level. Thus, the conclusion that there would be no adverse impact to Messner Pond may no longer be true. ODOE has asked PGE to redo its cooling tower drift impact analysis assuming a zero discharge system. We have not seen the results and have not determined that there would be no adverse impact to Messner Pond. Therefore, our Proposed Order requires that PGE maintain the total dissolved solids (TDS) concentration in the cooling tower water, and the drift rate from the tower, at the levels which were used as the basis of our finding of no adverse impact. We will reconsider these conditions, after we have reviewed PGE's revised cooling tower drift impact analysis. See Proposed Order, p. 29 to 32.

018-11

p. 5-7, Mitigation. PGE has submitted an "Ecological Monitoring Program" by letter dated January 5, 1994 to ODOE.

018-12

p. 5-8. Federally Listed Animals. We were unaware that PGE had done a Biological Assessment on federally listed threatened and endangered species. We appreciate BPA including it in the DEIS. I would appreciate you keeping me advised on USFWS and NMFS responses to the assessment.

018-13

p. 5-9, Water Impacts. It would be helpful if the EIS would explain who receives and reviews PGE's stormwater pollution plan.

018-14

p. 5-9, Surface Water. The third paragraph is no longer correct. See comment about zero discharge system for p. 3-9,10.

018-15

p. 5-10, Groundwater. This discussion is no longer accurate. Water for the project may be coming from more than three wells. Also, Waterwatch has protested the Oregon Water Resources Department (WRD) approval of the proposed new deep basalt aquifer well discussed in paragraph three. Thus, there is some uncertainty as to the ability to use water from this well. I asked PGE, the Port and WRD to make certain that there would be enough water for the project without relying on water from this new well. They have indicated that between the Port's already permitted wells and the agreement with the City of Boardman to

Comment Letters

March 30, 1994
Page 4

provide the Port water which could be used for the project, there would be enough water. See Proposed Order, p. 14,15; PGE letter to ODOE dated January 3, 1994.

p. 5-16, second paragraph. The values for drift rate and TDS in the first sentence may no longer be correct, if a zero discharge system is used. See comment for cooling tower, p. 5-7. 018-16

p. 5-20, Vegetation/Wetland Impacts. See comment for cooling tower, p. 5-7. 018-17

p. 5-25, Solid Waste Disposal. See comment for p. 3-12. 018-18

p. 5-34, Wildlife. Construction of the transmission line will require removing vegetation which exceeds 12 feet in height and all Russian olive trees (which occur along the southern edge of the Messner Pond area) from the corridor. This would represent a small loss of habitat for wildlife. However, PGE's proposal to plant and maintain trees between Messner Pond and the project site would make up for this loss. 018-19

p. 5-41, Noise Impacts. the Oregon Department of Environmental Quality has adopted noise regulations in OAR Chapter 340, Division 35. It is my understanding that noise levels from the transmission line will be consistent with the applicable provisions of those regulations. If this is correct, it would be useful for the EIS to say this. If this is not the case, I would appreciate you advising me. 018-20

p. 5-48 and 49. Transmission Capacity. The discussion of the impact of the three proposed power plants on BPA's transmission system, and what might be done to address the issue, was very useful. 018-21

f:\acreg\fac\ten\coyote\sp\hp\dies.v51

Comment Letters



DEPARTMENT OF THE ARMY
PORTLAND DISTRICT, CORPS OF ENGINEERS
P. O. BOX 2946
PORTLAND, OREGON 97208-2946

Reply to
Attention of:

April 5, 1994

| | |
|--|----------|
| RECEIVED BY BPA PUBLIC INVOLVEMENT LOG # 0248-1-19 | |
| RECEIPT DATE: 4/7/94 | |
| AREA: | DISTRICT |

Planning and Engineering Division

SUBJECT: Permit Application ID No: 94-235

Bonneville Power Administration
Attn: Ken Barnhart
P.O. Box 3621
Portland, Oregon 97208

Dear Mr. Barnhart:

I have completed my review of portions of the Draft Environmental Impact Statement dated January 1994 for the Coyote Springs Cogeneration Project in Morrow County, Oregon. Specifically, I have reviewed Sections 4.1.1, 4.1.2, 6.16, 6.18, 6.18.1 and Maps 4 and 5 of the document.

My numbered comments of the above referenced Sections and Maps follow:

019-1

1. Section 4.1.1 - The second sentence of the segment discussing Existing Land Use needs to be revised. The quarry still exists (or at least in part) according to your consultant, Chris Thoms.

019-2

2. Section 4.1.2 - In the segment that discusses Surface Water under the heading Water Resources (page 4-7) the discussion of gravel mining ponds is not consistent with the comments in Section 4.1.1.

019-3

3. Section 6.16 - The segment titled Section 404 should be rewritten thus: This section of the Clean Water Act is regulated by the U.S. Army Corps of Engineers. Fill and removal is regulated by the Oregon Division of State Lands under the Oregon Removal Fill Law. Generally, waterfilled depressions created in dry land incidental to construction activities and pits excavated in dry land for the purpose of obtaining fill or sand, are not considered waters of the U.S. unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States (preamble to 33 CFR 320-330/page 41217 under Section 328.3: Definitions).

Discharging fill into the gravel mining pond that is currently being mined, generally is not a regulated activity under Section 404 of the Clean Water Act.

Under the segment titled Oregon Removal Fill Law delete With the Corps, (first sentence) and replace with The.

4. Section 6.18 - No changes.

Comment Letters

-2-

5. Section 6.18.1 - Add to the last of the first sentence, in the absence of Congressional consent and approval of the plans by the Chief of Engineers and Secretary of the Army.

019-4

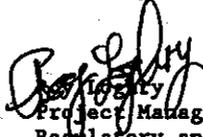
6. Map 4 - The National Wetland Inventory Map should be reviewed for the project area. A copy of that map is attached as an enclosure and indicates more wetland associated with Messner Pond than shown on Map 4.

019-5

7. Map 5 - No Concerns.

This concludes our comments and review of the referenced document. If you have questions, please contact me at the above address or telephone (503) 326-6997.

Sincerely,



Project Manager
Regulatory and Environmental
Resource Branch

Enclosure

Copy Furnished:

EPA, Portland
EPA, Seattle (Bregar)
BPA, Thoms

Comment Letters



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

RECEIVED BY BPA
PUBLIC INVOLVEMENT
OG #: COYOIE-02-0020
RECEIPT DATE:

APR 04 1994

REPLY TO
ATTN OF: WD-126

Ken Barnhart
EFBG
Bonneville Power Administration
P.O. Box 12999
Portland, Oregon 97208

REA: DISTRICT

Dear Mr. Barnhart:

In accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the Coyote Springs Cogeneration Project Draft Environmental Impact Statement (draft EIS). The draft EIS analyzes a No Action, and one action alternative to build a combustion-turbine electrical generation plant near Boardman, Oregon.

Based on our review, we have rated the draft EIS EC-2 (Environmental Concerns -- Insufficient Information). A copy of our rating system is enclosed. EPA is concerned that there is only one action alternative, and no site-specific options with which to choose a least environmentally damaging alternative. The National Environmental Policy Act stipulates that a thorough alternatives analysis is an integral part of the EIS. We have also enclosed comments on wetlands, water quality and project monitoring.

020-1

As Ken Barnhart and John Bregar discussed during their March 29 phone conversation, Martha Sabol of our groundwater section has not yet completed her review of the groundwater portion of the EIS. Her comments will be sent to you as soon as possible.

This rating and a summary of our comments will be published in the *Federal Register*. Thank you for the opportunity to review this draft EIS. Please contact John Bregar at (206) 553-1984 if you have any questions about our comments.

Sincerely,

Joan Cabreza, Chief
Environmental Review Section

Enclosure

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Comment Letters

U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE COYOTE SPRINGS COGENERATION PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT

Alternatives

The draft EIS provides a clear description of the proposed *Coyote Springs cogeneration project*. EPA is concerned, however, with the lack of alternatives for power generation.

Section 1500.2(e) of NEPA states, "Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment." It follows, according to section 1502.14 of the National Environmental Policy Act, that agencies shall:

- (a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.
- (b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.
- (c) Include reasonable alternatives not within the jurisdiction of the lead agency.
- (d) Include the alternative of no action.
- (e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.
- (f) Include appropriate mitigation measures not already included in the proposed action or alternatives.

020-2

The Coyote Springs draft EIS does not identify any alternatives for the proposed action. These alternatives are absolutely necessary in order to evaluate the comparative merits of other possible options.

Other alternatives should be presented in the final EIS or a supplemental draft EIS so the public can identify the least environmentally damaging option.

EPA recognizes that PGE's 1992 Integrated Resource Plan (IRP) identifies a wide range of new energy sources that will be needed in the future. However, this does not preclude a thorough alternatives analysis.

Since the IRP has already indicated a need for power that has "operating cost and environmental characteristics of gas-fired, combined-cycle CTs (page 2-2)," the alternatives analysis should include different plant locations, transmission alignments, water well locations, access, and other site-specific options.

Comment Letters

2

Wetlands

Page 4-2 states, "The current land use of the proposed power plant site is vacant. The parcel was once operated as a gravel quarry, but the quarry has since been filled..." This statement seems to imply that the gravel mining operation has ceased. However, later, on page 4-7 it states, "Because the (gravel mining) pond is created by an active mining operation, it is not regulated by either the Corps or the Oregon DSL." These statements do not provide a clear impression of the current land use for the gravel mining pond. The final EIS should address this topic, as there potential 404 permit implications if the pond is no longer used for gravel mining.

020-3

BPA should contact the Army Corps of engineers on this issue to clarify the situation. Before the final EIS is issued, the jurisdiction of the mining pond should be explained in detail. For further information, please contact Jim Goodzward at the Corps in Portland at 503-326-5500.

Water Quality

It is the goal of the Clean Water Act to restore and maintain the chemical, physical and biological integrity of the nation's waters. The final EIS should clearly demonstrate that project implementation will comply with state Water Quality Standards. State Water Quality Standards establish designated uses for a water body (or water body segment), support the uses with water quality criteria, and, where necessary, protect that water quality with an Antidegradation Policy.

Baseline water quality data at the project level are key in the evaluation of projected impacts. Therefore, data from relevant sampling efforts should be included as part of the "affected environment" discussion. The discussion should identify the amount and quality of available resource information, including data gaps and needs. When baseline water quality data are not available, assessments based on extrapolation from comparable watersheds or professional opinion should be carefully explained.

020-4

The final EIS should provide a quantitative basis to judge whether physical and chemical parameters, such as temperature, turbidity, and sediment accumulation, will be kept at levels that will protect and fully support designated uses and meet Water Quality Standards under each of the action alternatives. The state's identification of water bodies with impaired uses (found in the state 303(d) report), as well as the magnitude and sources of such impairment, should also be included.

In Chapter 5, on page 5-9 it states, "No direct impact to Messner Pond is expected by construction. A slight impact is expected from salt precipitation from cooling tower emissions." EPA would like to see a quantitative analysis of the salt precipitation effects on all surface water bodies in the area if there are predicted impacts.

In Chapter 4, on page 4-7 there is a brief discussion of the existing surface water in the project area. The reader is informed that there is surface water draining into Messner pond from the southeast. This section should be expanded using the above quantitative assessment. On map

Comment Letters

3

4, it shows a pipeline corridor, and a power line corridor located southeast of Messner pond. There is not enough information here to determine the possible impacts to Messner pond from construction and stormwater runoff. *The stormwater pollution plan, mentioned on page 5-9, should be included in the final EIS, so the reader can at least have an idea of the measures that will be taken to avoid impacts to the pond.*

Monitoring

The final EIS should include a discussion of monitoring for each resource category determined to be significant through the scoping process, including fisheries and water quality. A well designed monitoring plan will address how well the preferred alternative resolves issues and concerns by measuring the effectiveness of the mitigation measures in controlling or minimizing adverse effects.

On page 5-7, the fish, wildlife, and vegetation monitoring plan is mentioned. EPA would like to see this plan in the final EIS, not "before construction begins." A commitment should be made to monitoring these resources.

020-5

The monitoring plan should include types of surveys, location and frequency of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in plan implementation, and availability of results to interested and affected groups.

The EIS should describe the feedback mechanisms which will use monitoring results to adjust standard operating procedures, and monitoring intensity at first detection of unexpected, adverse effects. This ensures that mitigation strategies will improve in the future and that unforeseen adverse effects are identified and minimized.

Comment Letters



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

Reply to
Attn of: WD-139

MEMORANDUM

SUBJECT: Ground Water Section Comments on Coyote Springs
Cogeneration Project, Morrow County, Oregon

FROM: Martha Sabol, Hydrogeologist
Ground Water Section

TO: John Bregar
Environmental Review Section

The following are our comments on the Coyote Springs Cogeneration Project, Morrow County, Oregon Draft Environmental Impact Statement (EIS):

1) The EIS needs to address the relationship and impacts of the cogeneration project to the City of Boardman (the City) wellhead protection program currently under development. Specifically, the EIS needs to address the impacts the project will have on the wellhead delineation results. EPA provided funding to the City in 1991 to begin developing a wellhead protection program. These funds were used to delineate capture zones around the three Ranney collectors that supply water to the City. This study is described in "Final Report-Wellhead Protection Demonstration Project, Boardman, Oregon" October 1992, by CH2MHill. The EIS indicates that the City will provide water to the cogeneration project via current wells, and possibly from drilling additional wells. The impact of this water use on the delineation boundaries should be addressed in the Final EIS.

020-6

Specific items concerning the City of Boardman wellhead protection program that the Final EIS should address are:

a-Describe the impact of the project on the delineated capture zones. Do their shape and size change when the cogeneration project begins using the additional

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Comment Letters

water?

b-Determine if the cogeneration project is inside any of the capture zones. If it is, describe how the project is consistent or inconsistent with the City's land use management strategies for land inside the wellhead delineated capture zones.

c-Locate the proposed new well on a location map, and conduct a preliminary capture zone delineation to determine the impact of the new well on capture zones of the current wells.

d-Describe the land use and potential sources of contamination within the delineated capture zones around the proposed new well, and determine whether ground water contamination has ever been detected within the area of the capture zones. This exercise helps analyze whether water pumped from the new well will be a potential risk to public health.

020-7 2) Describe the impacts to ponds and wetlands from increased ground water pumpage.

020-8 3) Page 4-40: A discussion concerning potentially designated wellhead protection areas should be added to Section 4.1.8 "Protected Areas:."

020-9 4) Page 6-11, Section 6.17.2: Delete this section. The critical aquifer protection program under the Safe Drinking Water Act expired in 1988. However, the Sole Source Aquifer Program is still in effect for anyone desiring to petition EPA to designate an area as sole source.

This concludes our comments. Please give me a call if you have any questions (3-1593).

Comment Letters

APR 28 1994

EFBG

Mr. John Bregar, WD-126
Environmental Protection Agency - Region 10
1200 Sixth Avenue
Seattle, WA 98101

Dear Mr. Bregar:

As a follow up to our luncheon meeting on April 21, we plan to take the following actions in response to EPA's comments in the Draft Environmental Impact Statement (EIS) for the Coyote Springs Cogeneration Project:

1) **Alternatives** - Bonneville Power Administration (BPA) will describe several transmission line and gas pipeline routing alternatives that were considered. We also will describe the environmental considerations that were factors in formulating Portland General Electric's Integrated Resource Plan.

However, as we discussed in our meeting, with regard to the project as a whole, National Environmental Policy Act (NEPA) and its defining regulations oblige Federal agencies to discuss only alternatives that are reasonable. 40 C.F.R. §§ 1502.14(a) and (c), 1508.25(b)(2); see also, Forty Most Asked Questions Concerning CEQ's NEPA Regulations, 46 Fed. Reg. 18,026, 18,027 (March 23, 1981). Recognizing that "reasonable" is not self-defining, now Supreme Court Justice Clarence Thomas, in Citizens Against Burlington, Inc. v. Busey, 938 F.2d 190 (D.C. Cir. 1991), cert. denied, 112 S.Ct. 616 (1991), provided some clarity, as follows:

NEPA plainly refers to alternatives to the "major Federal actions significantly affecting the quality of the human environment," and not to alternatives to the applicant's proposal. NEPA § 102(2)(C), 42 U.S.C. § 4332(2)(C) [emphasis in original]. An agency cannot redefine the goals of the proposal that arouses the call for action; it must evaluate alternative ways of achieving its goals [emphasis in original] . . . Congress did not expect agencies to determine for the applicant what the goals of the applicant's proposal should be.

Id. at 199.

The approach in the Draft EIS is also consistent with Section 10 of BPA's enabling legislation, the Pacific Northwest Electric Power Planning and Conservation Act 16 U.S.C. §§ 839 et seq., as follows:

Nothing in this Act shall be construed to affect or modify any right of any State or political subdivision thereof or electric utility to . . . make energy facility siting decisions, including, but not limited to, determining the need for a particular facility, evaluating alternative sites, and considering alternative methods of meeting the determined need.

16 U.S.C. § 839g.

Accordingly, with regard to the Coyote Springs Cogeneration Project as a whole, BPA believes that it is appropriate to limit our examination of overall alternatives to the proposed action and the no action alternative.

2) **Wetlands** - As recommended, BPA has contacted the U.S. Army Corps of Engineers. The land use description of the site was in error. The quarry has been an ongoing operation for fifteen years and thus a 404 permit will not be required. We will report consultations with the Corps in the Comment/Responses Section of the Final EIS, and within Section 5 - Environmental Consequences and Section 6 - Environmental Consultation, Review, and Permit Requirements.

3) **Water Quality** - As we also discussed, the Draft EIS was written to non-technical readers. In the case of water quality, a significant amount of work was done that was not described in the Draft EIS. I have enclosed several documents that will be appended to the Final EIS to comply with your comments:

A.) Beak Consultants, Inc. April 1994. Potential Cooling Tower Drift Effects on the Water Quality and Vegetation at Messner Pond Near the Proposed Coyote Springs Cogeneration Facility.

B.) Portland General Electric Company. April 7, 1994. Draft EIS Comment Letter - Commitment to use a zero waste water discharge system.

Comment Letters

3

C.) Portland General Electric Company. 1993. Applications to Morrow County for National Pollution Discharge Elimination System (NPDES) permits for the Coyote Springs Cogeneration Plant and transmission line. Coyote Springs Erosion and Sedimentation Control Plans for the Coyote Springs Cogeneration Plant and transmission line.

D.) Morrow County Planning Department. May 27, 1993. Letter issuing requested NPDES permits for the Coyote Springs Cogeneration Plant and transmission line.

E.) Morrow County Planning Department. December 6, 1993. Letter acknowledging receipt and acceptance of the Coyote Springs Erosion and Sedimentation Control Plan.

4) **Monitoring** - Several environmental impact monitoring plans have been formulated and committed to by Portland General Electric. I have enclosed several documents that will be appended to the Final EIS and which respond to your comments on this topic:

A.) Portland General Electric Company. December 1993. Ecological Monitoring Program for the Coyote Springs Power Plant.

B.) Morrow County Planning Department. May 27, 1993. NPDES permits for the Coyote Springs Cogeneration Plant - Schedule B Minimum Monitoring and Reporting Requirements.

C.) Oregon Department of Environmental Quality. April 1994. Air Contaminant Discharge Permit No. 25-0031. Application No. 13212. Morrow County, OR. Monitoring and reporting requirements for air discharges are described in the permit.

D.) Oregon Department of Energy. January 10, 1994. Proposed Order - In the matter of the Application for Site Certificate of Portland General Electric Company for the Coyote Springs Cogeneration Project (proposed reporting and monitoring requirements related to environmental standards and requirements).

5) **Ground Water** - We have obtained a copy of the "Final Report - Wellhead Protection Demonstration Project, Boardman, Oregon," and have arranged to meet with CH2M Hill and the City of Boardman in order to answer the questions raised by Martha Sabol. The results of these consultations will be summarized in the groundwater sections of the Final EIS. We will describe anticipated effects from increased groundwater pumping on ponds and wetlands in the Final EIS.

We trust the actions described above explain BPA's position and adequately address EPA's comments and further, when accomplished in the Final EIS, will remove EPA's concerns. If you have specific questions related to any of these topics please contact me at (503) 230-3667.

Sincerely,



Kenneth A. Barnhart
Project Environmental Coordinator

Comment Letters

047 31 199 13:13 VECA-003-0678142



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

Post-It™ brand fax transmittal

To: JACE NAYSON
Cc: PGE

Reply to
Attn of: WD-139

MAY 25 1994

| | |
|-----------|------------|
| memo 7071 | # of pages |
| From | PAJMER |
| To | BOARDMAN |
| Phone | |
| cc | |

MEMORANDUM

SUBJECT: City of Boardman response to our comments on Coyote Springs Co-Generation

FROM: Martha Sabol, Senior Hydrogeologist
Ground Water Section *MS*

TO: John Bregar
Environmental Review Section

I received a letter from Barry Beyeler, Public Works Director for the City of Boardman, Oregon (the City), which addresses our concerns with the Coyote Springs Co-generation Draft Environmental Impact Statement. Our concerns related to the impact of the facility on the Boardman wellfield. Barry describes additional work that was conducted by CH2M Hill as a result of our comments, and the close working relationship that the City has with Portland General Electric.

The City is addressing our concerns, and ground water protection measures are being instituted that will protect the wellfield now, and in the future. I am enclosing a copy of Barry's letter for your use. I suggest that the Final EIS incorporate Barry's descriptions of the wellhead protection work that has been conducted, and a description of how the wellfield will be protected through the proposed wellhead protection ordinance.

Please give me a call if you have any questions (x-1593).

Attachments (Documents Forwarded w/ BOARDMAN RESPONSE)

cc: Barry Beyeler, Public Works Director, City of Boardman

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Comment Letters



City of Boardman

Town Square
P.O. Box 229
Boardman, OR 97818
Telephone (503) 481-9252

May 20, 1994

Ms. Martha Sabol
US Environmental Protection Agency
Region 10, Office of Ground Water
1200 Sixth Ave., WD-139
Seattle, Washington 98101

Dear Ms. Sabol,

Pursuant to your memo to John Bregar of the Environmental Review Section concerning the Coyote Springs Co-generation facility currently going through the site certification process, The City of Boardman has met with officials from Portland General Electric (PGE). Examined were potential impacts to the area, and specifically to the Drinking Water System and Wellhead Protection Area (WHPA).

The City is satisfied with the efforts of PGE to determine and mitigate any of the identified impacts. PGE has been very cooperative in their efforts to work with the City in assessing the potential impacts and provide complete protection to the WHPA.

In response to the question regarding potential impacts created by PGE's additional use of water in the area, PGE has consulted with CH2M HILL of Portland. CH2M HILL (Jeff Barry, project supervisor) has performed a review of the WHPA identified in the Demonstration Project Report of October 1992. CH2M HILL performed this analysis by using 2 dimensional numerical modeling with the additional pumping projections from Port of Morrow wells completed in the alluvial aquifer that the City Ranney Collector is completed in. These "remodeling" efforts showed a change in the delineated areas which actually decreased the size of the zone of capture for the Boardman Ranney Collector Field. Attachment 1 displays a view of the actual change in the size of the WHPA. When the pumping from the Port of Morrow sources, within the alluvial aquifer, are at capacity, the delineation shift has the effect of the co-generation facility site "moving" outside of the redefined WHPA (as compared to being between the 10 year time-of-travel [TOT] and the 20 year TOT without those alluvial aquifer wells in the proposed production levels). The pumping capacities of the Port of Morrow wells in the alluvial aquifer were not entered into the original Demonstration Project delineations to assure a conservative delineated area. This decision was based on the City not having control of the ultimate pumping rates for these wells.

Although the co-generation facility is outside of the redefined WHPA TOT boundaries, when Port of Morrow alluvial aquifer wells are producing at capacity, and inside of the defined WHPA when those wells are idle is interesting; however, for several reasons, the City is not considering changing the currently defined WHPA TOT lines an option, even based on the refinement of the numerical model. The reasoning behind this decision is the same as identified in the original delineation in that the City does not own or operate the wells in the alluvial aquifer

Comment Letters

and therefore has no direct control upon the ultimate well/aquifer pumping rates. Thus when these wells become idle the WHPA TOT definitions are projected to revert back to the original Demonstration Project delineations. The City is aware that there will be some period of time after the wells become idle to when the aquifer equilibrium returns to the originally defined TOT lines; however, given the conditions of this aquifer the City is convinced that this time should be minimal.

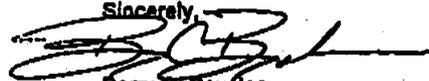
The City is drafting an Ordinance specifically for the Wellhead Protection Area, and has been reviewing current ordinances from other localities around the country to determine what will work best for local conditions and development patterns. A draft copy of developments to date is included (Attachment 2) for your review. Until this Ordinance is completed and adopted the City will review any potential development individually and work with the developer to assure that the development meets the purpose of protecting the drinking water supply. The City has found that this is far less than desirable (without the framework provided by an Ordinance) so the City is proceeding with the development of a WHPA ordinance as quickly as possible. The original intent of the City was to incorporate WHPA into a current review of the zoning and development regulations; however, due to the impending increase in development activity the WHPA ordinance is being placed into a higher priority in an effort to provide that necessary framework in a shorter period.

The City has reviewed the development plans of the Coyote Springs Facility and are satisfied with the plans that have been developed. The City and PGE have agreed to work together in meeting all of the goals of the City's Wellhead Protection Program. PGE has been very responsive to the City's concerns and have been acting as responsible corporate neighbors. Mr. Len Gunderson of PGE has been working to keep the City informed on progress of the project and to answer any questions regarding changes that are noted. PGE has supplied the City with information, complete with Material Safety Data Sheet (MSDS) information, on the substances proposed to be used at the facility. This will allow the City to determine potential impacts and to develop strategies that can be implemented jointly by the City and PGE to ameliorate those potential impacts.

In closing, the City of Boardman is confident that the working relationship that has been developed on this project with PGE will serve to protect our wellhead area. Further, this may serve as a model for proposed future industrial development. In addition the City, recommending authorization for the construction/operation of the plant, looks forward to a working relationship with PGE for the protection of the City drinking water supply through Wellhead Protection efforts.

Should you have any questions or comments please feel welcome to contact me and we can discuss them in greater detail.

Sincerely,



Barry C. Beyeler
Public Works Director

cc: Jack Mayson & Len Gunderson, PGE
Jeff Barry, CH2M HILL
Gary Neal, Port of Morrow

Comment Letters



Portland General Electric Company

Mr. Ken Barnhart - EFBC
BPA
P.O. Box 3621
Portland, Oregon 97208

RECEIVED BY BPA
April 7, 1994 PUBLIC INVOLVEMENT
TDW-085-94CSOG #: COYOTE-08-021
RECEIPT DATE:
4/19/94
REA: DISTRICT

Dear Mr. Barnhart:

RE: BPA Draft EIS

Thank you for the opportunity to comment on the January 1994 Draft Environmental Impact Statement (DEIS) for Coyote Springs.

021-1

After the DEIS was prepared PGE made two significant decisions relating to the Coyote Springs project. First, the decision has been made to change the plant design so that the NO_x emissions from the project are 4.5 ppm. (NO_x emissions are discussed on page 3-11 of the DEIS.) This reduces the NO_x emissions from the project by one half. The second significant change is that PGE has committed to utilize a zero discharge system if a suitable plan for mixing the Coyote Springs wastewater with the Port of Morrow's wastewater is not approved by Oregon DEQ. In the event that a zero discharge system was utilized at Coyote Springs the portions of the DEIS relating to water usage and wastewater discharges would not be up-to-date.

In addition to the two significant items I would also like to note some minor items in the DEIS that could be changed.

021-2

1. Page S-7 of the DEIS notes that a "... bank swallow colony on the plant site would be impacted by the proposed plant". The Site Certificate proposed by EFSC requires that PGE construct a fence and signs to protect the bank swallow nesting colony from disturbance during construction. The colony is outside the area affected by plant operation.

021-3

2. Page S-10 of the DEIS notes that a shortage of temporary housing facilities in area could occur if the two Hermiston cogeneration projects and the Coyote Springs project peak construction periods occur concurrently. While this is true, the construction schedules for the three projects are not coincident so the impact on temporary housing is not anticipated to be significant.

021-4

3. Page 3-2 of the DEIS discusses the PGT line being built to Coyote Springs. The inference is that the lateral line to Coyote

Comment Letters

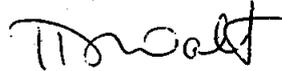
Springs will be sized to transport 41 billion BTU/day. The contract with PGT is for 41 billion BTU/day (enough gas for one unit at Coyote Springs). The pipeline is sized to carry about 100 billion BTU/day (enough gas for both units at Coyote Springs).

021-4

4. There are several references in the DEIS about Coyote Springs being outside the City of Boardman. Please be advised that the Port of Morrow is in active discussions with the City of Boardman about annexing the Coyote Springs site into the City.

021-5

Sincerely,



T. D. Walt
General Manager
Technical Functions

c: Dr. T. E. Meehan, ODOE