

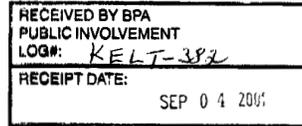
SIERRA CLUB
 Cascade Chapter
 8511 – 15th Ave. NE
 Seattle, Washington 98115

September 3, 2001

Lou Driessen, Project Manager
 Bonneville Power Administration
 PO Box 3621
 Portland, Oregon 97208

Re: Kangley-Echo Lake Transmission Line Project

Dear Mr. Driessen:



382-001 | We have reviewed the Draft EIS on the Kangley-Echo Lake Transmission Line Project, also known as the Raging Cedar Powerline, due to its impact on those two river valleys. As proposed, the Sierra Club is opposed to this project.

382-002 | BPA lines have huge impacts on forests and related wildlife including loss and fragmentation of habitat. Impacts of construction and operation will adversely affect water quality for a municipal water supply, affect compliance with the ESA, and diminish efforts to recover salmon and other listed species. Moreover, BPA would clearcut a swath through the watershed forest that we just succeeded in protecting.

382-003 | The EIS is deficient for several reasons: an inadequate demonstration of need, failure to analyze a full range of alternatives, failure to acknowledge the seriousness of impacts, incomplete information, failure to provide adequate mitigation, and avoiding the true costs of alternatives. We ask that you correct these deficiencies and publish a supplemental Draft EIS.

Proposal

This is a substantial project, constructing nine miles of new 500kV line with towers 135' high. BPA proposes to clear vegetation from 160-300 acres and construct at least a mile and a half of new road. Also proposed are three staging areas of undetermined size and location, plus a three acre expansion of an existing substation. The cost is estimated at \$11.5 million plus \$6.5 million for substation addition (S-3).

Need

Purpose and Need Unsubstantiated

382-004 | The need for this project has not been demonstrated, and the "purpose and need" statement in the DEIS is not clearly defined. The EIS merely claims that this project is needed to maintain system reliability and describes recent weather and general electrical grid situation and efforts at conservation. However, there is no substantive information that demonstrates that this project is necessary, nor that a more aggressive conservation effort would be a viable alternative.

382-005 | There is no explanation of the electrical transmission system serving the King County area that supports the necessity of the proposed line. The DEIS should include a regional system analysis that shows the current situation and other improvements BPA is

considering in the near term and distant future so the reviewer can understand why this specific link is necessary. Furthermore, it should demonstrate why BPA feels this project must be done in a particular manner and time frame that appears to preclude all but the selected alternative.

382-001 | Comment noted.

382-002 | Comment noted.

382-003 | Please see responses to Comments 394-003, 378-012, and 378-001.

382-004 | The description of the purpose and need for this project is greatly expanded in Chapter 1 of the SDEIS. A summary of the transmission planning studies (Appendix H) is available upon request.

382-005 | BPA performed a regional system analysis that supported the subject project. These analyses are conducted through computer simulation studies. A summary of these studies is available upon request (Appendix H).

BPA is considering other improvements in the area. See Section 1.7 of the SDEIS.

382-006 | Comment noted. Cost estimates for all the alternatives in the SDEIS were updated to include mitigation cost estimates. BPA is committed to providing the appropriate level of mitigation as required by King County's Environmentally Sensitive Areas Ordinance, Chapter 21A.24 of the King County Code. Although BPA as a federal government agency is not required to meet these procedural requirements, it strives to meet or exceed local development regulations' substantive requirements wherever possible. As a result, BPA is working with King County as well as Seattle Public Utilities and the U.S. Fish and Wildlife Service in developing a reasonable mitigation package that is acceptable to all of these agencies' needs. Please also see response to Comment 340-002.

382-007 | Please see response to Comment 394-090.

- Impacts**
 Contrary to BPA's description, this project has serious and extensive impacts. We are very concerned that BPA's approach to these impacts is weak and fails to fully understand them or fully mitigate for them. Such a project should not be constructed without such mitigation. Since full mitigation is not considered in the cost estimates, it is unclear whether alternatives rejected for cost would be less expensive.
- 382-006
- Serious cumulative impacts ignored**
 BPA claims, "...the relatively small areas required for the proposed transmission facilities would have only a low impact." (DEIS 4-6). This disregard for the impacts to precious resources, such as late-successional forest, clean drinking water, and cultural resources as well as the cumulative impacts of transmission lines crisscrossing the forests of this region, is indicative of BPA's lack of understanding of the impact of this proposal. The cumulative effects analysis is extremely weak, with no data to justify conclusions. The EIS merely states that the cumulative impacts of forest loss is considered low (DEIS 4-53). On the contrary, the cumulative effects of this and other BPA lines is significant, and when combined with other loss of forest becomes quite significant. This disregard for the cumulative effects of BPA's actions is a serious deficiency of this EIS.
- 382-007
- The DEIS must describe the impacts of existing line, as well as the combined effect of two lines. We understand that BPA is currently considering a similar project from Echo Lake to Monroe. This and other proposals must be described and the cumulative effects evaluated.
- 382-008
- 1.5 miles of new road construction has significant adverse impacts. Roads have high impact to soils, water quality, fragmentation of habitat, and wildlife behavior. BPA's proposal that 50' wide easement outside of powerline ROW seems excessive. While for planning purposes that might be appropriate, the road construction should be much narrower and specified within the narrowest easement. A 16' road surface plus 4-6' near curves is also excessive (DEIS p2-7). A single land road should suffice for equipment. Helicopters should be used if cranes cannot negotiate single lane roads with curves. Ten feet on either side of the road for ditches is also excessive. This 36' wide impact is not consistent with the 20' wide disturbance width used for the DEIS analysis (DEIS p2-7).
- 382-009
- Protecting Important Resources**
 The Cedar River watershed encompasses a unique lowland forest that will be protected in perpetuity, thanks to the City of Seattle's vision and commitment. Surrounding remnants of the original forest, the second growth has been growing and developing for up to 100 years. Nowhere else in the county will we see such ancient forests- at low elevation, in large blocks. This is also a critical ecological connection to Tiger Mtn. and Rattlesnake Ridge.
- While lands in the Raging River may be managed for timber, it will provide age classes of over 40 years, while in the powerline right of way trees will never exceed a few years. Due to conservation easements being developed in the valley, it should not be converted to urban uses. This and its location makes this valley particularly significant for forest ecosystem conservation. Thus, BPA should mitigate for the difference in this type of forest, by acquiring and conserving for forestry an equivalent amount of land that would otherwise be converted to non-forest uses.
- 382-010
- The impact of the BPA line will be in perpetuity, therefore the mitigation must be in perpetuity. The only reasonable solution is BPA must replace the lost habitat, sometimes referred to as compensatory mitigation.
- There are several excellent candidates in the vicinity of the line, including sections near Selleck, Taylor Mtn., the upper Rock Creek valley and Green River.
- 382-008 The DEIS and SDEIS contained a cumulative impact analysis that looked at the cumulative impacts of existing facilities when added to the proposed project and any reasonable foreseeable future actions. BPA does not know whether a line between Echo Lake Substation and Monroe Substation is needed. BPA's system planners are constantly studying the system, and only propose improvements to the system as they are needed. System planners have not determined that such a line is needed, and therefore, it would not be considered to be reasonable foreseeable at the present time.
- 382-009 The 50-foot road easement is a BPA standard for acquisition of a road to be constructed along a 500-kV transmission line. The typical cross section of a 16-foot wide road with ditches is 36-foot maximum with additional as may be required for cuts and fills or curve widening. Typically, a 16-foot wide road on the type of terrain in the project area would not require more than 26 feet.
- BPA will specify helicopter/sky crane tower erection within the Cedar River Watershed to minimize impacts in the area. Helicopter tower erection would also be used outside the Watershed in those areas where access might impact wetlands. Roads would still be necessary to allow access to most of the tower sites that could be reached from uplands, for both construction and maintenance activities. However, no wetlands would be filled to reach tower sites.
- 382-010 Comment noted. BPA has purchased or will fund the purchase of land to offset those forestlands and wetlands that would be lost due to the Proposed Action. See response to Comment 340-002.
- 382-011 Please see response to Comment 394-034 and Section 2.1.1.4 of the SDEIS.
- 382-012 A SDEIS has been provided with more in-depth analysis of a variety of issues raised during the comment period for the Draft EIS.
- 382-013 When siting its transmission facilities, BPA avoids sensitive areas such as wetlands where it can. Where it cannot, these sensitive

382-011 The DEIS states several times that the clearing would be 150' wide, but table 2.1 (DEIS p2-6) says 374'. If no extra clearing is done between towers (that is 75', assuming as close as possible), then 187' would be cut on the other side; thus, total clearing is 262' wide. Additional "danger trees" could be felled (p S-3). This could increase to up to 476' slope distance through mature and old-growth forests. At only 150' wide, 9 miles of clearing equals more than 160 acres, but it is apparent that clearing could easily exceed 300 acres, much of it late-successional forest. This is a significant impact on forest, which only increases if we assume blowdown in adjacent forest due to this clearing. In addition, there would be 3 acres of clearing for substation expansion. BPA is considering reduced clearing within the Cedar River watershed, but provides no specifics. This is crucial information and should be in a supplemental Draft EIS, rather than in the Final EIS.

382-012 Impacts on Wetlands
Ten wetlands with 242 acres are located within 500' study corridor (DEIS p3-47). While not all may be directly impacted by clearing and construction, all will be seriously affected. Mitigation measures should address all these. The first approach is avoidance. If an area can't be avoided, then replacement areas must be acquired and protected.

382-014 Important fisheries in Raging & Cedar Rivers
The City of Seattle is working to re-establish salmon in Cedar River. The Raging River has coho and Chinook salmon. Additional road construction, clearing, and potential spills all will adversely affect these species.

382-015 Impact on behavior of wildlife
Marbled murrelets may be using the upper watershed. This species tends to fly along the river corridors. Thus, any towers or lines that cross the rivers would present a hazard from both collision and electrocution. This is a significant impact, and one that bears on BPA's obligations under the ESA. As the forest approaches late-successional character, spotted owls will increase their use in this area. BPA's line will eliminate potential habitat and make it more difficult for owls to reach habitat to the west. Again, BPA's action may not be consistent with the ESA.

Fragmentation of habitat is a major concern, and one not adequately treated in the DEIS. This creates barriers to wildlife movements due to inappropriate habitat conditions and/or increased predator success. In some cases makes good habitat unusable. It is imperative that the upper and lower Cedar River forests be connected by the best possible habitat. Similarly, the connection to Tiger Mtn. and other forests in the vicinity is needed. BPA's powerlines are one of the most significant obstacles to achieving those goals.

382-016 Corridor management needs revision
The management of other vegetation in the ROW corridor (DEIS p2-5) is excessive and needs to be revised. Less clearing and more allowance for shrubby and woody vegetation should be included. This may require more frequent attention, to allow maximum height of vegetation, while maintaining safety clearances. Wherever topography is favorable, taller trees should be allowed to grow. In certain areas, this could be combined with installing taller towers, (thus increasing line height), to provide considerable forest cover.

Seattle City Light's management within the Ross Lake NRA has begun to incorporate some of these approaches. In special areas, such as the Cedar River watershed, special actions are necessary. While this might require more frequent corridor management, that is part of the price for traversing these special areas.

areas are spanned, and where they cannot be spanned, BPA minimizes its impact to the extent that it can. BPA has determined that the Proposed Action would convert approximately 14 acres of forested wetlands to scrub-shrub wetlands. No wetlands would be filled. BPA is looking for ways to mitigate for the wetland impacts; however, it proposes to use part or all of the 352-acre parcel recently purchased from the Trust for Public Land to mitigate for the conversion of forested habitat to non-forest uses, as well as to mitigate for a portion of wetland impacts associated with the Proposed Action. See also response to Comment 340-002 for information about compensatory mitigation.

382-014 Comment noted. BPA is aware that the City of Seattle intends to reestablish some species of salmon in the Cedar River, above Landsburg Dam, and that the Raging River has coho and chinook salmon. While additional road construction, clearing activities and potential spills could adversely impact these fish species, BPA would put in place mitigation measures to minimize any impacts. Additionally, BPA has written a biological assessment (BA) on the Proposed Action that has concluded that the Proposed Action may affect, but is not likely to adversely affect the chinook salmon (listed as threatened in the Puget Sound area) and their designated habitat, and that it may impact, but is not likely to adversely impact, the coho salmon (listed as a candidate species, under the Endangered Species Act).

In January 2002, NMFS issued a letter to BPA concurring with its effect determination of "may affect, but not likely to adversely affect" for Puget Sound chinook and their designated critical habitat; therefore, BPA has concluded informal consultation on these actions in accordance with 50 CFR 402.14 (b)(1). See Appendix U.

382-015 Section 4.1.1.1 of the Wildlife Technical Report (Appendix B) was amended to include a discussion of potential collisions with power lines by marbled murrelets potentially flying up river corridors. Section 3.3.2 was revised to include marbled murrelets as a species to be analyzed.

Section 3.3.2.1 of the Wildlife Technical Report was revised to reflect the level of potential future habitat loss in the lower

382-017 The new clearing and construction will allow incursions of noxious weeds. The current ROW has weeds, so the regional plan referenced in the DEIS is not adequate to control them. Additional clearing will engender additional weeds. A commitment to a control plan with proven effectiveness, even if it is all manual, must be a part of any powerline corridor.

We are pleased with your commitment to not use any herbicides in the Cedar River Watershed. (p S-5). However, it appears that it will be used in the Raging River watershed. The salmon in this river need the highest quality water and the powerline cross the river and continues for several miles in the watershed.

Alternatives

Range of alternatives is inadequate

The alternatives did not represent a full range, as numerous possibilities were rejected without further study. NEPA requires that reasonable alternatives be considered which include those alternatives that can meet the objectives, as defined by the purpose and need statement, of the proposal. For the stated goal, there is a much larger range of reasonable alternatives.

382-018 The DEIS does not provide sufficient analysis of alternatives outside of the Cedar River Watershed to support their elimination without detailed evaluation. The DEIS notes impacts to “developed land and people living in the area.” While it is clear there would be impacts, there is no analysis of the type, amount or significance. BPA cannot simply dismiss an alternative just because it would have impacts. All of the alternatives through the watershed also have impacts, and yet they were not dropped from consideration. Lacking stated criteria and evaluation, there is no justification for dropping certain alternatives and narrowly limiting the range of alternatives considered in the DEIS.

The EIS must evaluate the full range of reasonable alternatives. The DEIS also needs to present a detailed cost justification for the proposed action to ensure that agency funds are being spent prudently. This should include full consideration of anticipated future projects, as well as considering mitigation measures that could avoid or reduce impacts of the proposed action. Furthermore, NEPA requires that federal agencies consider alternatives that can accomplish the objectives of the proposal, but at a lower environmental cost.

Alternatives not considered

Adding a circuit to the existing towers, or replacement towers should still be considered. The risk of loss of a tower is very low, especially given the limited access, so the risk of losing two circuits at the same time is low. At your public meeting, a BPA staff person said it would require a six months outage to replace the existing towers and line with a double circuit. What length of time can you have this line out of service? Did you analyze using existing towers within the Cedar River Watershed, and separate towers outside? With accelerated construction activities and careful scheduling could the outage period be reduced to levels that would not significantly affect system loads? Again, there was no information in the DEIS on these questions.

382-019 Alternatives of rebuilding other lines and adding equipment at substations to increase voltage were briefly mentioned and dismissed (p2-18). Information on these options should have been expanded and compared to the proposed action.

We agree that no additional powerlines from Stampede Pass to Echo Lake should be built, but rebuilding an existing line was dismissed with little discussion except the cost would be higher. There is no assessment of whether BPA would in the future propose an additional circuit or increase of voltage on this line. Would rebuilding a 500kV double circuit now be more cost effective in the long run? Will BPA want to build another powerline in the Echo Lake-Raver corridor? If so, why doesn't the agency

Cedar River Watershed and to discuss the potential impacts of creating dispersal barriers for this species. Although spotted owls may use habitat in the lower Cedar River Watershed in the future, it is not guaranteed.

The analysis of potential impacts from habitat fragmentation within the Cedar River Watershed was expanded in Section 4.1.1.1 of the Wildlife Technical Report.

382-016 For safe and uninterrupted operation of the transmission line, vegetation within the ROW is not allowed to grow above a certain height. Restrictions vary, however, depending on the terrain, the type of vegetation, and growth rates. It is BPA's intent to protect and maintain, as much as practicable, vegetation in the ROW that will not interfere with the safe and reliable operation of the line. In some places, towers are sited so that trees in canyons and along rivers can be maintained. In addition, long-term vegetation management on the ROWs includes the promotion of low-growing plant communities on the ROWs to “out compete” trees and tall-growing brush.

382-017 BPA contracted for a noxious weed survey in July 2001. Six noxious weed species were found within the Proposed Action area, with three being so common that King County and the Noxious Weed Program recognizes that control or eradication is not economically feasible. Most of the noxious weeds were found on the more disturbed sites outside the Cedar River Watershed. During construction, BPA will follow the recommendations in that report regarding preventative measures such as educating the construction contractor to identify and avoid infested areas, washing vehicles and equipment prior to entry and upon moving to another location, using certified weed-free materials brought onto the project area, and reseeding disturbed areas. Following construction, BPA will follow standards and guidelines set forth for noxious weeds as defined in the FEIS and Record of Decision for BPA Transmission System Vegetation Management Program (BPA 2000). The Vegetation Management ROD can be found on the Internet at www.efw.bpa.gov/cgi-bin/PSA/NEPA/SUMMARIES/VegetationManagement_EIS0285. See also Appendix K of the SDEIS. BPA and SPU are drafting an agreement that addresses

consider using towers that carry two circuits, so we don't have to go through the same discussion again in a decade or two.

We have similar questions about the Covington-Maple valley 30kV line. There is no backup information to the claim that that circuit could not be taken out of service for reconstruction or that vacant circuits could not be used as part of this alternative. (p 2-17)

Routes outside the watershed were rejected, but will these be necessary in the future anyway? The impacts were vaguely described, but at least one of these should have been included in the EIS. All the impacts of such lines should be analyzed and compared to the proposed action.

382-020 We are adamantly opposed to other routes through the Cedar River watershed (alt 2, 4a, 4b) as they also have impacts associated with the preferred alternative plus additional destruction and fragmentation of forests and other natural habitats.

Conservation should be first choice

382-021 We are concerned with the lack of consideration of energy conservation. With reduced demand, such lines would not be necessary. The DEIS did not adequately consider alternatives of energy conservation, merely stating that BPA was doing all it could. We do not agree. While most of our comments in this letter focus on the project, we have not been convinced that conservation would not obviate the need for this project.

Environmental Analysis

Inadequate information and analysis

382-022 The DEIS has inadequate information and incomplete analysis for a reasoned decision. It violates NEPA by failing to fully disclose all environmental impacts. Clearly, a supplemental DEIS is needed.

382-023 For instance, the DEIS says that three staging areas will be needed (S-4). How large will these be? Where will they be located? What restoration measures will be implemented once they are no longer needed? This is key information lacking in the DEIS.

382-024 The fisheries analysis in the DEIS and technical appendix is inadequate due to lack of assessment of Type 4 and 5 streams, lack of thorough erosion assessment, minimal site-specific information on streams, no quantification of impacts by stream crossing, and lack of disclosure as to the extent of clearing in riparian areas. These omissions effectively preclude an evaluation of project effects.

382-025 The DEIS seems to avoid the fact that the Cedar Watershed is an unfiltered source of high quality water for over a million people in the Puget Sound region. The DEIS says nothing about potential impacts to the drinking water supply for these people. Incidents such as toxic spills or turbidity plumes are serious risks in any watershed, but are totally unacceptable in this watershed. What specific measures will be implemented to eliminate this risk? In addition, public notices and public meetings related to the NEPA scoping and DEIS comment periods have not been effective in involving those that drink this water. Additional public involvement with a Supplemental Draft EIS should be done.

382-026 Many of the impacts noted in the DEIS meet CEQ's definition of "significant." However, the DEIS avoids this determination, using instead the relative terms, "low, medium, and high." Thus, BPA has not taken a "hard look" at the impacts, as required by CEQ. Consequently, the public, other agencies, as well as BPA decision-makers do not have adequate information to review. Because of the importance of "significant impacts" in the NEPA process, failure to disclose this information is as serious breach of NEPA itself.

vegetation management of target species, including weeds, within the CRW.

382-018 In response to comments received about the range of alternatives analyzed in the DEIS, BPA analyzed five additional alternatives in the SDEIS that would avoid construction in the Cedar River Watershed.

382-019 Please see the responses to Comments 340-003 and 382-018.

BPA stated that the line could not be taken out of service long enough to be rebuilt. This is one of the main lines BPA relies on to carry power for the Seattle area when the existing Raver-Echo Lake line is forced out of service. Without the Covington-Maple Valley line, load in the Seattle area and/or Treaty return for Canada may have to be curtailed for the time period the line is out to be rebuilt. BPA has reevaluated and as a result included Alternative A, which uses the Covington-Maple Valley line corridor in the SDEIS.

The existing Raver-Echo Lake line (formerly the Raver-Monroe line) was built in the early 1970s. This line has been sufficient for system load purposes for the last 30 years. The addition of the second line will more than triple the power carrying capability of the two lines because each line will be more effective in backing up the loss of the other line and should therefore provide another 30 to 50 years of load serving capability.

382-020 See response to Comment 382-018.

382-021 Please see response to Comment 349-001.

382-022 Please see response to Comment 382-012.

382-023 BPA has no information on where the staging area(s) would be located at this time. The selection of staging areas would be at the discretion of the contractor and would be approved by the landowner. No staging areas would be in the Cedar River Watershed.

382-024 Erosion impacts and riparian clearing are assessed in Section 4.1 of the Fisheries Technical Report (Appendix A). Site-specific stream data are in Appendix A of the Fisheries

- 382-027 Several key aspects of the proposed transmission line are not described in sufficient detail to support an evaluation of impacts. We understand that BPA completed a Final Biological Assessment for this project during the public comment period for the DEIS. This indicates that sufficient details was available for the DEIS. The fact that specific, known design information for the proposed action was omitted from the DEIS indicates BPA has violated NEPA by failing to fully disclose environmental impacts. Please provide us with a copy of the biological assessment, and include it in a supplemental DEIS.
- 382-028 Failure to adequately describe the project compounds the vagueness of proposed mitigation measures, making it impossible to evaluate the effectiveness of mitigation. The net result is a level of uncertainty of the proposal's impacts that renders the DEIS useless to reviewers and decision-makers.
- 382-029 The impacts of the project are potentially greatest for the Cedar River Watershed, especially considering the area is the region's major drinking water supply, and the land is being managed under a complex Habitat Conservation Plan (HCP). However, BPA's proposed actions and their impacts are described so minimally that it is not possible for the public to evaluate the project's impacts. Once again, the DEIS does not fully disclose environmental impacts.
- 382-030 Site specific information on clearing requirements in the watershed (p2-6) and access roads (p2-7) is lacking, although at one point the DEIS describes removal of trees on the Cedar River as a "high" impact (p4-36). BPA attempts to avoid the requirement with an explanation that the information will be available for the Final EIS. This information is critical to evaluating project impacts and mitigation measures and therefore should be provided as part of the DEIS. Also, the DEIS does not describe tower locations, which could have substantial impacts. This does not provide the public with adequate opportunity to review the proposal. Again, a supplemental DEIS is needed.
- 382-031 Lack of consistency with federal, state, and local regulations
NEPA regulations require that an EIS discuss how the proposed action is consistent with federal, state, and local land use plans and policies. Has this been done, and if so how has BPA reconcile any conflicts. Two examples in the subject project are King County's sensitive areas and Shoreline Management provisions.
- 382-032 We cannot find where BPA coordinated with federal agencies on Endangered Species Act prior to releasing the DEIS. Perhaps this is one reason that the DEIS fails to fully assess impacts on endangered and threatened species such as Chinook salmon and coho salmon, and fails to address impacts on marbled murrelets. BPA has an obligation under the Endangered Species Act and Northwest Power Act to protect, mitigate, and enhance salmon runs where affected by its actions. However, BPA's proposed action has adverse impacts on federally listed salmon and their habitats that are not adequately mitigated.
- 382-033 This project will directly affect the Cedar River Habitat Conservation Plan, under the Endangered Species Act. BPA indicates that USFWS will have to "decide if the transmission line facilities require any change to the existing Habitat Conservation Plan..." The DEIS does not discuss the proposed action's impacts on the HCP, but the DEIS fisheries technical report suggests construction of the proposed action would violate provisions of the HCP. Commitments made by the City in its HCP would be substantially diminished by the BPA project, reducing the conservation value of the plan. The City should not need to modify the HCP as a consequence of BPA's activities. If BPA requests such changes, it must provide mitigation for any impacts that reduce the conservation value of the City's HCP that, at a minimum, compensates for that reduction in value.
- 382-034 Mitigation
The DEIS lacks mitigation for unavoidable impacts.
The DEIS suggests "mitigation measures", but these are actually standard practices (sometimes called best management practices or BMPs) and not really project mitigation measures. They do not offset, reverse, or rectify the impacts of constructing the proposed project. Thus, BPA's suggestion that "maintaining environmental quality" (S-2) is one of the purposes in developing this project, is but an empty statement. For example, although the DEIS states that impacts on ESA-listed species of fish are "high," BPA fails to commit to any mitigation that would offset those impacts.

- Technical Report. Data do not indicate that detailed analysis of Type 4 and 5 streams would substantively alter the findings of the analysis. The effects of the Proposed Action on such streams would be approximately the same as the effects on Type 3 fish-bearing streams, and those effects are detailed in Section 4.0 of the Fisheries Technical Report.
- 382-025 Please see response to Comments 378-005 and 382-012.
- 382-026 BPA agrees that the proposed project has potentially significant impacts. That is why we immediately proceeded to produce an EIS rather than an Environmental Assessment. However, we intend to mitigate any potentially significant impacts to a level below significance because we believe doing so is in the public interest. We disagree that it is improper to use relative terms such as "low, medium or high" to discuss the nature of the impacts. We believe making these assessments helps the public and decision-maker to be better informed concerning the nature of the various impacts upon the environment.
- 382-027 BPA hired a team of consultants to assist the agency develop technical study reports that the agency used to write the DEIS and the SDEIS. Subsequently, BPA needed to survey the Proposed Action before the tower sites could be located and access/spur roads identified to reach these facilities. Following the survey, BPA identified where the wetlands were, and sited the proposed towers to avoid these sensitive areas. While it is true that our biological assessment contained the proposed tower site and access/spur road locations and was printed a short time after the DEIS, this information was not available at the time the DEIS was written. Additional information is in the SDEIS.
- 382-028 Chapter 2 of the SDEIS describes the alternatives considered to meet the need, and summarizes how the environmental consequences differ among alternatives. More detailed information is presented in Chapters 3, Affected Environment, and Chapter 4 Environmental Consequences.
- 382-029 Chapter 4, Environmental Consequences, identifies the impacts of the Proposed Action and alternatives.

382-035 | We understand that BPA has not mitigated for habitat losses of their powerlines in the past. But this must change. Unless and until BPA makes a binding commitment to replace lost, damaged and fragmented habitat, we must oppose construction of this line.

382-036 | BPA cannot externalize the costs of this project, as it has done with previous lines. The loss of the forest is more than just a loss of timber revenue. It is a permanent loss of habitat that is rapidly disappearing- especially in the foothills of the Cascades in King County. The cost of such replacement must be included in the cost, then compared to other alternatives. The sale of timber by the underlying landowner does not mitigate the long term impacts of logging. Past practice of ignoring the loss of forest permanently is no longer defensible.

The mitigation measures presented in the EIS are wholly inadequate for a project of this nature. All construction alternatives should include the following.

382-037 | ➤ BPA should replace all habitat damaged within the project area with equivalent habitat type and quality in the vicinity, or if unavailable, then increase acreage in ratio to lesser quality, plus a premium for fragmentation.

382-038 | ➤ The height of transmission lines at Cedar and Raging River crossings should be high enough to allow late successional forest to grow to 200' tall in the riparian zone of the river and to mature heights on the slopes above the river bottom. Given the topography on either side of the river, that should be feasible. BPA should increase the height of the towers in that vicinity if necessary. We are disappointed that this issue was not addressed in the DEIS. We had brought it up during scoping and public meetings at that time.

382-039 | ➤ Eliminate roads outside of cleared powerline right of way. Use helicopter and/or trails to access those sites. Any roads constructed should be offset by eliminating an equal or greater amount of road in the affected watersheds, over and above what is planned by the land owner.

382-040 | ➤ Minimize tree cutting outside of 150' corridor; first option should be to only top thjem, then, if necessary, removing those trees deemed likely to topple into the lines within a short period of time, rather than wholesale clearcutting.

382-041 | ➤ Apply measures to prevent any and all toxic materials and sediment from entering surface or subsurface waters in the Cedar River Watershed.

Conclusion

382-042 | The Draft EIS is inadequate, and should be redone to display a full range of alternatives, demonstrate need, include relevant information, adequately assess the impacts and incorporate adequate mitigation, describe required coordination with other governmental entities, and incorporate and describe all costs of the project. The project fails to meet the requirements of NEPA and the ESA. We urge BPA to withdraw its proposal and only reissue a Draft EIS when has a proposed action that is legally and environmentally acceptable.

Thank you for this opportunity to comment on the DEIS. Please keep us apprised of any actions related to this proposal.

Sincerely,

Charles C. Raines
Director, Cascade Checkerboard Project

cc: Senator Patty Murray
Senator Maria Cantwell
King County Executive Ron Sims
Mayor Paul Schell

382-030 | Please see response to Comment 382-012.

382-031 | Section 5.10 of the SDEIS addresses the Coastal Zone Management Act. The information shows that BPA is, to the extent practicable, consistent with all federal, state and local government plans and programs, including the City of Seattle's recently adopted Habitat Conservation Plan (HCP).

With respect to the King County Environmentally Sensitive Areas Ordinance, Chapter 21A.24 of the King County Code, BPA is consistent to the extent that it can be. The proposed power line and access/spur roads were sited to avoid impacting sensitive areas. All are located on uplands. Where sensitive areas could not be avoided, i.e., conversion of forested wetlands to scrub/shrub wetlands within the proposed right-of-way, the impact would be minimized by undertaking hand clearing, and either leaving the vegetation removed within the right-of-way as wildlife habitat, or removing it by sky crane or helicopter to avoid ground disturbance to the wetlands, and avoid fuel loading within the right-of-way. Additionally, BPA would be providing compensatory mitigation as required by the King County Code to mitigate for altering these wetlands. With respect to the Shoreline Management provisions of the King County Code, BPA's proposed project would not be considered to be directly affecting the coastal zone. Although the proposed transmission line would cross two Class 1 Streams, the Cedar and Raging rivers, which are governed by the Shoreline Management Act, no ground disturbing activities would be undertaken within 200 feet of these waterbodies.

382-032 | Please see Section 5.2 of the SDEIS for a complete description of consultation with the U.S. Fish and Wildlife Service and NOAA Fisheries on threatened and endangered species. See also response to Comments 377-001, 382-014, 394-010, 394-088, 400-001, and 411-013.

382-033 | The DEIS (Pages 5-16) stated that the HCP covers only actions by the City of Seattle, and that activities undertaken by other agencies are not addressed by the HCP, and therefore, require separate reviews by FWS and NMFS. Furthermore, the DEIS stated that BPA is consulting with both FWS and NMFS to ensure compliance with the Endangered Species Act.

It is unlikely that the City of Seattle will be required to modify its HCP as a result of BPA's project.

While BPA is not requesting any changes to the HCP, BPA has purchased or will fund the purchase of land to provide compensatory mitigation to replace spotted owl habitat as well as to compensate for the conversion of forested wetlands to scrub/shrub as a result of project. See response to Comment 340-002.

While we recognize that the proposed project crosses the City of Seattle's CRW, we do not believe it will seriously interfere with the purpose or objectives of the HCP that Seattle Public Utilities recently adopted. While admittedly the project will have some adverse impacts, the proposed alternatives represent the least-damaging routes that could be identified. For example, impact to wetlands and cultural resources were avoided to the maximum extent practical. Additionally, BPA intends to mitigate for any adverse impacts resulting from project implementation in a manner consistent with the HCP purposes, and which will, in effect, keep the HCP whole.

- 382-034 Please see response to Comment 340-002.
- 382-035 Please see response to Comment 340-002.
- 382-036 Please see response to Comment 340-002.
- 382-037 BPA would be altering habitat on the CRW from a forested habitat to a non-forested habitat over the 5 mile right-of-way within the CRW. BPA has purchased land to offer as compensatory mitigation for the forested habitat that would be converted to a non-forest use. Please see response to Comment 340-002.
- 382-038 The 135-ft tall tower referred to in the EIS is an average based on past experience with 500-kV towers. The actual height of the towers would be determined during the design phase of the project. The towers flanking the Raging River will be sized to minimize clearing in riparian habitat. BPA is using double-circuit towers on the Cedar River crossing to eliminate clearing near the river.

- 382-039 BPA would be building access/spur roads outside of the cleared right-of-way only to avoid sensitive areas such as wetlands and their buffer areas. With regard to eliminating the need to access tower sites, BPA cannot do so. BPA needs access to each tower site to construct, operate and maintain the transmission system in a safe and reliable manner. BPA will specify that helicopter construction techniques be used for this project if BPA decides to build the transmission line.
- BPA has no authority to eliminate roads in the Cedar River Watershed. Seattle Public Utilities owns all roads within its property boundaries. BPA holds easement rights across some of these roads.
- 382-040 Please see response to Comment 340-004. Topping is not a recommended alternative to tree removal and should only be used if there are no other alternatives.
- 382-041 Comment noted. As a result of this and another comment, BPA has requested that the tower steel manufacturer not dip the tower steel in a solution of sodium dichromate prior to shipment. Sodium dichromate is commonly used on tower steel following the galvanizing process to prevent white rust from forming on the tower steel during shipment. This material is water soluble, and would add a short-term pollutant to the Watershed. BPA thanks the commenter for the comment.
- 382-042 In response to comments, the SDEIS includes more information about these topics. BPA has initiated formal consultation with the USFWS and has concluded informal consultation with NMFS.

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <u>KELT-383</u>
RECEIPT DATE: SEP 04 2001

5027 19th AVE NE
SEATTLE, WA 98105
AUGUST 29, 2001

Communications

attn: Mr. Lou Driessen, Project Manager
Bonneville Power Administration - KC-7
PO Box 12999
Portland, Oregon 97212

Dear Mr. Driessen,

I am writing with regard to the Bonneville Power Administration's interest in building new powerlines in the Cedar and Raging River watersheds.

I appreciate the importance of providing electricity to customers and I admire BPA's ability to do so at a low cost. I am concerned however with BPA's proposal to install nine miles of 500 kilovolt lines with a necessity of clearing away between one hundred fifty to two hundred eighty five feet worth of trees. I am also concerned about the plans BPA has to build one and a half miles of new roads in order to accomplish this task.

Mr. Driessen, I am sure that you care about the ecosystem and that you love the outdoors as much as the next person. I gather that you comprehend the importance of low elevation forests, rapid loss of forests in King County, and Seattle's decision to preserve its watershed forests.

Sir, I am against building new 500 kilovolt

383-001 Please see responses to Comment Letter 361.

383-001

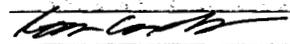
Mr Lou Driessen
 August 29, 2008
 page two

lines through the watersheds and I am opposed to construction of any roads in them. One of the reasons for my position is, has to do with salmon fisheries in Raging River as well as Seattle's attempts to re-establish salmon in Cedar River.

Mr. Driessen, I do however support BPA adding additional circuits to towers in the existing Corridor, if safe and if it can be done for a reasonable cost and without threat to BPA's workers.

Furthermore, I believe it to be of the utmost importance that any and all forests and wetlands that have been damaged by BPA be repaired through replacement. I also respectfully request a new Environmental Impact Statement with nothing less than all needed information, a substantive cumulative effects analysis as well as additional alternatives.

This letter states my position Mr. Driessen. I know BPA has a lot of pressure to produce but I think it can get the job done without harming our beautiful watersheds.


 TOM HUNDLEY
 tom@principia.edu

383-002 Please see the response to Comment 340-003.

383-002

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-384</i>
RECEIPT DATE: SEP 04 2001

4244 NE 88th Street
Seattle, WA 98115
August 31, 2001

Lou Driessen, Project Manager
Communications
Bonneville Power Administration - KC -7
Post Office Box 12999
Portland, OR 97212

Dear Project Manager:

384-001

This is to ask that the Bonneville Power Administration **build any new power lines through the Cedar and Raging River watersheds on already existing towers.**

384-002

The current plan--to clearcut a swath of forest (currently protected from logging) within the watershed and to construct new road--would have severe, extensive impacts throughout both watersheds. Wetlands, salmon grounds and fisheries, and forest habitat--all of which are at risk -- would be impacted by such a plan.

384-003

From my work in wetlands, I've found that mitigation does not recreate damaged or destroyed wetlands or forest. It may on paper, but the reality in every case is that the ecosystem never again works as it did before. This is true even for relatively small projects such as the BPA's proposed new 500 kilovolt line. A new Environmental Impact Statement (DEIS) is needed, with information and analysis of cumulative effects along with additional alternatives for the proposal to build within the Cedar River watershed.

I think it's vitally important to respect the sanctity of a protected watershed.

Sincerely,

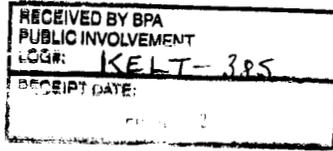


Lynn Pruzan

384-001 Please see the response to Comment 340-003.

384-002 See response to Comment Letter 361.

384-003 See response to Comment Letter 361.



Dear BPA Project Manager,

385-001

PLEASE ENTER THIS LETTER INTO THE PUBLIC RECORD WITH REGARDS TO THE DEIS FOR THE KANGLEY-ECHO LAKE TRANSMISSION LINE PROJECT.

385-002

I'D LIKE TO ADD MY VOICE TO THOSE WHO ARE CALLING FOR THE FOLLOWING.

① ANY NEW LINES SHOULD BE PLACED ON EXISTING TOWERS.

② IN ANY ALTERNATIVE, THE BPA MUST FULLY MITIGATE FOR ANY IMPACTS OF ITS PROJECTS.

ie- REPLACE ANY FORESTS YOU CUT OR WETLANDS YOU DESTROY

385-003

③ A NEW EIS SHOULD BE DEVELOPED THAT FULLY CONSIDERS THE CUMULATIVE EFFECTS OF THE PROJECT & ALL ALTERNATIVES.

ROBERT WATTEZ
2624 NE 145 AV.
VANCOUVER, WA 98282

THANK YOU,

385-001 Please see the response to Comment 340-003.

385-002 BPA would not be filling any wetlands. See response to Comment 340-002.

385-003 Please see responses to Comments 350-003 and 357-003.

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>REL-386</i>
RECEIPT DATE: SEP 04 2001

6215 Ravenna Avenue NE
Seattle, WA 98115-7025
August 31, 2001

Lou Driessen, Project Manager
Communications
Bonneville Power Administration - KC -7
Post Office Box 12999
Portland, OR 97212

Dear Project Manager:

386-001

Please, build any new power lines through the Cedar and Raging River watersheds on already existing towers.

386-002

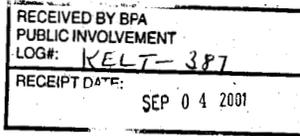
Also, please offer a new Environmental Impact Statement that supplies a substantive cumulative effects analysis of the proposal to build in the Cedar River Watershed, along with additional alternatives. The current plan--to clearcut a swath of forest (currently protected from logging) within the watershed and to construct new road--would have severe, extensive impacts throughout both the Raging River and the Cedar River watersheds. Wetlands, salmon grounds and fisheries, and forest habitat--all of which are at risk --would be impacted by such a plan.

Sincerely,

Ceci Cordova
Ceci Cordova

386-001 Please see the response to Comment 340-003.

386-002 Please see response to Comments 340-002 and 357-003.



4250 NE 88th Street
Seattle, WA 98115
1 September 2001

To the attention of: Lou Driessen, Project Manager
C/o Communications
Bonneville Power Administration - KC -7
Post Office Box 12999
Portland, OR 97212

Dear Project Manager:

Please, build any new power lines through the Cedar and Raging River watersheds on already existing towers.

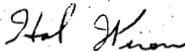
Also, please offer a new Environmental Impact Statement that supplies a substantive cumulative effects analysis of the proposal to build in the Cedar River Watershed, along with additional alternatives. The current plan--to clearcut a swath of forest (currently protected from logging) within the watershed and to construct new road--would have severe, extensive impacts throughout both the Raging River and the Cedar River watersheds. Wetlands, salmon grounds and fisheries, and forest habitat--all of which are at risk --would be impacted by such a plan.

Sincerely,



ALICE WIREN

and



HAL WIREN

387-001 Please see response to Comment 386.

387-001

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: KELT-388
RECEIPT DATE: SEP 04 2001

Aug. 29, 2001

Dear Lou Drivesson,
We, the residents of Seattle, WORKED HARD TO HAVE THE Cedar River and The Raging River watersheds protected FROM TREE CUTTING AND FROM ROAD BUILDING AND TO HAVE PAST DAMAGE RESTORED SO WE CAN BE ASSURED OF A SAFE WATER SUPPLY

388-001

YOU ALREADY HAVE A RIGHT OF WAY THROUGH THESE WATERSHEDS THAT YOU CAN USE FOR YOUR EXPANSION OR YOU CAN USE ALTERNATE ROUTES OUTSIDE OF THE WATERSHEDS.

388-002

I STRONGLY OPPOSE THE PROPOSED POWERLINE THAT WILL FURTHER DESTROY OUR WATERSHEDS; ON WHICH THERE HAS BEEN NO OFFER OF REPLACEMENT FOREST AND WETLANDS; AND FOR WHICH IMPACT ANALYSIS AND ALTERNATIVES HAVE NOT BEEN PREPARED.

Sincerely

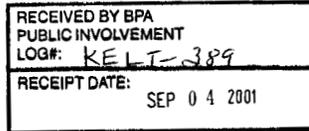


TABITHA KIESEL
109 NW 76
Seattle WA 98117

388-001 Please see the response to Comment 340-003.

388-002 See response to Comment 340-002. The SDEIS identified the impacts of the Proposed Action and the impacts of the alternatives to the Proposed Action, including the No Action Alternative. The Administrator of BPA will use the SDEIS and the Final EIS to make a decision on the Proposed Action.

Telephone comment by Ginny Kuehn
9/4/01



Doug Lawrenson
3232 Conkling Place W.
Seattle, WA 98119
(206) 283-4350

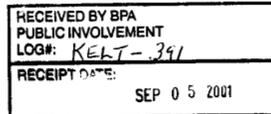
389-001

I object strongly to the idea that this power line would go through Seattle's watershed, which has just gone through extensive public process to keep the city river watershed undisturbed and clean. The idea that old growth forests and the watershed maybe cut down for this power line is absolutely appalling and I am hoping that when you come up with the final scope of the EIS that it will include routes that avoid construction and maintenance in Seattle's watershed, not just Seattle's watershed. Seattle supplies water too much of the regions from this watershed. So I am absolutely adamant that you need to find routes that go outside the watershed and that don't cut down old growth forests.

Thank you.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Tuesday, September 04, 2001 4:39 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Cedar River Watershed



-----Original Message-----
From: James T Michel [mailto:micheljt@hotmail.com]
Sent: Tuesday, September 04, 2001 3:34 PM
To: lcdriessen@bpa.gov
Subject: Cedar River Watershed

Lou,

391-001

It has come to my attention that the BPA is considering cutting a new 9 mile swath of the cedar river watershed to run new power lines. I am very opposed to this proposal. Currently, lines already exist, and running additional lines along the already existing corridor would be considerably less invasive than removing trees from one very important watershed to further scar this unique wildlife habitat.

Please do not Cut any more in the Cedar River Watershed.

Best Regards,

James T. Michel
3018 26th Ave W
Seattle, WA 98199

389-001 Please see response to Comment 382-018.

391-001 Please see the response to Comment 340-003.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Tuesday, September 04, 2001 5:17 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Biodiversity Project, Kangley - echo lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: <i>KELT-392</i>
RECEIPT DATE: SEP 05 2001

-----Original Message-----

From: Jill McGrath [mailto:cbcnews@cascade.org]
Sent: Tuesday, September 04, 2001 4:58 PM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: Biodiversity Project

To Lou Driessen, Project Manager:

Greetings,

I am writing to ask that the BPA not put any new lines on the existing towers. I understand that the BPA wants to build 9 miles of new 500 kilovolt line through the Cedar and Raging River watersheds. This would include 1.5 miles of new road construction. This plan would destroy forests recently protected by the City of Seattle.

Cutting of trees could be as far as 200' from the powerline, especially if it is old growth forest...not the 75' as is implied in the summary.

Would BPA build a powerline through Mt. Rainier National Park? Then why does it propose to through our watersheds?

I support adding additional circuits to towers in the existing corridor; I support having a new EIS with needed information on any decision.

In any alternative chosen, BPA must fully mitigate the impacts of the projects. That means replacing any forests that are cut.

Sincerely,

Jill McGrath
6743 Palatine Ave N
Seattle, WA 98103

392-001

392-001 Please see the response to Comment Letter 361.

Kuehn, Ginny -KC-7

PUBLIC INVOLVEMENT	
LOG#:	KEC-353
RECEIPT DATE:	SEP 05 2001

From: Driessen, Laurens C - TNP-3
Sent: Tuesday, September 04, 2001 5:18 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Raging Cedar (Kangley-Echo Lake Transmission) Line

-----Original Message-----

From: Donald Potter [mailto:potter.d@ghc.org]
Sent: Tuesday, September 04, 2001 4:18 PM
To: lcdriessen@bpa.gov
Subject: Raging Cedar (Kangley-Echo Lake Transmission) Line

Dear Mr. Driessen,

I have been aware of the proposed Raging Cedar Powerline proposal for several months now, and am distressed that it would cause a number of environmental problems.

First, it destroys forests, including Seattle's watershed, which is now protected from logging. The loss of a forest is more than just a loss of timber revenue, but is a permanent loss of habitat, which is rapidly becoming scarce in this highly populated portion of the state.

Second, no mitigation of replaced forests is included in the proposal, and should be.

Third, the area encompasses a unique lowland forest, including old growth forest. Such projects fragment the forest and connectivity so vital for the survival and migration of species, both flora and fauna.

Please, do the following:

- add additional circuits to towers in the existing corridor
- replace any forests or wetlands that are damaged
- complete a new EIS with substantive cumulative effects analysis and additional alternatives, including conservation.

Thank you

Respectfully yours,

Donald E. Potter, MD
3823 140 th Ave NE
Bellevue, WA 98005-1473
e-mail: potter.d@ghc.org

393-001

393-001 Please see the response to Comment Letter 361.

Kuehn, Ginny -KC-7

From: Edvondrasek@aol.com
Sent: Wednesday, September 05, 2001 6:30 PM
To: lcdriessen@bpa.gov
Cc: comment@bpa.gov
Subject: (no subject)

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: KELT-396
RECEIPT DATE: SEP 06 2001

Dear Sir,
2001

September 4,

I am writing to voice my strong opposition to your proposed Raging Cedar Powerline Project.

I worked hard with the Pacific Crest Biodiversity Project (where I serve on the Board of Directors) and the Protect Our Watershed Alliance to move the City of Seattle to protect the watershed and the forests and fisheries it holds, and to create the HCP to which the City is accountable. This proposed powerline would violate the HCP, which disallows any logging of the type required by this project in our watershed. This project should not even be considered in this protected area. No logging is legal in our watershed and the goals of the HCP are to remove roads not to cut new ones.

I demand that BPA drop this proposal immediately and consider legal (and ecologically sound) alternatives, such as adding additional circuits to towers in existing corridors. I request a new EIS with information including a substantive cumulative analysis and the addition of conservation alternatives.

Please keep me informed about the proposed project. Thank you.

Sincerely,
Chris Vondrasek
4742 35th Avenue S.
Seattle, WA 98118
email: bp649@scn.org

396-001

396-001 Please see responses to Comment Letter 361.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Monday, September 10, 2001 7:52 AM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Mr. Dreissen's reply, Kangley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-397
RECEIPT DATE:
SEP 10 2001

-----Original Message-----

From: Judy Lightfoot [mailto:jhlightfoot@hotmail.com]
 Sent: Friday, September 07, 2001 12:04 PM
 To: comment@bpa.gov; lcdriessen@bpa.gov
 Subject: Mr. Dreissen's reply

Dear Mr. Dreissen,
 Either you are being disingenuous for PR purposes or you didn't read my message carefully. I did not ask that the same lines or circuits be used for additional power. Another possible option is to put up new towers in the

same clearcut swaths, if necessary slightly widened, instead of clearcutting new swaths in different areas. Please be careful to understand public comments on this important issue.
 Thanks,
 Judy Lightfoot

>
 >Date: Mon, 3 Sep 2001 21:15:34 -0700
 >From: "Driessen, Laurens C - TNP-3" <lcdriessen@bpa.gov>
 >Subject: RE: Bonneville Power clearcuts
 >
 > [The following text is in the "iso-8859-1" character set.]
 > [Your display is set for the "US-ASCII" character set.]
 > [Some characters may be displayed incorrectly.]
 >
 >Thank you for your comments. We will include them along with those from
 >others to determine the selection of the final plan/alternative and
 >mitigation measures. We are also concerned about the impacts to the
 >natural
 >environment and are looking at ways to mitigate as indicated in the
 >Draft
 >EIS. Concerning your suggestion of putting the new line together with
 >the
 >existing line, we cannot do that for reliability reasons, also
 >described in
 >the DEIS. It would be to big of a disaster to our electrical system to
 >have
 >both lines go out at the same time as is more likely in a double
 >circuit
 >situation.
 >
 > Lou
 >

>-----Original Message-----

>Dear Mr. Dreissen:
 >
 >I am deeply concerned about the clearcut that the Bonneville Power
 >Administration proposes to make within the Cedar River Watershed.
 >Instead, why not improve the existing corridor? Bonneville could add
 >additional circuits to the towers in the present corridor instead of
 >clearcutting for a new corridor. In any case, an Environmental Impact
 >Statement that includes conservation options is absolutely essential.
 >
 >Sincerely,
 >
 > Doug Schuler and Terry Frankel
 > Seattle
 >Judy Lightfoot, PhD
 >1326 NE 62nd St
 >Seattle, WA 98115
 >206/522-2269
 >http://www.homestead.com/judy_lightfoot

397-001

397-001 BPA is proposing to construct a new 500-kV line immediately adjacent to the existing 500-kV line from near the tap point to the Echo Lake Substation. Paralleling the existing 500-kV line would take advantage of the existing access road system already in place, and also the clearing that has taken place for the existing line. The reason that the second line could not be located within the same 150-foot wide right-of-way is that it would violate BPA design standards. Right-of-way widths are established to ensure safe, reliable operation of the lines. The existing 500-kV line is located in the center of the 150-foot-wide right-of-way. The proposed line also would be located in the center of a 150-foot-wide right-of-way; therefore if the line were built the two lines would be 150 feet apart. This is the minimum distance that the two lines could be operated safely and reliably. Section 2.3.8 of the SDEIS examines use of double-circuit towers. Also see responses to Comments 426-002 and 1459-009.

A non-transmission alternative that included conservation has been fully analyzed in the SDEIS. See Section 2.2.9 and Appendix J of the SDEIS.

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-399</i>
RECEIPT DATE: SEP 10 2001

6528 - 50TH AVENUE NE
SEATTLE, WA 98115
SEPTEMBER 1, 2001

LOU DRIESSEN, PROJECT MANAGER
COMMUNICATIONS
BONNEVILLE POWER ADMINISTRATION - KC-7
POST OFFICE BOX 12999
PORTLAND, OR 97212

DEAR PROJECT MANAGER:

399-001

PLEASE BUILD ANY NEW POWER LINES THROUGH THE CEDAR AND
RAGING RIVER WATERSHEDS ON ALREADY EXISTING TOWERS.

399-002

ALSO, PLEASE OFFER A NEW ENVIRONMENTAL IMPACT STATEMENT THAT
SUPPLIES A SUBSTANTIVE CUMULATIVE EFFECTS ANALYSIS OF THE PROPOSAL TO
BUILD IN THE CEDAR RIVER WATERSHED, ALONG WITH ADDITIONAL
ALTERNATIVES. THE CURRENT PLAN TO CLEARCUT A SWATH OF FOREST
(CURRENTLY PROTECTED FROM LOGGING) WITHIN THE WATERSHED AND TO
CONSTRUCT NEW ROAD WOULD HAVE SEVERE, EXTENSIVE IMPACTS
THROUGHOUT BOTH THE RAGING RIVER AND THE CEDAR RIVER WATERSHEDS,
WETLANDS, SALMON GROUNDS AND FISHERIES, AND FOREST HABITAT--ALL OF
WHICH ARE AT RISK--WOULD BE IMPACTED BY SUCH A PLAN.

SINCERELY,


CARL PRUZAN


MARIAN PRUZAN

399-001 Please see responses to Comment Letter 361.

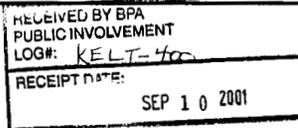
399-002 Please see SDEIS for more information about cumulative impacts.



Pacific Crest Biodiversity Project
 4649 Sunnyside Ave N #321
 Seattle, WA 98103

Ph: (206)545-3734
 Fax: (206)545-4498
 Email: pcbpinfo@pcbp.org
 Web: www.pcbp.org

Lou Driessen, Project Manager
 Bonneville Power Administration
 PO Box 3621
 Portland, Oregon 97208



August 30, 2001

RE: Kangley - Echo Lake Transmission Project

Dear Mr. Driessen:

The Pacific Crest Biodiversity Project, a nonprofit organization with approximately 2,000 members, is dedicated to the protection and restoration of forest ecosystems in the Pacific Northwest. We played a key role in facilitating public involvement in the development of the Cedar River Habitat Conservation Plan and advocated an end to the commercial timber sale program within the watershed.

Just over two years ago, in a unanimous and historic vote, the Seattle City Council voted to end commercial logging in the Cedar River Watershed. The vote was a conclusion to a remarkable public process in which more than a thousand people turned out to hearings and hundreds submitted comments. When the process began, the city was not planning to consider an alternative with no commercial logging. In the end, overwhelming public support for making 100% of the watershed an ecological reserve and a willingness of customers to pay an additional \$4 per average household per year led to the about-face. The city also expanded its goals for road decommissioning based on public input.

Especially within this context, proposals to cut trees or build roads in the watershed for anything but water quality or ecological integrity must be taken very seriously. It's as if the agency were proposing to cut a swath through an important park or wildlife refuge. We don't see how such a project could be consistent with Seattle's HCP for the watershed and are disappointed not to see a thorough discussion of this issue in the Draft EIS. We feel that the public should have the opportunity to see what the National Marine Fisheries Service and US Fish and Wildlife have to say about conflicts or consistency with the HCP before the project reaches the Final EIS stage.

About conservation: this was given minimal treatment in the DEIS. We do not feel BPA have given the public adequate information about the potential for conservation to

400-001

400-001 BPA agrees that the Cedar River Watershed is a very valuable water source and wildlife resource, and that any intrusions into the area should not occur lightly, or without good cause. The DEIS and SDEIS was sent to both USFWS and NMFS, who were invited to comment on the proposed transmission line. We have initiated formal consultation with USFWS and have concluded informal consultation with NMFS. See Appendix U.

The HCP is a plan that SPU had to prepare to build the Landsburg fish ladder and return chinook salmon to the upper Cedar River. It is a plan that was entered into between the landowner, Seattle Public Utilities, two state agencies, Washington State Department of Ecology and the State Department of Health, and the two federal agencies that have responsibilities under the Endangered species Act, the Fish and Wildlife Service and the National Marine Fisheries Service. As a federal agency, BPA does not prepare habitat conservation plans (HCPs), but instead is coordinating with these federal agencies under Section 7 consultation.

While SPU's HCP is not applicable to BPA's activities, BPA is subject to the Coastal Zone Management Act, which requires federal agencies to be consistent, to the extent practicable, with all applicable local, state and federal plans and programs in exercising its mission as the federal power marketing agency in the Northwest.

BPA contacted NMFS and USFWS earlier on in the project to request their participation as "cooperating agencies" under the National Environmental Policy Act of 1969, as amended. Both agencies declined. Subsequently, in early summer 2001, BPA prepared a biological assessment that identified what impacts, if any, would be created for listed and candidate species, as a result of the proposed project. BPA subsequently prepared an addendum to the BA, submitting additional information requested by FWS after receiving a letter from them stating that it could not concur in BPA's finding of no affect on the northern spotted owl, and requested that BPA enter into formal consultation with the agency. NMFS subsequently concluded that since the Proposed Action incorporates avoidance and minimization measures into the project, the agency can expect the effects of the action "to be discountable or insignificant."

400-002 | obviate the need for this project. When the call went out from local government agencies to conserve energy during the acute phase of the power crunch, the response was swift and significant. How much would the region need to conserve to avoid the brownouts you project within a few years? In a supplemental EIS, please thoroughly evaluate a conservation option and allow the public to determine whether the targets are attainable.

400-003 | We also do not feel it was appropriate for BPA to reject from further consideration the option of using the existing towers for the new lines. If you can deliver the power you believe is needed without clearing more forest or building more roads, please thoroughly analyze this alternative in supplemental EIS.

400-004 | We feel that any option that clears forest or builds roads in the Cedar River Watershed is a nonstarter. That said, the analysis for any alternative that does contemplate destroying habitat must include mitigation measures and must factor in the associated costs. In our view, appropriate mitigation requires that any forest cleared be replaced in kind and that any new road miles be accompanied by the decommissioning of an equal number of road miles within the same watershed. To account for fragmentation caused by a newly cleared swath, additional replacement forest will likely be required for adequate mitigation.

400-005 | Please issue an additional EIS that thoroughly analyzes the potential for conservation, alternatives prematurely rejected, and the relationship of the project to Seattle's HCP. We urge Bonneville Power Administration to present a preferred alternative which requires no clearcutting or roadbuilding within the Cedar River Watershed. To do otherwise flies in the face of the will of Seattle-area citizens and the historic, fifty-year plan enacted just two years ago.

Sincerely,



David Atcheson
Vice President

Therefore, NMFS concurred with BPA's effect determination of "may affect, but not likely to adversely affect" for the Puget Sound Chinook and their designated critical habitat. BPA has, therefore, concluded informal consultation with NMFS.

BPA has entered into formal consultation with the FWS. BPA will conclude this formal consultation with the agency prior to initiating any construction activities.

400-002 Please see response to Comment 409-002.

400-003 Please see the response to Comment 340-003.

400-004 See response to Comment 340-002.

With respect to the road issue, BPA would be building about 1-1/2 miles of new road within the Cedar River Municipal Watershed to build, operate and maintain the line. About half a mile of road in the CRW that crosses wetlands would be removed from service. Although BPA would be acquiring the rights to build these roads, it would have no authority to abandon any existing roads within the Cedar River Watershed, outside of those that it presently uses to operate and maintain the existing Raver-Echo Lake 500-kV line located there.

400-005 Please see response to Comment 357-003.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Monday, September 10, 2001 5:05 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Mr. Driessen's reply

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-401</i>
RECEIPT DATE: SEP 11 2001

-----Original Message-----

From: Judy Lightfoot [mailto:jlhlightfoot@hotmail.com]
 Sent: Monday, September 10, 2001 11:03 AM
 To: lcdriessen@bpa.gov
 Subject: RE: Mr. Driessen's reply

401-001

Thank you for this explanation. How wide is the existing clearcut? How wide will the widened clearcut be? Thank you for your attention and time--

Judy Lightfoot, PhD
 1326 NE 62nd St
 Seattle, WA 98115
 206/522-2269
http://www.homestead.com/judy_lightfoot

>From: "Driessen, Laurens C - TNP-3" <lcdriessen@bpa.gov>
 >To: "'Judy Lightfoot'" <jlhlightfoot@hotmail.com>
 >Subject: RE: Mr. Driessen's reply
 >Date: Mon, 10 Sep 2001 07:51:49 -0700
 >
 >The preferred plan is to parallel immediately next to the existing line >thereby reducing the amount of clearing needed as stated in the Draft EIS.
 >We cannot put the new line in the existing R/W without doing any clearing.
 >There is just not enough room. The only way to put the new line in the >existing clearing is to remove the existing line and replace it with towers
 >that would support the existing line and the new line such that both >circuits would be on the same structure. That would be unacceptable from a
 >reliability standpoint. So the preferred option is doing what you are >suggesting, utilizing the existing right of way to the extend possible and
 >minimizing clearing. In addition, we normally take any tree outside of the
 >right of way that could potentially fall into the new line. In this case
 >through the watershed, we are planning to take only those trees that are
 >unhealthy and leaning heavily towards the line and are most likely to fall
 >down in a heavy wind. All healthy trees would be allowed to remain. I
 >think we have a preferred option that takes into account all the aspects
 >and
 >concerns while meeting the needs of the project and minimizing the
 >environmental impacts to the watershed, other natural environments and
 >people impacts. Hope this helps.
 >
 > Take care
 >
 > Lou

401-001 The existing Raver-Echo Lake 500-kV Transmission Line is located on a 150-foot-wide right-of-way, the same width as the proposed right-of-way.

August 31, 2001
Mr. Lou Driessen

"Snoqualmie Preservation Initiative," which will permanently conserve the forests of the Raging River basin from future development and impacts. We will soon secure public purchase of the 350-acre Trillium parcel in Section 26 that BPA's power line now passes through. This entire basin, as well as Tiger Mountain to the west, the Cedar River Watershed to the south, and Rattlesnake Mountain to the east have been deliberately conserved and will be managed as permanent forestland. Proposals for expanding power line corridors through any of these forests must carefully consider and absolutely minimize potential impacts to the multiple scenic, environmental, recreational, habitat, and forest product benefits that these forests provide. Much of the lowland forests of the Puget Sound region have been fragmented or lost; it is critical to carefully protect what remains.

402-004

Thus, the Greenway Trust is concerned that the DEIS for the Kangley-Echo Lake power line expansion makes no mention of mitigation for the permanent loss of forestland that the project proposes. We estimate the minimum, permanent loss of forest cover to be 150' (proposed corridor width) x 9 miles (proposed length) = 164 acres. In an era of salmon listings, new measures being taken to protect native vegetative cover and heightened sensitivity to the importance of forests for wildlife habitat, water quality and quantity, recreation, scenic values, air quality and carbon sequestration, and more, BPA should permanently replace the 164 acres of forest lost to clearing and "development" with a minimum of 164 forested acres elsewhere. Since the impacts of the proposed project are within the Greenway corridor, we believe that BPA should provide replacement forestlands within the corridor. This should be factored into the project costs and could be accomplished via a conservation easement or fee acquisition. The Trillium parcel, now held by the Trust for Public Land until public funding becomes available, offers an immediate mitigation opportunity if BPA wishes to participate in its public purchase.

402-005

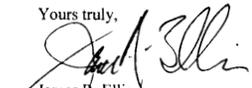
Other proposals for development in this region have required compensating mitigation for loss of forestland and habitat. Most notably, King County has a "4:1 program" which requires a developer to donate 4 acres to public ownership for every one acre rezoned into a higher urban zoning status. The City of Issaquah has utilized an "Urban Village" designation to cluster proposed developments while permanently protecting 75% of each site as public forestland. The Cedar River Watershed implemented a new Habitat Conservation Plan to protect and restore its old-growth forest characteristics. These, and other programs have set a precedent that BPA should follow when planning for any new power line corridor in this region.

402-006

BPA's proposed approach to "danger trees" is another issue of concern. Cutting any tree within range of the powerline that MIGHT have a future impact is not acceptable. Just as the Cedar River Watershed is not allowing this approach across their land, BPA should take a similar approach along the entire 9-mile length, and use the "stable tree" approach everywhere. We also believe mitigation should be provided for any trees that are cut outside of the 150' proposed BPA ROW.

402-007

A great deal of effort and public investment has gone into creating the Mountains to Sound Greenway corridor and permanently protecting its scenic forested character. It should be the policy of BPA to minimize and mitigate any negative impacts its projects may bring to this corridor. Thank you for the opportunity to comment.

Yours truly,

James R. Ellis
President

402-005 In response to this and similar comments from government agencies, BPA is proposing to provide compensatory mitigation to offset impacts as a result of the Proposed Action. Please see response to Comment 340-002.

402-006 Please see response to Comment 340-004.

402-007 Comment noted.

Kuehn, Ginny -KC-7

From: steve dubinsky & dina winkel [stevdina@oz.net]
Sent: Tuesday, September 11, 2001 9:14 PM
To: lcdriessen@bpa.gov, comment@bpa.gov
Subject: Kangley-Echo Lake transmission project

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KE-LT-403
RECEIPT DATE: SEP 12 2001

To Whom It May Concern -

I strongly disapprove of the plan to install 9 miles of new transmission lines through the Cedar River and Raging River watersheds.

I am concerned about the wildlife in this untouched area, which is vulnerable and can't fight back. We should know better than to intrude further into their habitat.

I am also concerned about the quality of the water that supplies the city. Construction of transmission lines will create silt and pollute runoff into the rivers and lakes. Erosion will strip the top soil of nutrients and adversely impact vegetation and wildlife.

PLEASE modify existing powerlines to carry the extra load, and leave the watershed alone.

Dina Winkel.

403-001

403-002

403-001 With respect to the comment that the commenter strongly disapproves of the proposal to construct the power line through the Cedar and Raging River watersheds, this comment is noted.

BPA is also concerned about the impacts of the proposed project on both the natural and human environment including impacts on fish and wildlife. Our SDEIS identified the impacts of the Proposed Action, and alternatives on the fisheries and wildlife resources (see Sections 4.6 and 4.7 of the SDEIS), and has also identified mitigation measures that would eliminate or at least minimize impacts identified.

We do not expect that any pollutants would enter surface waters as a result of the proposed project. BPA will comply with the National Pollutant Discharge Elimination System, and develop a storm water pollution prevention plan, prior to the onset of any construction activities. BPA will construct erosion control devices to prevent any sediment from entering surface waters, as required by the Clean Water Act, and the general permit issued by the state of Washington, Department of Ecology. To ensure that no pollutants enter ground water, BPA will leave the erosion control measures in place until the site is 70 percent stabilized, as required by the permit. Additionally, all disturbed areas would be reseeded following the completion of construction activities to reduce erosion.

403-002 Please see the response to Comment 340-003.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
 Sent: Wednesday, September 12, 2001 7:59 AM
 To: Kuehn, Ginny -KC-7
 Cc: Lynard, Gene P - KEC-4
 Subject: FW: Cedar River Powerline, Kangley - Echo Lake

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: K E L J - 404
RECEIPT DATE: SEP 12 2001

-----Original Message-----
 From: sierrasb@oz.net [mailto:sierrasb@oz.net]
 Sent: Monday, September 10, 2001 3:02 PM
 To: lcdriessen@bpa.gov
 Subject: Cedar River Powerline

TO:
 Bonneville Power Administration
 PO Box 3621
 Portland, OR 97208
 lcdriessen@bpa.gov

FROM:
 Shelly Baur
 3926 SW Southern St.
 Seattle, WA 98136

DATE: September 10, 2001

Dear BPA:

Seattle celebrated the protection of the Cedar River watershed, which I had thought would be protected for 50 years. Now, I find that BPA is undermining this protection with a proposed powerline. I want this to stop.

404-001

1. This powerline is not necessary. BPA has not done all it can and should to conserve energy. Energy conservation was not pursued wholeheartedly during the 90s until the California energy crunch, and building powerlines through vital watersheds is not the answer to catching up.

404-002

2. I don't believe all alternatives to such a powerline have been exhausted such as lines through corridors already cut.

404-001

3. Your environmental impacts were not adequately assessed. I would like a new environmental impact statement done that looks at the watershed and its areas with the affects of all factors represented over time. This assessment should include alternatives.

404-004

4. You have not even attempted adequate mitigation for the proposed damage. If in the future such a line goes through, the forest, wetlands, riparian corridors, etc. should bought from private landowners in at least a 2 for 1 exchange so the public is compensated for its loss. This is necessary also in part so BPA has the full cost of such a project as part of its cost/benefit analysis. If included, I believe that the current costs outweigh the benefits of the project as proposed and BPA will instead up the ante on conservation and alternative transmission measures.

So, do not build the line at this time.

Sincerely,

Shelly Baur

404-005

P.S.: Sorry I missed the official public comment period, but I do not feel BPA adequately advertised its intentions to the public, knowing how outraged we would be if it were well known. In future, I would like to see BPA advertise this more.

404-001 See response to Comment 349-001.

404-002 The Proposed Action would be next to an existing corridor.

404-003 See response to Comment 357-003.

404-004 See response to Comment 340-002.

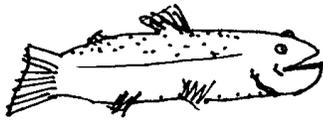
404-005 Comments noted. BPA does its best to notify all those who would either be affected by or interested in the Proposed Action. It does so early on after the system planners have identified a need. The comment period was extended from August 15th to September 4th, 2001. BPA tries to address all comments received even those submitted after the "official" review period has ended, to the extent possible.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-406
RECEIPT DATE: SEP 18 2001

DEAR MR. DRIESSEN,

PLEASE CONSIDER ENCOURAGING BPA TO PURCHASE
AND PRESERVE AN EQUIVALENT AMOUNT OF
LOW ELEVATION FORESTLAND THAT WOULD REPLACE
THE LOSS OF HABITAT IN CEDAR RIVER FOREST.
4 OUT OF 5 SALMON AGREE... IT'S THE RIGHT THING
TO DO!

THANK YOU
BPA!



SINCERELY,

Paul J. Hill

RANDY SILL
2426 WESTLAKE
SEATTLE, WA. 98149



LOW DRIESSEN
BONNEVILLE POWER ADMINISTRATION
P.O. Box 3621
PORTLAND, OR 97208-3621

TWP-3



406-001

406-001 Comment noted. BPA has purchased a 352-acre parcel formerly owned by the Trust for Public Land. This parcel is located immediately adjacent to and north of the Cedar River Municipal Watershed. The proposed power line would bisect the parcel. See also the response to Comment 340-002.

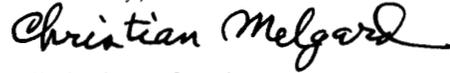
RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>REL-407</i>	1619 21st Ave. E. Seattle, WA 98112 September 9, 2001
RECEIPT DATE: SEP 27 2001	

Mr. Lou Driessen
 Bonneville Power Administration
 P.O. Box 3621
 Portland, OR 97208-3621

Dear Mr. Driessen:

I thought that we locals had secured our watershed against any further logging. The sentiment against the Seattle Water Department's plan to keep rates down by continuing logging in the watershed ultimately prevailed. I assumed that was the end of it. Now it appears that the BPA wants to cut a wide swath through the watershed for a new power line. I am sure there are other routes for such a line. I hope you find such an alternative. I am opposed to the current BPA proposal.

Sincerely,



Christian Melgard

407-001

407-001 Comment noted.

1932 Eleventh Avenue East
Seattle, Washington 98102

September 10, 2001

Mr. Lou Driessen
Bonneville Power Administration
P.O. Box 3621
Portland, WA 97208-2621

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-408</i>
RECEIPT DATE: SEP 27 2001

Dear Mr. Driessen:

408-001

I am writing you to express my concern about BPA's intention to build a new power line in eastern King County. I am afraid it will destroy hundreds of acres of protected forest in the City of Seattle's Cedar River watershed. I understand that it will cross the salmon bearing Raging River and the future salmon bearing Cedar River. I also understand BPA intends to build new roads and expand the Echo Lake substation.

408-002

Mr. Driessen, I do not feel the Bonneville Power Administration has fully investigated the potential environmental damage this project will cause. Perhaps your Environmental Impact Study has not gone far enough. Do you fully understand the importance of the Cedar River forest? Or the cumulative effects of power lines which destroy and fragment OUR forests?

408-003

The construction of new power lines should require the replacement of damaged habitat. BPA should be required to acquire and preserve an equivalent amount of forestland elsewhere, perhaps some that is at risk of being developed commercially. I feel that BPA should bear the full REAL cost of building these power lines and not ignore the loss of important habitat for forest animals.

Please take our comments into consideration as you formulate BPA's strategy for expanding power service thru OUR forests.

Very truly yours,



David N. James

408-001 Comment noted.

408-002 Comment noted.

408-003 Please see response to Comment 340-002.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, September 27, 2001 3:10 PM
To: Kuehn, Ginny -KC-7; Lynard, Gene P - KEC-4
Subject: FW: Please Protect the Cedar River Watershed

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KILT-410
RECEIPT DATE:
SEP 27 2001

-----Original Message-----

From: Lisa Ramirez [mailto:lr Ramirez@foe.org]
Sent: Thursday, September 27, 2001 2:24 PM
To: jim.compton@ci.seattle.wa.us; richard.conlin@ci.seattle.wa.us;
jan.drago@ci.seattle.wa.us; margaret.pageler@ci.seattle.wa.us;
peter.steinbrueck@ci.seattle.wa.us; heidi.wills@ci.seattle.wa.us;
diana.gale@ci.seattle.wa.us; mayors.office@ci.seattle.wa.us;
lcdriessen@bpa.gov
Subject: Please Protect the Cedar River Watershed

To My Elected Officials,

410-001

Please do not allow the Bonneville Power Administration to cut into our Cedar River Watershed. Their plan to clearcut a 9-mile strip of forest would adversely impact the ecosystem and our drinking water -- all for a powerline. This is unacceptable, especially since BPA has not even provided any other viable options.

410-002

You already know the importance of this watershed. The Cedar River Watershed's fragile ecosystem is currently protected under an HCP. This area was threatened a few years ago by another logging proposal. To everyone's relief, the ecosystem was left in tact. Please do not allow the logging to go through this time!

410-003

We must protect what is left, for us, for future generations, and for the health of the planet. Please do the right thing and oppose BPA's destructive plan.

Thank you,
Lisa Ramirez
Seattle, WA

410-001, -002, and -003 Comments noted.

Kuehn, Ginny -KC-7

From: Micki Larimer [mickilarimer@home.com]
Sent: Wednesday, October 03, 2001 5:39 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Line

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-412
RECEIPT DATE: OCT 04 2001

Dear BPA officials,

In the wake of the September 11th tragedies, Americans are more aware than ever of the potential for contamination of our air and water supplies. While the threat of extreme contamination from radicals outside our country looms large in the national psyche, the likelihood of our slowly poisoning ourselves must still be protected against. I urge you as a fellow Americans and representatives of our great country to protect the water supply of the Northwest's economic and cultural center. Seek out and implement alternative routes for the Kangley- Echo Lake Transmission line that do not pose a threat to the Cedar River Watershed, or other vital water sources.

Sincerely,

Lari M. Larimer
Bellevue, WA

Kangley-Echo Transmission Project

Telephone comment by Ginny Kuehn
1/16/01

Eldon Ball
Phone # 206-366-8405

I am calling in regard to the proposed transmission line through the Cedar River watershed. The transmission lines that were built across the Cascades from the Columbia River dams to western Washington were probably built in the 40's, 50's, 60's or 70's. I don't think there is anything much newer than that. It seems to me that with four or five transmission lines across Stampede Pass, four across Stevens Pass, one across Snoqualmie Pass that perhaps you could update some of the old lines that were 110 or 230 kilovolt and make them 500 kilovolt lines and don't track through additional watershed areas that are old growth forest that is pristine and shouldn't be damaged, maybe you could use some of your existing rights-of-way and just use them more efficiently.

I would like a reply.

Thank you.

412-001 Comment noted. Though BPA's Proposed Action would cross through the Cedar River Municipal Watershed, BPA does not believe that this line is a threat to the Watershed. BPA is undertaking extraordinary measures to ensure that it does not, threaten the watershed, including providing compensatory mitigation to replace that forest habitat that would be converted to non-forest habitat following project implementation. See response to Comment 340-002.

414-001 Please see the response to Comment 340-003.

412-001

414-001

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, October 18, 2001 12:16 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P -KEC-4
Subject: FW: Kangley comment

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: KELT-415 RECEIPT DATE: OCT 19 2001
--

Another comment

-----Original Message-----

From: Hilary B. Bramwell [mailto:hilarybb@u.washington.edu]
Sent: Thursday, October 18, 2001 9:31 AM
To: florrainebodi@bpa.gov; comment@bpa.gov
Subject: Cedar river watershed

Hi. My name is Hilary Bramwell, and I am a resident of Seattle. I'm very concerned with the future health of MY DRINKING WATER. I am writing to say that I absolutely am against the BPA's plan to build through the watershed area. Please realize that INDIVIDUALS (1.3 million of them) will be deeply affected. I'm sorry, but the purity of the water we have available to put in our bodies is more important than selling power to Canada. If you DON'T think it is, then you have some whacked-out priorities in my opinion. If you go through with the plan, I'm going to have to send the federal government a bill for my bottled water costs. I know they won't pay it, but hey, I'm really pissed off, and want to make people realize the implications of building transmission lines through the watershed area. Please consider the human element here, as well as the environmental one. What BPA is planning just isn't right or fair. Thanks for listening.
 sincerely, Hilary Bramwell

415-001

415-001 Comment noted.

Kuehn, Ginny -KC-7

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# <u>KEC-416</u> RECEIPT DATE: <u>OCT 19 2001</u>
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From: Lynard, Gene P - KEC-4
Sent: Wednesday, October 17, 2001 11:12 AM
To: Kuehn, Ginny -KC-7; Taves, John - KR-7C
Subject: FW: Regarding the Cedar River Watershed

-----Original Message-----

From: Michael Shank [mailto:michaels@pcbp.org]
Sent: Tuesday, October 16, 2001 3:09 PM
To: 'gplynard@bpa.gov'
Subject: Regarding the Cedar River Watershed

Greetings, Gene!

My name is Michael Shank and I'm serving as the Membership Coordinator for Pacific Crest Biodiversity Project. The Biodiversity Project spearheaded Protect Our Watershed Alliance, an environmental coalition that protected the Cedar River Watershed from commercial logging three years ago.

I have a few questions that have gone unanswered by Lou Driessen and I thought you might be able to answer them.

We (along with SPU and the Seattle City Council) have asked that BPA pursue other viable options outside the Cedar River Watershed and your reasons are short and lack full articulation. Your first reason/excuse given in why you cannot enter Maple Valley is that you cannot take turn the power off long enough to replace the lines. Is it not true that you could replace half of the line one year and the rest of the line the following year?

The second reason/excuse you give for not using Maply Valley is that two vacant lines are needed for other purposes. Could you explain those other needs? BPA is supposed to do such things in the DEIS and you haven't. I'd appreciate it if you would.

Thank you for your time.

warm regards,

Michael

Michael Shank
Membership Coordinator

-Protecting and restoring forest ecosystems in the Pacific Northwest-

Pacific Crest Biodiversity Project
4649 Sunnyside Avenue North #321
Seattle, WA 98103

Phone: 206.545.3734 ext. 11
Fax: 206.545.4498
Email: michaels@pcbp.org
Web: <http://www.protectandrestore.org>

416-001 and -002 Please see new information included in the SDEIS and the response to Comment 382-018.

416-001

416-002

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, October 18, 2001 5:15 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: clear cut

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: <i>KELT-417</i>
RECEIPT DATE: OCT 19 2001

417-001 Comment noted.

-----Original Message-----

From: Marc Smason [mailto:musicetc@earthlink.net]
Sent: Monday, October 08, 2001 1:59 PM
To: lcdriessen@bpa.gov
Subject: clear cut

417-001 |

As a seattlite, i strongly oppose bonneville power's plan to clear cut through ceadar river water shed!

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, October 18, 2001 5:16 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Kangley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: <i>KELT-418</i>
RECEIPT DATE: OCT 19 2001

418-001 Comment noted.

-----Original Message-----

From: Erwin Galan [mailto:galanerwin@hotmail.com]
Sent: Monday, October 08, 2001 1:06 AM
To: lcdriessen@bpa.gov
Cc: galanerwin@hotmail.com
Subject:

418-001 |

It is of the utmost importance that the Cedar River Watershed Be completey protected against any intrusion whatsoever; educate the public regarding how we can cut our consumption. This would eliminate the need of buiding this transmission line. This IS realistic - think of how many business leave their lights and computers on AFTER hours. Look around.

Kuehn, Ginny -KC-7

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#	KELT-419
RECEIPT DATE:	OCT 19 2001

From: Driessen, Laurens C - TNP-3
Sent: Thursday, October 18, 2001 6:05 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: NO to BPA's plan to log protected watershed, Kangley - Echo Lake

-----Original Message-----

From: Judy Lightfoot [mailto:jhlightfoot@hotmail.com]
 Sent: Thursday, September 27, 2001 4:26 PM
 To: jim.compton@ci.seattle.wa.us; jan.drago@ci.seattle.wa.us;
 margaret.pageler@ci.seattle.wa.us; diana.gale@ci.seattle.wa.us;
 richard.conlin@ci.seattle.wa.us; peter.steinbrueck@ci.seattle.wa.us;
 heidi.wills@ci.seattle.wa.us
 Cc: clayton.antieau@ci.seattle.wa.us; mayors.office@ci.seattle.wa.us;
 lcdriessen@bpa.gov
 Subject: NO to BPA's plan to log protected watershed

Dear City Council members:
 Don't let BPA log the Cedar River watershed. The source of Seattle's
 drinking water should continue to be carefully protected from any
 logging at
 all, but BPA hasn't even had the foresight to develop a complete
 proposal
 that fulfills official guidelines - it hasn't prepared EIS for other
 options
 than the one it happens to prefer, and there are other problems with its

proposal that SPU has carefully specified.
 Please make sure this project does NOT go forward.
 Thank you,
 Judy Lightfoot

Judy Lightfoot, PhD
 1326 NE 62nd St
 Seattle, WA 98115
 206/522-2269
http://www.homestead.com/judy_lightfoot

419-001

419-001 Comment noted.

Kuehn, Ginny -KC-7

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#	KELT-420
RECEIPT DATE:	OCT 19 2001

From: Driessen, Laurens C - TNP-3
Sent: Thursday, October 18, 2001 6:37 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: proposed powerline in 2 watersheds, Kangley - Echo Lake

-----Original Message-----

From: virgileh [mailto:virgileh1@home.com]
 Sent: Monday, September 17, 2001 6:54 PM
 To: lcdriessen@bpa.gov; coment@bpa.gov
 Subject: proposed powerline in 2 watersheds

I understand that Bonneville Power Administration proposes new
 transmission
 lines across the Cedar and Raging River watersheds. Via this e mail I am
 requesting that BPA

- 1 - place any new lines on existing towers (NO new roads!)
- 2 - replace any forest or wetlands that are damaged
- 3 - prepare a new EIS that contains a substantive cumulative effects
 analysis, and additional alternatives.

Please acknowledge receipt of my request.

Virgil E. Harder
 8005 Sandpoint Way N.E.
 Seattle, WA 98115

420-001 |

420-002 |

420-003 |

420-001 Please see the response to Comment 340-003.

420-002 See response to Comment 340-002.

420-003 See response to Comment 357-003.

Kuehn, Ginny -KC-7

from: Driessen, Laurens C - TNP-TPP-3
sent: Tuesday, October 30, 2001 11:58 AM
to: Kuehn, Ginny -KC-7
cc: Lynard, Gene P - KEC-4
subject: FW: Columbia River Treaty, Kanley - Echo Lake

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-422</i> RECEIPT DATE: OCT 31 2001
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-----Original Message-----

from: Steve Burke [mailto:nomadsteve@hotmail.com]
sent: Friday, October 26, 2001 3:35 PM
to: lcdriessen@bpa.gov
subject: Columbia River Treaty

I am concerned citizen of the Pacific Northwest and have just a few questions that you might be able to help me with. I have been following the recent developments regarding the Cedar River Watershed, the primary source of Seattle's drinking water and wonder if alternative routes for the proposed powerline have been properly researched. For instance, have environmental impact statements for other routes been proposed or completed; as the city brought to your attention the need for a water treatment plant what would be created by current route? Additionally, I would be gratefull if you could pass contact information for the BC Hydro official with whom BPA is working on the Kangley-Echo Lake Transmissio Project. Thank you for your time and help.

Steve Burke
 Political Science Student from the University of Washington
 402 N 145th
 Shoreline, WA 98133
 206.417.6500

421-001

421-001 The Cedar River Municipal Watershed HCP does not disallow logging, only commercial logging. BPA is in the business of transmitting electricity. Clearing of rights-of-way to safely construct, operate and maintain high voltage transmission lines is incidental to the delivery of electric power. Furthermore, the City's HCP is between the City of Seattle and the other signatories of the HCP, NMFS and the USFWS. BPA has concluded informal consultation with NMFS and has initiated formal consultation with the USFWS to meet the requirements of the Endangered Species Act of 1972.

BPA is proposing an insurance package to ensure protection of the CRW.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-TPP-3
Sent: Tuesday, October 30, 2001 11:58 AM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Columbia River Treaty, Kanley - Echo Lake

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-423</i>
RECEIPT DATE: OCT 31 2001

-----Original Message-----

From: Steve Burke [mailto:nomadsteve@hotmail.com]
Sent: Friday, October 26, 2001 3:35 PM
To: lcdriessen@bpa.gov
Subject: Columbia River Treaty

I am concerned citizen of the Pacific Northwest and have just a few questions that you might be able to help me with. I have been following the recent developments regarding the Cedar River Watershed, the primary source of Seattle's drinking water and wonder if alternative routes for the proposed powerline have been properly researched. For instance, have environmental impact statements for other routes been proposed or completed; has the city brought to your attention the need for a water treatment plant that would be created by current route? Additionally, I would be gratefull if you could pass contact information for the BC Hydro official with whom BPA is working on the Kangley-Echo Lake Transmissio Project. Thank you for your time and help.

Steve Burke
Political Science Student from the University of Washington
1402 N 145th
Shoreline, WA 98133
206.417.6500

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-423</i>
RECEIPT DATE: OCT 31 2001

Kangley-Echo Lake Transmission Line Project

Telephone comment by Ginny Kuehn
10/31/01

Margo T. Fetz
1901 7th Avenue West
Seattle, WA 98119
206-284-5870

423-001 | Add a line to the old towers instead of building new ones.

422-001 Please see response to Comment 382-018.

422-002 Yes. Seattle Public Utilities has stated that should BPA's project cause a violation of the water quality as a result of the Proposed Action, then BPA should be responsible to construct a water filtration plant for the City of Seattle. See also response to Comment 420-002.

422-003 You may call Phil Park (604) 293-5857 of BC Hydro.

423-001 Please see the responses to Comments 339-001 and 340-003.

OCT 14 2001

LOU DRIESSEN
BPA

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: KELT- 424
RECEIPT DATE: NOV 06 2001

Dear Lou,

As one of Seattle's citizens who worked hard to ensure the protection of the Cedar river watershed, I am asking you, may I implore you to reconsider the plan to site a new line through the Cedar river. Perhaps you could add an additional circuit to existing towers. We are doing our utmost to conserve electricity here in Seattle and frankly need more positive proof that a new line is absolutely mandatory.

Please exercise utmost creativity at solving this dilemma which could affect the region's drinking water for generations to come.

Thank you.

David J. Scherberg

3520 NE 92ND ST
SEATTLE, WA 98115

424-001

424-001 Please see the responses to Comments 339-001 and 340-003.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-TPP-3
Sent: Wednesday, November 14, 2001 2:16 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Raging-Cedar Powerline, Kangley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-425
RECEIPT DATE: NOV 14 2001

-----Original Message-----

From: Darrel Weiss [mailto:djweiss1@mindspring.com]
Sent: Tuesday, November 13, 2001 9:49 AM
To: lcdriessen@bpa.gov
Subject: Raging-Cedar Powerline

Dear Mr. Driessen:

I am extremely concerned about the impacts threatening the Cedar River Watershed as a result of access and construction of the proposed powerline. The risks and impacts are far too great, and are unacceptable.

425-001

Just because there are few or no private landholders in the Cedar River Watershed to raise a fuss about the proposed raging-cedar powerline construction does not mean this is not extremely valuable "property."

THIS LAND IS PRECIOUS AND CONSIDERABLY MORE FRAGILE THAN PRIVATELY-OWNED PROPERTIES ALREADY "RULED OUT" AS ALTERNATIVES FOR THIS POWERLINE.

It appears the selected BPA alternative for a new powerline is based strictly on cost. Cost cannot continue to be the number one priority for such decisions or future generations will find themselves with a wasted environment that was exploited at every opportunity in the name of economic gain.

425-002

WE SHOULD BE PROUD OF THIS LAND AND DO ALL WE CAN TO PROTECT IT, RATHER THAN FIND WAYS TO CAPITALIZE ON IT. Such is the trend, and it must not continue.

If our power rates need to increase because we have exceeded our capacity, then the costs must be borne by those who demand it. We cannot continue to skirt the issue of rising costs resulting from our lifestyle choices.

It is time to do the right thing -- to make the correct choice for siting this powerline (if it is, indeed, essential). I believe you know in your heart what the "correct choice of action" is. Please reconsider your alternatives and take action that does not exploit the Cedar River Watershed.

Thank you.

Darrel Weiss
755 N 204th
Shoreline, WA 98133
206-542-0687

djweiss1@mindspring.com

425-001 Comment noted.

425-002 Please see response to Comment 382-018.

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-426</i>
RECEIPT DATE: NOV 30 2001

6057 Ann Arbor Ave. NE
 Seattle, WA 98115-7618
 November 28, 2001

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

RE: New transmission lines to Seattle

Dear Sir/Madam:

I have recently become aware of the plan that you are developing to construct a second transmission line to the Seattle area. I am shocked to learn that you prefer a second transmission route that parallels the current transmission route. I have two major concerns with this possibility.

426-001

- The Cedar River Watershed supplies hundreds of thousands of men, women, and children in the Seattle area and the water must be safe and pure. Cutting a wide swath exposes our drinking water to the run-off of the silt and debris in this proposed area. We finally stopped logging in the area. This benefits our water supply by the action of rain and trees to keep our water safe.

426-002

- The proximity of the proposed second route so close to the current route exposes **both** routes to the very same climatic conditions that may knock out our power. It would seem logical to select an alternate route to avoid this potential devastating interruption of our power. In light of our fears of terrorist activities, it is also important to have a second route a considerable distance from the first route.

I look forward to your response to these concerns.

Sincerely,



Bonnie E. Miller

CC: Seattle City Council

426-001 BPA would guard against any sediment from reaching surface waters within the Cedar River Municipal Watershed. BPA would undertake erosion control measures to ensure against siltation of surface waters, and therefore, BPA does not anticipate that any pollutants would affect the water quality of the Cedar River Municipal Watershed.

426-002 While NERC reliability criteria does not allow both of these lines (existing Raver-Echo Lake line and the proposed Kangley-Echo Lake line) to be strung from a single set of towers, siting the transmission lines adjacent to each other is permitted. Outage of two adjacent lines is much less likely than outages of both lines on a double-circuit tower. See also Section 2.3.8 of the SDEIS and the responses to Comment 1459-009. See public meeting Comment 20 for a description of NERC)

BPA transmission lines are designed to handle high winds and ice loading, so any single weather related event would unlikely result in the loss of both lines. BPA has looked at the expected common mode outage rate of two 500-kV lines on adjacent towers in this region and has found that exposure to be acceptable.

BPA is concerned about security and takes precautions throughout the transmission system.



November 19, 2001

Gene Lynard (ITEC-4)
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon
97208

Dear Mr. Lynard:

Re: Kangley – Echo Lake Transmission Line Project

Powerex is responsible for marketing BC Hydro surplus energy, scheduling power deliveries resulting from Columbia River coordinated operation, and marketing surplus Canadian Entitlement to the Columbia River Downstream Benefits. Powerex also buys and sells electricity across western North America. In these capacities, Powerex makes extensive use of the Bonneville Power transmission system and its interconnections with Canada. In support of its trading activities, Powerex maintains involvement in Northwest and Western Interconnection regional planning activities for transmission system reinforcement. We would like to take this opportunity to comment on the need for the Kangley – Echo Lake Transmission Line Project. The following comments are based on our own experience with transmission restrictions and regional planning forums.

The Kangley – Echo Lake Transmission Line Project is one of many transmission projects needed for regional and Western Interconnection energy security. Over the past few years, power transfers between the Northwest U.S. and Canada have frequently been restricted due to inadequate transmission in the Seattle area. In extreme conditions, we understand this can threaten security of supply to the Seattle area.

Transmission owners in the Seattle Area, including BPA, Puget Sound Energy, and Seattle City Light, have undertaken many upgrades of the 230 and 115 kV transmission in the area over the past few years to relieve transmission constraints in the area and between the PNW and B.C. These owners have reported that the opportunities for further upgrades of the 230 and 115 kV to address restrictions are limited and that reinforcement of the 500 kV transmission system is needed. Information presented in public regional planning meetings on alternatives considered by the affected entities has shown the Kangley – Echo Lake line to be a key reinforcement for the area.

Planning studies have identified that the Kangley – Echo Lake Transmission Line Project is required mainly to maintain adequate transmission for supply to the Seattle/Tacoma area and relieve transmission capacity restrictions for the return of the Canadian Entitlement, as compared to importing power from Canada. The Columbia River Treaty provides for return of the Canadian Entitlement to Canada on a firm basis.

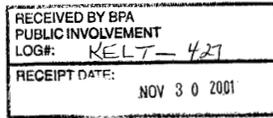
BC Hydro has invested in upgrades to maintain and enhance the transfer capability between B.C. and the PNW. Also, Powerex has participated in the costs of right of way maintenance for lines in the Seattle area to help maintain transfer capabilities.

While Powerex cannot comment on the specific routing or other aspects of the proposed line, Powerex believes that there is an urgent need to upgrade transmission capacity in the area to support Seattle area load growth and provide for return of increasing Canadian Entitlement capacity in April 2003.

Sincerely,

Phil Park, P.Eng.
Manager, Transmission Access

Direct Line: 604.891.5020
Fax Line: 604.895.7012
Email: phil.park@powerex.com



427-001 Comment noted.

427-002 Comment noted.

supply.
flexibility
commitment.

POWEREX CORP.

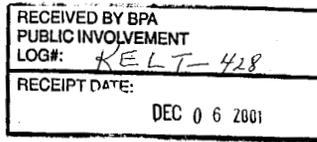
Suite 1400
666 Burrard Street
Vancouver, BC
Canada V6C 2X8
TEL: 604.891.5000
1.800.220.4907
www.powerex.com

427-001

427-002

November 2001

Attention Lou Driessen, Project Manager
Bonneville Power Administration - KC-7
PO Box 12999
Portland, Oregon 97212



Mr. Driessen,

428-001

I am deeply disturbed about your plans to build nine miles of new 500-kilovolt line through the Cedar and Raging River watersheds and your 1.5 miles of new road construction. Your preferred alternative states a plan to permanently clear-cut a swath from 150' to 285' wide through the forest, including Seattle's watershed, which is currently protected from logging. This plan would destroy forests recently protected by the City of Seattle and Protect Our Watershed Alliance. There are important salmon fisheries in Raging River and the City of Seattle is working to re-establish salmon in Cedar River. It was a landmark decision by Seattle to preserve its watershed forests. Would BPA propose a powerline through Mt. Rainier National Park? Then why through our protected watershed? Please thoroughly address your reasons for dismissing the other alternatives in your final EIS as your draft didn't adequately explain the reason they were thrown out.

428-002

Most of all, please realize that your plan is a temporary fix. In the next 10 years, we will be at the same load capacity that we are at now. What then? More logging in our watershed? What we need are stronger conservation programs. It is an unrealistic view that we have unlimited amounts of resources here in the Pacific Northwest. We have met a load capacity because the population has grown so significantly in the last 10 years. It's time we insist on conserving what we have and making it enough instead of simply saying we'll go find more. Especially when the only offered solution is one that could potentially contaminate the drinking water supply for over 800,000 Seattle residents who said they were willing to pay several dollars extra each year to protect our watershed.

428-003

If in the end you decide that conservation won't work and we need a new line, add additional circuits to towers in the existing corridor. I realize the potential for large scale failure, but I also realize the possibility is rare that this would happen. I INSIST that any forest or wetlands that are damaged be replaced. I also ask for a new EIS with needed information, a substantive cumulative effects analysis and additional alternatives especially including conservation.

Thank you,

Sabrina Shepherd

650 SW 316th St.
Federal way, WA 98023

428-001 Please see response to Comment 382-018.

428-002 See response to Comment 349-001.

428-003 Please see the response to Comment 340-003.

Kuehn, Ginny -KC-7

From: mlorincz [mlorincz@fhcrc.org]
Sent: Monday, December 10, 2001 4:20 PM
To: comment@bpa.gov
Subject: Kangley-Echo Lake Transmission Project

RECEIVED BY BPA PUBLIC INVOLVEMENT
LOG#: <i>KELT-429</i>
RECEIPT DATE: DEC 11 2001

Hello,

I am writing to voice my opinion on the Kangley-Echo Lake Transmission Project. Clearcutting in the Cedar River Watershed to construct a powerline highway through this beautiful natural area is not a good solution to the issue faced by the Bonneville Power Administration. The Cedar River Watershed should be preserved as is.

Matthew C. Lorincz
mlorincz@fhcrc.org

429-001

429-001 Comment noted.

Kuehn, Ginny -KC-7

From: Lynard, Gene P - KEC-4
Sent: Tuesday, December 11, 2001 2:12 PM
To: Kuehn, Ginny -KC-7
Cc: Driessen, Laurens C - TNP-TPP-3
Subject: FW: Proposed Raging-Cedar Powerline

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: *KELT-430*
RECEIPT DATE:
DEC 11 2001

Another email on the Kangley-Echo Lake EIS. Thanks.

-----Original Message-----

From: Darrel Weiss [mailto:djweiss1@mindspring.com]
Sent: Monday, December 10, 2001 8:06 PM
To: Gene Lynard (E-mail); Laurens Driessen (E-mail); Tom Pansky (E-mail); Vickie VanZandt (E-mail)
Cc: Ron Sims (E-mail); Gary Locke (E-mail); Heidi Wills (E-mail); Jan Drago (E-mail); Jim Compton (E-mail); Judy Nicastro (E-mail); Margaret Pageler (E-mail); Nick Licata (E-mail); Peter Steinbrueck (E-mail); Richard Conlin (E-mail)
Subject: Proposed Raging-Cedar Powerline

Dear Bonneville Power Official (Mr. Lynard, Mr. Driessen, Mr. Pansky, Ms. VanZandt):

You know how people are always saying "not in my backyard"? I would like to remind you that this is not the case for myself and many others who are very concerned that a new powerline is proposed to be built in the Habitat-Conservation-Plan-protected Cedar River watershed. It is not our backyard -- it the Seattle area's primary drinking water supply -- and it is a place that really should not be considered for a construction project of this magnitude.

430-001

I'm surprised that you let the not-in-my-backyard-property-owners (those whose properties fall into your category of "routes considered but eliminated") scare you off.

The watershed is not the only alternative. It is not the best alternative. It is the riskiest alternative. It is the most damaging alternative (and therefore, most certainly, the most costly alternative).

430-002

The City of Seattle's drinking water watershed should not be for sale.

I believe it was a mistake to quickly rule out alternatives outside the watershed because "hundreds of rural-residential properties" would object to a powerline in their backyard.

I am copying this message to my elected officials, urging their support in siting the powerline outside the watershed. If the project moves forward within the watershed, I urge them to assure that significant mitigation compensation be assessed the BPA. I also urge them to make sure the BPA takes every precaution to assure that the watershed is not damaged or compromised in any way.

430-003

The safeguards necessary to comply with the 50-year HCP protecting the watershed have not been adequately addressed. They need to be addressed considerable detail. The impacts also must be adequately mitigated.

Please -- do not trample on the watershed! Pursue another, less threatening route.

Darrel Weiss
755 N 204th
Shoreline, WA 98133-3112
206-542-0687

430-001 Comment noted.

430-002 Please see response to Comment 382-018.

430-003 See response to Comment 340-002.

Kuehn, Ginny -KC-7

From: Lynard, Gene P - KEC-4
Sent: Friday, January 04, 2002 4:27 PM
To: Kuehn, Ginny -KC-7
Subject: FW: KANGLEY-ECHO LAKE TRANSMISSION LINE

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-431
RECEIPT DATE: JAN 07 2002

More comments on Kangley-Echo Lake already. Thanks.

-----Original Message-----

From: Peter Rimbos [mailto:primbos@attbi.com]
Sent: Wednesday, January 02, 2002 5:51 PM
To: gplynard@bpa.gov
Subject: KANGLEY-ECHO LAKE TRANSMISSION LINE

Gene,

We understand the comment period on the draft EIS for the subject project is closed. However, as long-time residents in the Greater Maple Valley area, we wished to express our concerns with the subject project.

431-001 |
431-002 |
431-003 |
431-004 |

1. The Draft EIS fails to demonstrate a need for an additional transmission line.
2. Has the BPA done enough to increase conservation and reduce demand, especially during the peak power periods in question?
3. Has the BPA completed a detailed evaluation of other alternatives?
4. Were full mitigation costs included in BPA's analyses (e.g., a line through the watershed would be more expensive if full mitigation costs were included, such as damaged habitat)?

Please revise this project. Thank you.

Peter and Naomi Rimbos
19711 241st Ave SE
Maple Valley, WA 98038-8926
primbos@attbi.com

Kuehn, Ginny -KC-7

From: MPaul Hansen [student_uw98115@yahoo.com]
Sent: Sunday, January 13, 2002 4:10 PM
To: comments@bpa.gov
Cc: student_uw98115@yahoo.com
Subject: Comments on HV BPA transmission lines

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-432
RECEIPT DATE: JAN 14 2002

1-8-02

RE: Kinsley-Kanley Line upgrade - comments

Perhaps lattice tower aesthetics can be improved.

432-001 |

So they resemble the Tokoyo Tower or Eiffel Tower. By adding dummy member with slotted end holes, to soften sharp re-entrant corners. So the body-pedestal looks like curves rather than straight lines

432-002 |

Also [this may be redundant] has consideration been given to a new cross mountain HV line over Stampede Pass but then through Cedar Notch, down the Cedar River, via the existing 115 kv line to the Fairwood Station near the large Seattle load center? Just a thought, for what it is worth.

431-001 Comment noted.

431-002 See response to Comment 349-001.

431-003 Additional information on the alternatives has been included in the SDEIS.

431-004 Please see response to Comment 382-006.

432-001 Comment noted.

432-002 If another line is needed across the Cascade Mountains, it would likely be needed north of Seattle in the Monroe area. BPA has identified that another cross-mountain 500-kV line would be necessary after about 2010, but has not done a more extensive siting evaluation.