

Public Comments

DECLARATION OF SERVICE							
1. Nancy Lygren, say:							
1. I am now and at all times herein mentioned, a citizen of the United States and resident of the State of Washington, over the age of eighteen years, not a party to the above-captioned action, and competent to testify as a witness.							
2. I am employed with the law firm of Williams, Kastner & Gibbs PLLC, 4100 Two Union Square, 601 Union Street, Seattle, Washington.							
3. On March 26, 2002, we caused to be served the following documents in the manner indicated:							
(1) Letter dated March 26, 2002, re: Schultz-Hanford Area Transmission Line Project – DOE/EIS 0325; CORRECTIONS; Comments on Draft Environmental Impact Statement Attachments 2 and 3; serial photographs of overview and springs directed to the Bonneville Power Administration, Communications – KC-7 (Document No. 1265429).							
<table border="1"> <tr> <td>Bonneville Power Administration Communications – KC-7 905 NE 11th Avenue Portland, OR 97232 Fax: (503) 230-5285</td> <td><input checked="" type="checkbox"/> U. S. Mail Facsimile Email</td> </tr> <tr> <td>Nancy A. Wirtzheim (KC-4) Environmental Project Lead Bonneville Power Administration 905 NE 11th Avenue Portland, OR 97232 Fax: (503) 230-5699</td> <td><input checked="" type="checkbox"/> U. S. Mail Facsimile Email</td> </tr> <tr> <td>Carol Borgstrom, Director Office of NEPA oversight, EH-25 U.S. Dept. of Energy 1000 Independence Avenue S. W. Washington D.C. 20585 Fax: 202-586-7031</td> <td><input checked="" type="checkbox"/> U. S. Mail Facsimile Email</td> </tr> </table>		Bonneville Power Administration Communications – KC-7 905 NE 11th Avenue Portland, OR 97232 Fax: (503) 230-5285	<input checked="" type="checkbox"/> U. S. Mail Facsimile Email	Nancy A. Wirtzheim (KC-4) Environmental Project Lead Bonneville Power Administration 905 NE 11th Avenue Portland, OR 97232 Fax: (503) 230-5699	<input checked="" type="checkbox"/> U. S. Mail Facsimile Email	Carol Borgstrom, Director Office of NEPA oversight, EH-25 U.S. Dept. of Energy 1000 Independence Avenue S. W. Washington D.C. 20585 Fax: 202-586-7031	<input checked="" type="checkbox"/> U. S. Mail Facsimile Email
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United States Department of the Interior	
<p style="text-align: center;">OFFICE OF THE SECRETARY ATTORNEY GENERAL'S OFFICE 500 Pennsylvania Avenue, N.W. Washington, D.C. 20585 Telephone: (202) 501-0100</p> <p style="text-align: right;">RECEIVED BY BPA PUBLIC INVOLVEMENT LCG# 54 DE-55-C-246 RECEIPT DATE: APR 03 2002</p>	April 2, 2002
<p>ER020150</p> <p>Mr. Lou Driessen, Project Manager Bonneville Power Administration Communications - KC-7 P.O. Box 12999 Portland, Oregon</p> <p>Subject: COMMENTS – Review of Draft Environmental Impact Statement for the Schultz-Hanford Area Transmission Line Project, DOE/EIS-0325, Kittitas, Yakima, Grant, and Benton Counties, Washington</p> <p>Dear Mr. Driessen</p>	
<p>The Department of the Interior (Department) has reviewed the subject draft environmental impact statement for the proposed Schultz-Hanford Area Transmission Line Project, DOE/EIS-0325, to be located in Kittitas, Yakima, Grant, and Benton Counties, Washington. The following comments reflect considerable concern about environmental impacts related to the construction and operation of the proposed project, especially for the project's potential to adversely affect the operation and management of the Hanford Reach National Monument and the Saddle Mountain National Wildlife Refuge. The Department requests that the Bonneville Power Administration (BPA) address these concerns, including continued consultation and coordination with the Hanford Reach National Monument/Saddle Mountain National Wildlife Refuge, during the development of the final environmental impact statement for this proposed project.</p>	
<p>GENERAL COMMENTS</p> <p>In December 2001, the Department, through the U.S. Fish and Wildlife Service, Hanford Reach National Monument/Saddle Mountain National Wildlife Refuge, provided preliminary comments on an earlier draft of this environmental document. Several text and figure inaccuracies describing administrative boundaries and agency management responsibility on the Hanford Site, the Hanford Reach National Monument (Monument), and the Saddle Mountain National Wildlife Refuge were noted. Concerns were also expressed regarding the treatment of cultural resources. Review of the subject document indicates that most text corrections describing administrative boundaries and</p>	

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agency management responsibility have been made. However, there is still confusion about the relationship between the Monument and the U.S. Department of Energy (USDOE) in several sections of the document, especially in Chapter 3. Figures throughout the document remain incorrect, and technical details are still lacking or confusing for the cultural resource sections.

The document suggests that double-circuit towers would be built along some portions of the "new" line, instead of single-circuit structures. We strongly recommend using double circuiting on Monument lands to avoid new ground disturbance that would be incurred by developing a new row of towers adjacent to the existing towers. The Monument Proclamation states that "Existing Federal Columbia River Transmission System facilities located within the monument may be replicated, modified and expanded, and new facilities constructed within the monument, as authorized by other applicable law. Such replacement, modification, expansion, or construction of new facilities shall be carried out in a manner consistent with proper care and management." (Proclamation 7319, June 9, 2000) (emphasis added)

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The Department believes that the greatest consistency with proper care and management would be achieved by replacing existing structures within the existing Right-of-Way (ROW) without disturbing additional Monument land. To accomplish this, the Department supports a modified preferred alternative which would include use of double circuiting on Monument lands and other lands with resource protection and preservation as primary management objectives. The use of a double circuit tower, rather than multiple, separate single-circuit structures, would decrease the disturbance to monument land.

In describing impacts to wildlife resources, the draft document fails to explain the significance of impacts. The document reports the litany of species which could be impacted by construction and operation of the proposed transmission line, reports the types of mitigation measures which would be used to offset impacts, and finally provides an overall assessment of post-mitigation impact. This is accomplished in a table using single words, such as high, moderate, low, or none. Such an analysis does not assess the overall ramifications of the impact of the proposed action on affected resources, what the National Environmental Policy Act (NEPA) refers to as significance (see 40 CFR 1502.16 (a), (b) and 40 CFR 1508.27). The final environmental statement should explain the reasoning behind the one-word impact assessment. The biological basis for why the proposed mitigation measures are expected to reduce the level of impact, and the ramifications of the level of impact in the context of existing baseline conditions should be explained.

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For example, in section 4.4.3.3, the draft document reports that where the proposed transmission line climbs over Umatilla Ridge, clearing the area would cause high impacts to barrowing owl and moderate impacts to other shrub-steppe dependent species. The document also reports that the "southern most end of the proposed line crosses the Cold Creek wildlife migration corridor, which is one of the most important bird migration corridors in Washington and an important corridor for wildlife migrating between the Yakima Training Center and the Hanford site. Disruption to this area could disrupt the migration patterns of these species and increase the hazard of avian collisions with transmission lines and structures (moderate impact)."

The measures recommended in section 4.4.10 to mitigate these impacts include consulting with wildlife agencies to avoid construction during migration times, monitoring potential problems after construction, and installing line markers in areas with high risk for avian collisions. However, no biological rationale is provided to explain why these proposed measures are expected to reduce impacts to wildlife species or document their effectiveness. In addition, there is no discussion of the overall ramifications of such impacts in the context of how important these habitat areas are to local and regional wildlife populations. Thus the reader, as well as any potential decision-maker, cannot assess the significance of the direct and indirect impacts reported in the document. The final environmental statement should include an analysis, which better explains the effectiveness of the recommended mitigation measures and better assesses the significance of the post-mitigation impacts.

The U.S. Fish and Wildlife Service (USFWS) has engaged in pre-development consultation with BPA and its consultants. We expect that formal consultation pursuant to section 7 of the Endangered Species Act and its implementing regulations at 50 CFR 402.14, will be initiated by BPA with the USFWS in the near future. Federal agencies are required to review their actions at the earliest possible time to determine whether any action may affect listed species or critical habitats. If such a determination is made, consultation with the USFWS is required.

The BPA should prepare a Biological Assessment (BA) to evaluate the potential effects of the project on listed and proposed species and critical habitat, and determine whether any such species or critical habitat are likely to be adversely affected by the action. Under the Act's implementing regulations at 50 CFR 402.08, the Commission may designate a non-federal representative to conduct informal consultation or prepare a biological assessment. If the BA is prepared by the designated non-federal representative, the BPA must furnish guidance and supervision, and must independently review and evaluate the scope and contents of the BA. The ultimate responsibility for compliance with section 7 remains with the BPA.

The document's treatment of cultural resources lacks technical detail. For example, the details of the proposed substation at Wanama are minimal. It is in the vicinity of Dry Creek, which may have significant natural and cultural resources. More complete details about the location and construction of the substation would be useful. The final environmental statement should also explain how the substation would affect or be affected by the proposed Black Rock Reservoir in that area.

The lack of detail may explain the generic treatment of the cultural resources information discussed in section 5.3.11 of the document summary. This section should provide a concise synopsis of the data known in the project area, the types of sites, number of sites, site significance, etc. It should state clearly where gaps exist in the known data. Pursuant to NEPA and 36 CFR 800, cultural resource values must be considered equally with other environmental values.

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 Although it is often impossible to have 100 percent field surveys at the draft environmental assessment stage, the analysis should clearly state where such information is incomplete. As currently presented, each Alternative and Segment varies as to the level of field coverage and, hence, cultural resource documentation. Definitive numbers of sites and "sensitive areas" are at best preliminary. For example, Map 11 has few cultural resource areas identified on Segments D and E. Does this reflect a lack of sites or a lack of survey(6)? Similarly, little information is discussed about project areas previously surveyed. The map shows a number of identified cultural resource areas along Segment C, yet the cultural resources technical report lists only 55 sites for all of Alternative 3, compared to over 90 for the other two alternatives. The cultural resources technical report even mentions the different level of survey between the two Segment B opinions. Thus, a major discrepancy in the substantiation of cultural resource information exists in the draft document. One cannot discern with confidence the number of cultural resource sites potentially at risk, or the type of sites within a designated "sensitive area." Section S.4.11 reports the number of sensitive areas and their square miles for each alternatives show, but does not explain why the number of cultural resource sites as listed in the cultural resources technical report are not. Consequently, the information portrayed in the draft environmental document shows little significant difference in the impacts to cultural resources between alternatives. Flushing out the details on the cultural resources affected is necessary to make an informed decision.

More importantly, the Section 106 process for the implementation of the National Historic Preservation Act, in accordance with 36 CFR 800, requires sites to be evaluated for significance. It is a site's eligibility for the National Register of Historic Places that is critical to the environmental review process. The draft document presents no information on the eligibility of any of the sites discussed, nor is there any mention of undertaking this process even on the sites previously recorded. Without eligibility determinations for these sites, the comparison of any of the cultural resources information for the selected alternatives does not contribute to the draft's use as an environmental decision document.

Lastly, there is no information regarding consultation with Native Americans and Tribal entities on Traditional Cultural Properties, use areas, sacred areas, etc. The forthcoming Phase II cultural resource survey should include such information. This information would also need to be included in the final environmental document and added into the equation for determining site significance.

SPECIFIC COMMENTS

Section S.2.9 Communications Equipment - This section states that as part of the preferred alternative, approximately 59.3 miles of fiber optic cables would be strung between the Vantage Substation and the new Whatomia Substation, and between the Vantage and Columbia Substations. It is not clear whether the installation of these cables along existing transmission lines would result in ground disturbing activities that are in addition to those associated with the

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 construction of the Schatz-Hanford line. If so, it would be prudent to include a description of these activities and to quantify the amount of ground disturbance that would take place.

Section S.4.5 Fish Resources - The third paragraph of this section states that Segment A of the preferred alternative would cross streams that are designated as critical habitat for Middle Columbia River steelhead and bull trout. This statement is incorrect regarding bull trout. At this time, the U.S. Fish and Wildlife Service has not designated critical habitat for bull trout.

Section S.4.6 Land Use Impacts - This section should explain the standard used to establish the height of towers and conductors along transmission line routes. The option of installing shorter towers in some areas to match the profile of existing lower voltage transmission lines as a measure to reduce visual impacts and the likelihood of bird collisions should be analyzed.

Section 1.1 Need for Action - Increasing the reliability of the current transmission system is one of the stated needs for this project. Please explain whether the current transmission systems has enough capacity to reroute the flow of electricity without lengthy interruption in the event of a catastrophic line failure. Will the construction of the proposed 500 kV line necessitate the construction of another 500 kV line along a different route to provide system reliability in the event of a line failure? If such future construction is likely, then the effects of those actions should be addressed now instead of adding it piecemeal at a later date.

Section 2.1.1 Segment A - This section mentions a potential reroute for this segment. The conditions or criteria that would be used to determine whether the original route or the potential reroute would be chosen for implementation should be explained.

Section 2.2.1 Structures - In addition to the double circuit lines proposed for the agricultural land along Segment D of the preferred alternative, the possibility of utilizing double circuit structures in areas where the transmission line would be in close proximity to sensitive plant populations should also be considered as a measure to minimize land disturbance.

Table 2.8-1 - Under the preferred alternative column on page 2-23, the table states that the introduction or spread of weed species would be a low to moderate impact. The introduction and spread of weeds is one of the greatest threats to native ecosystems nationwide. Documented impacts of weed invasion include dramatic reductions in both the structural and biological diversity of plant and animal communities. These impacts should not be classified as low.

We assume that Table 2-8 lists the selected alternatives in preferential order. If so, this information should be stated in the table title and in the document. On page 2-27 of the table under Visual Resources on the Preferred Alternative, Segment G is discussed. There is no Segment G identified on the accompanying map.

Table 3.4-1 - The units used in this table are misleading. Linear miles are not a unit that can be used to describe vegetation "cover". For example, if a plant community or population covers 1

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<p>Mr. Lou Driessen, Project Manager</p> <p>26-14 cont.</p> <p>mile and the segment width is 0.5 miles, this could encompass 310 acres. All of this information should be presented as acres, or some proportion of the total acres included in the project. These tables should be changed to reflect acres or proportions. Vegetative cover data should be presented in the text as is on page 4-27. This convention should be used consistently throughout the document.</p> <p>26-15</p> <p>Several areas of importance identified by the Washington State Natural Heritage Program (WNHP) are impacted by the project. However, information on the relative size or importance of these areas statewide is not presented. The size in acres of each of these areas, and the total area of each of these communities that remain should be stated so that their importance can be evaluated. For example, the project may only impact 5 acres of one of these communities, but if there are only 15 acres like it remaining in the state, impact significance could be considered very high. It is difficult to assess the real impacts to these WNHP sites without knowing the relative abundance of these areas statewide.</p> <p>26-16</p> <p>Rare plant surveys were conducted in August 2001, which is too late in the year to identify many plants in the Columbia Basin. Most plants are dormant by the heat of the summer and many have disappeared from the landscape. Further surveys should be conducted during the spring growing season, March through May, and should also be based on known phenology of the listed plants.</p> <p>26-17</p> <p>Section 3.5 Wildlife - The reference to Johnson and O'Neil is misleading because there are many more wildlife species that occupy these habitats than the opening statement suggests. Johnson and O'Neil present information for 150 species that have an association with shrub-steppe habitats. There are, however, many more generalist species and migratory species that occupy shrub-steppe habitats. The difference is that species that are associated rely on aspects of the shrub-steppe habitat for their life-cycle, whereas other generalists and migratory species may use or occupy these habitats, and other habitats as well. This section should be revised to reflect that 150 species are associated with shrub-steppe habitats, but many more species use or occupy these habitats.</p> <p>26-18</p> <p>Section 3.5.2 Segment B - Canadian geese should be changed to read Canada Geese</p> <p>26-19</p> <p>Section 3.5.3 Segment C - The statement that the elk herd has "dramatically increased" over the past several years is incorrect. The herd has decreased since 2000. We are unaware of any evidence or data indicating that elk populations in surrounding areas have originated from the Rattlesnake herd.</p> <p>26-20</p> <p>Section 3.5.5 Segment E - Brunkal is misquoted on page 3-37 as stating that pygmy rabbits and sagebrush voles are known to exist in Hanford Reach National Monument. Potential habitat for these species exists, but no surveys have been conducted to verify the presence/absence of these species. Historical information suggests that these species may have been present in these areas. The most recent surveys, which were not exhaustive, suggest pygmy rabbits have been extirpated from the area.</p>	<p>6</p>
<p>Mr. Lou Driessen, Project Manager</p> <p>26-21</p> <p>Several areas of importance identified by the Washington State Natural Heritage Program (WNHP) are impacted by the project. However, information on the relative size or importance of these areas statewide is not presented. The size in acres of each of these areas, and the total area of each of these communities that remain should be stated so that their importance can be evaluated. For example, the project may only impact 5 acres of one of these communities, but if there are only 15 acres like it remaining in the state, impact significance could be considered very high. It is difficult to assess the real impacts to these WNHP sites without knowing the relative abundance of these areas statewide.</p> <p>26-22</p> <p>Section 3.5.7 Threatened and Endangered Species - This section needs to be revised to include the pygmy rabbit (<i>Brachylagus idahoensis</i>) as an endangered species. The Columbia Basin pygmy rabbit was granted immediate endangered species status under the emergency rule provision of the Endangered Species Act on November 30, 2001.</p> <p>26-23</p> <p>Table 3.7-2 - This table does not reflect lands that are owned by USDOE and administered by the USFWS.</p> <p>26-24</p> <p>Section 3.7.2.2 Public Agency Administered Lands - The study area includes crossing of the Saddle Mountain, Wahluke, and Columbia River Islands/Dunes Units of the Hanford Reach National Monument. The study area also includes crossing of the Hanford Reach of the Columbia River. This river reach was found suitable for inclusion in the National Wild and Scenic Rivers system under "Recreational River" classification in the National Park Service's Hanford Reach of the Columbia River Comprehensive Conservation Study/EIS (June, 1994). The Hanford Reach is currently under interim protection as directed by Public Law 100-605, as amended by Section 404 (Hanford Reach Protection) of Public Law 104-333. The USFWS is responsible for overseeing interim management protection.</p> <p>26-25</p> <p>Section 3.7.6.2 USDOE Lands - The description for the Hanford Reach National Monument should be altered to reflect the following: The lands within the Monument are divided into five major management units: Frazier Floberhardt Arid Lands Ecology Reserve (administered by USFWS), McGee-Riverlands Unit (administered by USDOE), Saddle Mountain Unit (USFWS), Wahluke Unit (USFWS), and the Columbia River Islands/Dunes Unit (USDOE).</p> <p>26-26</p> <p>Section 3.7.7.2 Public Lands - Segment E would cross through the Saddle Mountains Unit of the Hanford Reach National Monument. Please delete the word "uninhabited" when describing wildlife habitat.</p> <p>26-27</p> <p>Section 3.7.8.2 USDOE Lands - Change text to reflect the following: Segment F crosses the Wahluke Unit of the Hanford Reach National Monument, which receives year-round recreation use.</p> <p>26-28</p> <p>Section 3.9 Visual Resources - The state highway 24 and 12 travel corridors, the Vernita Bridge rest stop, and the primitive boat launch are key viewing areas for travelers and recreationists associated with the Hanford Reach National Monument. Visual impacts and potential mitigation for these areas should be assessed in the final environmental document.</p> <p>26-29</p> <p>Section 3.10.4 Hanford Reach National Monument - The Saddle Mountain Unit is situated on the north side of the Columbia River. Public access to this area is currently limited to permitted research and environmental education activities only.</p>	<p>7</p>

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<p>Mr. Lou Driessen, Project Manager</p> <p>26-29 cont.</p> <p>The Wahluke Unit, located north and east of the Saddle Mountain Unit, provides 57,000 acres of recreational opportunities in the Hanford Reach National Monument. Popular recreation pursuits include sightseeing, hiking, photography, bird watching, hunting, fishing, and environmental education. Current visitor use facilities consist of directional signage, improved roads, boat launches, and parking areas.</p> <p>26-30</p> <p>Table 4.1-1 - To accurately represent the acres of ground disturbance associated with each of the construction alternatives, this table should include the number of acres that would be disturbed at line tensioning sites, staging areas, and the construction of the new substation.</p> <p>26-31</p> <p>Section 4.3 Vegetation - Fragmentation of vegetation communities should be addressed as part of the construction impacts. Larger parcels of vegetation/habitat have greater biodiversity. Fragmentation reduces biodiversity and decreases surrounding habitat quality and quantity.</p> <p>26-32</p> <p>Section 4.3.1 Vegetation Impact Levels - The permanent removal of vegetation from an area dominated by non-native species may not be a low impact if the vegetation actually being removed consist of the native portion of the plant population.</p> <p>Increasing the density of noxious weeds in a location where they already exist should not be classified as a low impact to the vegetative community. An increase in the density of noxious weeds at a particular location may result in increased seed production and dispersal, and thereby increase the rate of noxious weed invasion to adjacent areas.</p> <p>26-33</p> <p>Section 4.3.1 Segment A - The number of acres and proportion of the Wyoming big sagebrush/bluebunch wheatgrass plant community that would be affected by the construction of segment A should be described.</p> <p>This section states that there would be no direct impact to Ute ladies' tresses because the wetland habitats where the plant may be found would be avoided by the transmission line tower placement. However, access roads along the transmission route include the installation of culverts and stream crossings that may result in a direct impact to this species during both construction and operation and maintenance. These potential impacts should be addressed in the final environmental statement.</p> <p>26-35</p> <p>Section 4.3.3 Segment D - The number of acres and proportion of the Bitterbrush/Indian ricegrass plant community that would be affected by the construction of segment A should be described. The conditions or criteria that would be used to determine whether a double circuit structure would be used in the area of the Umatilla buckwheat populations should be explained.</p> <p>26-36</p> <p>This section states that there would be no direct impact to Ute ladies' tresses because the wetland habitats where the plant may be found would be avoided by the transmission line tower placement. However, access roads along the transmission route include the installation of culverts</p>	8
<p>Mr. Lou Driessen, Project Manager</p> <p>26-37 cont.</p> <p>and stream crossings that may result in a direct impact to this species during both construction and operation and maintenance. The potential impact of these construction activities on Ute ladies' tresses should be addressed in the final environmental statement.</p>	9
<p>Section 4.3.8.2 Native Plant Communities - Shrub-steppe communities can be restored. On the Hanford Site, the USDOE is required to restore acres at a 3:1 ratio (Hanford Site Biological Resources Management Plan, 2009) of acres restored to acres disturbed through construction. Shrub-steppe restoration has been underway in the Hanford area for several years. There are many acres of public land near the proposed project with restoration potential. The existing 3:1 ratio should be considered as a precedent for BPA to mitigate project-caused shrub-steppe habitat losses, particularly for the impacted acres on the Hanford Reach National Monument, and within the Hanford Site that are designated as Preservation in the Hanford Site Comprehensive Land Use Plan. The Department recommends that the USDOE and BPA continue to consult and coordinate with USFWS Monument/Saddle Mountain National Wildlife Refuge staff regarding when, where, and how such mitigation should occur.</p>	
<p>The use of non-invasive, non-native species for re-seeding disturbed areas when there are seed sources for native species available is not recommended.</p>	26-39
<p>Section 4.3.8.3. Rare Plants - The discussion regarding rare plants suggests that double circuit structures could be used in these areas as mitigation. However, this strategy is not included in the mitigation section. As previously mentioned, the Department strongly recommends the use of double circuit structures on Monument lands to avoid new ground disturbance that would be incurred by developing a new row of towers adjacent to the existing towers.</p>	26-40
<p>Section 4.4.2.1 Construction Impacts - Wildlife habitat destroyed by this project should be mitigated through habitat improvements in other areas, or on adjacent public lands. The Department recommends that the USDOE and BPA continue to consult and coordinate with USFWS Monument/Saddle Mountain National Wildlife Refuge staff regarding when, where, and how such mitigation should occur.</p>	26-41
<p>Section 4.4.2.2 Operation and Maintenance Impacts - There is no mention in this section of the potential electrocution of perching and migratory birds, particularly hawks and eagles. This issue and measures to prevent the electrocution of raptors and other migratory birds should be addressed in the final environmental assessment.</p>	26-42
<p>Section 4.4.3 Threatened and Endangered Species - This section needs to be revised to include the pygmy rabbit (<i>Brachylagus idahoensis</i>) as an endangered species. The Columbia Basin pygmy rabbit was granted immediate endangered species status under the emergency rule provision of the Endangered Species Act on November 30, 2001.</p>	26-44

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Section 4.4.8.1 Bald Eagle - This section states that with mitigation, the project would have no impact on bald eagles. It is highly unlikely that there would be absolutely no impact to bald eagles as a result of project construction and operations. The temporary displacement of eagles from foraging areas during construction or operations and maintenance is just one of the possible impacts that may result. Although this level of impact may be minimal it is an impact nonetheless.	26-45	Section 4.5.8.3 Bull Trout Columbia River DPS - The first sentence of this section is not correct. At this time, the USFWS has not designated any areas of critical habitat for bull trout.	26-52
Section 4.4.10.4 Shrub-steppe Habitat Loss and Mitigation - Please refer to prior comments for section 4.3.8.2 - Native Plant Communities.	26-46	Section 4.4.10.5 Wildlife Disturbance Mitigation - Seasonal activity restrictions should occur during the breeding/nesting season from March 1 through August 31.	26-47
The draft document does not address mitigation for impacts to migrating and/or resident bats.	26-48	Section 4.4.10.2 Avian Collision Mitigation - Avian collisions are minimized not only by minimizing the vertical separation between structures but also by minimizing the horizontal separation between structures. Mitigation could be enhanced by reducing the number of structures and lines to a minimum, i.e., using the single, double circuit to hold the lines rather than creating new lines. Visual indicators should be used on all lines crossing the Monument, all water crossings, and areas adjacent to wetlands that may be frequented by waterfowl. All lines should use insulators in areas where birds may perch and be electrocuted.	26-49
Section 4.4.11 Cumulative Impacts - Adequate mitigation is not proposed for long-term decline in wildlife habitat. We suggest BPA target areas that are identified as habitat preservation areas for wildlife habitat enhancement mitigation.	26-50	Section 4.5.2.2 Operation and Maintenance Impacts - The discussion in this section should mention that information on the effects of Electric and Magnetic Fields (EMF) on humans and fish and wildlife is available in the appendix.	26-51

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<p>26-60</p> <p>Mr. Lou Driessen, Project Manager</p> <p>Section 4.10.6 Cumulative Impacts - This section could be improved by providing more information relative to the proposed project's contribution to potential cumulative impacts on cultural resources. Based on the concluding remark in the last paragraph, one would surmise that such cumulative impacts are likely to be significant. The final environmental document should specify the action(s) that would be implemented to avoid, mitigate, rectify, or compensate for the project's contribution to cumulative damage to cultural resources.</p>	<p>12</p> <p>Section 4.11.5 Fire - This section refers to construction that would occur during the summer months (winter months would be largely unrestricted, due to "low" fire danger), but does not provide many specifics on prevention/suppression of fires arising from construction work. We recommend a 3-tiered restriction based on fire danger rating, similar to how the USFWS limits human uses (open fires, camp stoves, smoking, etc.) or industrial activities (mowing, road scraping, welding, etc.) as fire danger increases. The USFWS can provide fire danger ratings to the COR or other entity on a daily or weekly basis. The restriction tiers would be accompanied by respective prevention/suppression requirements at each level (i.e., fire extinguishers, pumps, water tenders, etc.). Ultimately, the USFWS would reserve the right to prohibit high fire-risk activities during periods of "very high" or "extreme" fire danger.</p>
<p>26-61</p> <p>Section 5.2.2 Wildlife - This section states that with mitigation, the project would have no impact on bald eagles. It is highly unlikely that there would be absolutely no impact to bald eagles as a result of the proposed project. The temporary displacement of eagles from foraging areas during construction or operations and maintenance is just one of the possible impacts that may result. Although this level of impact is minimal, it is an impact nonetheless.</p>	<p>26-62</p> <p>Appendix C: Line Separation - There is no risk analysis associated with the justification that lines need to be separated by 2000 feet. Data should be presented that documents how often transmission lines are struck by lightning, how often line falls onto another line, etc. It is difficult to assess the actual need for 2000-foot line separation without information on the frequency/risk of such occurrences.</p>
<p>26-63</p> <p>Appendix D: Property Impacts - This section presents the action of removing existing transmission lines and replacing them with new lines in the same location as a mitigative strategy. We suggest that this action instead be brought forward and considered as a separate alternative, which would have potentially less overall environmental impact than several of the other alternatives proposed. This action, at a minimum, should be considered for use on all Monument lands and other lands with preservation and resource protection as primary management objectives.</p>	<p>26-64</p> <p>Appendix II: Phase I Cultural Resources Assessment - We appreciate that this technical report has been modified and improved since the last iteration. Unfortunately, there is still confusion about the relationship between the Monument and the U.S. Department of Energy (USDOE); important figures are absent or remain incorrect, and technical details are still lacking. This confusion and lack of detail in the technical report is carried forward into the draft environmental</p>

Public Comments

Chapter 6 — Comments and Responses

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