

Public Comments

25. View northeast towards Colockum Pass from Coleman house corral, main facilities at Kellogg Family Ranch. View of area to be impacted by the potential reroute. CD photo no. PC010028.
26. View of twisted tree looking north toward Cooke Canyon from meadow north of Gage Road on Kellogg Family Ranch with Cooke Creek in the background. Portion of land to be taken by potential reroute and view of area to be impacted by potential reroute. CD photo no. P6170021.
27. View of moon rising over meadows north of Kellogg Family Ranch driveway looking northeast toward Colockum Pass. View of area to be impacted by the potential reroute. CD photo no. PB290004.
28. View of Kellogg family recreating on Kellogg Family Ranch, with Cooke Creek and teepee spring in the background. View from teepee site to be impacted by potential reroute. CD photo no. PB100019.
- Frank Perkins Photos dated before March 20, 2002
29. View looking north up Cooke Creek north of Gage Road on Kellogg Family Ranch. Illustrates area to be crossed and impacted by potential reroute. March 20, 2002 from Frank Perkins labeled "Creek N. of Gage Rd."
- Gayleed Kellogg Photos taken March 3, 2002
- Camera: Canon EOS 3, lens 28-135, flash Canon Speedlight 420 EX; used 50 mm setting. One frame 70.
Roll 1 Kodak Gold, 100 ASA, print film, 24 exp.
Roll 2 Kodak gold, 200 ASA, print film.
30. View of dry intermittent creek bed underneath existing BPA power line on Kellogg Family Ranch's seasonal irrigation source located on land of Todd Loperman. Illustrates stream channel pinch point resulting from tower construction and placement. Demonstrates BPA actual practice is detrimental to the environment contrary to statements in DEIS. Roll C: CD photo no. 010_7.
31. View of one of Cooke Creek channels with Cooke Creek Bridge in background. Shows detrimental impact to vegetation and creek due to BPA survey and maintenance practices. DEIS describes a conservative practice and this photograph illustrates actual BPA practices are detrimental to the environment contrary to statements in DEIS. Roll C: CD photo no. 015_12.
32. View of Spring in Cooke Creek alluvial fan (Vancil Spring) located on Kellogg Family Ranch south of Gage Road. Potential groundwater impact due to tower construction and
- placement of potential reroute. This is a view of one of many springs on Kellogg Family Ranch. Roll C: CD photo no. 025_22.
33. View from teepee site shown in Exhibit 28 on this index, looking north toward Cooke Canyon. View of area to be impacted by potential reroute. Roll D: CD photo no. 010_7.
- Robin Kellogg Photos Taken December 29, 2001
34. View of William D. Ruckelshaus (1st and 5th EPA Administrator, current Commissioner of U.S. Commission on Ocean Policy appointed by President George W. Bush, and Chairman of Salmon Recovery Funding Board of State of Washington appointed by Governor Gary Locke) and family vacationing at Kellogg Family Ranch in December 2001, riding on John Deere ATV. Photo ID #803-089 – Roll B – Negative # 1.
35. View of William D. Ruckelshaus's family vacationing at Kellogg Family Ranch in December 2001. Playing broom hockey on the house pond. Photo ID #803-089 – Roll B – Negative # 9.
36. View of William D. Ruckelshaus's family vacationing at Kellogg Family Ranch in December 2001. Photo of one young man playing broom hockey on the house pond. View of area to be impacted by potential reroute is in the background. Photo ID #803-089 – Roll B – Negative # 12.

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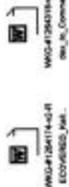
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3

Public Comments

Kuehn, Ginny -KC-7

From: Hicks, Stephanie [shicks@wkg.com]
Sent: Friday, March 22, 2002 12:04 PM
To: 'newlinn@bpa.gov'; 'comment@bpa.gov'
Cc: Harrel, Arley; 'griford@maziarco.com'; Hicks, Stephanie; Lygren, Nancy
Subject: Schultz-Hanford Transmission Line Project - DOE/EIS 0325; Comments on DEIS



WKG#1264318-41
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 March 22, 2002

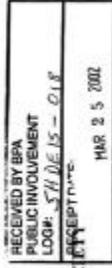
On behalf of the Kellogg Family Ranch, attached please find: (1) Comments on the referenced DEIS; and (2) Index of Attachments supporting Kellogg Family Ranch Comments on DEIS. Hard copies of these documents are being faxed to you simultaneously. Supporting attachments, along with the documents attached to this email are also being sent via Federal Express for delivery to you on March 25, 2002.

Thank you for your consideration of these comments.

F. Arley Harrel
 Stephanie M. Hicks

Williams Kastner & Gibbs PLLC
 601 Two Union Street, Suite 4100
 Seattle, WA 98101
 Phone: (206) 628-6600
 Fax: (206) 628-6611
 www.wkg.com

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LOWER COLUMBIA AUDUBON SOCIETY
 9016 Saunet Trail
 Pasco, Washington 99301

March 24, 2002

U.S. Department of Energy
 Bonneville Power Administration
 Attn: Communications-KC-7
 P.O. Box 12999
 Portland, Oregon 97212

Dear Sir / Madam:

I am writing to comment on the Schultz-Hanford Area Transmission Line Project Draft environmental Impact Statement (DOE/EIS-0325).

First of all I would like to say that I was highly disappointed in the Draft EIS Summary. I have been reviewing EIS's since 1978 and without a doubt this is the worst EIS summary I have ever reviewed. The project location descriptions were confusing at best. I am absolutely appalled that you did not even include a map of the alternative routes. I do not believe you have provided the public with adequate information, in an easily understandable format from which to comment on this project.

18-1

I am also disappointed that you have not scheduled public hearings on this project. Your public meetings were simply opportunities for the public to review your state displays and not an opportunity for public dialogue so essential in the review process.

18-2

In short, I do not believe you have met the requirements for public involvement in the decision process for this project.

18-3

I recommend that the project follow existing transmission lines, we therefore recommend using Segment B-North, and D or E. We recommend that the transmission lines be constructed within 200 feet of existing lines not 1200 feet. If you construct the lines at a distance greater than 200 feet, you are establishing a new transmission corridor and not utilizing the existing transmission corridor.

18-4

We are particularly concerned that disturbance to the Hanford Reach National Monument is held to an absolute minimum. We therefore recommend that you replace the existing single-circuit with double-circuit towers when crossing the Monument. We note that you recommend using these double-circuit towers when crossing irrigated areas and believe the same technology can be used to minimize disturbance when crossing the Monument's fragile environment.

18-5

Public Comments

Kuehn, Ginny -KC-7

From: Rick Leumont [leumont@owl.com]
Sent: Sunday, March 24, 2002 8:56 PM
To: comment@bpa.gov
Cc: Rick Leumont
Subject: Schutz-Hanford draft EIS comments

Bonneville Power Administration:

I am attaching my comments on the Schutz-Hanford Area Transmission Line Project draft EIS.

Thank you!

Rick Leumont
509-946-6115

3/25/02

Whatever route is chosen will involve substantial damage to the wildlife, native plants and habitat the transmission lines cross. We believe the Bonneville Power Administration must mitigate this damage and the best place to start is by purchasing the McCorder Ranch, adjacent to the Hanford Reach National Monument. This property contains excellent shrub-steppe habitat and provides an outstanding opportunity for managing the Rattlesnake Mountain elk herd. The acquisition of this property is supported by sportsman, environmentalist, state and local government and the U.S. Fish & Wildlife Service. It is truly a win/win proposal that provides real mitigation for some of the disturbance constructing and maintaining a transmission line will cause.

Thank you for this opportunity to comment on the draft EIS.

Sincerely,

Richard J. Leumont

18-5
cont.

Public Comments

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19-3 cont.

alternative to meet BPA's actual need for increased system reliability in central Washington is a policy decision that requires major federal action to implement. NEPA mandates that the BPA use the rule of reason to look at reasonable alternatives and their impacts before deciding to make an irreversible commitment of resources to build more transmission lines

Reasonable Alternatives:

Other than the "No Action" alternative, all of the alternatives detailed in and considered by the draft EIS are to construct an additional transmission line through central Washington. The consideration of alternative transmission lines to the preferred transmission line may satisfy NEPA's requirement that the government include a detailed statement of alternatives to the proposed action in its recommendation or report. NEPA §102 (C)(ii) codified at 42 U.S.C. 4332(C)(iii). However, because the actual need and purpose is not to build more transmission lines but to increase system reliability, it is more likely that the rule of reason would require the BPA to detail and consider all alternatives which are technically, economically, and environmentally feasible to meet the actual need and purpose of the action/project.

19-4

There are at least two alternatives that I can think of which are reasonable because they are technically, economically, and environmentally feasible: distributed renewable energy generation and conservation. Distributed renewable energy generation is single units or clusters of renewable energy generation units that are interconnected to the distribution lines and serving on-site loads. Conservation is the decrease of load demand by changing behavior and investing in energy efficient appliances and practices. Both distributed renewable energy generation and conservation have the potential to at least partially meet BPA's need and purpose to increase system reliability in central Washington. In addition, there is reliable evidence that deserves further consideration that suggests both distributed renewable energy generation and conservation can completely meet BPA's need to increase system reliability in central Washington. Therefore, the draft EIS is inadequate because of its failure to detail these reasonable alternatives so that the decision maker may consider them before making a policy decision that requires major federal action, which affects man and the environment. See 40 C.F.R. 1502.14(a), agencies shall "[r]igorously explore and objectively evaluate all reasonable alternatives...."

19-6

In an effort to assist the BPA in producing an adequate final EIS (by complying with NEPA's mandates under §102 (C)(ii) and (E)), a discussion of the feasibility of distributed renewable energy generation and conservation to meet BPA's need and purpose follows. According to the background information provided in the draft EIS (section 1.3), during the spring run-off, water is spilled over dams in the Lower Snake and Columbia Rivers to help transport juvenile salmon. The energy generation lost by spilling water over the dams for salmon needs to be replaced to meet load demands. Currently, it appears that the dams along the mid and upper Columbia River increase energy generation to make up for the lost generation due to spilling water for salmon transportation on the lower Snake and Columbia Rivers. BPA wants to maintain system reliability by increasing the transmission line capacity in central Washington. However, it is also possible to make up for the lost generation due to spilling water for salmon transportation by increasing the amount of distributed renewable energy generation near the Lower Snake and Columbia Rivers or near the area where it will ultimately be used (Oregon and California, i.e. the

19-7

BARBARA J. RHOADS-WEAVER

2724 S. Elmwood Place
 Seattle, WA 98144
 (206) 325-7402
 weaverb@seattleu.edu

RECEIVED BY BPA
 PUBLIC INVOLVEMENT
 LOG# 5313/EIS-019
 RECEIPT DATE: MAR 25 2002

March 22, 2002

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

Sent Via Email: comment@bpa.gov

RE: Schultz-Hanford Area Transmission Line Project Draft EIS DOE/EIS-0325

Dear Mr. Dressson,

Please include my comment letter in the official record and address the concerns raised in the final Environmental Impact Statement (EIS). I have several comments regarding the adequacy of the draft EIS for the proposed Schultz-Hanford Area Transmission Line Project. The following concerns are set out in more detail below: (1) the narrow articulation of the action's or project's purpose and need that forecloses substantive alternatives to the proposed action/project; (2) the lack of consideration of reasonable alternatives to achieve the action's or project's actual purpose and need; (3) the narrow scope of the EIS that does not include the effects of connected, cumulative, and similar actions/projects; and (4) the lack of consideration of all reasonably foreseeable direct, indirect, and cumulative impacts.

Purpose and Need:

In section 1.1 of the draft EIS it is stated that the "...BPA needs to increase transmission capacity north of Hanford..." (emphasis in original). However, it is apparent based on the previous paragraph of section 1.1 that the real need is to increase system reliability in central Washington to prevent outages, brownouts and blackouts. In addition, it is clear that the real need is to increase system reliability because in section 1.2 the first bullet articulating the action's/project's purpose is to "[m]aintain transmission system reliability."

19-1

Federal agencies, such as the BPA, may not define the purpose and need so narrowly that only one alternative is reasonable. By defining the need as to increase transmission capacity north of Hanford, the BPA has circumvented the purpose of an EIS under NEPA and made only one alternative (building more transmission lines) the only reasonable alternative to meet its stated need (increased transmission capacity). See 40 C.F.R. 1502.1, primary purpose of an EIS is to serve as an action-forcing device and it "shall inform decision-makers and the public of reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." (emphasis added).

19-2

Whether an increase in transmission capacity (building more transmission lines) is the best

19-3

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19-7
 cont.

Southern Interior).

One feasible distributed renewable energy source is wind. The resource maps produced by Northwest Sustainable Energy for Economic Development (NWEED) with funds from DOE and BPA show that one distributed renewable resource could make up for the energy lost by spilling water over the dams for salmon. See www.windpowermaps.org. The maps were validated by NREL. Although using distributed wind energy generation to meet BPA's need and purpose may be outside the jurisdiction of BPA, it must be considered in the EIS to provide decision makers and the public information on all reasonable alternatives. See *Natural Resources Defense Council, Inc. v. Morton*, 458 F.2d 827 (D.C. Cir. 1972); 40 C.F.R. 1502.14(c).

Distributed wind generation certainly meets the purposes set out in section 1.2 of the draft EIS. It would maintain the transmission system reliability in central Washington because it would be using the transmission lines in central Washington. It optimizes the transmission system usage by achieving the same goals without having to build more lines. It minimizes environmental impacts because not only does it prevent the need for new large transmission lines, but it also preserves water for salmon and has other beneficial effects (discussed below in the section on impacts) without many negative environmental impacts. Costs are minimized when the environmental costs (externalities) are considered in the whole picture. Although the cost of energy production may be less for hydro than wind, there is a good possibility that the cost of transportation (building new transmission lines) will make the current preferred option more expensive than the alternative of distributed wind generation, which does not require BPA to build a new transmission line across central Washington. And finally, because wind turbines do not take long to install, it is possible for BPA to meet an energization date of late 2004 with distributed wind generation.

Although conservation was not considered a reasonable alternative that needed to be considered in 1978, it is clear that conservation is a very reasonable alternative in 2002. See *Vermont Yankee Nuclear Power Corp. v. Natural Resources Defense Council, Inc.*, 435 U.S. 519 (1978). Conservation was so effective in reducing the demand for energy (load) during the "energy crisis of 2001" that many utilities in the northwest have ironically applied for rate increases to cover the lost income due to a drop in demand. Therefore, more information should be provided in the EIS either detailing the alternative of conservation or at least explaining why it is not considered as an alternative. 40 C.F.R. 1502.14(a), "...for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated."

A policy decision needs to be made, and it appears there are two choices, only one of which is detailed in the draft EIS: whether (1) to invest in distributed renewable generation and/or conservation to make up for lost generation due to spilling water for salmon and to maintain system reliability in central Washington; or (2) to invest in more transmission lines to move electricity from northern Washington through central Washington to Oregon and northern California. Before a decision can be made the EIS must provide details for each of the alternatives.

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Scope

Section 1.8 describes other projects in the area. The "other projects in the area" all fall into the categories of connected actions, cumulative actions, or similar actions. 40 C.F.R. 1508.25(a)(1)-(3). Therefore, the other actions should be included in the scope of the EIS. *Id.* The other projects in the area include another new transmission line (similar action), two natural gas combined-cycle combustion turbines (connected and/or cumulative actions), and four wind farms (connected and/or cumulative actions). The new transmission lines and centralized power generation plants (natural gas or wind) are interdependent parts of a larger action to meet the regional energy needs with more centralized plants and transmission lines as opposed to distributed renewable sources and conservation. Therefore, unless there was a Programmatic EIS that was not referenced in the draft EIS, all of the actions need to be included in the scope of the EIS so that the policy makers will have all of the information in one document before deciding which course of action to take. See *Thomas v. Peterson*, 753 F.2d 754 (9th Cir. 1985).

Environmental Consequences

Section 4 of the draft EIS details the direct, indirect, and cumulative impacts or effects of the proposed action and its alternatives on the environment. The following discussion points out impacts or effects that have not been detailed which make the current draft EIS inadequate. I will address the inadequacies in the order in which their omissions appear in the draft EIS.

19-12

First, are the direct and cumulative impacts due to the increased use of herbicide spray and vegetation control near water crossings. Section 2.29 discusses the on going maintenance needed for the action/project. It includes vegetation control near water crossings and the use of herbicides in the area of substations. Section 4.1 discusses the impacts and effects on water resources, soils, and geology. There are details about the effects of vegetation control such as the loss of shade and erosion. However, there is no discussion of the impact, if any that the increased use of herbicides would have on the already stressed waterways (section 3.1.2.1 discusses the current water quality of the affected areas).

19-13

Second, are the direct, indirect, and cumulative impacts to socioeconomics in the affected areas (section 4.7). In particular is section 4.7.3 on the economy and industry. While the impacts of constructing a new transmission line and no action are considered, the lack of discussion for the alternative distributed renewable generation is missing. Unlike construction projects that create little economic value in the way of local jobs or are of value for only a short duration of time, distributed renewable generation has the potential to create new jobs and/or sources of income in the area and benefit the local economy and industry for a long duration of time.

19-14

Third, are the direct, indirect, and cumulative impacts to public safety and health in the affected areas (section 4.11). There are several public safety and health concerns not discussed in this section. For example there is not a section on the increased risk to public health created by the increased pollution that comes with the construction of additional natural-gas power plants. As discussed earlier there are two new natural gas projects in the area being considered as well. The gas plants would not be viable without additional transmission lines, therefore, the final EIS should include a discussion of the increased risk to public health created by the gas plants that will result if a new transmission line is constructed.

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Another public health and safety concern that is not addressed is the possibility of terrorism. Although terrorism may not have been a reasonable or foreseeable impact in the past, it certainly should be considered a realistic and foreseeable impact now. Many of the northwest dams were the targets of terrorist plots according to the local news sources quoting FBI reports. The BPA may wish to take a page out of the Defense Department's book (it created the internet and world wide web because of the vulnerabilities of a centralized computer and communication system). Centralized power plants and large transmission lines are easy targets for terrorist because if they go down the disruption and potential effect on large populations is enormous. Whereas, distributed renewable energy sources make difficult targets and have less of impact if one is "taken out" for whatever reason. Therefore, the EIS needs a section on national security and public health and safety impacts of centralized energy plants with large transmission lines versus the impacts of distributed renewable energy sources and conservation. While discussing national security and its impacts on public safety and health the EIS should also contain detailed information for the policy makers and the public on the impacts of maintaining our dependence on fossil fuels as opposed to the nation security impacts of reliance on distributed renewable energy sources.

19-16

Fourth, are the direct, indirect, and cumulative impacts on air quality (section 4.12). The discussion in section 4.12 does not consider the cumulative impacts on air quality of more transmission lines. More transmission lines necessarily means more centralized power generation. Included in the new sources of centralized power generation are at least two natural gas plants. Natural gas may be "cleaner" than other fossil fuels. However, it still produces air pollution that should be detailed in this section of the EIS.

19-17

Summary
 In conclusion, the final EIS should (1) accurately articulate the need and purpose of the proposed action, which is to increase system reliability in central Washington; (2) provide the public and policy makers with detailed information on alternatives such as distributed renewable energy generation and conservation; (3) provide the public and policy makers with detailed information on the impacts of all of the connected, cumulative and similar actions that have already been identified; and (4) provide the public and policy makers with additional information on reasonably foreseeable impacts to water resources, socioeconomic, public health and safety, and air quality.

Sincerely yours,

[emailed without signature to avoid delay]

Barbara J. Rhoads-Weaver

Kuehn, Ginny -KC-7

From: Barb Rhoads-Weaver [weaverb@soastleu.edu]
 Sent: Monday, March 25, 2002 11:03 AM
 To: comment@opa.gov
 Subject: Schultz-Hanford Transmission Line Draft EIS comment letter



EIS comment icon

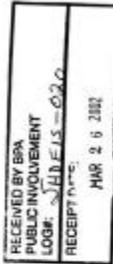
Attached please find my comments on the draft EIS for the Schultz-Hanford Transmission Line Project.

Barb Rhoads-Weaver
 2724 S. ELMWOOD PLACE
 SEATTLE, WA 98144
 206-325-7402 / call 206-755-9444
 hbwe4@tazzle.com

Public Comments

March 21, 2002

Department of Energy
Public Affairs Officer – KC – 7
ATTN: Mr. Lou Dressen
P.O. Box 125999
Portland, OR 97212



Subj: Draft Environmental Impact Statement for the Shultz-Hanford Area Transmission Line Project (DEIS).

Dear Mr. Dressen:

The Nature Conservancy (Conservancy) welcomes the opportunity to review and comment upon a proposed 500-kilovolt transmission line construction project affecting areas of biological significance identified as priority conservation action sites by the Conservancy. The project's purpose, to address the increasing demands on the regional power supply and distribution system, is well articulated. Based on the alternatives presented in the DEIS, with the caveat set forth in the comments below, we concur with the selection of Alternative 2 as the preferred alternative.

Introduction and Background

Key areas of interest to us in the corridor delineated in the preferred alternative include the Hanford Reach National Monument and the Yakima Training Center. The Conservancy's identification of these priority areas comes in part from the Conservancy's Columbia Plateau Ecoregional assessment process. Based upon principles of conservation biology, our planning model yields a set of conservation areas representing biological diversity at varying biological and spatial scales. In addition to the Hanford Monument and Yakima Training Center, private ownerships and other federal ownerships characterized by intact shrub-steppe communities are also significant sources of remnant high quality plant communities. Appendix E of the DEIS notes the presence of these element occurrences in several segments of the proposed corridor.

In addition to much of the proposal route's importance from an ecoregional planning perspective, results from the Conservancy's biodiversity inventory of the Hanford site provides strong justification for expanded protection of this area. In 1992 the U.S. Department of Energy (DOE) and the Conservancy entered into a Memorandum of Understanding that called for a cooperative and coordinated inventory of plants, animals and ecologically significant areas at the Hanford Site. This study is noteworthy in its discovery of plant and insect species new to science. The following excerpt from the executive summary underscores the importance of this area within the Columbia Plateau ecoregion (*Biodiversity Inventory and Analysis of the Hanford Site*, TNC, 1999):

Findings from the biodiversity inventory clearly demonstrate that the Hanford Site, including the Hanford Reach, is home to a spectacular, undisturbed and irreplaceable natural legacy. While its mosaic of habitats, Hanford supports a wealth of relatively unaltered and increasingly uncommon native plant communities, the size and diversity of

which is unmatched in the Columbia Basin. Not surprisingly, significant numbers of plants, insects, amphibians, reptiles, birds, and mammals, many of which are rare or declining in Washington, were found to be associated with or dependent on these habitats. In its present condition the Hanford Site is not only a refuge, but also a genetic bank for both the common and rare plants and animals that are integral components of the shrub-steppe and Columbia River ecosystems. From a conservation standpoint, the Hanford Site is a vital—and perhaps the single most important—link in preserving and sustaining the diverse plants and animals of the Columbia Basin Ecoregion.

The Yakima Training center is also a conservation priority for the Conservancy, within the constraints imposed by the mission needs of the Department of Defense. The Conservancy's report titled *Identifying and Preserving Biodiversity on a Regional Scale, the Role of the Yakima Training Center in Conserving Biodiversity in the Shrub-Steppe of Washington* (TNC, 1999) states that

The YTC supports over 100,000 acres of high quality, native plant communities in seven major habitat types and more than 30 major cover types. Although many of these types are represented to a lesser degree on other public lands, the extent at the YTC of contiguous high quality, low elevation big sagebrush...is unique and of regional importance. The YTC supports 21 of the 77 rare plant taxa currently known in the region.... These taxa found on the YTC are not known elsewhere in Washington....

This report, based on extensive field research, remote sensing, literature review and expert opinion used a regional filter to reveal the significance of the remaining areas of unfragmented shrub-steppe to conservation of sensitive species and habitats. It is surprising that the report is not listed as a reference in the DEIS, as it offers important data and management recommendations for habitat protection in the affected landscapes.

Comments

Given the exhaustively documented value of the region's remnant shrub-steppe environment, we would like to raise several points that emerge from the DEIS:

- **Line Separation:** One of the principles embedded in the DEIS is the ranking of perceived economic impacts to a single user group (agricultural producers) over the broader costs of environmental impacts to all user groups. This is made clear by the proposal to separate the lines throughout the preferred alternative with the exception of the eight miles located in an agricultural area. The DEIS does not provide any justification for running a double circuit line utilizing the existing Right of Way (ROW) through an agricultural zone, while imposing the fiscal and ecological costs of constructing a separate single circuit transmission line and support facilities throughout the rest of the project. There is no discussion or evidence of impact analysis by non-market valuation techniques of the loss of unique and imperiled genetic diversity and untrammeled remnant ecosystems versus the loss of agricultural ground. Since it appears a double circuit line can be provided through a land use type that the DEIS acknowledges can still function within a transmission line ROW, there is no reason for the DEIS not to consider whether it can also be provided through sensitive habitat areas that cannot function once disturbed. **In particular, there should be consideration of a proposed alternative which offers the construction**

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of a double circuit line through Hanford, which traverses a Monument land use designation of Preservation (DEIS pg 3-60, 5-13).

- **Regional Cumulative Impacts:** This project represents only a small portion of the proposed expansion plans for meeting regional power demands. On page 1-6, the DEIS lists a number of other projects under consideration. Each will be undergoing separate analysis of impacts at the project scale. **This failure to consider all of these impacts in effect isolates each project and prevents analysis at a scale that would potentially yield a much different picture, with a different suite of solutions, than the default "sum of the parts" approach.** Actions taken at the project level to minimize impacts to a globally imperiled species, for instance, may not be sufficient if other remnant populations or element occurrences are going to be lost at other project sites.

20-5

- **Mitigation:** Related to selecting an appropriate scale to analyze impacts, defining a substantive mitigation strategy that accounts for the expansion of regional power production becomes critical. One of the most successful strategies for mitigating unavoidable impacts is to replace the loss through a replacement ratio. The mitigation strategies proposed in the DEIS relate to minimizing on-site construction impacts in ecologically sensitive areas. **With the exception of the offer to provide land replacement funding to owners of agricultural land (fair market value compensation), there is no strategy proposed to replace the loss of ecologically significant land.** Establishing a land bank to address both project-scale and regional impacts would serve as a substantive mitigation technique. A suitable site was in fact recommended to BPA for funding by the Northwest Power Planning Council in January, 2002. The site, identified as the Rattlesnake Slope Addition (Project Number 25020) abuts the Hanford Monument, and is central to the regional expansion area. This site is for sale by a landowner predisposed to seeing it placed in the public domain, and the transfer to public ownership is supported by local county commissioners, state legislators, and a broad spectrum of special interests.

20-6

- **Monitoring:** The mitigation strategies proposed to offset the effects of constructing the project leave out any means for monitoring, oversight and enforcement in the case of non-performance. The need for a credible monitoring plan becomes critical in areas where the DEIS identifies the downgrading of high impacts to moderate impacts through the use of mitigation techniques. An example is the case for impact to sage grouse. Construction of Segments A and B (YTC) is deemed a "high impact" but "with mitigations, construction of Segments A and B would cause a moderate impact to sage grouse (DEIS, pg 4-46)." Assuming this is a correct assumption (no scientific support offered in the DEIS), what methods are proposed to assure these mitigation techniques will occur? What methods are proposed to address the high impacts if the mitigation techniques are unsuccessful? What venues are proposed to seek compliance with the mitigation measures? Paragraph S.2.2.10 (DEIS pg 5-8) describes a variety of ongoing maintenance measures ascribed to the preferred alternative, including structural repairs, vegetation

20-8

control and road maintenance, but nothing is included about monitoring or maintaining proposed mitigation actions.

Conclusion
Our conclusion in reviewing the DEIS is that an alternative making use of double circuits throughout the project area, with a subset alternative using double circuits through highly sensitive areas must be included for analysis. Mitigation measures that offer replacement value for agricultural loss but do not include replacement of lost habitat may fail to offset environmental impacts from the project. Lack of monitoring and adaptive management provisions for the proposed construction mitigation techniques also lead to potential failure to offset high environmental impacts. We agree that the no action alternative fails to address the pressures imposed by a growing regional population. Under the same pressure, protecting the remaining fraction of unique, vanishing habitats and genetic diversity becomes even more crucial.

Sincerely,

Elizabeth Bloomfield
South Central Washington Program Manager

- Cc: Elliot Marks
David Weekes
Laura Smith
Alan Holt
Michael Powelson
Maggie Coon
Terry Cook
Len Barson
John Humke
Karen Berky