

# **Chapter 1**

## **Introduction to the Final Environmental Impact Statement**



**Sierra Nevada Customer Service Region**

# CHAPTER 1

## INTRODUCTION TO THE FINAL ENVIRONMENTAL IMPACT STATEMENT

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### 1.1 INTRODUCTION

Western Area Power Administration (Western) is a power marketing administration of the U.S. Department of Energy (DOE). Western owns and operates a grid of electrical transmission lines in 15 western states, including California. The Calpine Corporation (Calpine) has requested an interconnection to Western's Keswick-Elverta/Olinda-Elverta double-circuit 230-kV transmission line to transmit electricity generated by their proposed Sutter Power Project (SPP). The SPP is a proposed 500-megawatt (MW) natural gas-fueled, combined-cycle, electric generation facility. This *Final Environmental Impact Statement (EIS)* can be viewed on DOE's National Environmental Policy Act (NEPA) website (<http://tis.eh.doc.gov/nepa/>) or Western's website ([www.wapa.gov](http://www.wapa.gov)).

This *Final EIS* has been prepared in accordance with NEPA and the implementing regulations of the Council on Environmental Quality (CEQ) and the implementing procedures of DOE (10 Code of Federal Regulations [CFR] 1021). This *Final EIS* is Western's final analysis of the potential environmental impacts of the proposed SPP and its alternatives. It also contains responses to comments received on the *Draft EIS* from state and federal agencies and the public.

Western released the *Draft EIS* on the proposed project in October 1998, jointly with the *Final Staff Assessment (FSA)* of the California Energy Commission (Commission). The *Draft EIS/FSA*, as well as other documents, hearing transcripts and information on the project are available on the Commission's internet website (<http://www.energy.ca.gov/sitingcases/sutterpower/index.html>) or may be requested from the Commission or Western.

### 1.2 ORGANIZATION OF THE FINAL EIS

This document is organized into five chapters. Chapter 1 presents an introduction to the *Final EIS* and an overview of the environmental review processes and other constraints that affected the evaluation and analysis of the impacts. This chapter also contains a list of the public meetings that were held to ensure full participation by the public and other organizations. Finally, it presents the environmentally preferable alternative. Chapter 2 presents a summary of the *Draft EIS* so the reader does not have to refer back to the Draft to understand issues discussed here. Chapter 3 presents a summary of the Commission's *Presiding Members Proposed Decision* for

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the SPP and its revision<sup>1</sup> and supplemental testimony that was presented at the public hearings. Chapter 4 includes a restatement of the NEPA analysis for the project. Chapter 5 presents Western's responses to public comments received in the hearings and from written letters. Volume II contains the appendices referenced in this *Final EIS*.

### 1.3 ENVIRONMENTAL REVIEW MANDATES

Western and the Commission are mandated by Federal and/or state laws to perform an analysis and evaluation of the potential environmental impacts of the SPP. The two processes are functionally equivalent. Western and the Commission made a decision early in the planning stages to combine efforts in order to streamline the process and eliminate overlap and duplication. The joining of these processes, understandably, required some flexibility by each agency. Since the melding of these two environmental processes was unique, each will be described briefly then followed by a discussion of the merging of the processes.

#### 1.3.1 WESTERN AREA POWER ADMINISTRATION PROCESS

The specific regulations under which Western operates in compliance with NEPA are found in 10 CFR 1021. Specifically in this case, 10 CFR 1021, Appendix D6 to Subpart D, requires Western to prepare an *EIS* if Western integrates into an existing transmission system additions from major new sources of generation. Appendix D7 requires that Western prepare an *EIS* when Western establishes and implements contracts that involve the addition of a major source of generation. In both cases, major generation is taken to mean an average of 50 MW or greater. Therefore, the consideration of an agreement to incorporate the power generated by the 500-MW SPP would require the preparation of an *EIS*.

The regulations in 10 CFR 1021 refer to the implementing regulations of the CEQ found in 40 CFR 1500-1508. These regulations define a process for Federal agencies to follow to ensure there is full disclosure of all environmental impacts associated with a Federal action.

The process Western follows to implement the regulations is simple. First, the scope of the action and the likely impacts to environmental variables are determined. The proposal is then taken to the public to determine if there are any issues within the scope of the action that are of particular concern (scoping meetings). At this time, the public is encouraged to comment on the action, offer suggestions and even propose alternative actions to inform the agency about potential environmental

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<sup>1</sup> The Commission issued a revised PMPD in March, 1999. All future references are to the revised version.

impacts. The proposed project is then combined with this scoping information and a Draft EIS is prepared. The public and other interested agencies and organizations are invited to comment on the information and analysis contained in the *Draft EIS*. After a specified comment period, the comments are assembled and responses are provided. This information is then published and released publicly as a Final EIS. Following a waiting period, the agency is then required to publish a record of decision (ROD) on the proposal. The ROD is a concise public record of what the decision is, the alternatives that were considered and a determination that all practicable means to avoid or minimize environmental harm have been adopted, and if not, why not.

The EIS process is required to use a multidisciplinary approach in order to ensure the integration of natural, social and environmental sciences. The process also requires the participation of the public, as well as other agencies with expertise or jurisdiction.

### **1.3.2 CALIFORNIA ENERGY COMMISSION PROCESS**

In the case of the SPP, interwoven into Western's mandated process, is the process of the California Energy Commission. The Commission has the siting and licensing responsibilities for all generation above 50 MW within the state of California. The Commission obtains the authority through Sec. 25500 (*et seq.*) of the California Public Resources Code (Cal. Pub. Res.). Following those regulations, the Commission also acts as state lead agency when issuing a license, in compliance with the California Environmental Quality Act (CEQA.)

CEQA is the mandate of the state of California to consider the environmental impacts of a proposal under consideration by an agency of the state. CEQA is included in a class of state environmental planning statutes known as "little NEPAs." While there are subtle differences between each of these "little NEPAs" and the Federal NEPA, each shares a goal of making informed and more public decisions on activities that may impact the environment.

There are two major differences between CEQA and NEPA. The first is a mandate in CEQA to provide mitigation for impacts deemed significant. The mitigation is intended to reduce the impacts to less than significant levels. The second is a mandate to include a discussion of growth-inducing impacts. However, the authors of CEQA and their guidelines have stressed the need to combine processes and documents where there would be a service to the public.

The Commission has its own procedures that have been determined to be the functional equivalent of the CEQA procedures. The applicant is responsible for submitting information on the specific proposal and its impacts on the environment to the Commission [Application for Certification (AFC)]. The Commission staff reviews the AFC, and if it is complete to their satisfaction, the Commission will issue a determination of the data adequacy. The staff then systematically evaluates the submission by the applicant, and public workshops are held to obtain information from the public in order to assist the staff in evaluating the submission. The results of

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the evaluation are written in the *FSA*. The *FSA* is released to the public, and public hearings are held to take testimony on the adequacy of the *FSA*.

Two features distinctly mark the Commission process. First is the considerable amount of public information that is available and the amount of opportunity the general public has to influence the decision making. Through the workshops and hearings, the public has a significant amount of input to the process. The second feature is the semijudicial nature of the process. The staff assessments found in the *FSA* are considered testimony, and during the hearings on the *FSA*, the Commission staff are expected to testify to the accuracy of their analyses and the conclusions they rendered.

Following the public hearings, the Commission weighs the evidence of the AFC, the *FSA* and the testimony by staff and other witnesses, and releases a preliminary decision (*Presiding Members Proposed Decision [PMPD]*). The Commission holds a hearing on the *PMPD*, and then renders a final decision on the proposal. This entire process is scheduled to take no more than 12 months.

### 1.3.3 MERGING OF THE PROCESSES

Western and the Commission conferred very early on in this process to determine whether the two processes could be combined. Western looked at the joining of the processes as an advantage for three reasons. First, the mandated 12 month review period fit Western's desire to reduce the time needed to complete EISs, as is being urged by the DOE. The second reason was the advantage of using the expertise and experience of the Commission staff to analyze information unfamiliar to Western staff. Lastly, combining documents and processes is a clear advantage for the public, since it eliminates review of separate documents, analyses and public meetings.

Additionally, NEPA and its implementing regulations also stresses a need to reduce paperwork (40 CFR 1500.4), to reduce delay (40 CFR 1500.5) and to eliminate duplication with other procedures (40 CFR 1506.2). Specifically, the regulations (40 CFR 1506.4) suggest that an agency should combine a NEPA document with another agency document in order to reduce duplication and paperwork.

To these ends, the coordination of the two processes worked extremely well. Western provided input into the analysis of impacts, provided information and hard data and reviewed all of the work produced to ensure that Western's interests were well served. The Commission staff was well versed in the interest areas that Western was less familiar; and therefore, provided excellent analysis. Finally, the public was more than well served by the joint processes. The public had considerable access to the processes and actually provided valuable information that was incorporated into the analysis. Western was very pleased with this input, since it was considerably more than what would have been possible under a normal NEPA process.

However, merging the documents posed some challenges. The NEPA process requires a recommended format for all *EIS* documents, which includes specific content requirements. To combine processes, Western adopted the Commission's format. This decision was made since all the requirements of a NEPA document could be included in the Commission's format, and Western's process has greater flexibility than the Commissions' process. Western is providing a topical index in this document that will assist readers in finding the discussion of specific issues according to the more traditional NEPA format (Table 4.2).

### **1.3.4 OTHER CONSIDERATIONS**

The electrical industry is currently in a state of flux due to deregulation. In 1996, the Federal Energy Regulatory Commission (FERC) issued Order No. 888 in 61 FR 21540 requiring certain transmission owners to provide (and allowing others) to provide open non-discriminatory transmission. While Western is not directly subject to the FERC order, Western is operating under the intent of the order through publication of Western's Open Access Transmission Service Tariff (OAT). The OAT provides comparable transmission service to eligible customers under the same conditions required by public utilities by the FERC Order No. 888. Western cannot place conditions on access to its transmission system based on the type of generation or on some justification by the generator that there is sufficient consumer demand. Calpine is proposing to build a "merchant" plant and is not necessarily responding to consumer demand. Instead, they are focusing on their ability sell electricity on the open market. Under Western's OAT, if Calpine meets the conditions of the OAT, if capacity is available on the requested transmission line and the requirements of NEPA are met, Western will provide transmission access.

As discussed above, Western is required to prepare an *EIS* when contemplating the incorporation of new generation greater than 50 MW into our existing grid system. However, Western's decision on that analysis only considers the interconnection of the power from the proposed plant to the transmission system. The decision for siting and certification of the generation plant itself lies with the Commission.

### **1.4 PUBLIC INVOLVEMENT**

Public involvement is an integral part of the NEPA and Commission processes. These processes are designed to facilitate input from the public, interested parties and agencies and to guide the decision-making agencies through a collaborative and systematic decision-making process. Outlined in this section is the process initiated by Calpine and carried through by the Commission and Western for the SPP.

Calpine petitioned the Commission for an exemption from the Notice of Intention requirements of Cal. Pub. Res. Code Sec. 25502 for the SPP. Pursuant to Cal. Pub. Res. Code Sec. 25540.6(a)(1), the Commission granted the exemption June 25, 1997.

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Between June and September 1997, five public pre-filing workshops were held to discuss the SPP and the AFC data adequacy requirements.

On December 15, 1997, Calpine filed the SPP AFC. On January 21, 1998, the Commission found that the application met the data adequacy requirements. On February 2, 1998 to more fully understand the project and adequately analyze the potential impacts associated with the project, Commission staff filed a data request from Calpine for additional information in nine technical areas. Data responses in air quality, biology, cultural resources, hazardous materials, land use, public health, soils and water, transmission system engineering and visual resources were due by March 4, 1998.

On February 13, 1998, Western published a “Notice of Intent to Prepare an Environmental Impact Statement” in the *Federal Register* (63 FR 7412-7413). The notice announced the upcoming scoping meeting, notification to the general public and Federal, state, local, and tribal agencies. In addition, the notice requested identification by the public and agencies of issues and reasonable alternatives to be considered in the *EIS*. A scoping meeting was held in Yuba City on March 3, 1998, and the comment period was set through May 5, 1998. Project contacts were identified for both agencies, which included technical experts as well as process contacts.

The Preliminary Staff Assessment (PSA) was completed and filed on July 1, 1998. Nine workshops were held in Yuba City to discuss and receive input for the *Draft EIS/FSA*. The *Draft EIS/FSA* was sent to the parties on the mailing list (Appendix C) and was filed on October 19, 1998. The Environmental Protection Agency’s Federal Notice of Availability was recorded on October 30, 1998 (Vol. 63, No. 210, p. 58379). Western’s Notice of Availability and the Notice of Public Hearings were noticed in the *Federal Register* on November 6, 1998 (Vol. 63, No. 215, p. 59986) for the public evidentiary hearings that were held on November 2, 10, 16 and December 2, 1998. A chronology of public hearings, held subsequent to the filing of the AFC, is listed in Table 1.1.

Public comments and opinions from interested groups, Federal and state agencies, neighbors of the proposed project and the general public are an integral part of the decision-making process. Therefore, both the Commission and Western maintained mailing lists of interested parties. Each workshop and hearing was publicly noticed in the local community, on the Commission website and by direct mailings to those on the project mailing list. Western and the Commission have received input through public meetings, workshops, hearings, mailings and comments on the *Draft EIS/FSA* that address the scope of the project, the alternatives and the concerns of the public. These comments and Western’s responses are presented in Chapter 5.

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**TABLE 1.1 CHRONOLOGY OF PUBLIC HEARINGS**

Type of Meeting	Meeting Date	Topic(s) Covered
	Dec. 15, 1997	Application for Certification (AFC) Filed
Data Request Workshop	Feb. 10, 1998	air quality, transmission system engineering, biological resources, soils and water, public health, hazardous materials, land use, visual resources, cultural resources and paleontological resources
Informational Hearing/NEPA Scoping Meeting	March 3, 1998	open to public comment on all issues (per NEPA)
Public Workshop	March 25, 1998	air quality, visual resources, alternative transmission line routes, transmission line impacts to agricultural operations, hazardous materials handling, data requests and data responses
Public Workshop	March 31, 1998	water resources, impacts to nearby wells, drainage, water supply options, water disposal options, biological resources and data requests
Public Workshop	June 3, 1998	revised transmission route, air quality, project site drainage, water supply and other related subjects
Committee Status Conference	July 13, 1998	status of the proceeding, including any potential delays, Sutter County's environmental review process, and other parties' comments
Public Workshop	July 14, 1998	Preliminary Staff Assessment, including land use, visual resources, socioeconomics, traffic and transportation, worker safety, cultural resources, paleontological resources, hazardous materials handling, transmission system engineering, noise, transmission line safety and nuisance, efficiency, reliability and facility design
Public Workshop	Aug. 4, 1998	water resources, biological resources, public health, waste management, and alternatives
Public Workshop	Aug. 6, 1998	hazardous materials, worker safety, traffic and transportation, land use, air quality and facility closure
Public Workshop	Aug. 12, 1998	water quality, drainage, water temperature modeling, land use and alternatives
Prehearing Conference	Aug. 19, 1998	procedures, issues and witnesses and schedules for document production and evidentiary hearings
Public Workshop	Sept. 15, 1998	air quality issues associated with the Feather River Air Quality Management District's Preliminary Determination of Compliance
Evidentiary Hearing	Nov. 2, 1998	biological resources, water resources, noise, transmission line engineering, traffic and transportation, hazardous materials, alternatives, enter stipulations
Public Workshop	Nov. 4, 1998	visual and transmission line route
Evidentiary Hearing	Nov. 10, 1998	visual resources, land use, socioeconomics

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Type of Meeting	Meeting Date	Topic(s) Covered
Evidentiary Hearing/NEPA Hearing	Nov. 16 1998	air quality, public health, and open to public comment on all issues (per NEPA)
Committee Conference	Feb. 11, 1999	<i>Presiding Members Proposed Decision</i>
Evidentiary Hearing	March 10, 1999	air quality, crop-dusting, comments on revised <i>Presiding Members Proposed Decision</i>
Commission Business meeting	March 14, 1999	adopted revised <i>PMPD</i> (awaiting General Plan Amendment and rezoning actions by Sutter County <sup>2</sup> ).

### 1.5 CONSULTATION AND COORDINATION WITH AGENCIES

Western is required by the Endangered Species Act (ESA), to determine the impacts of the SPP on threatened and endangered species. Western also takes into consideration the California Endangered Species Act (CESA; California Code Regulations [CCR] Sec. 670.5) provides protection for threatened and endangered plants and animals and their critical habitat and establishes the requirement that these species be considered when a Federal action is proposed. ESA requires consultation with the U.S. Fish and Wildlife Service (FWS) and the National Marine Fisheries Service (NMFS).

In addition to the statutorily required consultations, Western submitted copies of the *Draft EIS* to other Federal and state agencies (Appendix C). The Department of the Interior replied indicating it did not have any comments (Appendix L). The EPA's Office of Federal Activities was provided copies; EPA Region IX provided comments on the *Draft EIS*. Response to the comments is in Chapter 5. The State Clearinghouse was notified of the availability of the *Draft EIS*, but comments were received from only the California Fish and Game and the State Historic Preservation Office (Sec. 1.6). Additionally, representatives of the Sutter National Wildlife Refuge provided input into the process, and testified at several hearings. The refuge is located approximately 4 miles to the west of the proposed action. There are potential biological resource impacts to the refuge associated with the powerplant and construction of the gas pipeline. On February 17, 1999, FWS granted permission (with conditions) for project work within the existing Pacific Gas and Electric

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<sup>2</sup> The Sutter County Board of Supervisors met on March 30, 1999, and approved these land use changes. Subsequently, the Commission will likely take its final vote regarding certification of the project at April 14, 1999, regularly scheduled business meeting.

Company (PG&E) 15-foot easement corridor in the Sutter refuge. Their letter to the Commission is included in Appendix S.

Western is also required by the National Historic Preservation Act (NHPA) and the American Indian Religious Freedom Act (16 U.S.C. 1996) to determine impacts of the SPP to important or significant cultural resources. Section 106 of NHPA requires Western to take into account the potential effects of its undertakings on historic properties. The NHPA requires consultation with the State Historic Preservation Office (SHPO). The results of these consultations are provided here.

### **1.5.1 BIOLOGICAL RESOURCES**

Western, as the lead Federal agency, determined that the proposed action may affect endangered or threatened species and initiated formal consultation with the FWS and the NMFS. On March 9, 1998, in accordance with 50 CFR 402, Western requested a list of endangered, threatened or proposed species, which might be present in the project area. A Biological Assessment was submitted to the FWS Sacramento Field Office on April 1, 1998 and the NMFS Regional Administrator on June 9, 1998. Both resource management agencies requested additional information on the project's water requirements.

On June 8, 1998, Western was notified that the FWS had received the request for formal consultation pursuant to the ESA and indicated that barring new information on water quality effects, no additional information would be needed to issue a biological opinion. The FWS was aware that the water quality modeling had not been completed. Based on the information available at that time, the FWS anticipated that the modeling results would not change its analysis of effects of the proposed action to listed species. On July 14, 1998, the FWS received reports on the results of the water quality modeling. Review of the reports revealed the unexpected result that effluent discharge could affect listed species in a manner or to an extent not previously considered.

On October 7, 1998, Western subsequently notified both FWS and NMFS offices of changes in the cooling design, which would result in "zero effluent discharge," thus minimizing impacts to protected aquatic species. At that time Western notified NMFS of our determination that the SPP would not likely adversely affect listed or proposed NMFS species.

NMFS concurred with Western's determination of not likely to adversely affect marine species on March 7, 1999 (Appendix P). On April 2, 1999, the FWS issued its biological opinion stating that the project would not likely adversely affect species in the project area.

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### 1.5.2 CULTURAL RESOURCES

As the lead Federal agency, Western bears the responsibility for compliance with Sec. 106 of the NHPA and the American Indian Religious Freedom Act. On February 8, 1999, Western submitted the “Cultural Resources Inventory of the Sutter Power Project, Sutter County, California” to the California SHPO with the determination that the proposed undertaking would affect no historic properties.

On March 2, 1999, the SHPO concurred with Western’s determination and indicated they “do not object to [Western’s] determination.”

The Native American Heritage Commission (NAHC) was also contacted in July 1997. Pursuant to the request, the NAHC provided a list of Native American representatives who may have an interest in heritage lands or other resources that could potentially be affected by the proposed project (Appendix P). The NAHC also conducted a search of its Sacred Lands File for known areas of Native American occupation and traditional cultural properties. NAHC determined that there were no findings or areas of concern to tribes in the area of the SPP.

In March 1998, letters were sent to each of the 16 tribal contacts identified by the NAHC. The letters described the proposed project, the agencies involved, and provided an interest response form to help identify potential concerns with the proposed project. There was no response to this pre-*Draft EIS* mailing. After release of the *Draft EIS*, subsequent attempts were made by Western to personally call each tribal contact. Those that were contacted indicated that they were unaware of any heritage lands near the SPP. Those contacted wanted to remain on the mailing list for the *Final EIS*. Based on those responses, 16 tribal contacts were kept on the mailing list for the *Final EIS*.

### 1.6 PREFERRED ALTERNATIVE

NEPA (40 CFR 1502.14(e)) requires Western to identify a preferred alternative in the *Draft EIS* if possible, or in the *Final EIS* unless prevented from doing so by some other law. Western believes that the SPP would not have any significant impact on the human environment provided that Calpine follows the Conditions of Compliance imposed by the Commission and detailed in the *PMPD*. Western supports the proposed action, with the dry-cooling alternative and the transmission line alternative along O’Banion Road, as the preferred alternative (Figures 1-1 and 1-2).

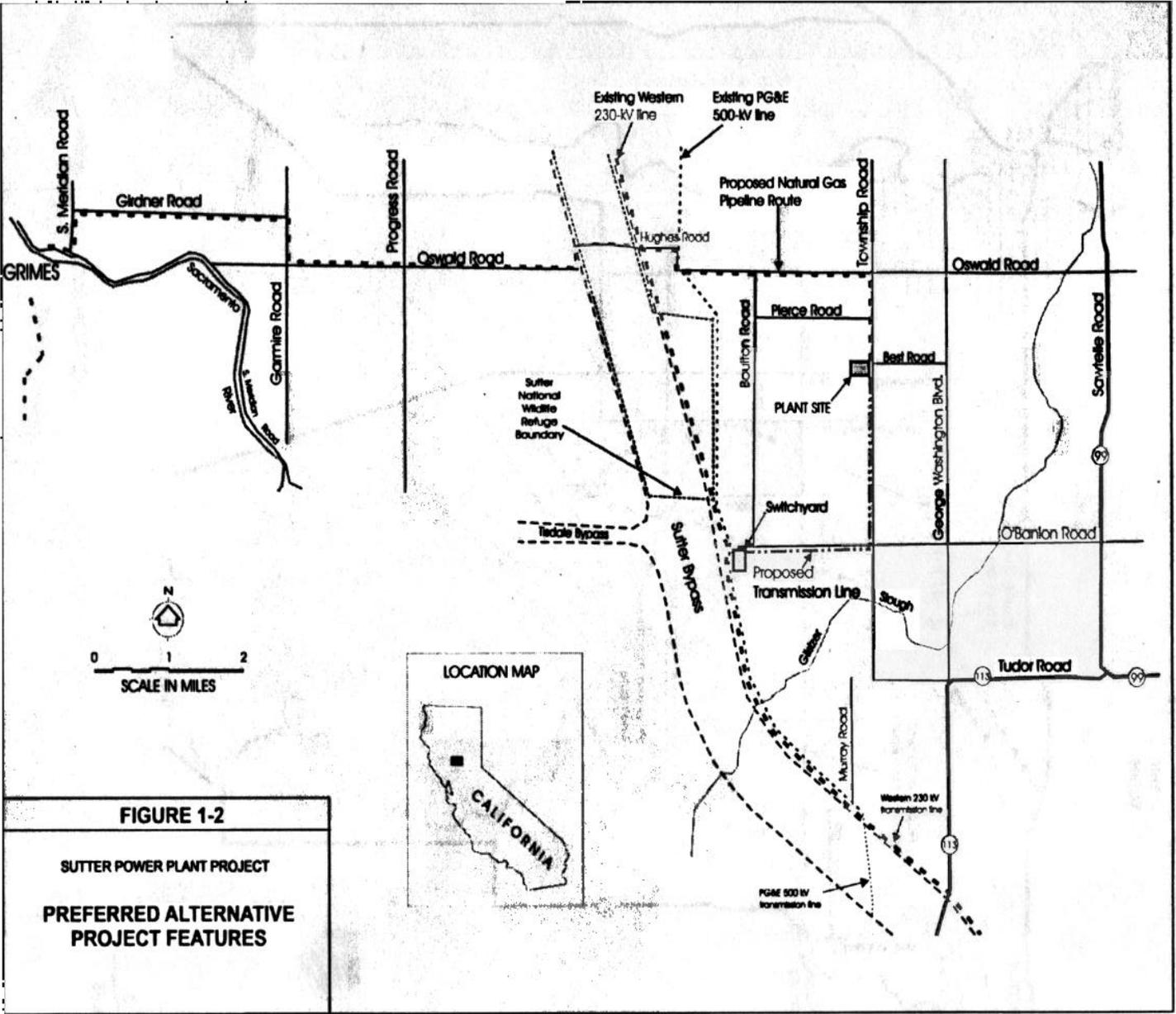
The preferred alternative is not to be confused with the discussion in Western’s *Draft EIS* of the environmentally preferred alternative on pp. 16-17, which was mandated by the regulations of the Commission. Western will identify and discuss the “environmentally preferred alternative” at the time of the publication of the ROD (40 CFR 1505.2(b)).



LOCATION MAP

**FIGURE 1-1**  
**SUTTER POWER PLANT PROJECT**  
**PREFERRED ALTERNATIVE**  
**LOCAL SETTING**





## 1.7 FLOODPLAIN/WETLANDS STATEMENT OF FINDINGS

Western is required (10 CFR 1022.14) to provide a statement of findings concerning the impacts to floodplains and/or wetlands. The statement of findings is provided in response to the requirements of Executive Order 11988 — Floodplain Management (May 24, 1977) and Executive Order 11990 — Protection of Wetlands (May 24, 1977). Western is required to take into account the impacts of any activity on floodplains/wetlands during the normal planning process activities, such as NEPA. It is the policy of Western and the U.S. Department of Energy to “. . . avoid to the extent possible long- and short-term adverse impacts associated with the destruction of wetlands and the occupancy and modification of floodplains and wetlands. . .”

The *Draft EIS* discussed the likely impacts of the proposed project on floodplains and wetlands on pp. 469-470 and on pp. 430-436, respectively. Alternatives to the proposed project were discussed in the *Draft EIS* on pp. 15-74; the impacts on these resources are detailed in the alternatives matrix in Sec. 4.2 in this document. The following summarizes these discussions.

The project area would be located in the floodplain of the Sacramento River. The Federal Emergency Management Agency 100-year floodplain maps designate this area as Flood Zone X, which is a 100-year floodplain protected by levees. The alternative matrix in Sec. 4.2 shows that only one of the other alternative locations appear to be superior to the project location in terms of impacts to wetlands. The O’Banion Road site was suggested by members of the public and by the Commission staff as a way to avoid the visual impacts of the project location. This alternative could also avoid impacts to wetlands at the project location.

The alternative was carried through the analysis because of the public interest and because the Commission received incorrect information about the availability of the land. In the hearings on the *Draft EIS*, however, it was determined that the majority of the owners of the O’Banion Road property would refuse to sell the property under any circumstances (e.g., see written comments from Wilma Creps LaPerle dated November 9, 1998 in Chapter 5). Since Calpine had no reasonable expectation of ever acquiring the property, the alternative became infeasible. In addition, the Sutter County Planning Commission would be unlikely to convert agricultural land to other uses, specifically agricultural land in the project area (Appendix E). Finally, the Commission noted that this alternative had the potential to adversely impact the Sutter National Wildlife Refuge (*PMPD*, pp. 254-255).

In Calpine’s application for a Sec. 404 permit pursuant to the Clean Water Act (CWA), Calpine would mitigate the impacts of less than 6 acres of wetlands and 25 acres of habitat by purchasing 38.488 acres in the Wildlands, Incorporated mitigation bank in Placer County. This mitigation was developed in consultation with and to the satisfaction of the U.S. Army Corps of Engineers and the FWS.

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In accordance with 10 CFR 1022, Western believes that there would be no practicable alternative to the proposed project that would avoid impacts to floodplains/wetlands. Western further believes that the impacts to the floodplain were adequately considered, and the impacts to the wetlands would be adequately mitigated. Western, along with the Commission, would monitor the activities of the project to ensure these measures were carried out to the fullest.

Western will accept comments on the floodplains/wetlands statement of findings for a period of 15 days following the Federal Register Notice of the *Final EIS*. Western will address any comments in the ROD.