

State Agencies



RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-390</i>
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August 23, 2001

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

RE: Kangley-Echo Lake Transmission Line Project

Dear Sir,

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

DNR state lands has the following comments:

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

390-001
390-002

1. Construction, maintenance, abandonment of power line roads and towers as they relate to Clean Water Act and the Endangered Species Act (ESA); must address existing conditions on all BPA facilities in the study area
2. Management of nonnative plants within power line corridors.
3. The Department requests that any public lands should be replaced, acre for acre, with additional forest lands.

DNR regulatory has the following comments:

390-003

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

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

Sincerely,

Susan Casey
Forest Practice Coordinator

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

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

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

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

See also response to Comment 340-002.

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

