

RECEIVED

LETTER "I"

December 18, 1995

DEC 26 1995

ENERGY FACILITY SITE
EVALUATION COUNCIL

DEC 26 1995

Energy Facility Site Evaluation Council
State of Washington
PO Box 43172
Olympia, WA 98504-3172

Re: Northwest Regional Power Facility-Comments Spokane Tribe-Draft EIS

The Spokane Tribe of Indians submits these comments to the Draft Environmental Impact Statement ("DEIS") for the proposed Northwest Regional Power Facility ("NRPF").

The Spokane Indian Reservation is located approximately 15 miles northeast of the proposed project. The Reservation is approximately 165,000 acres and governed by the Spokane Tribe of Indians through the Business Council of the Tribe. Along with providing a homeland for the members of the Spokane Tribe, the Reservation has an abundance of natural resources and recreation facilities for the use and enjoyment of Tribal members and non-members alike. The Spokane Reservation is classified as a Class I airshed under the Clean Air Act.

At the time of intervention with the Energy Facility Site Evaluation Council ("EFSEC"), the Spokane Tribe identified issues of concern with the application for the NRPF. These issues were: effects on cultural and archeological resources of the Tribe, effects of air emissions on Tribal lands, and the water withdrawal from the Spokane River where it would affect the Spokane Reservation including the fishery in the Spokane River and Lake Roosevelt. With the change in the application from water to air cooling, the water withdrawal issues were not of primary concern to the Spokane Tribe (as long as they remained out of the application) and therefore the Tribe concentrated on cultural resources and air quality. Correspondingly, the Spokane Tribe executed two agreements with the applicant to protect its cultural and environmental interests. Those agreements have been entered as evidence in the adjudicative proceeding with EFSEC.

The NRPF will significantly affect the environmental quality of the Spokane Reservation. The lack of comprehensive baseline data in the initial studies of the applicant do not allow for an adequate evaluation of all impacts addressed in the DEIS as well as possible unknown impacts. Many examples exist in the DEIS where the lack of baseline data is crucial. The Tribe will articulate a few here. For example, the applicant states that the NRPF will have visibility impacts on the Class I airshed of the Spokane Reservation for 6 percent of the hours of the year mostly at sunrise and sunset hours. For members of the Tribe and users of the recreational facilities at the confluence of the Spokane and Columbia Rivers this is a significant impact. Again this prediction is conjecture without the benefit of an adequate baseline. Other examples can be seen in Table 3.4 and on page 3-32 where the DEIS gives information on effects on sensitive plant species. The DEIS and correspondingly the Clean Air Act permits are wrought with these assumptions. The baseline data must be established before impacts on Tribal natural resources and recreational facilities can be adequately evaluated. The air quality agreement with the applicant starts this

1

evaluation process.

In the "Northwest Regional Power Facility- Air Quality Agreement with the Spokane Tribe of Indians" the Spokane Tribe has agreed that it shall participate in the ongoing process of evaluation of the environmental effects of air emissions on the Spokane Indian Reservation. The agreement provides for the establishment of detailed baseline data which is lacking in the application and the DEIS. At the time the baseline data is established the Tribe can then further evaluate the effects of air emissions on the Reservation environment. Relevant effects are, but are not necessarily limited to: visibility, NOX, SO2, CO, PM10, VOC. The Agreement also provides for the direct monitoring by the Spokane Tribe and limits certain emissions. Most importantly the Agreement provides for further dispute resolution and legal process if emission levels are found to have adverse effects after establishment of the adequate baseline data.

2

The Agreement provides the vehicle for the applicant to provide adequate information to the evaluating agencies in concert with the Spokane Tribe. However, it will be quite difficult for the agencies to fully consider, discuss and evaluate all environmental impacts and alternatives under the DEIS without the establishment of adequate baseline data. Therefore, it may be premature to set forth a Final Environmental Impact Statement until such time baseline data on the Spokane Reservation exists.

3

Proper permitting under the Clean Air Act as integrated in the EFSEC and EIS processes is a necessity. Valid baseline data to make assumptions in the permitting process is mandatory and the comments above as they address the lack of baseline data are also germane in the permitting process. In addition, it seems that certain other requirements of the Clean Air Act may not have been followed. Section 165 (d) requires that for proper permitting to take place a consultation process must occur with the Federal Land Manager of Class I areas. To date the Spokane Tribe has not seen any evidence of satisfaction of this requirement.

4

The "KVA/CSWE Stipulation and Agreement with the Spokane Tribe of Indians for the Northwest Regional Power Facility" sets forth the obligations of the applicant regarding the cultural resources of the Spokane Tribe for Reservation, ceded, aboriginal lands and usual and accustomed places. The primary intent of the document is the Spokane Tribe is the only party which can adequately evaluate the effects of the NRPF on those lands.

5

The agreements cited above are incorporated by reference into these comments and are on record with EFSEC. Please address any questions or concerns to the Spokane Tribe of Indians, c/o Larry Goodrow, Executive Director, Box 100, Wellpinit, WA 99040. (509) 258-4581.

LETTER "I" RESPONSES

- I-1 The visibility impacts discussed in the DEIS were based upon conservative estimates of background data which probably lead to an over statement of estimated impacts. The visibility analysis utilized a modeling procedure developed by the U.S. Environmental Protection Agency. The value selected for the background visual range was selected in consultation with the Washington State Department of Ecology. A background visual range of 160 km was selected. This is typical of remote wilderness areas. Use of this background value for the Spokane Indian Reservation is conservative, and will likely lead to over-estimating the anticipated impacts on visibility in that area. Collection of additional background data is not necessary to reach a reasonable estimate of the projected impacts to visibility.

The analysis of impacts to vegetation in the DEIS was based on information on chronic injury symptoms published by the U.S. Department of Agriculture. These data indicate that air quality thresholds for chronic injury to plants are more than ten times higher than the conservative estimates for air quality impacts within the Spokane Indian Reservation Class I area. Collection of background data is not reasonably necessary to evaluate impacts to sensitive vegetation.

The comment suggests that the purpose of the stipulated air quality agreement between the Spokane Tribe of Indians and the NRPF is to collect background data. The agreement provides for payments to the Spokane Tribe of Indians for funding "to establish baseline studies, air monitoring or for any other purpose at the Tribes full discretion." It is quite possible that this agreement will lead to other environmental studies unrelated to air quality. Further, funding of the agreement does not begin until three months after commencement of construction -- an event which will not occur, if at all, until after the FEIS is completed. It is thus not possible to delay the FEIS to await studies under the agreement.

- I-2 The impacts upon visibility were derived from the conservative assumptions discussed above. Some impact may be visible under proper lighting situations if one were looking toward the plant site and visibility was not obstructed by land forms. If one knew where to look, a slight distortion might be detectable. Most of the recreation on or along the rivers occurs at locations where hills will obstruct this view. The impact, if it occurs, should not be noticeable to recreational visitors. The impact to visibility is only a possibility, and, if it occurs, it should not be significant.

As stated above, the DEIS summary of chronic impacts to sensitive plant species all occur at threshold values at least ten times above those conservatively estimated to occur in the Class I area. Even chronic impacts to sensitive plants should not occur.

- I-3 See Response to Comment I-1.

- I-4 The Environmental Protection Agency confirms that the Spokane Tribe of Indians is the federal land manager for the Class I area within the Spokane Indian Reservation. NRPF has had repeated consultations with the Spokane Tribe of Indians. The stipulated agreement concerning air quality, which was signed by the Spokane Tribe of Indians, and which resolved all air quality issues raised by the Tribe before the Energy Facility Site Evaluation Council, is evidence of this consultation.

I-5 Comment noted.

LETTER "J"

RECEIVED

OCT 23 1995

10-20-95

Jason Zeller
E.F.S.E.C.

ENERGY FACILITY SITE
EVALUATION COUNCIL

We are writing in response
to your letter received 10-19-95.

We are not able to attend the
meetings to be held in Creston 10-24 or 11-15-95.

After our own extensive search,
we have finally received information on the
proposed B.P.A. plant in Creston.

We oppose this plant from its
conception. After speaking with a representative
of the gas Co. This plant is not necessary.
Getting tired of the greediness of B.P.A. Enough
damage has been done to this state.

Being located on your preferred
pipe line route has come as a surprise, we
recently learned this fact. We oppose this
route as well as the others. None suitable
for a 20" gas pipe line.

As deadlines approach, we wish
to object. Protest this plan in its
entirety.

add.

S. 13615 CHEWEY - Sp. Rd.
CHEWEY WA, 99004

Mary L. McCaughey

John L. McCaughey

LETTER "J" RESPONSES

- J-1 Comment noted. Please refer to Section 1.2, Purpose and Need, of the Draft EIS for a discussion of the need for the project.
- J-2 Comment noted. However, the preferred route for the natural gas pipeline has not yet been determined. Please refer to General Response No. 1 for a discussion of the natural gas pipeline and to the appendix in this document, which deals with generic impacts of natural gas pipelines.

LETTER "K"

RECEIVED

10-20-95
OCT 30 1995

Nancy Whitterson
B.P.A. E.I.S.

ENERGY FACILITY SITE
EVALUATION COUNCIL

We are writing in response to your letter received 10-19-95. We will not be able to attend the planned meetings in Creston wa.

We had received one piece of information on this plant in April. After extensive searching, we have learned that a 20" gas line is supposed to go through our property. Maps received in early Oct.

We are writing to protest the BPA plant and all proposed routes for your gas line.

After speaking with a representative for the gas company, this plant is not necessary.

B.P.A has damaged this state enough in the name of power, for whom I do not know. No one has approached us about this gas line; it will be opposed.

addr:
S. 13615 CHEWEY. Sp. Rd.
CHEWEY WA. 99004

Mary L. McCaughey
John L. McCaughey.

1

2

LETTER "K" RESPONSES

- K-1 Comment noted. However, the preferred route for the natural gas pipeline has not yet been determined. Please refer to General Response No. 1 for a discussion of the natural gas pipeline and to the appendix in this document, which deals with generic impacts of natural gas pipelines.
- K-2 Comment noted. Please refer to Section 1.2, Purpose and Need, of the Draft EIS for a discussion of the need for the project.

LETTER "L"

RECEIVED

November 9, 1995

NOV 09 1995

Jason Zeller
EFSEC Manager
PO Box 43172
Olympia, WA 98504-3172

ENERGY FACILITY SITE
EVALUATION COUNCIL

Re: Northwest Regional Power Facility Draft EIS

Dear Mr. Zeller,

I am writing in support of the Northwest Regional Power Facility Plant proposed in Creston, Washington.

I feel the plant will be beneficial to the area. New jobs and a growth in population will provide a stabilizing effect on our economy.

Sincerely,

Bonnie Jensen
Mayor

BJ/mjd

LETTER "L" RESPONSES

L-1 Comment noted.

LETTER "M"

SWANSON, PARR, CORDES,
YOUNGLOVE & PEEPLES, P.S.

ATTORNEYS AT LAW
EASTSIDE PROFESSIONAL PLAZA
924 EAST SEVENTH AVENUE
P.O. BOX 7846

OLYMPIA, WASHINGTON 98507-7846
FACSIMILE (360) 754-9268

WILLIAM LEE PARR (1976)
CLIFFORD F. CORDES, JR. (1980)

RECEIVED

DEC 18 1995

ENERGY FACILITY SITE
EVALUATION COUNCIL

(360) 357-7791

December 18, 1995

GINA M. BISSELL
C. F. (RICK) CORDES, III
DIANA E. MOLLER
JOHN McCUTCHEON PARR
DARREL L. PEEPLES
ROBERT FRANK SPAULDING
R. ALAN SWANSON
EDWARD EARL YOUNGLOVE, III

RALPH G. SWANSON
OF COUNSEL

HAND DELIVERED

Jason Zeller
EFSEC Manager
Washington State Energy Facility
Site Evaluation Council
PO Box 43172
Olympia, WA 98504-3172

Re: Comments to NRPF Draft EIS

Dear Mr. Zeller:

Enclosed are two memoranda (with attachments): KVA Resources and CSW Energy Comments on the NRPF Draft EIS; and KVA Resources and CSW Energy Editorial Suggestions for the NRPF Draft EIS. This letter, together with the "Comments" memo constitute the comments of KVA Resources and CSW Energy to the Draft EIS. The second memo consists of editorial suggestions, which we do not intend be treated as comments or necessarily responded to in the Final EIS. Many of these "suggestions" reflect changes which occurred with the change in the method of cooling.

The change in method of cooling reduced the footprint of the plant so that its permanent impact covers only 75 acres, of which 70 acres are currently used to grow alfalfa. None of the construction will occur in wetlands. The Applicants believe, in view of this limited impact, it is incorrect to conclude that impacts to wildlife will be significant. During the course of the adjudicatory hearing, the Applicants committed to eliminate grazing on the remainder of the site for a period of three to five years, and then to allow more limited grazing, managed to protect habitat quality. The Applicants hope that the responsible official will reconsider the impacts on wildlife in view of these changes.

Jason Zeller
Page 2
December 18, 1995

2

The Applicants contend that NRPF's long-term effect on "greenhouse" gases, the effect of these gases upon global climate, and the particular effects of climate changes, are all speculative. These uncertainties are at least mentioned in section 4.2 of the Draft EIS, although their treatment in other sections is sometimes awkward. During the adjudicatory hearings, various witnesses concluded that if the NRPF is constructed, it will displace older, "dirtier," fossil fuel plants in the Northwest and on the West Coast. (A copy of Eric V. Toolson's Dispatch Study is enclosed.) Thus, the overall impact would be to improve emissions. The potential displacement of other emissions should be discussed in the EIS.

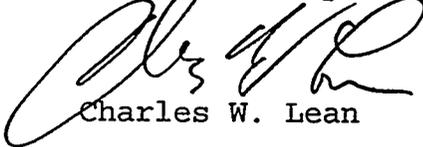
Please consider these comments, along with those in the enclosed memoranda, when preparing the Final EIS. We have appreciated the extra efforts that you, and your consultants, have undertaken as this proposal has been revised during the course of the hearing process to incorporate mitigating features.

Sincerely yours,

SWANSON, PARR, CORDES,
YOUNGLOVE & PEEPLES, P.S.



Darrel L. Peeples



Charles W. Lean

DLP:jw

Enclosures

LETTER "M" RESPONSES

M-1 Comment noted.

M-2 Comment noted.

LETTER "N"

KVA Resources and CSW Energy Comments on the NRPF Draft EIS

General Comment on the Natural Gas Pipeline

As the Draft EIS states, natural gas fuel for the project will be supplied through a natural gas pipeline running approximately 60 miles from the Pacific Gas Transmission Company's (PGT's) main transmission line east of Spokane to the project site. This pipeline will be owned and operated by PGT. PGT will also secure the licenses for, and construct, the pipeline.

The gas pipeline must be licensed by the Federal Energy Regulatory Commission (FERC), and EFSEC has no jurisdiction over that pipeline. Before licensing the pipeline, FERC will conduct an environmental review of the proposal pursuant to the National Environmental Policy Act. Neither EFSEC nor the present applicants (CSWE and KVA) control the extent or nature of FERC's environmental review.

The Applicants submitted written testimony addressing the environmental impacts of the natural gas pipeline. (Prepared Testimony of Wilfred G. Thomas, and Rebuttal Testimony of John D. Cassady.) EFSEC eventually ruled that since it did not have jurisdiction over the gas pipeline, any testimony related thereto was irrelevant. The Applicants therefore withdrew the testimony which they had submitted regarding the pipeline.

The contents of an environmental impact statement prepared under the State Environmental Policy Act (SEPA) may be broader than EFSEC's jurisdiction. The SEPA Rules, in WAC197-11-060(4)(b), state that an agency shall not limit its consideration of environmental impacts only to those within its jurisdiction. Since the natural gas pipeline will not be constructed "but for" construction of the NRPF, some consideration of the impacts of that pipeline in the EIS for the NRPF may be appropriate. WAC 197-11-060-(3)(b).

The SEPA Rules also state that "the level of detail and type of environmental review may vary with the nature and timing of proposals and their component parts" WAC 197-11-060 (5) (d). EFSEC lacks jurisdiction to require mitigation of pipeline impacts because this lies within the jurisdiction of FERC. Even if mitigation were within EFSEC's jurisdiction, the SEPA Rules would require consideration of whether those impacts may be mitigated by federal requirements.

Under these circumstances, the required coverage of the natural gas pipeline in the SEPA EIS is not completely clear. The Applicants, however, believe that it is appropriate for the SEPA EIS to consider whether there is a reasonable likelihood that the natural gas pipeline will lead to significant, adverse environmental impacts which will not be mitigated or avoided. If such impacts would result from the natural gas pipeline, they should be considered by EFSEC and the Governor as part of the SEPA process. Impacts which can be mitigated, and the details of that mitigation, fall within the exclusive jurisdiction of FERC.

For the above reasons, the Applicants are submitting the Prepared Testimony of Wilfred G. Thomas and the Rebuttal Testimony (excluding exhibits) of John D. Cassady as comments to the DEIS. Mr. Thomas and Mr. Cassady are both employed by Pacific Gas Transmission Company, and are familiar with environmental mitigation measures employed on natural gas pipelines. The testimony of both supports the conclusion reached by Mr. Thomas that "even if one assumes a worst case scenario with

respect to environmental impacts from the pipeline, tried and tested measures exist to mitigate those impacts to acceptable levels" (p.7).

FERC has standard wetland and waterbody construction mitigation procedures, a requirement for an erosion control, revegetation, and maintenance plan, and guidelines for reporting on cultural resources investigations—all of which would be applied to the natural gas pipeline. Mitigating measures discussed in the attached testimony address erosion control, stream crossings, wetland crossings, protection of endangered plants and animals, noxious weed control, and historic and cultural resource protection, as well as other possible impacts. PGT has experience in constructing major natural gas pipelines without significant adverse long-term impacts; there is no reason to expect that construction of this approximately 60-mile line will be any different.

The DEIS (at pp. 1-9, 1-10, 3-25, and 3-34) mentions possible impacts from compressor stations. There will be no compressor stations required for this pipeline, so these references should be deleted. 1

Fact Sheet

Page i, second paragraph, line 4:

Currently reads: . . . of which less than 380 acres will be used. . .

Should read: . . . of which less than 140 acres will be impacted. The footprint of the facilities permanently impacts 75 acres; 70 acres of agricultural lands and 5 acres of three-tip sagebrush/Idaho fescue habitat. The remaining 65 acres will be temporarily disturbed during construction of an underground gas pipeline, an underground water pipeline, and grading for the area used for the collection of stormwater runoff into the stormwater retention pond. 2

Section 1.4.1.2 Climate

Page 1-9, Mitigation Measures—last sentence

Currently reads: However, some power plant developers have voluntarily offered offset for greenhouse gases. 3

This sentence should be deleted since this is an editorial comment.

Fourth paragraph in section, lines 2, 3, 4, and 5

Currently reads: However, carbon dioxide (CO₂) emissions from the NRPF will contribute to the cumulative impact of greenhouse gases. The incremental contribution of the NRPF is in itself not considered significant, although the cumulative impact of global warming may be significant. This is discussed in Section 4.2. 4

Should read: However, carbon dioxide (CO₂) emissions from the NRPF may contribute to greenhouse gases. The incremental contribution of the NRPF Site emissions is in itself not considered significant. The relationship of carbon dioxide emissions from the NRPF Site to global warming is discussed in Section 4.2

Section 1.4.1.5 Water Quality

Page 1–12, first paragraph

Currently reads: Wastewater from employee sanitary facilities, service sinks, etc., will be routed to a septic system and transferred to the wastewater discharge pond.

Should read: Wastewater from employee sanitary facilities, service sinks, etc., will be routed to a package sewage treatment system and transferred to the evaporation pond.

5

This revised language is consistent with the rest of the document. (See Section 2.1.5.8 Sanitary Wastewater Treatment, page 2-29 for reference to an aerobic digestion package sewage treatment system.) A package treatment plant is not considered a septic system and uses an anaerobic digestion process.

Section 3.1.2.3 Mitigating Measures (NRPF Site)

Page 3–25, line 4

Currently reads: However, CO₂ emissions from the NRPF will contribute to the cumulative impact of greenhouse gases. The incremental contribution of the NRPF is in itself not considered significant, although the cumulative impact of global warming may be significant. This is discussed in Section 4.2.

6

Should read: However, CO₂ emissions from the NRPF may contribute to greenhouse gases. The incremental contribution of the NRPF Site emissions is in itself not considered significant. The relationship of carbon dioxide emissions from the NRPF Site to global warming is discussed in Section 4.2.

Section 3.1.3.1 Existing Conditions

Page 3–28, Table 3.2

Hourly emissions of carbon monoxide should be 56 and annual emissions should be 249 tons per year.

7

This reflects the draft permit issued by EFSEC dated November 1994.

Section 3.1.3.2 Impacts (NRPF Site)

Page 3–29, last paragraph, line 1

Modeled Ambient Air Quality Concentrations

Currently reads: Two EPA-developed computer dispersion models were used to estimate the ambient air pollutant concentrations caused by the controlled emissions from the NRPF turbines: the ISCST2 model was used to evaluate close-range impacts resulting from building wake effects; and the COMPLEX1 computer model was used to calculate the long-range impacts within the elevated terrain near Creston Butte and within the Spokane Indian Reservation.

8

Should read: Two EPA-developed computer dispersion models were used to estimate the ambient air pollutant concentrations caused by the controlled emissions from the NRPF

turbines: the ISCST2 model was used to evaluate impacts in flat terrain. The COMPLEX1 model and ISCST2 were both used to evaluate impacts in intermediate terrain, which is defined as areas above stack top but below plume height. Creston Butte and areas within the Spokane and Colville Indian Reservations were identified as areas with intermediate terrain.

Section 3.1.3.2

Page 3-30

Table 3.4

The following underlined corrections are made to Table 3.4:

	Class I Impact		Class II Impact		9
	<i>Currently reads</i>	<i>Should read</i>	<i>Currently reads</i>	<i>Should read</i>	
NO _x (annual)	0.025	<u>0.18</u>	0.86	<u>1.6</u>	
PM ₁₀ (annual)	0.005	<u>0.03</u>	0.15	<u>0.27</u>	
PM ₁₀ (24-hour)	0.14	<u>0.29</u>	12.0	<u>3.0</u>	

This reflects the draft permit issued by EFSEC dated November 1994.

Section 3.1.3.2

Page 3-31

Table 3.5

The following underlined corrections are made to the results in Table 3.5:

	NRPF Modeled Impact		Total Concentration		10
	<i>Currently reads:</i>	<i>Should read:</i>	<i>Currently reads:</i>	<i>Should read:</i>	
NO _x (annual)	0.86	<u>1.6</u>	12	<u>13</u>	
CO (1-hour)	766.0	<u>91.0</u>	1,931	<u>1,256</u>	
CO (8-hour)	220.0	<u>68.0</u>	1,385	<u>1,233</u>	
PM ₁₀ (annual)	0.15	<u>0.27</u>	13	<u>13</u>	
PM ₁₀ (24-hour)	12.0	<u>3.0</u>	98	<u>89</u>	

This reflects the draft permit issued by EFSEC dated November 1994.

Section 3.1.3.2Page 3-31

Table 3.6

The following corrections are made to Table 3.6:

	Maximum Impact	
	<i>Currently reads:</i>	<i>Should read:</i>
Benzene	1.7×10^4	<u>3.0×10^4</u>
Formaldehyde	2.0×1^3	<u>3.1×10^2</u>

11

This reflects the draft permit issued by EFSEC dated November 1994.

Section 3.1.3.2Page 3-32, last paragraph, line 8

Currently Reads: In all cases, the modeled changes in the rainwater pH were small relative to the assumed baseline pH, and the overall pH values of the ephemeral and permanent water bodies was within the tolerance level that might indicate adverse effects on amphibians. Therefore, it was concluded that the NRPF would not cause adverse impacts on sensitive animal species in the Class I areas.

Should read: In all cases, the modeled changes in the rainwater pH were small relative to the assumed baseline pH, and the overall pH values of the ephemeral and permanent water bodies were within the tolerance level that might indicate adverse effects on amphibians, except for one amphibian species. In the Spokane Indian Reservation, rainwater pH was predicted to be 5.3 using conservative methodology. The Tiger Salamander was identified as having a potential impact threshold of pH 5.3. Because of the conservative methodology used in the analysis, it was concluded that the NRPF would not cause adverse impacts on sensitive animal species in the Class I areas.

12

Section 3.1.3.2

Page 3-33

Table 3.7

The following underlined corrections are made to the results in Table 3.7:

	Background Loading Rate		Incremental Change		Predicted Impact	
	Currently reads	Should read	Currently reads	Should read	Currently reads	Should read
Alpine Lakes			0.004	<u>0.021</u>		
Glacier Peak			0.002	<u>0.011</u>		
Pasayten			0.017	<u>0.011</u>		
North Cascades			0.002	<u>0.011</u>		
Spokane Indian Reserv'n	2.9	<u>0.8</u>	0.053	<u>0.376</u>	3.0	<u>1.18</u>

13

This reflects the draft permit issued by EFSEC dated November 1994.

Section 3.1.6.2 Impacts (Plants and Animals)

Page 3-58, first paragraph in Wildlife section, lines 5

Should add this sentence to the end of the paragraph: No critical wildlife habitat will be impacted, and all wetlands and wetland setbacks will be avoided.

14

Page 3-58, second paragraph in Wildlife section, lines 1 and 2

Currently reads: Impacts to wildlife are considered significant. This determination is based on the amount of habitat impacted and associated impacts on wildlife by increased light, noise, and increased human activity and increased industrial activities in the area.

Should read: Impacts to wildlife will not be significant. The permanent construction footprint at the NRPF Site is 75 acres, of which 70 acres are now agricultural fields (as noted previous 3-51). These fields are unlikely to provide resident habitat for wildlife species. Wildlife may be impacted by the construction and operation of the NRPF Site, but the mitigation measures addressed in the following sections were designed to sufficiently offset any permanent habitat losses. The loss of 5 acres of three-tip sagebrush/Idaho fescue, while adverse to wildlife, is not considered significant in view of the remaining undisturbed habitat on the site and the mitigation proposed for that acreage.

15

Page 3-59, last line

This sentence refers to a breeding season (March 1 to August 15), but it does not indicate what species the breeding season is for, nor does it explain the relevancy to this section.

16

Limitations on timing are usually reserved for the sensitive periods of Endangered and Threatened species.

Section 3.1.6.3 Mitigating Measures

Page 3-62, first paragraph in NRPF Site section, lines 1, 2, and 3

Currently reads: Vegetation- The loss of three-tip sagebrush/Idaho fescue habitat in eastern Washington should be quantified and the conversion of agricultural land back to this type of habitat should be considered. It may be advisable to have a biologist on-site during initial grading of the NRPF site to identify sensitive species of plants during construction activities. Sensitive plants could be transplanted to a neighboring area with similar characteristics.

17

Should read: Vegetation- To mitigate the loss of the 5 acres of three-tip sagebrush/Idaho fescue and 70 acres of agricultural land to be permanently affected by the project, the applicant proposes to temporarily eliminate grazing on the remaining portion of the rangeland for a period of three to five years to allow re-establishment of the native vegetation. Thereafter, grazing of those areas would be allowed on a managed basis consistent with habitat quality.

Page 3-62, third paragraph in NRPF Site section, lines 1, 2, and 3

Currently reads: Weed control will include, where appropriate, preconstruction treatment and removal, establishment of wash-down stations at the edge of infested areas, and inspection of borrow materials for evidence of weed species. At the washdown stations, high-pressure water will be used to clean construction equipment to minimize the likelihood that weed seeds could be spread from infested to non-infested areas. All borrow material areas will be inspected to ensure they do not harbor noxious weeds.

18

Paragraph should be deleted. Control measures will vary and may include backpack spraying in some areas and other methods not outlined above in other areas. Furthermore, water may be limited, especially during the initial construction phases.

Page 3-62, fifth paragraph in NRPF Site section, lines 1 and 2

Currently reads: It may be advisable to have a biologist on-site during initial grading of the NRPF site to identify sensitive species of wildlife during construction activities. If found, sensitive animal species could be moved to another location.

19

Should delete existing paragraph and replace with: The temporary elimination of grazing, and the management of grazing thereafter, will enhance the site for wildlife, and will offset any minimal losses of habitat functional values associated with the project. The avoidance of wetlands during project construction will also benefit habitat values. Furthermore, the stormwater retention and evaporation ponds will be designed and constructed in a manner that is as "wildlife friendly" as the design parameters for their primary purpose will allow. Such considerations will include shallow shoreline slopes, shallow water along the shoreline, and earthen berms planted with native vegetation.

Section 3.2.1.1 Existing ConditionsPage 3-70, first paragraph under heading Site Conditions; second sentence

20

Appendix G does not contain the latest noise technical report (attached), which was provided to EFSEC as part of the hearings testimony.

Section 3.2.2.1 Existing Conditions (Application of Existing Plans and Ordinances)Page 3-108, paragraph 2, line 9

Currently reads: Finally, the plan proposes that the site continue to be used for agriculture.

21

Delete the sentence. This land is presently zoned agricultural and will remain so if the NRPF is not permitted. However, the plan clearly states that industrial development on land of marginal value for agricultural use is allowed and encouraged. This site is on ground that is considered to have marginal value for agricultural use.

To state that the plan "proposes" agricultural use of the site is incorrect.

Section 3.2.3.2 ImpactsPage 3-119, last paragraph, line 1 and 2:

Currently reads: Only 29 permanent jobs would be created for facility operation, and KVA expects to fill approximately half of these plant jobs with local residents. The increase in local population of 14 operation workers and their families would result in an insignificant increase in demand for recreation facilities in the project vicinity.

22

Should read: Twenty-nine permanent jobs would be created for facility operation, and KVA/CSWE expects to fill these plant jobs with local residents to the degree possible. The increase in population caused by the plant workforce should not be significant.

The Applicant has never agreed that they could provide locals with half of the operation jobs available. However, the Applicant has agreed to hire as many local people as possible.

Section 3.2.3.3 Mitigation MeasuresPage 3-120

Currently reads: A good faith effort will be made to hire approximately half of the permanent workers for the project from the local communities.

23

Should read: A good faith effort will be made to hire permanent workers for the project from the local communities.

See comment for Section 3.2.3.2.

Section 3.2.7.2 Impacts, Law Enforcement

Page 3-165, paragraph 3, line 4

Currently reads: ... by adding one to three additional staff members. If in-migrant travel to work via car pools, there will be an estimated 100 cars used (3 people per car) and require the addition of three patrol officers and one jail/radio operator. If in-migrants travel to the site by bus, one additional Lincoln County police officer will be needed (Berry 1994).

Should read: . . . by adding one to three additional staff members. If in-migrants travel to work via car pools, there will be an estimated 100 cars used (three people per car), which will require the addition of three patrol officers and one jail/radio operator. If in-migrants travel to the site by bus, one additional Lincoln County police officer will be needed (Berry 1994).

24

When Dan Berry, Lincoln County Sheriff, was first contacted he said that one to three police officers may be needed. After further information was provided to him on expected worker population and number of vehicles expected to be on the Lincoln County roads, he seemed to think only one additional police officer would be needed. The rationale provided in the Draft EIS implies that when an additional 100 cars are expected in Lincoln County, three patrol officers would be necessary, or one officer per 33 cars. This seems to be high when comparing the usual ratio of patrol officers to vehicles per day in more highly populated areas.

Section 3.2.7.3 Mitigating Measures

Page 3-168, first paragraph in section, line 4

Currently reads: A population monitoring program would document the number of workers, family members, and secondary employment population that occurs in the local Lincoln County communities.

Should read: A population monitoring program would document the number of workers, number of family members, and locations of construction workers' residences in Lincoln County.

25

Secondary employment is not being monitored because it is insignificant. Primary employment (the NRPF construction workers) will be monitored.

Section 4.2 Global Warming

Page 4-2, paragraph 2, line 2

Currently reads: NRPF may contribute to global warming.

Should read: NRPF may contribute additional CO₂ emissions to the atmosphere.

26

Note: It is the applicant's position that the scientific community is undecided as to whether CO₂ and other greenhouse gases can lead to global warming. The applicant concedes that the NRPF will release CO₂ into the atmosphere. The applicant's consultants have shown and testified that the NRPF

will displace other large CO₂ emitters in the region. Therefore, the NRPF will result in a net reduction of CO₂ production in the Pacific Northwest.

LETTER "N" RESPONSES

N-1 to

N-15 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

N-16 Comment noted.

N-17 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

N-18 Comment noted. Changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

N-19 Comment noted. Changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

N-20 Comment noted. The Final Noise Technical Report will be attached to the Final EIS.

N-21 to

N-26 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

LETTER "O"

KVA Resources and CSW Energy Editorial Suggestions for the NRPF Draft EIS

Fact Sheet

Page i, second paragraph, line 1:

Currently reads: KVA Resources, Inc., and Central and Southwest Energy, Inc. (CSW) propose to construct a . . .

1

Should read: KVA Resources, Inc. (KVA) and Central and South West Energy, Inc. (CSWE) propose to construct a . . .

Both CSWE and CSW Energy, Inc. are correct; CSW, however, refers to the parent company.

Page i, fourth paragraph:

Currently reads: The proponents are KVA Resources, Inc. and CSW Energy, Inc.

2

Should read: The proponents are KVA and CSWE.

Page iv-v, Table 1:

Table 1 is misleading because it ignores ch. 80.50 RCW and lists permits and approvals which are either issued by the EFSEC or which are not required for the NRPF.

3

Page iv, fourth element of Table 1:

Why is the Department of Ecology Engineering and Technical Services broken out separately from the rest of the Department of Ecology?

4

Section 1.1 Background

Page 1-1, first paragraph, lines 5 and 6:

Currently reads: . . . independent power producers: KVA Resources, Inc. and Central and Southwest Energy, Inc. (CSW).

5

Should read: . . . independent power producers: KVA Resources, Inc. (KVA) and Central and South West Energy, Inc. (CSWE).

Section 1.3.1 Proposed Action (Preferred Alternative)

Page 1-4, first paragraph in section, line 8:

Currently reads: . . . resulting in zero surface water discharge.

6

Should read: . . . resulting in zero discharge to surface water.

Page 1-4, second paragraph in section, lines 2-4:

Currently reads: The NRPF will require approximately 55 to 70 gallons per minute (gpm) (3.5 to 4.4 liters per second) for use in boiler makeup, cooling, general process applications, and as a domestic water supply.

7

Should read: . . . approximately 55 to 75 gallons per minute . . .

The NRPF ordinarily needs only 70 gpm for plant operations. The additional 5 gpm is for the domestic water supply needs. This is consistent with the Water Supply Option Agreement approved by the Town of Creston and the Applicant.

Page 1-5:

Figure 1-1 should be replaced with a figure that conveys the most complete wetland and habitat data. Such a figure was produced by CSWE for submittal to EFSEC as part of the post-hearing material.

8

Section 1.4.1.3 Air Quality

Page 1-10, fourth full paragraph, lines 3 and 4:

Currently reads: Air quality impacts of the natural gas pipeline (e.g., compressor stations) have not been assessed for this EIS.

9

Should read: Incremental air quality impacts of the existing natural gas pipeline (e.g., compressor stations) have not been assessed for this EIS. No new compressor stations are required.

Page 1-10, fifth full paragraph, line 6:

Currently reads: . . . construction management measures, such as water spraying and washing vehicle wheels.

10

Should read: . . . construction management measures, such as water spraying, washing vehicle wheels, and reduced speed limits for construction vehicles.

Section 1.4.1.5 Water Quality

Page 1-11, first paragraph in section, line 1:

Currently reads: On-Site Retention Pond

11

Should read: On-Site Ponds

Page 1-11, first paragraph in section, lines 4 and 5:

Currently reads: . . . whether the lined ponds are leaking and whether contaminants from the unlined pond are leaching . . .

12

Should read: . . . whether the lined evaporation ponds are leaking and whether contaminants from the unlined stormwater pond are leaching . . .

Section 1.4.1.6 Plants and Animals

Page 1-13, third paragraph in section, lines 3 and 4:

Currently reads: There could be significant impacts could in tall shrub . . .

13

Should read: There could be significant impacts in tall shrub . . .

Section 1.4.2.2 Land and Shoreline Use

Page 1-17, second paragraph, line 1:

Currently reads: . . . is not considered necessary in given . . .

14

Should read: . . . is not considered necessary given . . .

Section 1.4.2.3 Recreation

Page 1-17, second paragraph in section, lines 2 and 3:

Currently reads: Although BPA is coordinating with the city on tower placement, the project could permanently lessen the park's usefulness, and would lead to a significant impact.

15

Should read: Although BPA is coordinating with the city on tower placement, the project could permanently lessen the park's usefulness, and depending upon the degree of intrusion could lead to a significant impact.

Section 1.4.2.4 Visual and Aesthetic Resources

Page 1-18, second paragraph in section, lines 3 and 4:

Currently reads: . . . facility's night-time security lighting and would directly see the anti-collision lights on the emission stacks.

16

Should read: . . . facility's night-time security lighting.

Because the stacks are less than 200 feet in height, no anti-collision lights are required, per FAA AC 70/7460-1H.

Pages 1-18 and 1-19, last paragraph that begins on 1-18 and continues on 1-19:

Currently reads: Measures designed to mitigate visual impacts of the proposed facility include planting pine tree stands to screen the facility as much as possible, painting the buildings earth-tone colors to blend with the landscape, painting the exhaust stacks a light color to blend with the sky and mountains, and planting deciduous and evergreen trees to blend with the rural aesthetic of the project area.

17

Should read: Measures designed to mitigate visual impacts of the proposed facility include planting native trees to screen the facility and painting the buildings earth-tone colors to blend with the landscape.

Pages 1-18 and 1-19, under Mitigation Measures:

No statement is made about utilizing/paralleling existing ROWs.

18

Section 1.4.2.6 Transportation

Page 1-20, last line:

Currently reads: The impacts will be concentrated on State Route 2 . . .

Should read: The impacts will be concentrated on U.S. Federal Highway 2 . . .

19

Through the entire document, State Route 2 should be changed to U.S. Federal Highway 2.

Section 1.4.2.7 Public Services and Utilities

Page 1-22, third paragraph, line 3:

Currently reads: A good faith effort will be made to hire approximately half of the permanent workers for the project from the local communities. In addition, a good faith effort will be made to hire as many construction workers from the local labor pool. 20

Should read: A good faith effort will be made to hire construction and permanent workers for the project from the local communities.

Section 2.1.2.1 General Plant Description

Page 2-2, first paragraph in section, lines 2 and 3:

Currently reads: . . . consisting of four MS7221FA combustion turbines . . .

Should read: . . . consisting of four General Electric MS7221FA combustion turbines or equivalent. . . 21

Page 2-2, first paragraph in section, lines 5 and 6:

Currently reads: Chilling capability of the inlet air will be provided.

Should read: No inlet air cooling is provided. 22

Section 2.1.2.2 Major Facilities

Page 2-5, Figure 2-2:

Figure 2-2 should be replaced with a figure that conveys the most complete wetland and habitat data. Such a figure was produced by CSWE for submittal to EFSEC as part of the post-hearing material. 23

Section 2.1.2.3 Cycle Design

Page 2-13, last paragraph (continuing on page 2-14):

Currently reads: The generating facility consists of two combined-cycle units, each containing two combustion turbine generators, one steam turbine generator, and two HRSGs. The combustion turbine section is natural-gas-fired. The combustion turbine discharges hot exhaust gases to the HRSG for the production of steam for use in the steam cycle. Steam from each pair of HRSG's is combined and routed to a separate steam turbine generator. Main steam conditions will be 1,400 pounds per square inch, gauge (psig), or 9.7 MegaPascal (Mpa-g) at 1,000°F (538°C), and reheat conditions will be 318 pounds per square inch, absolute (psia), or 2.2 MegaPascal (Mpa-a) and 1,000°F (538°C). In addition, a low-pressure (LP) evaporator will be provided to produce steam at 80 psig (0.5 Mpa-g) and 432°F (222°C) for injection into the LP turbine for additional output. Each HRSG is of triple-pressure design, which includes a separate deaerator. 24

Should read: The generating facility consists of two combined-cycle power blocks, each containing two combustion turbine generators, one steam turbine generator, and two HRSGs. The four (4) combustion turbines are natural-gas-fired. Each combustion turbine discharges hot exhaust gases to an HRSG for the production of steam. Steam from each pair of HRSGs is combined and routed to a steam turbine. Each of the four (4) combustion turbines and two (2) steam turbines rotates a direct coupled electric generator.

Approximate main steam conditions to the steam turbine will be 1,485 pounds per square inch, absolute (psia), or 10.2 MegaPascal (Mpa-a) at 884°F (473°C), and reheat conditions will be 357 pounds per square inch, absolute (psia), or 2.5 MegaPascal (Mpa-a) and 838°F

(448°C). In addition, a low-pressure (LP) evaporator will be provided to produce steam at 80 psia (0.55 Mpa-a) and 487°F (253°C) for injection into the LP turbine for additional output. Each HRSG is of triple-pressure design, which includes a separate deaerator.

These changes reflect the latest modeling results for the air cooled system, and therefore, supersede Site Certificate Application data based on the previous water cooled design. Page

2-14, first full paragraph, lines 6 and 7:

Currently reads: Steam from the LP turbine is exhausted to the surface condenser where it is condensed.

25

Should read: Steam from the LP turbine is exhausted to the air cooled condenser where it is condensed.

Page 2-14, third full paragraph, line 2:

Currently reads: Each turbine will exhaust downward to a surface condenser.

26

Should read: Each turbine will exhaust to an air cooled condenser.

Page 2-15, fourth paragraph, lines 6 and 7:

Currently reads: The HP (about 1,400 psia/1,000°F or 9.7 Mpa-a/538°C), IP (about 320 psia/1,000°F or 2.2 Mpa-a/538°C), and LP (about 70 psia/432°F or 0.5 Mpa-a/222°C) levels are . . .

27

Should read: The HP (about 1,485 psia/884°F or 10.2 Mpa-a/473°C, IP (about 357 psia/838°F or 2.5 Mpa-a/448°C, and LP (about 80 psia/487°F or 0.55 Mpa-a/253°C levels are . . .

These changes reflect the latest modeling results for the air cooled system, and therefore, supersede Site Certificate Application data based on the previous water cooled design.

Section 2.1.2.6 Balance-of-Plant—Mechanical

Page 2-16, first bullet:

Currently reads: Single shell, two-pass, divided water box surface condenser

28

Delete this bullet.

Page 2-16, third bullet:

Currently reads: Three half-capacity circulating water pumps

29

Should read: One air-cooled condenser, with approximately 24 cells

Page 2-16, fifth bullet:

Currently reads: A full-capacity closed-cycle, air-cooled, heat exchange system

30

Should read: A full-capacity closed-cycle, cooling water, heat exchange system

Section 2.1.2.7 Balance-of-Plant—Electrical

Page 2-17, last bullet on page, lines 5-8:

Currently reads: All of the breakers in a ring bus are of sufficient capacity to carry all of the local generation capacity. If there is a fault on any part of the ring, the power may be routed in the opposite direction around the ring. Metering of net output will also be coordinated with BPA.

31

Should read: Either a ring bus or a breaker-and-a-half configuration is anticipated. All of the breakers in the switchyard are of sufficient capacity to carry all of the local generation capacity. If there is a fault on any part of the bus, the power may be routed through another path to the transmission interconnect. Metering of net output will also be coordinated with BPA.

Page 2-18, first bullet:

Currently reads: . . . medium voltage (4-kV) motors . . .

32

Should read: . . . medium voltage motors . . .

Page 2-19, second full paragraph:

Currently reads: The design and installation of the electrical system will be in compliance with the National Electric Code.

33

Should read: The design and installation of the electrical system will be in compliance with the National Electric Code and the National Electric Safety Code.

Section 2.1.2.8 Other Site Improvements

Page 2-20, third paragraph:

Currently reads: A conventional farm fence of woven wire topped with two strands of barbed wire will be constructed around the entire site boundary.

34

Should read: A conventional farm fence with five strands of barbed wire will be constructed around the entire site boundary.

Page 2-20, fourth paragraph, lines 3-5:

The last sentence correctly states: "Fencing heights will be 7 feet (2.1 meters) in all areas except around the switching station, which will be 8 feet (2.4 meters)." *This is an inconsistency carried over from the application. Please do a search for the "8" feet and replace it with a "7" feet as it applies to the enclosure fence except around the switching station. There is inconsistency with the 7 feet height as follows:*

35

Page 2-31, first bullet should read: Installation of a 7-foot-high enclosure fence.

Page 3-39, Stormwater, should read: To prevent any incidental erosion off-site, a 7-foot enclosure fence around . . .

Page 2-21, second full paragraph, line 1:

Currently reads: The stormwater retention pond will . . .

36

Should read: The evaporation pond will . . .

Page 2-22, second set of bullets, bullet 5:

Currently reads: Fuel delivery road

37

Delete bullet

Section 2.1.4 Water Supply System

Page 2-23, only paragraph in section, lines 1-4:

Currently reads: The NRPF project will require approximately 79,200 to 100,800 gallons per day (gpd) (55 to 70 gpm), or 300 cubic meters per day for use in boiler makeup, general process applications, and as a domestic water supply for the facility. The nominal water usage is expected to be in the range of 55 to 70 gpm.

38

Should read: The NRPF project will require approximately 79,200 to 100,800 gallons per day (gpd) (55 to 75 gpm), or 300 cubic meters per day for use in boiler makeup, general process applications, and as a domestic water supply for the facility. The nominal water usage is expected to be in the range of 55 to 75 gpm.

The NRPF ordinarily needs only 70 gpm for plant operations. The additional 5 gpm is for the domestic water supply needs. This is consistent with the Water Supply Option Agreement approved by the Town of Creston and the Applicant.

Section 2.1.5 Wastewater Discharge System

Page 2-23, first paragraph in section, line 3:

Currently reads: . . . resulting in zero water discharge.

39

Should read: . . . resulting in zero process wastewater discharge.

Section 2.1.5.1 Pretreatment System

Page 2-24, only paragraph in section:

Currently reads: In the pretreatment system, lime, coagulant, and coagulant air may be used in a clarifier to reduce suspended solids, silt, turbidity, color, and colloids if required. Chlorination is also added at the clarifier. The product water is then filtered for further solids removal. The filter residue is routed to the evaporation pond.

40

Delete section.

Section 2.1.5.2 Demineralizer System

Page 2-24, only paragraph in section, line 1:

Currently reads: The demineralizer is used to further treat a portion of the filtered water to use as makeup. . .

41

Should read: The demineralizer is used to treat a portion of the water supply to use as makeup. . .

Section 2.1.5.3 Steam Cycle Blowdown

Page 2-29, only paragraph in section, third line:

Currently reads: . . . bottom of the evaporator where particles collect.

42

Should read: . . . bottom of the HRSG drums where particles collect.

Section 2.1.5.5 Pretreatment System Wastewater

Page 2-29, only paragraph in section:

Currently reads: This wastewater is composed of a high concentration of the solids found in the water supply with lime, coagulant, coagulant air, and chlorine from the clarifier.

43

Delete paragraph.

Section 2.1.6 Stormwater Control System

Page 2-30, third paragraph in section, lines 1 and 2:

Currently reads: All storage tanks will have secondary containment with discharge valves kept in the closed position.

44

Should read: All oil storage containers, such as lube oil storage tanks, transformers, etc., will have secondary containment as required by federal and Washington State spill control regulations.

Section 2.1.7.1 Proposed System of Heat Dissipation

Page 2-33, first paragraph in section:

Currently reads: The cooling system that will serve the condensing and cooling needs of the facility has two major components: a steam turbine condenser, and circulating water for cooling major equipment within the facility.

45

Delete the entire paragraph.

Page 2-33, fourth paragraph in section, lines 1 and 2:

Currently reads: The condenser finned tubes or elements are arranged in an A-frame orientation so that the steam passes through the tubes in a counterflow orientation.

Should read: The condenser finned tubes or elements are arranged in the A-frame orientation. The steam passes down through the tubes counterflow to the air and condenses.

46

Section 2.1.9.2 Construction--Craft and Non-Craft Employment

Page 2-44, last sentence on page:

Currently reads: Separate contracts and independent workforces will be used to install offsite gas and water pipeline facilities.

47

Should read: Separate contracts and independent workforces will be used to install offsite gas pipelines and transmission facilities.

Section 2.2 No Action Alternative

Page 2-48, second paragraph, second bullet:

Currently reads: . . . by the Board of Commissioners of Lincoln.

48

Should read: . . . by the Board of Commissioners of Lincoln County.

Section 2.3.1.2 Heat Dissipation System

Page 2-49, last two lines on page:

Currently reads: The “wet” cooling system had three major components: a steam turbine condenser, a cooling tower, and circulating water for cooling major equipment within the facility.

49

Should read: The “wet” cooling system had five major components: a steam turbine, a shell and tube surface condenser, a cooling tower, a circulating water system for cooling major equipment within the facility, and a water makeup pipeline system.

Section 2.3.3 Alternative Energy Resources

Page 2-53, line 1:

Currently reads: An evaluating of all of the primary energy resources. . .

50

Should read: An evaluation of all the primary energy resources . . .

Section 3 Affected Environment, Impacts and Mitigating Measures

Page 3-1, second paragraph, line 1:

Currently reads: Federal and Washington state regulations . . .

Should read: Federal and Washington State regulations . . .

51

Section 3.1.1.1 Existing Conditions

Page 3-2, paragraph 2, lines 2 and 3:

Currently reads: The rocks of the Okanogan Highly are largely . . .

Should read: The rocks of the Okanogan Highlands are largely . . .

52

Page 3-8, third full paragraph:

Several thousand feet of “potentially unstable slopes” are identified. Suggest defining or qualifying “potentially unstable slopes” so that readers are not unnecessarily alarmed. The slopes may be steep, but most are probably quite stable except for surface erosion.

53

Section 3.1.2.1 Existing Conditions

Page 3-15, bottom of page, Winds

The wind rose referred to in this discussion is a wind rose for F stability and light wind speeds (2-3 m/sec). This should not be applied in the manner it is here. It is really only a partial wind rose.

54

Page 3-29, Table 3.3:

For clarification, please add the units (lb/yr) for the Estimated Emissions and the Small Quantity Emission Rate columns.

55

Section 3.1.3.2

Page 3-30, second paragraph

Currently reads: The "PSD increment" is the allowable increase in the ambient concentration above the background values. 56

Should read: The "PSD increment" is the allowable increase in the ambient concentration above the baseline values.

Section 3.1.5.2 ImpactsPage 3-39, first paragraph under "Groundwater," lines 3 and 4:

Currently reads: . . . is expected to provide a recharge function to the groundwater table in the Sinking Creek basin. 57

Should read: . . . is expected to provide a recharge function to the groundwater table.

Section 3.1.5.3 Mitigating MeasuresPage 3-42, last paragraph, line 3:

Currently reads: . . . to detect if the lined pond is leaking and whether or not contaminants from the unlined pond are . . . 58

Should read: . . . to detect whether the lined pond (evaporation) is leaking and whether or not contaminants from the unlined pond (stormwater) are . . .

Section 3.1.6.1 Existing ConditionsPage 3-44, third paragraph, lines 1 and 2:

Currently reads: The habitats were identified during surveys of the project site on 16 and 17 June 1993, 3 and 4 June 1994, and 16 through 19 May 1995. 59

Should read: The habitats were identified during surveys of the project site on 16 and 17 June 1993, 2 and 3 June 1994, and 16 through 19 May 1995.

Page 3-45, third full paragraph, line 5:

Currently reads: . . . long-leaf fleabane (*Erigeron corymbosus*). . . 60

Should read: . . . long-leaf fleabane (*Erigeron corymbosus*) . . .

Page 3-45, third full paragraph, line 8:

Currently reads: . . . *Artemisia tridentata tridentata*. . . 61

Should read: . . . *Artemisia tripartita*. . .

Page 3-45, fourth full paragraph, line 5:

Currently reads: . . . photographs indicated 42 isolated . . . 62

Should read: . . . photographs indicated 43 isolated . . .

Page 3-45, fourth full paragraph, lines 6 and 7:

Currently reads: Most of these wetlands are in the northwest portion of the site. 63

Delete the sentence. They are dispersed through the central portion of the site.

Page 3-45, fourth full paragraph, lines 7-10:

Hardstem bulrush, Olney's bulrush, and alkali cordgrass were listed as dominates on the NRPF site. Please reference source of information. 64

Page 3-49, second full paragraph, line 10:

Currently reads: Great Basin gopher snakes (*Pituophis catenifer*) . . .

Should read: Great Basin gopher snakes (*Pituophis melanoleucus deserticola*) . . . 65

Catenifer is a subspecies of P. melanoleucus that occurs only in western Oregon and California, and is known as the Pacific Gopher Snake.

Page 3-49, third full paragraph, line 6:

Currently reads: . . . and mule deer have been seen at the site.

Should read: . . . and mule deer could potentially use this habitat at the site. 66

CH2M HILL biologists did not report observing great blue heron and greater yellowlegs.

Page 3-49, fourth full paragraph, lines 1 and 2:

Currently reads: Waterfowl, such as mallard (*Anas platyrhynchos*) and cinnamon teal (*Anas cyanoptera*) . . . 67

Should read: Waterfowl, such as mallard (*Anas platyrhynchos*) and green-winged teal (*Anas crecca*) . . .

Only green-winged teal are reported in CH2M HILL reports.

Page 3-50, Table 3.10:

CH2M HILL did not report seeing the following: piute sculpin, golden eagle, great blue heron, osprey, and Swainson's hawk. Reference sources for observations on NRPF Site or delete. 68

Page 3-50, last line on page:

Because the northern sagebrush lizard is listed as a sensitive species, it should not be implied that it occurs at the site, along with the long-tailed vole. 69

Page 3-51, third full paragraph:

Delete the paragraph. These two streams will not be impacted by the NRPF Site and are not discussed elsewhere in the DEIS. 70

Page 3-51, last paragraph, line 4:

Currently reads: . . . as a result of domestic livestock grazing in the 1830s and later for croplands. 71

Should read: . . . as a result of domestic livestock grazing and agricultural practices.

Page 3-54, fifth full paragraph:

Currently reads: Farming and livestock grazing have reduced or degraded the original steppe wildlife community in Washington. Any steppe, especially shrub steppe, that retains native species and supports native wildlife is highly valued.

72

Should read: Farming and livestock grazing have reduced or degraded the original steppe wildlife community in Washington.

Highly valued is a subjective determination that is usually reserved for critical habitats.

Section 3.1.6.2 Impacts

Page 3-57, first paragraph under NRPF Site, sentence 2 and 3:

Currently reads: These acres will be lost as a result of the construction and operation of the proposed power plant and ancillary facilities. Losses will include about 70 acres (28 ha) of agricultural vegetation and 70 acres (28 ha) of tree-tip sagebrush/Idaho fescue habitat.

73

Should read: The footprint of the facilities permanently impacts 75 acres; 70 acres of agricultural lands and 5 acres of three-tip sagebrush/Idaho fescue habitat. The remaining 65 acres will be temporarily disturbed during construction of an underground gas pipeline, an underground water pipeline, and grading for the area used for the collection of stormwater runoff into the stormwater retention pond.

Page 3-58, first paragraph in Wildlife section, lines 5

Should add this sentence to the end of the paragraph: No critical wildlife habitat will be impacted, and all wetlands and wetland setbacks will be avoided.

74

Page 3-58, second paragraph under Wildlife:

Currently reads: Impacts to wildlife are considered significant. This determination is based on the amount of habitat impacted and associated impacts on wildlife by increased light, noise, and increased human activity and increased industrial activities in the area.

Should read: Impacts to wildlife will not be significant. The permanent construction footprint at the NRPF Site is 75 acres, of which 70 acres are now agricultural fields (as noted previous 3-51). These fields are unlikely to provide resident habitat for wildlife species. Wildlife may be impacted by the construction and operation of the NRPF Site, but the mitigation measures addressed in the following sections were designed to sufficiently offset any permanent habitat losses. The loss of 5 acres of three-tip sagebrush/Idaho fescue, while adverse to wildlife, is not considered significant in view of the remaining undisturbed habitat on the site and the mitigation proposed for that acreage.

75

Section 3.2.1.1 Existing Conditions

Page 3-69, second paragraph under Regulatory Overview, last three sentences

The 15, 10, and 1.5 minute exceptions are usually not reduced to a simple 2 dBA increase in the allowable Leq. Instead, the L25, L8.3, and L2.5 can be used directly.

76

Page 3-70, second paragraph under Site Conditions, last two sentences:

Delete last two sentences and replace with: "The measured noise levels shown in Table 3.15 are given in terms of Leq, L25, L8.33, and L2.5. The measured Leqs can be compared directly with the WAC regulations. To compare the measured L25, L8.33, and L2.5 with the WAC regulations, 5 dBA, 10 dBA, and 15 dBA should be added to the WAC limit, as discussed on page 3-69."

77

Page 3-74, sixth paragraph, line 1:

Currently reads: During operation, sludge, a semi-solid, will be produced by the cooling tower.

78

Should read: During operation, sludge, a semi-solid, will be produced by the water treatment system.

Page 3-79, third paragraph, lines 3 and 4:

Currently reads: . . . CSW Energy, Inc. . . .

79

Should read: . . . CSWE . . .

Section 3.2.1.2 Impacts

Page 3-85, first full paragraph, line 7:

Currently reads: . . . 45-dBA to 54-dBA . . .(Table 3.18).

80

Should read: . . . 36 dBA to 38 dBA . . . receivers.

The reference to Table 3.18 should be deleted as shown because it is the wrong reference.

Page 3-85, first full paragraph, lines 9 and 10:

Currently reads: These modeled levels are higher than the nighttime and daytime background levels, and are therefore expected to be audible at the residential receivers.

81

Should read: These modeled levels are higher than the night-time background levels, and may be audible at the residential receivers if startup operations occurred at night.

Page 3-85, first full paragraph, lines 10 and 11:

Currently reads: However, the modeled levels are less than the regulated daytime limits for residential areas.

82

Should read: Delete the sentence.

Page 3-85, first full paragraph, last sentence:

Currently reads: Therefore, the start-up operations would comply with the state noise limits if they were conducted during the day.

83

Should read: Startup operations would comply with the WAC daytime and night-time limits.

Page 3-87, first full paragraph, line 3:

Currently reads: . . .siteand burned as it is used. . .

84

Should read: . . .site and burned as it is used. . .[run-on words]

Section 3.2.1.3 Mitigation Measures

Page 3-91, last paragraph on page, line 3:

Currently reads: . . . CSW Energy, Inc. . . .

Should read: . . . CSWE . .

85

Section 3.2.2.1 Existing Conditions

Page 3-94, first paragraph:

Make certain the project acreage numbers are consistent throughout the document and that they agree with actual acreage impacted. Less than 140 acres will be impacted by the NRPF project. The footprint of the facilities permanently impacts 75 acres; 70 acres of agricultural lands and 5 acres of three-tip sagebrush/Idaho fescue habitat. The remaining 65 acres will be temporarily disturbed during construction of an underground gas pipeline, an underground water pipeline, and grading for the area used for the collection of stormwater runoff into the stormwater retention pond.

86

Page 3-101, last full paragraph on page, lines 2 and 3:

Currently reads: Most agricultural land is used for growing cereal grain (wheat, oats, barley), hay, and rapeseed.

Should read: Most agricultural land is used for growing cereal grain (wheat, oats, barley),

87

Section 3.2.3.1 Existing Conditions

Page 3-115, second paragraph in section, lines 4 and 5:

Currently reads: Three new golf courses have been proposed in the northern Davenport area at Deer Meadows, Seven Bays, and Mill Canyon.

Should read: Two new golf courses have been proposed in the northern Davenport area at Seven Bays and Mill Canyon, and another one has recently opened to the public at Deer Meadows.

88

Section 3.2.3.2 Impacts

Page 3-119, last paragraph, lines 1 and 2:

Currently reads: Only 29 permanent jobs would be created for facility operation, and KVA expects to fill approximately half of these plant jobs with local residents. The increase in local population of 14 operation workers and their families would result in an insignificant increase in demand for recreation facilities in the project vicinity.

Should read: Twenty-nine permanent jobs would be created for facility operation, and KVA/CSWE expects to fill these plant jobs with local residents to the degree possible. The increase in population caused by the plant workforce should not be significant.

89

The Applicant has never agreed that it could provide locals with half of the operation jobs available. However, the Applicant has agreed to hire as many local people as possible.

Section 3.2.4.2 Impacts

Page 3-131, Figure 3-16B:

The figure has not been updated to show the new dry cooling system. The view is so distant that the changes to the project will not change the simulation to a great degree and the project impacts will not change.

90

Page 3-135, second paragraph, lines 1-3:

Currently reads: Lighting would consist of small, high-intensity lights to illuminate exterior portions of on-site buildings and anti-collision lights on the four 125-foot emission stacks.

Should read: Lighting will consist of small, high-intensity lights to illuminate exterior portions of on-site buildings.

91

Because the stacks are less than 200 feet high, they do not need to be illuminated for FAA requirements.

Page 3-135, third paragraph, lines 4 and 5:

Currently reads: . . . night-time security lighting and would directly see the anti-collision lights on the emission stacks.

Should read: . . . night-time security lighting.

92

Section 3.2.5.1 Existing Conditions

Page 3-138, first full paragraph:

Currently reads: Dr. Rob Whitlam, state archaeologist with the Office of Archaeology and Historic Preservation, notes that the 1980 study probably needs to be redone in order to meet contemporary professional standards (Whitlam 1994).

93

Should read: Dr. Rob Whitlam, state archaeologist with the Office of Archaeology and Historic Preservation, notes that the 1980 study probably needs to be redone in order to meet contemporary professional standards (Whitlam 1994). Hence, the NRPF project area, although partially surveyed by Morgan et al. (1980), was surveyed again by Larson et al. (1995).

Page 3-138, second full paragraph, lines 6 and 7:

Currently reads: A strip along the eastern margin of the New Study Area was not surveyed, hence the abrupt straight boundary for site 45LI138.

94

Should read: A strip along the eastern margin of the New Study Area was not surveyed.

Page 3-139, first full paragraph, lines 5-7:

Currently reads: None of these appears to be eligible for inclusion in the State or National Registers of Historic Places, although Requests for Determination of Eligibility have not been sought from the SHPO.

95

Should read: None of these appears to be eligible for inclusion in the State or National Registers of Historic Places.

Page 3-139, third full paragraph, lines 5-7:

Currently reads: Although no formal determination has been made, site 45LI138 is considered potentially eligible for inclusion in the NRHP. For purposes of the project, 45LI138 will be assumed eligible.

96

Should read: Site 45LI138 is considered potentially eligible for inclusion in the NRHP.

Pages 3-142 and 3-143, first paragraph under Traditional Cultural Properties:

Currently reads: Although consultation with the Spokane[e] and Colville Confederated Tribes has been initiated, the level of consultation required to identify and document traditional cultural properties has not been completed. Standards for such studies are presented in NRHP Bulletin No. 38, *Guidelines for Evaluating and Documenting Traditional Cultural Properties* (Parker and King 1990).

97

Should read: No traditional cultural properties potentially eligible for listing on the National Register of Historic Places were identified in the NRPF project area through consultation with the Spokane Tribe and Colville Confederated Tribes. Adeline Fredine, however, indicated that the NRPF project area was historically a plant-gathering area, as was most of the Creston vicinity. Review of traditional cultural properties for the gas pipeline corridor has not been undertaken with the Tribes.

Section 3.2.5.2 Impacts

Page 3-144, third full paragraph, lines 3 and 4:

The paragraph states that there will be a high probability of impact to the sites. It does not state what type of impact, significant and adverse, etc.

98

Page 3-145, paragraph under Traditional Cultural Properties:

Currently reads: The necessary studies to identify traditional cultural properties have not been completed. The nature of traditional cultural properties that reasonably may be anticipated in the project areas varies . . . Unless appropriately identified so that mitigative options can be determined, any such properties present will be impacted by the project.

Should read: No impacts to traditional cultural properties eligible for inclusion on the National Register of Historic Places in the NRPF project area would occur. The necessary studies to identify traditional cultural properties in the transmission and gas pipeline corridors have not been completed. The nature of traditional cultural properties that reasonably may be anticipated in the project areas varies. . . Unless appropriately identified so that mitigative options can be determined, any such properties present will be impacted by the transmission and gas pipeline corridor projects.

99

Section 3.2.5.3 Mitigation Measures

Page 3-145, last paragraph:

Add to the end of the paragraph: Other cultural resources mitigation measures that may apply to the NRPF Site are listed as stipulations required by the Colville Confederated Tribes and the Spokane Tribe.

100

Page 3-146, first paragraph, line 6:

Currently reads: . . . and the President's Advisory . . . 101

Should read: . . . and the Advisory . . .

Page 3-146, second paragraph, line 10:

Currently reads: . . . and the President's Advisory . . .

Should read: . . . and the Advisory . . . 102

Page 3-146, third paragraph, lines 2-4:

Currently reads: However consultation with affected tribes has been initiated, and the Colville Confederated Tribes and the Spokane Tribe have identified cultural resources decisions that require their participation. 103

Should read: Consultation with the Spokane and Colville Confederated Tribes has resulted in a set of stipulations that is agreeable to both Tribes.

Section 3.2.6.1 Existing Conditions

Page 3-148, second paragraph, lines 4 and 5:

Currently reads: The posted speed limit is 55 mph (86 kmh), reducing to 35 mph (56 kmh) in Davenport and Reardon. 104

Should read: The posted speed limit is 55 mph (86 kmh), reducing to 30 mph (56 kmh) in Davenport and Reardon.

Page 3-148, third paragraph, lines 1 and 2:

Currently reads: . . . which connects the town of Lincoln, . . .

Should read: . . . which connects the community of Lincoln, . . . 105

Lincoln is not incorporated.

Section 3.2.6.2 Impacts

Page 3-153, fourth paragraph, lines 1 and 2:

Currently reads: Materials would be delivered to, and workers would arrive at, the site using State Route 2 and either Lincoln Road or Creston Butte Road, depending on which site is selected. 106

Should read: Materials would be delivered to, and workers would arrive at, the site using U.S. Federal Highway 2 and Lincoln Road.

Page 3-154, last paragraph, lines 1 and 2:

Currently reads: These shipments will include the combustion turbines, condensers, steam turbines, and generators. 107

Should read: These shipments will include the combustion turbines, condensers, steam turbines, generators, and HRSGs.

Section 3.2.6.3 Mitigating Measures

Page 3-158, first bullet:

Currently reads: The applicant will fund the upgrading of Lincoln Road or Creston Butte Road (depending on alternative chosen) from its intersection with State Route 2 to the main facility entrance in order to support construction vehicle weights. 108

Should read: The applicant will fund the upgrading of Lincoln Road from its intersection with U.S. Federal Highway 2 to the main facility entrance in order to support construction vehicle weights.

Section 3.2.8.2 ImpactsPage 3-176, first (partial) and third paragraphs:

Again, there is reference to one-half of the plant jobs (50 percent of the workers) being filled by locals. See comment for page 3-119. 109

Section 3.2.8.3 Mitigation MeasuresPage 3-187, Population and Housing paragraphs:

Again, there is reference to one-half of the plant jobs being filled by locals. See comment for page 3-119. 110

Section 4.2 Global WarmingPage 4-2, first full paragraph, lines 2-4:

Currently reads: Its contribution would be noticeable, but not significant, in comparison to emissions of greenhouse gases from other sources in Washington State and the rest of the world. 111

Should read: Its contribution would not be significant, in comparison to the emissions of greenhouse gases from other sources in Washington State as well as globally.

Section 6.2.1 Notice of Intent and MailingsPage 6-2, last paragraph, line 5:

Currently reads: . . . due to the agency by May 27, and provided contacts for further information. 112

Should read: . . . due to the Agency by May 27, 1994, and provided contacts for further information.

Section 6.2.2 Scoping MeetingsPage 6-3, three bullets:

Please include the year for the dates listed for the open houses. 113

Section 6.4 EFSEC Adjudicative HearingsPage 6-6, second paragraph, line 5:

Currently reads: . . . granted intervenor states. 114

Should read: . . . granted intervenor status.

Section 9 Glossary and Acronyms

Page 9-2, definition of CSW (should be CSWE):

Currently reads: Central & Southwest Energy, Inc.

115

Should read: Central and South West Energy, Inc.

Section 10 Distribution List

Page 10-1, Applicant:

CSWE is not listed as an applicant; is this an omission?

116

Page 10-2, lines 1 and 4:

There are question marks after USDI Bureau of Indian Affairs and USDA Forest Service. They should be deleted.

117

Appendix C Facility Site Alternatives

Page 9.2-3, fourth paragraph:

References to the water pipeline route should be deleted. Neither the Sinking Creek nor the NRPF site would require the water pipeline linking the site with a wellfield adjacent to the Columbia River, although Sinking Creek would require a transmission corridor linking that site with the BPA transmission line to the north; that transmission corridor could also be used to extend the proposed water pipeline from the City of Creston south from the NRPF site to the Sinking Creek site.

118

Page 9.2-10, last paragraph:

This section needs to be revised to delete references to a wellfield adjacent to the Columbia River and water pipeline from there to either the NRPF site or the Sinking Creek site. Both sites would use water from the City of Creston; the Sinking Creek site would require an extension of the pipeline that will run from the City of Creston to the NRPF site south from there to the Sinking Creek site.

119

Page 9.2-11, first and second paragraphs:

References to losses of 380 acres should be deleted and replaced with 140 acres, which is the total area that will be disturbed temporarily; only 75 acres will be disturbed permanently.

120

Page 9.2-19, fifth and sixth paragraphs:

Should reference 140 acres, not 380; a total of 70 nonirrigated agricultural acres and 5 acres of three-tip sagebrush/Idaho fescue would be permanently converted.

121

Page 9.2-29, last paragraph, first sentence:

Again, delete references to the water supply wellfield.

122

Page 9.2-30, second bullet:

Delete the second bullet, which references the wellfield and water pipeline.

123

Page 9.2-31, Figure 9.2-8:

In the row "Impacts on Land Use," in the NRPF column:

Currently reads: Conversion of 192 acres of nonirrigated agricultural land and 188 acres of grazed land to a nonagricultural, industrial land use.

124

Should read: Conversion of 70 acres of nonirrigated agricultural land and 5 acres of grazed three-tip sagebrush/Idaho fescue to industrial land use.

LETTER "O" RESPONSES

- O-1 Comment noted. Both CSWE and CSW Energy, Inc. are correct; CSW however, refers to the parent company. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-2 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-3 This is a joint State Environmental Policy Act/National Environmental Policy Act document that identifies the permits and approvals for all phases of the project, i.e, the facility, gas pipeline, electric transmission lines.
- O-4 Comment noted. The reference to "Engineering and Technical Services" in Table 1 has been deleted.
- O-5 and
- O-6 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-7 Comment noted. The applicant states that the NRPF ordinarily needs only 7- gpm for plant operations. The additional 5 pgn is for the domestic water supply needs. This is consistent with the Water Supply Option Agreement approved by the Town of Creston and the applicant.
- O-8 Comment noted.
- O-9 to
- O-17 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-18 Comment noted. Please refer to section 1.3.1 Proposed Action (Preferred Alternative).
- O-19 to
- O-22 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-23 Comment noted.
- O-24 to
- O-34 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-35 Comment noted. The inconsistency relating to the height of the fencing will be corrected to ensure that reference to the height of the fencing, excluding that around the switching station, will be 7 feet. Reference to the height of the fencing around the switching station will be 8 feet. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

O-36 to

O-52 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

O-53 Comment noted. See General Response No. 1.

O-54 Comment noted. The wind rose used does not show annual average wind speed and direction characteristics. However, this did not affect the impact analysis.

O-55 Comment noted. The units "lb/yr" have been added to the Estimated Emissions and Small Quantity Emission Rate columns in Table 3.3.

O-56 to

O-63 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

O-64 Comment noted.

O-65 to

O-67 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

O-68 Comment noted. Reference to piute sculpin, golden eagle, great blue heron, osprey, and Swainson's hawk has been deleted. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

O-69 Comment noted. Reference to listed species has been deleted from the last sentence on p. 3-50 and the first sentence on p. 3-51. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

O-70 to

O-75 Comment noted. Changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

O-76 Comment noted. See response to O-77

O-77 Comment noted. The last two sentences have been deleted and replaced with the text shown in Chapter 2 (Corrections and Modifications to the DEIS) of this document.

O-78 to

O-85 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

O-86 Comment noted. The acreages throughout the document should be consistent. The following explanation of acreages will be used as a reference to the acreages throughout the document. "Less than 140 acres will be impacted by the NRPF project. The footprint of the facilities permanently impacts 75 acres: 75 acres of agricultural lands and 5 acres of three-tip sagebrush/Idaho fescue habitat. The remaining 65 acres will be temporarily disturbed during construction of an underground gas pipeline, an underground water pipeline, and grading for the area used for collection of stormwater runoff into the stormwater retention pond.

- O-87 Comment noted. However, suggested changes were not made to the text.
- O-88 to
- O-89 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-90 Comment noted.
- O-91 to
- O-97 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-98 Comment noted. Changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-99 to
- O-115 Comment noted. Suggested changes have been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-116 Comment noted. CSWE should be listed as an applicant. This change has been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-117 Comment noted. The question marks should be deleted. This change has been made to the text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- O-118 to
- O-124 Comment noted. However, this appendix was written prior to the decision to change the design of the power plant from water-cooled to air-cooled, and was included to demonstrate the facility site alternatives process.

LETTER "P"

RECEIVED

NOV 15 1995

ENERGY FACILITY SITE EVALUATION COUNCIL

Mr. and Mrs. Blake Angstrom
P.O. Box 67
Creston, Wa, 99117
November 14, 1995

EFSEC

Re: KVA Siting Stipulations

Ladies and Gentlemen,

There are several issues related to the proposed plant site, which I currently lease from Washington Water Power, that I have considered for sometime. I am concerned that these issues are not being addressed with common sense and good judgment with the true benefits to mankind as the ultimate goal, that they are in fact the decisions based on nonproductive idealistic views of a few.

Carol and I have supported the energy project at Creston from the time of its inception.

KVA has proposed a project that will benefit themselves, as a private industry should. However, the benefits to our fellowman are also of great value. Power will be produced for millions of people and business. The economy of Lincoln County and the Creston area will be greatly enhanced. The benefits of this project fall within the parameters set forth by society.

It is a shame some groups such as the Department of Fish and Game and the Indian Tribal Council have the power to cost such a project untold dollars in added nonsense such as removal of cattle, building bat houses, planting non-native species of plants and the fencing of a shale rock grave site 500' in all directions. Costs such as these would be brought to bare by the future rate payers, or possibly stop the project.

There are also other costs that have not been addressed which are related to cattle removal, bat houses, and shale rock grave protection.. These are personal. You see, my wife and I make a living off of the ground where the proposed energy plant is to be built. We produce a product which returns dollars to us and our community. We produce beef.

On the acres of the property, we produce over 37,536 pounds of beef annually. With the per capita consumption of over 62 pounds, we feed 605 people annually. The value of the products to us alone from those acres is over \$50,000.00 annually. In 20 years, we feed 12,100 people, and produce an income of \$1,000,000.00.

We personally will lose our livelihood as the loss of this acreage will not allow us to maintain the integrity of our farm.

Allowing the siting without these stipulations allows for a win win situation. KVA produces power and much needed revenue; we maintain the ground and the livelihood that has been there for the past 100 years.

Thank you for your consideration in these matters.

Sincerely,

A handwritten signature in cursive script that reads "Blake D. Angstrom". The signature is written in black ink and is positioned to the right of the typed name.

Blake Angstrom

LETTER "P" RESPONSES

- P-1 Comment noted. According to the Washington State Environmental Policy Act, the environmental impact statement must identify impacts and mitigation measures and these are discussed under several headings relevant to the commenter's concerns. Please refer to Section 3.2.2, Land and Shoreline Use, 3.2.5 Historic and Cultural Resources, and Section 3.2.8, Socioeconomics, for a detailed discussion of these issues.

LETTER "Q"

11.05.15/95

pg 1/ To The Energy Facility Site Evaluation Council:

I am sure there will be dissatisfied people in this area you can count me in: should the gas-generating plant (KVA) be located so close to the town of Creston, esp; when the plant is in full operation 24 hours a day, year after year of continuous "humming" noises and emitting toxic particles into the air, over our agricultural areas - the food source which does benefit everyone in 'human-energy' on a daily basis.

By toxic particulates the plant could emit, includes formaldehyde and benzene along with sulfur dioxide, carbon monoxide, ammonia and nitrogen oxides.

As for the Site Characteristics (pg. 6 paragraph 8, on line 21-22-23, in the matter of application NO 93-2) it was listed quote: "that the site is not near any populated areas with major air pollution problems" - does this mean just because you and many other people who does NOT live here, and ~~probably~~ probably never will, entitles you (KVA & affiliates) the right to create a pollution problem for those of us who have to live here and raise our families?

Creston has always been proud of its clean environment, air quality and open spaces for the last 5 generations, and have worked hard to maintain a safe environment for future generations.

882/ Thus, insuring a stable production in ^{our} the
Agriculture industry and its lands (this Easter
gardens).

As a reminder: Human-energy should come
first, above all else, in accomplishing any other
tasks and progress, in making our country (U.S.)
strong in its resources, with a healthy society.

If the United States would quit admitting
people by the thousands, each year, into this
country to use-up our resources faster than
Nature can replenish it, we wouldn't need so
much more power, industries, schools, roads
transmission lines, housing, etc.; and jeopardizing
~~those~~ non-renewable resources that are here, today.

We feel it's Time Federal Gov. puts tighter restrictions
on the population growth within our boundaries,
as seen in Canada & other nations - before the
U.S. could be in same situation as Tibet (where
99% of their food/resources depend on imports from
other countries)

A "weak" country can never be a free-country
very long.

In conclusion: We request that EFSEC
gives a wise and thoughtful consideration
towards Agriculture lands and its uses, and
the Free Enterprise system who "backs" a
Conservative America and its people.

Sincerely
Mr. and Mrs. M.F. Brown + Son
(Marvin + Leon)

LETTER "Q" RESPONSES

- Q-1 Comments noted. Please refer to the Air Quality section (3.1.3 on page 3-25) of the draft environmental impact statement for a discussion of air quality impacts and regulations. The project is required to comply with the air quality regulations established by the federal government (U.S. Environmental Protection Agency, the state of Washington, and by local air pollution authorities.

LETTER "R"

Pangaea International



Wilbur, Washington 99185-0168 U.S.A.

Tel: 509 647 2152 Fax: 509 647 2511 Internet: PangaeaInt@aol.com

RECEIVED

NOV 21 1995

November 16, 1995

ENERGY FACILITY SITE
EVALUATION COUNCIL

Energy Facility Site Evaluation Council
PO Box 43172
Olympia, Washington 98504-3172

Attn. Mr. Jason Zeller, EFSEC Manager

re: KVA/CSW Draft EIS Comments

Dear Jason,

After reviewing the Draft Environmental Impact Statement for the KVA/CSW project in Creston, Washington, I would like to bring to light some areas which need to be addressed in the Final EIS.

Section 1.4.2.1 Environmental Health and Public Safety

During construction phases, road closures and traffic can become troublesome, especially during harvest times when local traffic can be heavy. Prior notice and minimal detours can alleviate most difficulties.

1

Heavy equipment to be installed in the facility may be railed as close to the site as possible. A rail head located directly south of the site (as opposed to one located in the town of Creston) would be beneficial in that Highway 2 would only have to be crossed and not traveled along. The roads from the rail head to the site would naturally need to be re-enforced by KVA/CSW.

2

Section 2.1.8.1 Transmission Facilities

A proposed compensation station would be built on BPA's existing Grand Coulee-Hanford 500kV line. A small building would be included with this station. It would be preferable to have a permanent building instead of prefab. trailer type. The trailers tend to look bad and weather worse after a while.

3

Section 3.1.1.1 Earth Existing Conditions

Flow thickness of the basalt layers and loess soil need to be better defined for the site as well as the rest of the Columbia Plateau. The local hydrology would also be of importance to include in the FEIS.

4

The earthquake of Dec. 14, 1872 represents a seismicity concern for the facility which were not properly addressed in the DEIS. With intensities of VI for Walla Walla, VII-VIII for Wenatchee, and VI for Whitestone, this can present operating and construction concerns for the facility which need to be addressed. Even with "moderate earthquake damage likely", this can represent significant concerns for the facility as well as the pipeline.

5

Section 3.2.1.1 Noise

LETTER "R" RESPONSES

- R-1 Comment noted. The mitigation measures outlined in the EIS have been carefully considered to compensate for increased traffic problems during construction. Please see Section 3.2.6.3 in the document.
- R-2 Comment noted. A railhead is not part of this project and is therefore outside the scope of this EIS.
- R-3 After comparing the economics of a permanent structure vs. a pre-fab structure and the fact that the structure would be unmanned in a rural area, bpa decided to build a pre-fab structure.
- R-4 Comment noted. The geology has been defined to an adequate level for the purposes of this EIS. Please see Section 3.1.1.1, Existing Conditions, 3.1.1.2, Impacts, and 3.1.1.3, Mitigation Measures.
- R-5 Comment noted. The seismicity has been defined to an adequate level for the purposes of this EIS. As noted in the mitigation section (Section 3.1.1.3), further studies would be completed on the NRPF site once the application has been approved. Please refer to Section 3.1.1.1, Existing Conditions, and 3.1.1.3, Mitigating Measures, first paragraph.
- R-6 Comment noted. Pine tree plantings would be incorporated into the site design to act as an effective partial screen for the project.
- R-7 Comment noted. However, Figure 3-8 is only intended to show that the primary landuses in the project area are agriculture and rangeland. No changes to Figure 3-8 were made.
- R-8 Comment noted. Figure 3-9 has been revised. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- R-9 BPA not building the line to Bell Substation in Spokane has little implication for this project. There is no need to build a line to Bell Substation. The new plant needs to be integrated into the transmission system. Since the load centers that may be served by the plant are to the west and south, the power will not need to flow east toward Spokane. A line to Grand Coulee allows the power to flow in the direction of greatest need.
- R-10 Comment noted. The form of referencing material within an EIS is not described by SEPA or NEPA. The EIS contains references where appropriate and these are provided in Section 8, References, in a usual and acceptable manner.

LETTER "S"

Page 1

Dec 1st 1995

RECEIVED

Jack Tenter
Rt. 1 Box 716
Davenport, Wa.
99122

DEC 4 1995

ENVIRONMENTAL QUALITY SITE

ENVIRONMENTAL COUNCIL

Mr. Jason Zeller
EFSEC Manager
PO Box 43172
Olympia, Wa. 98504-3172

RE: Written testimony concerning ~~NRPE/DIES~~ Creston Site
Lincoln Co. Wa.

Dear Mr. Zeller

To begin with, it has been very difficult for me as a layman to thoroughly digest the DIES and (I suspect with purpose). Please take that into consideration while reviewing this testimony.

I would begin by talking about environmental impact to people rather than plants and animals.

I live approximately 8 mi. directly down wind from the Creston Site at 7 Bays on Roosevelt Lake. The Areas of 7 Bays, Deer Meadows, Lincoln, Ft. Spokane, and Miles are without a doubt the fastest growing areas not only on the lake, but within Lincoln County. With 5 Major housing developments (100 to 500 Lots each), 3 boat launch ramps, 3 golf courses (2 proposed and 1 completed), a National Park Campground and a Casino all within less than 12 mi. of the Creston Site. 1

We of eastern Washington are all aware of the air pollution problems caused by the inversions in Spokane. Living here I can tell you that this river valley has the same problems.

Because this area is obviously a fast growing, high use area and suffers from air pollution inversions, I find it amazing that the DIES has failed to take it into consideration.

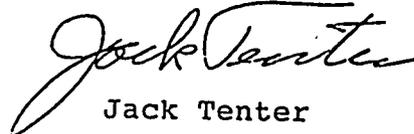
Exhaustive testimony was given by the permit applicant concerning possible air pollution impact to National Parks and Wilderness Areas 125 Mi. upwind of Creston But no mention was made of a densely populated , low lying area within 6 Mi. directly down wind of the site.

I do not believe that data from 13, 16, and 18 year old air monitoring is sufficient to draw the DIES assumed conclusions concerning baseline ambient air quality.

The TSP monitoring in Davenport ending during 1977 did not meet Washington State standards. From my personal experience I can testify that (at least visually) the air quality has deteriorated within this area during the last 18 years.

I would suggest that due to the conditions outlined above, a current and comprehensive baseline study should be completed in site downwind areas as a condition of permit approval.

Thank You

A handwritten signature in cursive script that reads "Jack Tenter". The signature is written in black ink and is positioned above the printed name.

Jack Tenter

LETTER "S" RESPONSES

- S-1 Comments noted. The air quality analysis showed that ambient air quality standards will be met at all locations, including areas six to eight miles downwind of the project site. The ambient air quality standards have been set at levels which are health-protective. The air quality assessment identified the peak impacts at any location and determined that they would fall within the health-protective standards. Therefore, all locations not at the point of peak impact would also meet the standards, even though these specific areas were not mentioned in the text.

LETTER "T"

To: EFSEC
From: Patti Lowe, Executive Director, Greenhouse Action
Re: Northwest Regional Power Facility DEIS
Date: December 11, 1995

The DEIS states that the NRPF's contribution of greenhouse gases "would be noticeable, but not significant, in comparison to emissions of greenhouse gases from other sources in Washington State and the rest of the world."

While the facility's 3 million tons would make up about 1.7% of total Washington Carbon dioxide emissions in 2010, the plant's proportion of the projected increase in Washington state emissions would be about 8%. This is very significant in view of the Framework Convention on Climate Change signed by over 160 nations which calls on industrialized countries to reduce emissions of greenhouse gases to 1990 levels by the year 2000. U.S. emissions are currently increasing, and WSEO projects Washington state emissions to increase about 40%. The U. S. is the leading emitter of greenhouse gases and our commitment to averting rapid climate change, or lack of it, will have a powerful influence on the actions of other countries.

The International Panel on Climate Change which consists of over 2500 scientists from around the world, has just reported that they are now confident human activity is contributing to global warming. Therefore, the phrase in section 4 -2 "If this hypothesis is correct..." should be removed.

KVA has not started a plan to offset those 3 million tons of greenhouse gas emissions. Without such a plan, this facility should not be approved.

RECEIVED

DEC 11 1995

ENERGY FACILITY SITE
EVALUATION COUNCIL

LETTER "T" RESPONSES

- T-1 The impacts of the NRPF relative to global carbon dioxide (CO₂) have been greatly overstated in the DEIS, which addresses gross rather than net emissions. An extremely detailed analysis of the future net CO₂ emissions associated with generation of electricity in the Western United States indicates that the operation of the NRPF is expected to result in an overall decrease in emissions ("Northwest Regional Power Facility Dispatch and CO₂ Emission Analysis." Henwood Energy Services, Inc., Sacramento, CA, September 28, 1995). This report concludes that the NRPF will displace 7100 GWh of generation in the Western System Coordinating Council (WSCC) region, resulting in a total net CO₂ emission *reduction* of 2.8 million tons in 1999.



LETTER "U"

CENTER FOR ENVIRONMENTAL LAW & POLICY

1100 N.E. Campus Parkway
Seattle, WA 98105

Ralph W. Johnson, Chair

Rachael Paschal, Director

RECEIVED

18 December 1995

DEC 18 1995

Allen Fiksdal
EFSEC Project Manager
P.O. Box 43172
Olympia, WA 98504-3172

ENERGY FACILITY SITE
EVALUATION COUNCIL

BY FAX to: 360/956-2158
3 pages total

Re: Northwest Regional Power Facility
Draft Environmental Impact Statement

Dear Mr. Fiksdal:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement, DOE/EIS-0214, dated October 1995 (DEIS) discussing the Northwest Regional Power Facility project (NRPF) proposed for construction near Creston, Washington. This letter is directed toward the subject of water supply for the project and the impacts of predicted water use on resources in the Columbia Basin.

Water Quantity

Water supply for the NRPF project is proposed to be delivered from the Town of Creston, pursuant to its municipal water rights, including its Water Right Certificate No. G3-26677, with a priority date of September 25, 1980. At the time this water right issued, the Department of Ecology determined that the application was exempt from the provisions of the State Environmental Policy Act, RCW 43.21C, and no environmental assessment or analysis of the impacts of the water right was conducted at that time.

The Creston municipal water rights, on paper, are for quantities significantly in excess of the amounts actually used by the town. It is clear that the water to be supplied to the NRPF project by Creston represents "new water," that is, water that is going to be pumped and delivered in addition to the amounts currently in use.

At the time that the application for Water Right No. G3-26677 was under consideration, Creston obtained a hydrogeologic investigation of the proposed well. That report did not conclusively identify the discharge point or area for the aquifer proposed as a source of supply for this water right. The report noted that "it is possible that either aquifer may

'pinch-out' in the Creston area . . . or that groundwater is depleted by discharge into the Columbia River gorge." (Converse Ward Davis Dixon, Inc., Seattle, WA, Report No. 80-5223-01, dated 10/27/80).

The DEIS does not specifically discuss the subject of natural discharge of the ground water intended to supply the project. In the section on water supply it is assumed that, because the Town of Creston possesses water rights adequate to supply the NRPF, no further impacts need be considered (DEIS, p. 3-36). Given that the supply for the NRPF represents water that has not heretofore been pumped or applied to use, there will be impacts associated with the use of this source of supply. Those impacts should be discussed as a part of the EIS process.

Analysis of these impacts is important. Washington recently imposed and extended a moratorium on the issuance of new water rights within the Columbia Basin out of concern for the relationship between surface water flows in the Columbia River and the health of various fish stocks, especially salmonid species that have been listed or proposed for listing pursuant to the Endangered Species Act. This moratorium applies both to surface water diversions and to groundwater pumping that is in "direct hydraulic continuity" with the main stem of the Columbia River. WAC 173-563-015 (as amended 1/3/95). The DEIS discussion of impacts to fish and wildlife does not address this issue.

The Columbia Basin moratorium was not in effect at the time the Creston water rights were issued, but does illustrate the drastic problems associated with water supply in Creston's region. The moratorium may apply to water right applications that involve changes to or enlargement of existing water rights. This topic is not discussed in the DEIS.

Place of Use

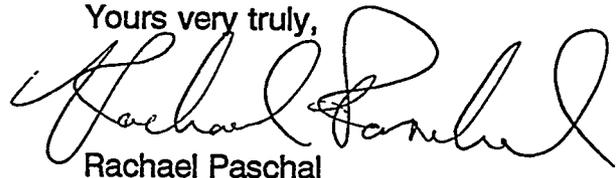
The DEIS asserts that municipalities may provide water service outside their city boundaries for a distance of 10 miles (DEIS, p. 3-36). This assertion is in conflict with the rule that water rights are appurtenant to the place of use as defined in the water right certificate. In this case the place of use is the area served by the Town of Creston in 1980. The Report of Examination for Water Right Certificate G3-26677 discusses future increase in population within the Town of Creston associated with construction and operation of a previous proposal for the "Creston Generating Station," but does not discuss the possibility of supplying water to the power facility. Extension of water supply outside the Creston service area may involve a change in place of use that would require a change in the municipal water right. This topic is not addressed in the DEIS.

Conclusion

The DEIS relies upon the prior issuance of a water right as a basis for not assessing the impacts of increased water withdrawals on the resources of the Columbia River basin. Because of the potential effect of water use by the NRPF on critical fishery resources, it is both appropriate and necessary to give full consideration to water supply as a potential adverse impact of the project.

Thank you for the opportunity to comment. If I can provide additional information, please feel free to contact me at the numbers shown above. Please add my name to the mailing list and keep me informed of any decisions you make regarding this project.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Rachael Paschal". The signature is written in black ink and is positioned above the printed name.

Rachael Paschal

LETTER "U" RESPONSES

- U-1 The entirety of the ground water aquifer supplying the Town of Creston's water supply has not been mapped recently to our knowledge. Consequently, the natural discharge of the aquifer is not known.
- U-2 It is not clear what is meant by "new water" and the phrase "...heretofore been pumped or applied to use.." The amount of water pumped and used by the Town of Creston varies annually and by season depending on the population and such factors as rainfall and temperature. In the past, the amount of water pumped has been substantially more than is currently being used. In 1979 the Town of Creston pumped an average of 120,000 gallons per day (gpd) to supply water service to 320 residences. Creston now supplies only about 240 residences. In 1993 Creston pumped 26,400,000 gallons (approximately 72,300 gallons per day). The NRPF's normal operating water requirements of 79,200 gpd to 100,800 gpd will increase the pumping amounts only slightly over the historically indicated amounts. These amounts are still substantially less than the amount of water rights certificates and claims held by the Town of Creston.
- The Town of Creston is currently preparing a Capital Facilities Plan. Part of this plan will contain a study by Varela & Associates (Spokane, WA), addressing the potential impact of Creston supplying water to the NRPF. This study is not yet available, but is reported to confirm the aquifers and the ability of Creston to supply the NRPF with water.
- As in the past, the Town of Creston is currently pumping water with both wells. Therefore, to our knowledge no new wells or improvements to the existing well system is planned.
- U-3 The NRPF's use of water supplied by the Town of Creston does not require the issuance of new water rights for the pumping of groundwater. Further, the groundwater in the Creston area is derived from aquifer systems within the Columbia River Basalts. Records indicate that the area contains more than one aquifer system. While these aquifers tend to flow north westerly, there are no clear indications of "direct hydraulic continuity" with the main stem of the Columbia River. Because there is no new water right involved, no direct hydraulic connection to the Columbia River is indicated and the amounts of water used is insignificant in terms of average flows in the Columbia River. There is no impact to assess.
- U-4 There is no plan or need to change or enlarge the existing water rights for the Town of Creston to provide water to the NRPF.
- U-5 It is well known that under Washington laws and regulations that municipalities can provide water service outside the town boundaries upon approval or resolution of their governing body. The Town of Creston has made such a determination in Resolution No. 95-008. Further, the Town of Creston currently provides service to two residences located outside the town boundaries. The use of the Town of Creston water rights are described as the "area served by the Town of Creston," however, exemptions for other service are provided for under RCW 90.03.300; 90.03.390; and 90.44.020.

LETTER "V"

YOUR COMMENTS PLEASE!

We want to be sure to get your comments. You may use this comment sheet to provide comments regarding the Northwest Regional Power Facility Draft Environmental Impact Statement..

Page 7-14 Electric Generators
"... 30 psig (0.2 MPa-g) hydrogen, ..."
and "Each generator is hydrogen-cooled..."

I was unable to find any reference to the amount of hydrogen used and/or stored, precautions to avoid explosive ignition, leak detection ...

In short, was the explosive nature of hydrogen adequately considered?

RECEIVED

DEC 04 1995

ENERGY FACILITY SITE
EVALUATION COUNCIL

If yes please clearly write your name and address:

Jerry W. Robinson
Route 1, Box 47
Creston, WA 99117

Please leave at meeting, mail, or fax to:

Jason Zeller
EFSEC
PO Box 43172
Olympia, WA 98504-3172
Fax: (360) 956-2158

LETTER "V" RESPONSES

- V-1 Comment noted. The explosive nature of hydrogen has been addressed in the Draft EIS. As stated on pages 3-85 and 3-87 of the Draft EIS "*Risk of Fire or Explosion*- There would be a risk of a fire or explosion at the NRPF during both construction and operation, as well as during standby or nonuse, dismantling and site restoration. The risk is produced by the on-site use and storage of flammable liquids and gases. The risk of explosion or fire during construction will be very low. Only small amounts of flammable liquids, such as fuel or solvents, will be stored and used on-site. Compressed gases required for welding, such as acetylene and oxygen, will also be used and stored on-site. The risk of fire and explosion should be minimal because applicable federal and state safety regulations and WAC 296-155 procedures are required and will be adhered to during construction.

Operation of the NRPF facility will require the use of two materials which can be explosive under certain conditions: natural gas and hydrogen gas. Natural gas will be piped to the site and burned as it is used; none will be stored on-site. Hydrogen gas will be stored on site in standard bottles or larger capacity tank. The hydrogen is then used on site as part of the combustion turbine generator cooling system.

For many years, industry has stored and used natural gas and hydrogen in large quantities; when there were explosions, they resulted from equipment malfunctions or operator errors. During these incidents, flammable gases were released in an unsafe manner, either inside equipment or to the work area. The combination of flammable gases, ignition sources, and oxygen resulted in explosions. As a result of these incidents, codes, regulations, and industry standards have been upgraded to reduce the likelihood of recurrences. These codes, regulations, and consensus standards will be implemented during operation of the facility to mitigate this potential hazard. Therefore, the risk of fire or explosion associated with the NRPF is not considered a significant impact."



LETTER "W"

PACIFIC GAS
TRANSMISSION
COMPANY

2100 February 21, 1996
SOUTHWEST
RIVER
PARKWAY Nancy Wittpen
PORTLAND Bonneville Power Administration
OREGON 905 NE 11th Avenue
97201 Portland, OR 97232

Subject: Draft EIS, Northwest Regional Power Facility

Dear Ms. Wittpen:

Attached for your consideration are Pacific Gas Transmission Company's comments on the subject Draft EIS. If you have any questions about our comments, please call me at 503-833-4703.

Sincerely,

John Cassady
Director, Environmental and Regulatory Planning

Enclosure

cc: Allen Fiksdal, Washington Energy Facility Site Evaluation Council
Mike Boyle, Federal Energy Regulatory Commission
Jane Christmas, Resource Management International
Hunter Horvath, KVA Resources, Inc.

TEL
503 833 4000

FAX
503 833 4900

Pacific Gas Transmission Company
Comments on the Draft EIS for the Northwest Regional Power Facility

General Comments

In this Draft EIS for the Northwest Regional Power Facility, BPA and EFSEC have appropriately deferred detailed environmental analysis of the natural gas pipeline until an application is filed with the Federal Energy Regulatory Commission (FERC). It is possible, however, to include in the EIS for the Power Facility more information of a general nature regarding natural gas pipeline impacts and mitigation. For example, the FERC has developed standard mitigation plans and procedures for erosion control/restoration and wetland/waterbody construction, which are routinely made a part of the certificate conditions for interstate gas pipelines (copies sent under separate cover to RMI).

1

In addition, the FERC has recently prepared numerous NEPA analyses for natural gas pipeline projects in the West, and has refined its analytical methods and mitigation requirements with each succeeding project. It is possible to more accurately characterize the general range of impacts associated with gas pipeline projects by drawing on this extensive body of information regarding similar projects. A brief summary prepared by PGT is attached. The summary does not imply that all of the impacts would be significant or even present for the NRPF pipeline, nor that the mitigation measures will or should be employed for this project. It does, in our opinion, fairly represent the types of impacts that the FERC is likely to examine, and identifies a reasonable array of mitigation measures that the FERC is likely to select from, according to recent practices.

2

Specific Comments

Page 1-24, Section 1.6.1. The last sentence of the first paragraph should be revised to read "The pipeline project will be constructed and permitted independently of the NRPF." The second sentence of the second paragraph should be revised to read "When an application for the gas pipeline is submitted, FERC will conduct a NEPA review of its potential impacts." The third paragraph inaccurately states that PGT's routing study was "based on" an earlier corridor study. While PGT reviewed the earlier corridor study, the PGT study was not confined to the corridors identified therein, nor did PGT rely upon the earlier study's data or its conclusions.

3

Page 2-23, Section 2.1.3. The first sentence of the first paragraph should be revised to read "An underground gas pipeline to the facility would be built." In the second paragraph, refer to the previous comment regarding the earlier corridor study.

4

Figure 2-12 shows Northwest Pipeline Company's existing transmission line north of Spokane. Because the North Route would involve building another line adjacent to Northwest's existing line, the blue line representing the North Route should be extended to parallel Northwest, to the intersection with PGT's existing line. PGT wishes to reiterate that it does not consider the North Route a feasible alternative deserving of further attention.

5

Page 3-8. The first sentence under *Natural Gas Pipeline* should be revised to read "Five routes for the natural gas pipeline to provide fuel to the NRPF were examined by PGT in its routing study" (i.e., they have not yet been proposed). See also Page 3-38, first sentence under *Natural Gas Pipeline*. 6

Page 3-13 and 14. PGT suggests that the EIS reference the FERC's "Upland Erosion Control, Revegetation, and Maintenance Plan", which would be a stipulated requirement for any FERC jurisdictional pipeline. Typically, no other erosion control plan would be required unless the detailed analysis identifies a special situation requiring it. Also the reference to automatic emergency shutoff valves should be deleted; these would not be installed. 7

Page 3-42. PGT disagrees that open cutting of streams "will degrade the natural banks and bottoms of streams". As numerous recent pipeline projects have demonstrated, utilizing standard construction and mitigation techniques typically ensures that impacts to stream morphology, water quality or aquatic resources are temporary. This is particularly true for the small, low-velocity streams that would be crossed by the pipeline route. 8

Page 3-43. PGT suggests that the EIS reference the FERC's "Wetland and Waterbody Construction and Mitigation Procedures", which would be a stipulated requirement for any FERC jurisdictional pipeline. Typically, site-specific crossing plans are required only for streams greater than 100 feet in width (none of which occur along the feasible pipeline routes identified by PGT). 9

Page 3-61, first paragraph under *Natural Gas Pipeline*. Only a strip within about 10 feet on either side of the pipeline is kept clear of trees or deep-rooted shrubs. The rest of the right-of-way is not typically cleared as part of normal pipeline maintenance. 10

In the second paragraph, PGT believes that the broad statements regarding habitat loss, displacement and ultimate perishing of wildlife, and reduction in wildlife populations are unwarranted. PGT acknowledges that more information is necessary to fully assess wildlife impacts, but a more accurate general characterization of likely impacts to wildlife is also possible at this stage (see General Comments). 11

Page 3-64, *Natural Gas Pipeline*. See General Comments. 12

Page 3-146, Traditional Cultural Properties. PGT has not consulted with the Spokane or Colville Tribes regarding the natural gas pipeline. PGT would engage in such consultation in conjunction with pre-construction cultural resources investigations for the pipeline. 13

Appendix B. Table 1 in PGT's routing study contains a numerical error in Line Item No. 10 (Number of Sensitive Fish Streams Crossed). A corrected Table 1 is attached. 14

Table 1 - KVA Pipeline Route Comparisons

TOPIC	ROUTE				
	NORTH	MIDDLE 1	MIDDLE 2	MIDDLE 3	SOUTH
1 Miles of Pipe	58.32	68.73	68.73	70.28	63.85
2 Construction Cost (\$ million)	46.16	47.00	47.00	47.63	50.53
3 Number of Quaternary Surface Faults within 5 miles	0	0	0	0	0
4 Feet of Potentially Unstable Slopes	12,500	4,400	4,200	2,200	600
5 Feet of Sidehill Construction	6,500	2,400	2,200	2,200	400
6 Miles with Bedrock at or Near the Surface	15.5	13.6	13.6	18.0	41.0
7 Feet of Wetlands Construction	2,300	14,800	18,550	20,550	12,400
8 Number of Perennial Stream Crossings	5	5	5	3	3
9 Number of Ephemeral Stream Crossings	50	58	65	57	38
10 Number of Sensitive Fish Streams Crossed	12	15	13	7	3
11 Miles Above Spokane Aquifer	9.75	0	0	0	0
12 Miles Crossing Sensitive Biological Habitats	18	8	7	15	21
13 Number of Visually Sensitive Locations	6	3	3	3	3
14 Miles of Merchantable Timber	17.70	6.71	6.71	4.46	11.50
15 Miles of Land Use: Residential	14.40	0	0	0	0
16 Miles of Land Use: Agriculture	41.72	68.73	68.73	70.28	63.85
17 Miles of Land Use: Commercial	2.20	0	0	0	0
18 Miles of Public Lands	2.5	0	0	1.0	1.5
19 Number of Property Owners	133	175	174	164	84
20 Number of Residences within 500 feet	193	35	35	41	13
21 Miles Parallel to Existing Linear Facilities	35.30	39.24	34.20	39.90	10.02
22 Number of City or County Road Crossings	60	64	58	63	57
23 Number of State or Federal Highway Crossings	5	6	6	6	5
24 Number of Railroad Crossings	1	7	7	8	5

LETTER "W" RESPONSES

- W-1 Comment noted. See General Response #1.
- W-2 Comment noted. See General Response #1.
- W-3 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- W-4 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- W-5 Comment noted. However, the natural gas pipeline routing study (see Appendix B) shows the north route starting at Creston. Other alternative routes would likely be considered by FERC during the focused environmental review of the potential environmental impacts of the natural gas pipeline.
- W-6 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- W-7 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- W-8 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- W-9 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- W-10 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- W-11 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- W-12 Comment noted. See General Response #1.
- W-13 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- W-14 Comment noted. Suggested changes made to text. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.

LETTER "X"

Public Comments on the DEIS Taken at public meeting in Creston, Washington November 15, 1995

Mr. Purvis

- 1) Expressed concern about the independence of the EFSEC process because it is paid for by the developer. 1

Pete Bean

- 2) Mr.Bean asked if there is a danger of lightning strike on the powerline igniting the gas pipeline? What about fire risks on the pipelines? There are no access roads in many areas. 2
- 3) Will the pipeline affect puddles and springs needed by livestock? It would be preferable to do construction in the late winter/fall and early spring. 3

Pete Crow Plumbers & Steamfitters Union - Spokane

- 4) The union has a lot of experience constructing gas pipelines. The pipelines are safe, and are buried underground. There are a lot of regulations governing construction and operations of pipelines. Livestock grazing can continue over the pipelines. When another pipeline was under construction environmental requirements forced construction to stop, to allow birds to nest. Mr. Crow was pleased to see socioeconomics covered in the DEIS. 4

He asked if construction will have an adverse effect on the town? When a papermill was under construction in Usk, Washington, buses were used to help 800 workers from Spokane to commute to the site. There are plenty of workers in the local area to do the work. Career opportunities will exist in maintenance and possibly construction of the pipelines and the power plants. Tax revenues from this project will be of substantial benefit to Lincoln County. The DEIS handled air and water impacts appropriately. Mr. Crow stated that he wished the siting process could have been more rapid. He believes that the Council has had an open siting process. 5

Joe Bean

- 5) Expressed concern about possible leaks along the pipeline route. Transmission lines are a possible ignition source. He believes it would be better to route pipelines along Hwy 2 - this would provide better access for fire trucks. Mr. Bean expressed concern about the location of the water line from Creston to the plant. He would prefer to have the water line along a fence line - not in the middle of cultivated ground. Mr. Bean asked about lining storm water ponds - he believes should be lined. Pollutants in the storm water will spread out widely - The applicant responded the ponds won't be year round. The applicant also stated the ponds are not designed to be lined. The storm water returns back into the ground - additional water from the plant is not being added to the 6

stormwater. Mr. Bean noted it is hard to farm an area that has had additional water added to it from a standing water pond.

Jim Hall

- 6) Expressed concern about Washington Public Power Supply System - Northwest ratepayers are still paying for WPPSS. BC Hydro is a possible source of power for Washington. What is the area the plant is designed to serve? Should Eastern Washington suffer the negative environmental consequences of the plant when there is no need for power here? He asked the Councils DEIS to examine the implications NAFTA on BC-Power. What is the potential amount of electricity available from BC Hydro? Low and high head hydro may be an alternative. This part of DEIS should be expanded (alternative analysis). The gas pipeline will be near the school. Mead School District's new 1800 student high school. It should be rerouted away from the school. The basic question that should be addressed in the EIS is this project really needed? 7

Craig Brougner

- 7) Pg. I-16: Mr. Brougner requested that the Council require that there are no road closures during harvest season. If there must be road closures, farmers must be notified. He asked if road upgrades will be paid for by KVA? He urged KVA to build a rail head as close to site as possible to transport large equipment for the project. 8

Pg. 2-34: If a new trailer building is needed near Coulee - it should be a permanent building if it will be a permanent structure. Temporary structures should not serve as permanent buildings. 9

Pg. 3-7: He noted that a pre-1900 earthquake in North Cascades did significant damage in this area, and was not discussed in the DEIS. He urged the Council to require a tree buffer around plant 20-50' wide. A deep buffer would be very helpful to mitigate sound from the plant. 10

Fig. 3-8: In the maps on this nearby pages, the DEIS should use consistent colors for designating land use to describe the same land use. Consistency would make the maps easier to follow. 11

In the DEIS in Fig. 3-9: The delineation of National Park Service (NPS) land is somewhat lacking - The NPS does not manage any land on Colville Reservation or Spokane Reservation. 12

Fig. 3-15/16A: He was impressed with visual simulation of the plant and would like more of these visual simulations including other views of the site. 13

Mrs. Bean

- 8) Expressed concern about noise effects on wildlife and livestock. This should be considered by Council, also the effects of noise from the plant on domestic animals (horses). 14

Mr. Purvis

- 9) Appendix B - Pg. 9: Summary and conclusions should be written for the lay reader - It is hard for the average person to understand. Shouldn't use word transmission when referring to gas line between segments F & E. The DEIS is not specific enough about where pipeline will go. Would prefer to have a single review process, not a separate process for the pipeline. There should be one EIS for the entire project including the pipeline. 15

Mayor Haydon

- 10) Distributed a copy of Resolution #94013, supporting this project. He took issue with the testimony of Ecology's witness regarding Creston's water rights. The Mayor believes Ecology's witness improperly characterized town's water rights and the existence of an artesian well in area. There is no artesian well near Creston. This project will be clean and will benefit the county. Something needs to be done to keep young people in Lincoln County. 16

Mr. Purvis

- 11) Appendix E - PSD Pg. 1 Applicability Form
Benzene is a dangerous waste and known carcinogen - Can it be cleaned up? What will be the effect of benzene down wind from the plant? The DEIS should discuss benzene in more detail. 17

Joe Bean

- 12) Pg. 124
How did BPA end up working with FERC on pipeline issues? 18
- 13) Expressed concern about noxious weeds - another right-of-way will add more noxious weeds - farmers shouldn't have to pay to control weeds. 19

Jim Hall

- 14) Should be a clear road map of the entire review process for the public, so they can participate in all of the review processes. The name of preparers should be on the DEIS. 20

Mr. Purvis

- 15) DEIS - The intent of SEPA is to precede all governmental action and acts, including hearings (adjudicative). Hearings should have been held after the DEIS was issued. The current process violated intent and letter of law specifically SEPA and NEPA. The process is out of sequence!

21

PUBLIC MEETING RESPONSES

PUBLIC MEETING "X" RESPONSES

- X-1 Comment noted.
- X-2 The powerline and the natural gas pipeline would not be located in the same corridor. With regard to the natural gas pipeline, please refer to General Response #1.
- X-3 See General Response #1.
- X-4 Comment noted.
- X-5 As stated on page 1-23 (Socioeconomics) of the Draft EIS "Potential socioeconomic impacts include short- and long-term effects on population, housing, employment, and income. In general, socioeconomic impacts are expected to be beneficial because of job creation and increased tax revenue for the affected counties. Potential negative effects are limited to the short-term and are associated with population, employment, and housing from potential in-migration of construction workers. Such negative impacts, however, are expected to be insignificant for a construction project of this size and will be partially offset by planned mitigation measures."
- X-6 See General Response #1.
- X-7 Comment noted. Please refer to Section 1.2.3, Applicant's Determination of Purpose and Need, for a more detailed description of the need for additional electricity in the Pacific Northwest Region. With regard to the natural gas pipeline, please refer to General Response #1.
- X-8 Comment noted.
- X-9 Comment noted.
- X-10 Seismicity near the NRPF site is addressed in the Draft EIS, please refer to page 3-7, Local Seismicity. Pine tree plantings would be incorporated into the site design to act as an effective partial screen for the project.
- X-11 Comment noted. Suggested changes made to figure. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document.
- X-12 Comment noted. Suggested changes made to figure. Please refer to Chapter 2 (Corrections and Modifications to the DEIS) of this document. The location of the Coulee Dam National Recreation Area is shown in more detail on Figure 3-13, page 3-117.
- X-13 Comment noted.
- X-14 As stated on page 1-15 (Environmental Health and Public Safety) of the Draft EIS "Because of the distance separating the site from existing residences, construction noise would be attenuated and noise impacts are expected to be negligible. Based on the information provided in the application and supporting technical documents, the

proposed facility will not have significant operational noise impacts. The proposed facility would comply with the state noise limits at all of the representative receivers, and is expected to be audible during the night and during some daylight hours depending on the activity at the time. The facility would not exceed existing ambient noise standards at any residences."

- X-15 Comment noted. With regard to the natural gas pipeline, please refer to General Response #1.
- X-16 Comment noted.
- X-17 Comment noted. The annual average peak project impact of benzene is 400 times smaller than the acceptable source impact level.
- X-18 Please refer to General Response #1.
- X-19 Mitigation measures have been identified that would control noxious weeds in the transmission line corridor. Please refer to Section 3.1.6.3 (Mitigating Measures) of the Draft EIS (pages 3-62 and 3-63). In addition, Appendix A identifies mitigation options that would control noxious weeds in the natural gas pipeline corridor.
- X-20 Comment noted. Section 7 of the Draft EIS provides a list of the Draft EIS preparers.
- X-21 Comment noted. However, it is the policy of SEPA to "Integrate the requirements of SEPA with existing agency planning and licensing procedures and practices, so that such procedures run concurrently rather than consecutively." (WAC 197-11-030 (2) (e)).