



## United States Department of the Interior

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IN REPLY REFER TO

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*Electronically Filed*

February 19, 2004

Mr. Thomas McKinney  
Bonneville Power Administration  
Communications - DM7  
P.O. Box 14428  
Portland, Oregon 97212

Dear Mr. McKinney:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the COB Energy Facility Interconnection, Klamath County, Oregon. The Department offers the following comments for use in the development of the Final Environmental Impact Statement (FEIS).

The Bureau of Land Management (BLM) is a cooperating agency in the National Environmental Policy Act process for this project. At the end of the process, the BLM will need to make a decision regarding an easement or right-of-way that would be necessary to place energy facilities on BLM-administered lands. BLM intends to use information contained in the EIS as the basis for making that decision. In this role as cooperating agency, BLM's Klamath Falls Resource Area (KFRA) reviewed the preliminary DEIS and provided comments, as well as supplemental information, in late 2002. However, a number of those comments were not addressed, or were not covered sufficiently and so are included in this letter.

To help ensure the FEIS will meet BLM's needs with respect to their easement decision, we request Bonneville Power Administration and its contractor, CH<sub>2</sub>MHill, schedule a meeting with BLM in Klamath Falls, well in advance of releasing the FEIS.

## General Comments

### Best Management Practices

- 028A The use of Best Management Practices (BMPs) for minimizing impacts is mentioned throughout the DEIS, though they are not listed or defined. The Department recommends that BMPs to be used be identified and defined in the FEIS.

### Mitigation

- 28B The DEIS identifies several recommended mitigation measures that would be expected to reduce impacts of the proposed project that may or may not be implemented. Without providing assurance that mitigation will occur, the impacts of the alternatives are not clear to the reader or the decision-maker. The Department suggests that those mitigation measures, that are expected to be implemented, and that mechanisms to ensure mitigation will be implemented be built into the proposal, and reflected in the FEIS.

### 28C Definition of the Action area

The action area appears to be defined as the immediate vicinity of the "Energy Facility site and ¼ mile on either side of the proposed project's linear features" (Page 3.4-1, Vegetation and Wildlife), and these are the areas that were included in the DEIS analysis. However, additional areas may be impacted. For example, DEIS Appendix C, Figure 1, depicts a "Significant Impact Area for Annual PM10" on the ridges southwest to southeast of the facility. However, we found no analysis of these significant impacts in the DEIS.

In another example, the DEIS identified an alternative to discharging stormwater drainage into a ditch, which eventually flows through a canal into the Lost River, but no analysis was provided regarding potential impacts of this alternative. The Department recommends the action area be defined as all areas that may be directly or indirectly affected by the proposed project, and that the potential impacts be analyzed in the FEIS. If effects would not be significant, it would be helpful if the FEIS provided, at a minimum, a brief description of the effects, and an explanation of why they would not be significant.

### 28/D Recreation

Recreation and tourism concerns and issues are not fully addressed in the DEIS, as there is no discussion of these issues in Chapter 3, and no recreation specialist is listed as a member of the EIS team in Chapter 5. Minor attention is given to recreation values in section 4.10, Recreation Resources on page 4-4.

While it may be true there are no significant recreation facilities on the lands directly impacted by the project features, there are significant recreational values on public lands surrounding or within sight of the proposed facilities, and administered by the BLM, Forest Service, the state of Oregon and Klamath County. There is a substantial amount of dispersed recreation that occurs

in southern Klamath County in the vicinity of the project area, including, but not limited to, activities such as hunting, hiking, off-road vehicle use, and sight-seeing, that may be affected by the proposed project. Some recreational impacts that could occur relate to the indirect effects to the aesthetic qualities of the area, due to the emitted plume that will be visible from surrounding lands. The Department recommends the potential significant impacts to these recreation activities be fully analyzed.

### Specific Comments

- ✓ 28E Page S-1, Purpose and Need for Action: The last sentence of the paragraph is not clear. The Department suggests it be reworded as follows, "BLM will grant the rights-of-way if they are determined to be appropriate uses of public land, consistent with applicable planning documents."
- ✓ F Page S-3, Major Conclusions: The first sentence may be an overgeneralization. Some impacts may be significant even with mitigation applied. Please refer to later comments about potential significant impacts.
- ✓ G Page S-4, Hydrology and Water Quality: How will leaching from the evaporation pond be prevented under wastewater management alternative, as described in the third paragraph? On pages 2-8 and 3.3-7, it states the pond would be lined with bentonite clay or a geotextile system. Perhaps this should be stated in the summary as well.
- ✓ H Page S-4, Vegetation and Wildlife: Disturbance on 109 acres, though reduced substantially from the 179 acres described in the Preliminary DEIS, still may be a significant impact. The DEIS does not provide an explanation as to why this impact level is not significant. Perhaps it would be helpful if this loss were put into context, for example, by explaining how this loss of habitat compares to the total remaining in the area.
- ✓ I Also, the last sentence states, "...constituents in the process wastewater would not be expected to be toxic to wildlife." The DEIS does not identify the constituents expected to be in the process wastewater, or provide an explanation for this conclusion. The Department suggests this information be added.
- ✓ S Page S-5, Fish: The construction of transmission lines, associated roads, and intermittent stream crossings, along with wastewater discharge onto irrigated pastures, will result in direct and indirect discharges of sediment and/or nutrients into surface water. This may negatively affect fish and/or habitat, either on-site or downstream. The Department suggests this be described and analyzed, and any additional mitigation measures identified.
- ✓ K Page S-6, Scenic and Aesthetic Values: The third sentence does not include reference to the plume that could come from the four stacks. This may be a greater impact to scenic and aesthetic values than the stacks themselves.
- ✓ L The fourth sentence does not mention that the transmission line access road and associated right-of-way clearing could also affect visual and aesthetic values. There is no mention of mitigation

measures to reduce the visual impacts from the above mentioned features, the electric transmission towers, or the power plant and associated facilities. The Department suggests these impacts be described and analyzed, and any additional mitigation measures identified.

M There is no mention of potential impacts to BLM-administered lands. The Department suggests you address potential impacts to areas of scenic value or sensitive visual resources on BLM-administered lands within the project area, as well as BLM-administered lands adjacent to or within sight of the proposed facilities, not just the area directly affected by project facility location. These areas are delineated on Map 5 of the KFRA Resource Management Plan and Record of Decision (RMP).

✓ N Page S-7, Land Use Plans and Policies: The Department suggests an additional paragraph be added that describes how the proposed project conforms to BLM's existing KFRA RMP, as well as the recent National Energy Policy of 2001. We note that if the BLM cannot demonstrate conformance with existing plans and policies, then a right-of-way/easement cannot be issued. The Department suggests adding the following paragraphs:

The proposed project involves the location of facilities on approximately [insert number of acres] acres of lands administered by the BLM. This will involve the issuance of a right-of-way or easement to BPA. The right-of-way objective from the KFRA RMP, pages 66-67, calls for making rights-of-way available where consistent with local comprehensive plans, Oregon statewide planning goals and rules, and avoidance/exclusion areas identified in the RMP-ROD.

The proposed facilities do not cross any lands identified as right-of-way avoidance or exclusion areas. The RMP encourages, but does not require, new utility corridors to be located within existing corridors. However, the applicant must demonstrate that the use of an existing route or corridor is not technically or economically feasible, and that the proposed corridor minimizes damage to the environment. The proposed corridor locations fall outside of existing corridors designated in the RMP. The proponent's reasoning for not using existing corridors is found in Section 2.5.2.3, Alternative Electric Transmission Line. The proposed project is also consistent with the goals and objectives of the National Energy Policy of 2001.

✓ O Page 2-1, Proposed Action: Figure 2.2 does not show lands "owned" by the BLM, as stated in the last sentence of the second paragraph. The Department recommends revising this figure to accurately depict land status. } The Department also recommends revising the sentence to reflect that these lands are BLM-administered lands, rather than BLM-owned, as these are public lands managed or administered by the BLM.

✓ Q Page 2-7, Wastewater Management, Beneficial Use, and Disposal: Since review of the preliminary DEIS, the design has changed to include an option of using wastewater to irrigate pastureland. This is an improvement from the previously analyzed options. However, the BLM previously suggested consideration of using wastewater for wetland development to mitigate the impacts to wetlands associated with the project. It is not clear whether this option was considered? It could be a less expensive and equally effective means of treating wastewater

compared to a lined, evaporation pond. A wetland would also create multiple benefits to wildlife and could be used to enhance scenic and aesthetic values. At a minimum, it would be appropriate to describe such an option under Section 2.5.2, Alternatives Considered but Eliminated from Detailed Analysis.

BR Page 2-11, Electric Transmission Line: The last sentence in the fourth paragraph states, "any disturbed ground (associated with temporary roads) would be repaired." The Department suggests you state what techniques or mitigation measures will be employed, and what steps will be taken to minimize erosion or damage to soils.

S Page 2-12, Electric Transmission Lines: The Department suggests the discussion in the second paragraph include mention of, or reference to, the mitigation measures described on page 3.4-17. These include re-seeding and re-vegetating cleared transmission corridors with native, low growing plants and shrubs, in consultation with BLM and Oregon Department of Fish and Wildlife (ODFW). By managing vegetation with selected native plants, noxious weeds and future vegetation control measures can be substantially reduced.

✓ T This paragraph also discusses vegetation control needs, including the use of chemical methods. The Department recommends discussing which chemicals are proposed for use and describe how they would be applied, along with any proposed mitigation methods. There are significant restrictions on the types of chemicals that may be used on BLM-administered lands due to an existing Court injunction on herbicide use. We also suggest acknowledging that only approved chemicals will be used on BLM-administered lands within the project area.

✓ U Weed control is currently described only as a component of the electric transmission line, but will likely be needed periodically at all of the project facilities, including mitigation lands, during the life of the project. The proposed plan should include the development and implementation of a comprehensive noxious weed management plan for the entire project area (facilities and rights-of-way), which incorporates the principles of integrated weed management. Components of an integrated weed management plan should include prevention and detection, integrated control methods, awareness and education, coordination, native plant community restoration, and monitoring and evaluation. Integrated control methods should include cultural, physical, biological, and chemical control techniques. This discussion should be described in detail in the appropriate location in Chapter 2. The impacts of implementation of such a plan should be described fully in Section 3.4.2.

✓ V Further, it does not appear that the impact of periodic vegetation maintenance and treatment, to be conducted over the life of the project, is addressed anywhere in the document. It would be appropriate to do this in Section 3.4, Vegetation and Wildlife. It would also be appropriate to discuss the potential impacts of chemical use in Section 3.13, Health and Safety.

✓ X Since the proposed easement would be 154 feet wide, we expect that periodic vegetation maintenance would be necessary and would involve some off-road vehicle use for mowing, brush-beating, or chemical application. The Department suggests the document discuss the potential impact from these activities, and any mitigation measures.

- ✓ Y Page 2-15, Other Energy Projects: This section should also address the recent proposal to develop a wind generation facility on Bryant Mountain.
- ✓ ✓ Z Page 2-17, Alternative Strategies: Recently, there has been considerable interest in the potential use of juniper and forest thinning material as a source of biomass energy production, sparked in part by the President's Forest Health Initiative, and the availability of grant monies. There is a considerable amount of potential biomass material available on BLM, Forest Service, and private lands near the project area. The removal of biomass could be used to meet some BLM resource management objectives on surrounding lands. The Department recommends the consideration of an energy facility design that could utilize biomass, as well as natural gas.
- ✓ AA Page 2-20, Alternative Electric Transmission Line: The reasoning for why one alternative easement needed to be 200 feet wide, while the selected one only needs to be 154 feet wide should be explained; a diagram may help. The amount of land that would be impacted differs substantially, and without this explanation could be viewed as misleading, especially when the comparison is shown in Table 2-2.
- ✓ B1 The last sentence in the fourth paragraph refers to "BLM-owned land" in two locations. Technically these are "public lands" and should be referred to as "BLM-administered lands."
- ✓ C1 The Department suggests revising line three in the fifth paragraph to read, "private residences," as opposed to "residences."
- ✓ D1 Pages 2-23 to 2-30, Table 2-1: Since this is a summary table for Chapter 3, the Department suggests it be moved to Chapter 3, and labeled Table 3-1.
- ✓ E1 Page 2-25, Table 2-1, Vegetation and Wildlife: In the column labeled Existing Conditions, the project area description includes the Bryant Mountain area which supports numerous and extensive populations of noxious weeds on both public and private lands. Construction and maintenance of the project would create the disturbed conditions under which many of these noxious weed species would have a competitive advantage over native plant species. Therefore, the Department suggests the "Impact" column of the table include a summary discussion of the potential for an increase in the establishment and spread of noxious weeds. We also suggest that proposed mitigation include development and implementation of a noxious weed management plan for the project area (facilities and rights-of-way), which incorporates the principles of integrated weed management. Components of an integrated weed management plan include prevention and detection, integrated control methods, awareness and education, coordination, native plant community restoration, and monitoring and evaluation. Integrated control methods should include cultural, physical, biological, and chemical control techniques. In addition to summarizing this discussion in the table, the Department suggests it be described in detail in the appropriate location in Chapter 2, and the associated impacts described and analyzed in Section 3.4.2. Weed control is currently described only as a component of the electric transmission line (Section 2.3.2), but will also be needed at all of the project facilities, including mitigation lands during the life of the project. The Department recommends this be reflected in the FEIS.
- ✓ F1

28G1  
28H1  
Page 2-26, Table 2-1, Fish: In the column labeled Existing Conditions, the Department recommends removing the sentence: "Construction and operation of the Facility would not affect fisheries resources in the area." This statement is not an "existing condition," nor is it an accurate description of potential impacts. Refer to our comment pertaining to page S-5, above. Also, there are two federally/state listed endangered fish species in the project area, not one. These are shortnose sucker and Lost River Sucker.

28I1  
28J1  
Page 2-26, Table 2-1, Traffic and Circulation: In the column labeled Impact of Proposed Action/Mitigation, line 3.6.2, the Department recommends replacing the term "visible" with "structural" or some other more appropriate term. Also, it is not clear how and when a threshold of damage would be met. This needs to be defined; if not in this table, it should be described later in detail in Section 3.6.2.

28K1  
Line 3.6.3 in this same column states "No mitigation measures are recommended." The Department recommends the project proponent be required to repair any local roads damaged by their operational activities, not just damage that occurs during construction. The Department recommends stating this here, and later in Section 3.6.3, as the required mitigation measure.

28L1  
In the "Air Quality" section, "Existing Conditions" column, the Department suggests deleting the statement: "No exceedance of the annual PM10 standard has occurred in the last 10 years," as it merely repeats the information presented in the previous sentence.

28M1  
28N1  
28O1  
28P1  
Priestley  
Page 2-27, Table 2-1, Scenic and Aesthetic Values: Line 3.8.1 states the facilities "would be in the background of any views." The Department suggests this be described more fully, and that the view points from which the facility would be visible are listed. Visual impacts to scenic and aesthetic resources could also result from cleared transmission corridors and transmission line roads. It seems understated to say that stacks and transmission towers "would be in the background of any views." Facility features and potential plumes would be clearly visible to visitors traveling on West Langell Valley Road (foreground) south of Bonanza, and may be visible to residents in Bonanza and Malin, Oregon, and Tulelake, California. Features may also be visible from the Volcanic Legacy All American Road (Highway 139, Tulelake, CA), Immigrant Trail Scenic Byway (Tulelake to New Pine Creek, Modoc County, CA), and the Modoc Volcanic Scenic Byway (Tulelake, CA). In addition to providing a better description of these impacts, the Department recommends you consider minimization measures such as final placement of transmission towers and associated roads, and mitigation measures such as vegetation plantings and screening vegetation.

28Q1  
Page 2-28, Table 2-1, Land Use Plans and Policies: In the column labeled Impact of Proposed Action/Mitigation, line 3.10.6, it states, "... permanent impacts to rangeland/woodlands along the electric transmission line..." Please briefly list the types of impacts that would occur (e.g., loss of vegetation, habitat) and state the level of severity or significance, using quantitative terms such as acres of lost habitat.

28R1  
Page 2-29, Table 2-1, Socioeconomics: In the column labeled Impact of Proposed Action/Mitigation, line 3.11.3, you might consider providing tours of the facility as a socio-economic/tourism benefit.

2851 Page 2-30, Table 2-1, Health and Safety: In the column labeled Impact of Proposed/Action Mitigation, the Department recommends line 3.13.6 include a statement about the increased potential for electric lines to start a wildfire under certain atmospheric conditions. We also recommend this be included in Section 3.13.6.

2871 The table does not discuss or summarize impacts to recreation and tourism, nor include mitigation for these impacts. As mentioned in our General Comments section above, recreation and tourism concerns and issues are not fully addressed in the DEIS, as there is no discussion of these issues in Chapter 3, and no recreation specialist is listed as a member of the EIS team in Chapter 5. Minor attention is given to recreation values in section 4.10, and Recreation Resources on page 4-4. The Department recommends the potential significant impacts to these recreation activities be fully analyzed.

2841 Page 2-31, Table 2-2: As discussed for Page 2-20 above, an explanation as to why the easement widths differ should be included in the FEIS. Also, under Raptor Mortality near the bottom of the table, in the "Preferred Route" column, will there only be a single line for the foreseeable future? If it is foreseeable that more lines will be added during the life of the project, the Department recommends this be added to the FEIS, in this section and in the impacts analysis in Chapter 3.

2861 Page 2-33, Figure 2-1: In this figure and other figures throughout the document that use the same base map layers, the Department suggests you label major county roads and show Federal and State land administrative boundaries, and in Figure 2-1, specifically, add a legend for the color shading.

2841 sock There is currently no map or figure in the document that shows BLM-administered land boundaries. This makes it very difficult for reviewers to determine which BLM-administered lands are affected by the project. At a minimum, Figure 2-1 should include a land status overlay. It could be applied to other maps in the document as well, where it would not interfere with other features being displayed. This land status data (called LANDLINES) for BLM and other federal lands is available in GIS (Arc export) format from the BLM GIS data website at: <http://www.or.blm.gov/gis/resources/library.asp> . Metadata is also available from this same site.

2841 Bristleberry Page 3.1-2, Scenic and Aesthetic Values: As stated in this section, a facility will exist where one did not exist before. The unavoidable adverse impacts should be clearly identified for the main plant as well as the transmission lines and associated roads, as they may be visible from several scenic byways (see our comments for Table 2.1, above). The power plant steam plume would also be visible for many miles, where there is presently none.

2871 Page 3.1-3, Proposed Action: This section identifies the use of process wastewater as beneficial and states there would be no discharges of process wastewater or stormwater "to surface or ground water." However, it is not clear why these discharges would not enter groundwater or surface waters. The Department recommends additional clarification be provided.

✓2BA2 Page 3.2-4, Soil: This section states that several soil samples were collected and that at “selected boring locations, composite soil samples were collected to establish background soil chemical characteristics.” However, this chemical data is not presented. The Department recommends this information be presented to show current soil chemical baseline conditions.

✓B2 Page 3.2-12, Environmental Consequences and Mitigation Measures: Under the seventh bullet, in addition to stating that Oregon-certified seed will be used for revegetation, the Department recommends you also restate or reference the mitigation measures on page 3.4-17 describing the use of native shrubs and grasses for re-vegetation, along with consultation on seed mixes with the ODFW and BLM.

✓C2 Page 3.2-13, Impact 3.2.3, Assessment of Impact: We note that the installation of a culvert, in itself, does not mean that erosion at road-stream crossings will be minimized, as suggested in the last sentence of the fourth paragraph. Appropriate BMPs should be employed during culvert installation. Temporary and permanent access roads that traverse BLM-administered lands should be constructed and maintained according to the BMPs described in Appendix F of the KFRA RMP (pages F-13 to F-21).

✓D2 Page 3.2-14, Impact 3.2.4, Assessment of Impact, first paragraph: Temporary and permanent access roads that traverse BLM-administered lands should be constructed and maintained according to the BMPs described in Appendix F of the KFRA RMP (pages F-13 to F-21).

✓E2 Page 3.2-14, Impact 3.2.4, Assessment of Impact, second paragraph: The last sentence appears to have been revised in response to BLM’s comments on the preliminary DEIS. It now states that “Heavy equipment would be restricted to the access roads and transmission tower sites (during operations) where possible.” However, it should also be acknowledged that equipment will need to go off-road as part of routine facility and vegetation maintenance activities. The easement is 154 feet wide and periodic vegetation maintenance activities will involve some off-road vehicle use for mowing, brush-beating, or chemical application. Refer also to a similar comment on section 2.3.2, Electric Transmission Lines. The impacts of this off-road vehicle travel needs to be analyzed and described, particularly as it relates to soil compaction and erosion, within Chapter 3.

F2 Page 3.2-14, Section 3.2.2, Impact 3.2.4: This section lists discharging stormwater into a nearby irrigation ditch which eventually flows into the Lost River, as an option for disposing of this water. However, there is no analysis provided to address potential impacts. The Department recommends the potential effects be analyzed and the ditches be included as part of the analysis area under this alternative.

G2 Page 3.2-15, Section 3.2.2, Impact 3.2.6: This section discusses process wastewater and states that the water is “of equal or better quality than the shallow groundwater and Lost River water used for irrigation,” and that agricultural soils would not be adversely impacted. It is not clear how this conclusion that this wastewater would be equal or better quality was reached, and the DEIS does not indicate that wastewater monitoring would occur to ensure its quality. The Department recommends additional information and analysis be provided to clearly identify the fate of water constituents that may be harmful. We further recommend that a monitoring

program be presented as part of the proposed action, that includes (1) soil sampling to determine a pre-irrigation baseline for soils where the proposed irrigation and/or discharge would occur, (2) periodic wastewater sampling and analysis, and (3) periodic soil monitoring to determine if constituent levels are approaching levels that could be harmful to human health or the environment.

- 28I2 Page 3.2-16, Impact 3.2.6, Recommended Mitigation Measures: You may want to consider adding a small designed wetland to the proposed action, to inexpensively treat process wastewater, while helping to mitigate for the loss of wetlands.
- 28J2 Page 3.2-17, Cumulative Impacts: The Department suggests planting fast growing hybrid poplar trees along West Langell Valley Road, prior to project construction, as an additional measure to minimize potential cumulative impacts from construction dust and erosion.
- 28K2 <sup>new</sup> Page 3.3-2, Surface Water: This section describes impacts to water bodies directly affected by the “footprint” of the project. However, the EIS needs to describe indirect effects on water bodies as well. Specifically, the EIS should address surface waters that could be potentially affected by project air emissions within the “disposition area” for stack emissions. The Department recommends that all surface waters measurably affected by the project be included in the analysis area.
- 28L2 <sup>new</sup> Page 3.3-2, Surface Water, Lost River: This section identifies the Lost River as a “closed, interior basin.” However, the Lost River historically received flows from the Klamath River and currently is connected to the Klamath River via the Lost River Diversion Canal. The Department recommends this be explained in the FEIS.
- 28M2 Page 3.3-2, Surface Water, Hydrology: The document should clarify that seasonal flows in the Lost River are controlled by releases from Clear Lake, and through water management by irrigation districts and private landowners.
- 28N2 Page 3.3-2, Surface Water, Surface Water Quality: The Department recommends replacing “cold water species” with “resident fish and aquatic life.”
- 28O2 Page 3.3-2, Surface Water, Surface Water Quality: With respect to the statement that “the area’s high summer temperatures account for many of the [303(d)] listings,” it is not likely that naturally occurring high temperatures alone would be the cause for a 303(d) listing. It seems more likely that a listing due to elevated water temperatures would be caused by high summer temperatures combined with human-induced conditions, such as changes in hydrology or loss of vegetative shade cover. The Department suggests a more accurate explanation for the cause of these 303(d) listings be provided.
- 28P2 Page 3.3-4, Environmental Consequences and Mitigation Measures, Impact 3.3.1: This section indicates the deep and shallow aquifers are not hydrologically connected. During the pump test there was a minor effect on nearby wells, and although the DEIS attributes the effect to a leaking well packer, it is our understanding this has not been confirmed as the cause of this response.

Therefore, the Department recommends statements regarding the wells and aquifers clearly identify the test results and probable causes not be stated as fact.

28Q2 Page 3.3-5, Environmental Consequences and Mitigation Measures: The second sentence in the last paragraph states, "No other wells or water rights are known to exist in the deep aquifer system within the project area." Later, the second sentence in the third paragraph discusses "deep interbasin groundwater flow that likely contributes additional recharge." The Department recommends you address the amount of water extraction occurring in these other contributing basins. Some deep aquifer wells have been drilled recently. This has the potential to cause adverse cumulative effects that could be realized beyond the boundaries of the project area. The Department recommends you address this impact under Section 3.3.3, Cumulative Impacts, on page 3.3-13.

28S2 Page 3.3-9, Stormwater, Storm Sewer System: This section identifies an option for discharging stormwater through a series of ditches and canals into the Lost River. There is no analysis of potential effects, and it does not appear to be included as part of the analysis area. The Department recommends the area encompassed by this option be included in the analysis area, and that the effects that would occur if it were implemented are analyzed.

28X2 Page 3.3-6, Process Wastewater: You may want to consider adding a small designed wetland to the proposed action, to inexpensively treat process wastewater, and sanitary sewage and storm runoff, while helping to mitigate for the loss of wetlands.

28L2 Page 3.3-11, Stormwater, West Langell Valley Road Drainage System Alternative: The Department recommends segregating the storm sewer system from the West Langell Valley Road drainage ditch, and instead constructing an infiltration pond. This would help to minimize the potential impacts of increasing surface runoff (as a result of creating impervious areas) and introducing chemical contaminants (from vehicles parked on-site, for instance).

28V2 Page 3.3-13, Additional Precautions: The second paragraph on this page states "Because these areas would be exposed to rainfall, these contaminant curb areas would not have drains." Since materials are defined as being indoors, it appears this sentence should state "these areas would not be exposed to rainfall" and therefore would not need drains. The Department recommends this be corrected or clarified to show why it would not overflow during storm events.

28W2 Page 3.3-13, Cumulative Impacts: With respect to the second paragraph in this section, refer to the comments above, for Page 3.3-4 and 3.3-5, regarding the need to address deep aquifer impacts.

28X2 Page 3.3-13, Cumulative Impacts: The Department recommends this section also discuss: (1) the impacts of road construction, maintenance and use, and (2) the connection between the facility stormwater drainage and the West Langell Valley drainage ditch.

28Z2 Page 3.3-15, Table 3.3-1: The row titled Estimated Average Annual Precipitation states that "28 inches" of precipitation occurs in the project area. This number is at least double the estimate of possible recharge. Furthermore, pages 2-25 and 3.3-1 state that the average precipitation for