Olympic Peninsula Transmission Line Reinforcement Project

Revision Sheet for the Environmental Assessment
Finding of No Significant Impact

DOE/EA-1576
Bonneville Power Administration

March 2008

Revision Sheet

for the

Olympic Peninsula Transmission Line Reinforcement Project

Final Environmental Assessment

DOE/EA -1576

Summary

This revision sheet documents the changes to be incorporated into the Olympic Peninsula Transmission Line Reinforcement Project Preliminary Environmental Assessment (EA). With the addition of these changes, the Preliminary EA will not be reprinted and will serve as the Final EA.

On February 15, 2008, the Preliminary EA was sent to agencies and interested parties. Notification that the EA was available and how to request a copy was sent to all others on the mailing list of potentially affected parties. Comments on the Preliminary EA were accepted until March 6, 2008. Twelve individuals, two tribes and two agencies commented or asked questions about the project. Please see the **Public Comments** section for the comments and responses to those comments. Minor clarifying changes were made to the EA due to public comments.

Revisions to the EA

There are no significant changes to the EA.

Please note that there has been a change in Mile 9 of the right-of-way which requires three additional new towers. Also, two towers that were proposed in wetlands in miles 11 and 12 have been moved out of wetlands. These changes to the Proposed Action necessitated changes in the text and the addition of Figure 15.

Text changes are organized by the chapters and sections of the Preliminary EA. For each change, the location of the change is identified by page and paragraph number of the Preliminary EA. Where text has been modified, deleted text is indicated in "strikethrough" format and new or replacement text is underlined.

Chapter 2

2.1.2 Existing Transmission Line Removal

Page 2-1, the second paragraph of this section has been modified as follows:

The first mile of the Olympia-Kitsap No. 3 230-kV line (H-Frame and ***lattice steel*** structures and conductor) would also be removed. This would be completed after this line is rerouted. In addition, one tower in Mile 9 of this line would be removed (see Section 2.1.4 and Figures 2 and 15).

2.1.4 Reroute Other Existing Transmission Lines

Page 2-4, add the following paragraph after the second paragraph:

In Mile 9, the Olympia-Kitsap No. 3 line crosses over the existing Olympia-Shelton No. 1 line. Removing then rebuilding the Olympia-Shelton No. 1 line would require some changes on the Olympia-Kitsap No. 3 line. To avoid placing new structures on steep slopes, one existing tower on the Olympia-Kitsap No. 3 line would be removed, and one new lattice steel structure and two new H-Frame wood pole structures would be built on terrain less steep (see Figure 15). This change would require about 1.5 acres of new ROW on the west side of the transmission line corridor (see Figure 15).

2.1.5 Transmission Structures

Page 2-5, the second paragraph has been modified as follows:

H-Frame Wood Structures — One single-circuit H-frame wood pole structure would be needed near Shelton for the reroute of the Olympia-Kitsap No. 3 line (see Section 2.1.4). This structure would be supported by ***guy wires***. Two H-frame wood pole structures would also be needed in mile 9 (see Section 2.1.4). The wood poles used would also be directly embedded in the ground. H-Frame structures average about 70 feet tall.

2.1.7 Right-of-Way

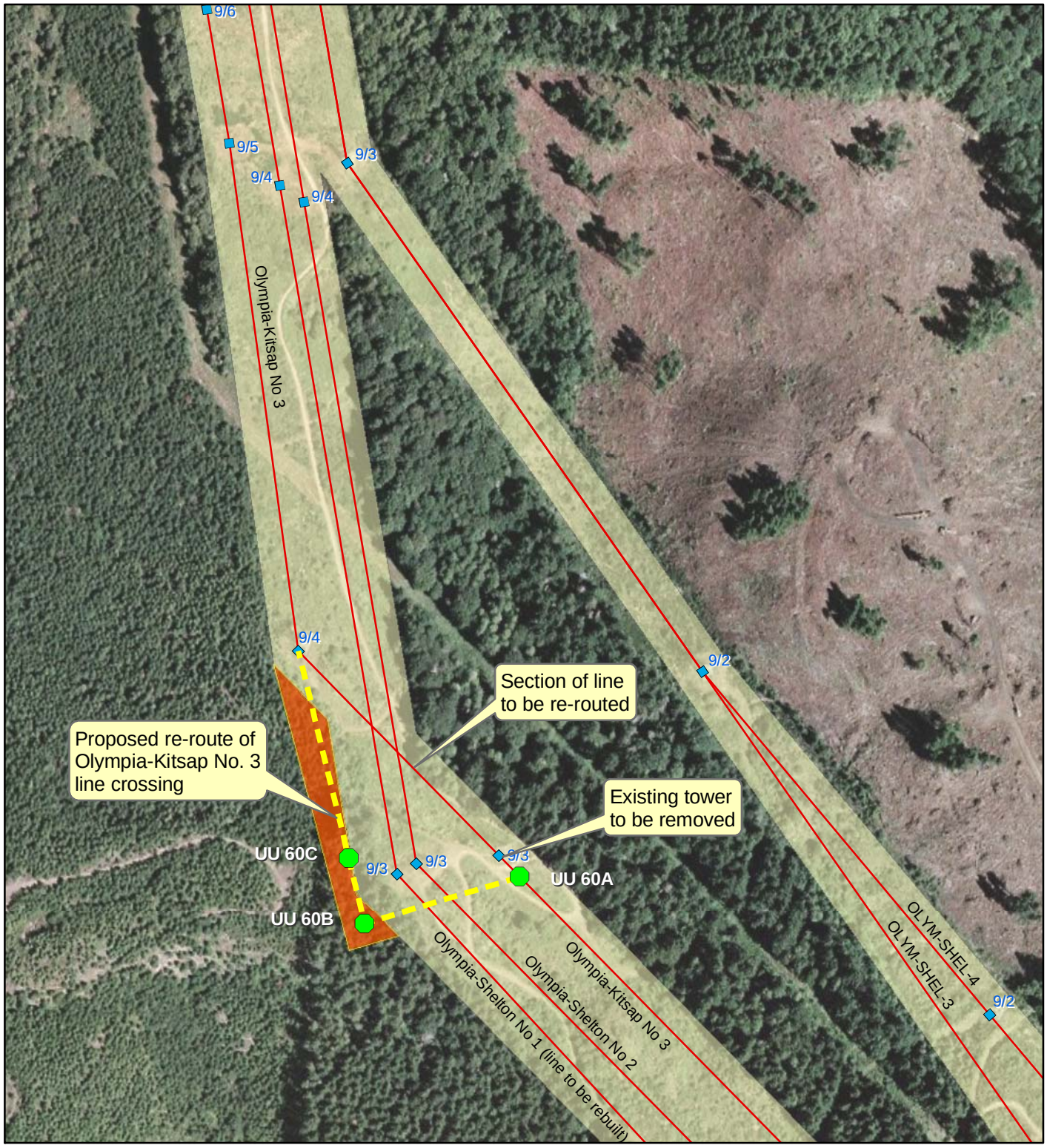
Page 2-6, the first paragraph has been modified as follows:

In three locations, BPA would need to acquire additional ROW. In Mile 9, two new structures would be needed on new, permanent ROW (see Section 2.1.4 and Figure 15). About 1.5 acres of new ROW would be required.

2.1.9 Access Roads

Page 2-6, the second paragraph in this section has been modified as follows:

To facilitate moving construction equipment and materials, portions of existing roads would need to be cleared of encroaching vegetation, graded, covered with crushed rock, and provided with better drainage, including two new ***culverts*** and a new bridge. To install culverts under new roads, soils would be excavated, and excavations would be backfilled in a trench slightly longer than the road width. The new bridge would be in Mile 18 over a tributary of Coffee Creek and would be used instead of a culvert to lessen potential impacts. No fill would be required.



Olympic Peninsula Reinforcement Project

Corridor Adjustments - Mile 9

Legend

- Existing BPA Towers
- Proposed New Tower locations
- Proposed Line Reconstruction Location
- Existing BPA Transmission Lines
- Probable Proposed New ROW
- Existing BPA Right of Way

N

0 100 200 300 400 Feet

Figure 15

Table 2-1

Page 2-11, Row 6, has been modified as follows:

Land Use	About 10 acres of trees and shrubs cleared. Most impacts temporary. About 6.5 acres of new ROW needed. Low impacts expected.	No change in impacts from existing condition. May inhibit some development in the future.

Chapter 3

3.2.2 Environmental Consequences

Page 3-4, the first paragraph in this section has been modified as follows:

The proposed actions would take place on existing ROW and in substation yards, except for a small area near structure 18/4, ~~and~~ a small area in Mile 9, and a small area in Shelton near Shelton Substation (see Figures 5, ~~and~~ 6, and 15). New ROW would be needed in these areas (about 2 acres total). BPA has easements or owns in fee the land that would be affected except for these small parcels. Easements would be purchased to use these parcels.

3.3.2 Environmental Consequences—Proposed Action

Page 3-8 the paragraphs in the Access Roads subsection have been modified as follows:

Portions of existing roads would be cleared of encroaching vegetation, graded, covered with crushed rock, and provided with better drainage, including two new culverts and one bridge. The direct impact on soils from this work is expected to be low to moderate. The areas at greatest risk of soil erosion are steep slopes. Routes to a few structures appear to lead up steep, overgrown terrain that would incur direct impacts from grading, and cutting and filling to accommodate construction equipment. A number of short segments of road are to be improved in areas of steep slopes.

About 2 miles of new road would be built. About 5 acres of soil would be disturbed. About 6.4 miles of existing access roads would be improved. Direct impacts on soils would include compaction and severe loss or elimination of most natural biological functions.

To install culverts under new roads, soils would be excavated, and excavations would be backfilled in a trench slightly longer than the road width. Installing one new bridge would require limited excavation and no fill. Only limited and minor erosion would be likely for the culverts and bridge, a low impact.

The indirect impact on soils from road work and culvert and bridge installation is expected to be low to moderate. The project area receives 50 to 60 inches of precipitation a year, most of it in winter. Erosion could be moderate during the rainy season, especially on steep slopes where

clearing and grading are required. The potential for erosion would be greatest just after construction, before damaged or cleared vegetation is restored and bare soils are stabilized.

3.4.2 Environmental Consequences—Proposed Action

Page 3-12, the first paragraph under New ROW has been modified as follows:

New ROW
About 6 acres of ***mid-successional*** vegetation could be removed where new ROW would be needed if the vegetation poses a danger to the transmission line. Because there are large acreages of mid-successional vegetation in the project area and because the potential amount of mid-seral vegetation that could be removed is small, the proposed project would create no to low impacts to this type of vegetation.

3.4.3 Mitigation

Page 3-13 the third bullet has been deleted.

- ~~Develop and implement a noxious-weed control plan to minimize the introduction and broadcast of weed seeds, which will be submitted to the county weed control boards' specialists for recommendations.~~

3.6.2 Environmental Consequences-Proposed Action

Page 3-24, the second paragraph under Access Roads Impacts has been modified as follows:

Two culverts would be placed in unnamed ephemeral ditches (two between structures 11/3 and 11/4~~, and one at structure 17/9~~) to provide reliable access during the winter months. A new bridge would be placed over an unnamed ephemeral tributary to Coffee Creek at structure 18/4 to provide reliable access year round.

3.7.2 Environmental Consequences-Proposed Action

Pages 3-27 and 3-28. Two structures proposed to be built in wetlands have been relocated out of wetlands. The second and third paragraphs and Table 3-3 under Removal of Existing Structures and Installation of New Structures has been modified as follows:

Construction of each new structure of the 230-kV line would temporarily disturb about 1 acre (200 feet by 200 feet). Most new structures would be built outside of wetlands. However, four proposed structures would be located in wetlands, which would result in a total of about 4 acres of temporary impacts to wetlands from construction of the new structures. Each new structure would create about 0.009 acre of permanent impacts, totaling 0.036 acres of permanent impacts to wetlands (see Table 3-3).

For the four new structures built in wetlands, impacts to wetland hydrology associated with the installation of the tower footings are expected to be temporary and minor, as the hydrologic source in depressional wetlands occurs above the 6 foot depth of the minimal footing depth. The riparian wetlands hydrology is strongly influenced to the surface water elevation of the adjacent stream; placement of footings well below the seasonal low water elevation is not expected to have a permanent impact to riparian wetland hydrology. Additionally, most of the hydric soils within the project site have a high water holding capacity because their texture is largely loamy-clay. The top 18 inches of soil would be removed and kept separate from the remaining soil column removed for footing installation. After installing each footing, BPA would backfill using the top 18 inches of the original soil. By maintaining the soil column, native vegetation could reestablish from the seedlings within the upper 18 inches of native soil. Where invasive species (i.e., reed canary grass) is present, BPA could replant with native species, but past replanting attempts have failed to out compete reed canary grass with native emergent species. Accordingly, this impact would be considered low to moderate.

Table 3-3 Structures In Wetlands

Existing Structure in Wetland	Temporary Impacts for Removal (acres)	Proposed Structure within Wetland	Temporary Impacts for Installation (acres)	Permanent Impacts for Installation (acres)
		~~12/2~~	~~1~~	~~0.009~~
11/7	0.01	~~11/7~~	~~1~~	~~0.009~~
18/1	0.01	18/1	1	0.009
18/2	0.01	18/2	1	0.009
18/3	0.01	18/3	1	0.009
18/4	0.01	18/5	1	0.009
Total	**0.05**		**~~6~~ 4**	**~~0.054~~ 0.036**
*Note that installation impacts are not in addition to removal impacts.				

Page 3-28, add a new section before Access Roads as follows:

New ROW

About 0.4 acre of forested/shrub-scrub wetland vegetation could be removed where new ROW would be needed in Mile 9 if the vegetation poses a danger to the transmission line. Forested/scrub-shrub vegetation within this new ROW is primarily comprised of willow, Oregon ash, and red alder. The under story is comprised of lady fern, soft rush, tall manna grass, reed canary grass, and bulrush. The forested/scrub-shrub wetland is situated between the existing BPA ROW and an El Paso natural gas pipeline ROW. The wetland within the existing El Paso pipeline ROW is very similar to the BPA ROW (e.g., vegetation, soils, hydrology, previous disturbance, and vegetation maintenance). BPA would remove any danger trees by hand. The removal of the trees would not entail the discharge of dredged or fill material in the wetland and would not alter the wetland hydrology. After trees are removed, BPA expects the wetland to develop similar palustrine emergent and shrub-shrub hydrophytic vegetation as the existing BPA and El Paso ROWs. Impacts would be considered low.

Pages 3-28 and 3-29. The paragraph under Access Roads and Table 3-4 have been modified as follows:

Access Roads

To provide sufficient access for construction, operation, and maintenance of the transmission line, BPA would construct and/or improve several access roads impacts (see Table 3-4). All road construction and/or improvements would use clean fill material to achieve necessary grades. Proposed road improvements would consist of blading/shaping for site preparation, installation of geotextile for soil stability, rocking of road surfaces, and installing culverts and a bridge to improve maintenance access. Three wetlands would be impacted by access road construction and improvements (see Table 3-4). Most of the wetlands that would be impacted by access road improvements or construction extend beyond the existing ROW and have varying vegetative structure and functional value. Within the existing ROW where access roads would be improved or constructed, wetland functional value is typically low based on the dominance of reed canary grass and low habitat value. Outside of the existing ROW wetland functions increase based on vegetative specie diversity that provide better habitat. Approximately 0.35 acre of wetland would be permanently impacted by blading/shaping for site preparation, installation of geotextile for soil stability, and rocking of road surfaces. About 0.08 acre would be temporarily impacted. Access road construction and improvements to existing access roads are expected to have a low to moderate impact on wetland functions and values because of limited road construction and improvements planned within wetlands, and the functional value of impacted wetlands (Jones and Stokes, 2007).

Table 3-4 Road Improvements In Wetlands

Access Road within Wetland (Wetland Identification number*)	Type of Activity	Permanent Impacts (acres**)	Temporary Impacts (acres)
10/5-1	Construct New Access Road	0.01	
11/3-1	Improve Existing Access Road	~~0.15~~ 0.09	
~~16/6-1~~	~~Improve Existing Access Road~~	~~0.18~~	
~~17/8-1~~	~~Construct New Access Road~~	~~0.74~~	
18/4-1	~~Improve~~ Construct Temporary and Permanent ~~Existing~~ Access Road	~~0.30~~ 0.25	0.08
Total		~~1.38~~ 0.35	0.08

* Wetland identification numbers are from Jones & Stokes. 2007. Final Wetland Delineation Report. Olympic Peninsula Reinforcement Project.

** Based on a variable 13-20-foot wide disturbance.

Pages 3-28. The paragraph under Tensioning Sites has been modified as follows:

Tensioning Sites

The use of tensioning sites would have no impact on wetlands because the sites would not be located within wetlands.

3.11.2 Environmental Consequences/Potential Impacts of the Proposed Action

Page 3-45, the first paragraph under Property Impacts has been modified as follows:

Property Impacts. Since only a small amount of permanent new ROW (about 6.5 acres) would need to be acquired for the project, and BPA would pay compensation for the land acquired, this would be a low impact.

Chapter 4

Section 4.4 Cultural and Historical Resources

Page 4-4, the fourth full paragraph has been modified as follows:

On August 1, 2007, BPA submitted the cultural resources report to the Washington State Department of Archaeology and Historic Preservation (DAHP) requesting concurrence with the determination that no historic properties would be affected. On December 20, 2007, BPA determined that Olympia and Shelton substations would be considered contributing resources to a larger thematic district of substations, submitted additional information about the substations to the DAHP, and requested concurrence with the determination that no historic properties would be affected. In a January 16, 2008 letter to BPA, the DAHP concurred that while the Olympia and Shelton substations would be considered contributing resources to a larger thematic district of substations, the current project as proposed will have no adverse effect on National Register eligible or listed historic and cultural resources (Holter, 2008).

Section 4.8.1 Wetlands

Page 4-7, the second paragraph has been modified as follows:

Impacts on wetlands from installing new structures *in* wetlands and construction or improvement of access roads are expected to be low to moderate and mostly temporary. Four proposed structures are located in wetlands, totaling approximately 4 acres of temporary impacts and approximately 0.036 acre of permanent impacts. There are three proposed access road improvements and/or access road construction within wetlands that would result in about 0.35 acres of permanent impacts and 0.08 acre of temporary impacts. Impacts to wetland hydrology associated with the installation of the tower footings are expected to be minor, as the hydrologic source in depressional wetlands occurs above the 6 feet depth of the minimal footing depth. Additionally, the top 18 inches of soil would be removed and used as backfill upon structure installation. By maintaining the soil column, hydric soils would retain their attributes and native vegetation could reestablish from the seedlings within the upper 18 inches of native soil. Activities adjacent to wetlands could impair some wetland functions by degrading the quality of the wetland buffer. Operation and maintenance is expected to have a low impact on wetlands. Mitigation measures that would be implemented to minimize impacts to wetlands are discussed in Section 3.7.3, **Wetlands**.

Section 4.9.3 Section 404

Page 4-9, the second paragraph has been modified as follows:

For all unavoidable impacts to waters of the U.S., including wetlands, BPA would apply for a Section 404 permit from the ACOE. There could be about 4 acres of temporarily impacts from mechanized land clearing and temporary side-casting of excavated material within jurisdictional wetlands, and about 0.35 acres of permanent impacts to wetlands resulting from the discharge of fill material within jurisdictional wetlands. Several Nationwide Permits, such as Nationwide Permit 12 for Utility Line Activities, (33 CFR 330) may apply to different types of activities. For project activities covered under an existing Nationwide Permit, all conditions of the permit, including regional general conditions and special conditions, would be followed.

Public Comments

This section presents comments received on the Preliminary EA and responses to those comments.

Comment 0001

Harris,Candace C - DKE-7

From: TCWeeds [TCWEEDS@co.thurston.wa.us]
Sent: Friday, February 22, 2008 11:47 AM
To: BPA Public Involvement; Beck,Gary O - TEP-TPP-3; gary@roadsendllamas.com
Cc: 'Chloe Kaufman'; 'Chloe Kaufman'; tcd@thurstoncd.com
Subject: Re: TEP-TPP-3, Olympia Peninsula Transmission Line Project

Attachments: TCWeeds.vcf

OR0001

TCWeeds.vcf (222 B)

Thurston County Noxious Weed Control supports Mr. Kaufmans concernes regarding reseeding of disturbed areas in the project area. Without this preventive measure a host of invasive noxious and toxic plants will surely germinate and become a problem. We would appreciate a communication back from BPA about this issue.

Rick Johnson
Weed Coordinator
Thurston County Noxious Weed Control

Olympia WA 98512

360 786 5576

Response

Noxious weeds are also a concern to BPA, and BPA staff work with landowners and local agencies on this ongoing problem. BPA proposes reseeding disturbed areas following construction and listed reseeding as a mitigation measure on page 3-13. For all BPA's operating transmission lines, BPA follows the methods outlined in BPA's Vegetation Management Program, which includes a variety of methods to keep plants from interfering with transmission facilities. Information about this program can be found at the following Web site: http://www.efw.bpa.gov/environmental_services/Document_Library/Vegetation_Management/.

Comment 0002

We are generally in favor of any action that will improve the availability and reliability of our electrical power resources. We hope you will be able to stand firm against the inevitable objections to your plans by the environmental extremists. Thank you for giving us the opportunity to comment.

Robert and Mildred Poague

Response

Comment noted.

Comment 0003

From: Gary Kaufman
Sent: Friday, February 22, 2008 8:57 AM
To: Beck,Gary O - TEP-TPP-3; BPA Public Involvement
Subject: TEP-TPP-3, Olympia Peninsula Transmission Line Project

Dear Mr Beck,

We have recently received a set of documents dated February 15, 2008 regarding the potential impact on the project referenced above. This is the first notification we have received and do assume as the letter suggests that changes in the project may now affect us.

I have attempted to access the online comment process via the website indicated in the letter, but there is substantial conflicting information as I searched for the comment section regarding the date of closure for comments. Some sections of the BPA website suggest that comments ended in January 2007 while other sections suggest, as does the letter the comment period deadline is now March 6, 2008.

With that in mind, I would appreciate this input being added to the formal comments on the project. Please take note also that I am including the Thurston County Noxious Weed Control Board, and the Thurston County Conservation District in this electronic communication, since I believe my comments also have a direct bearing on their missions and roles within Thurston County.

We own livestock, specifically llamas. During the past 12 years, we have come to appreciate the respect and cooperation of the BPA during their various weed control, access improvement, and transmission line work on that part of your lines that are directly over and adjacent to the portion of our property that supports some of our animals. Communication of information has been accurate, timely, and consistent.

People have always made themselves available to answer specific questions about potential immediate impacts, and the work crews have been diligent about minimizing the impact on our livestock.

Over the past 3 years, there has been substantial work on access roads to power line towers and substantial weed control work. The most recent project last summer did extensive access road work. This included substantial grading work and turned up a substantial amount of bare ground for ease of access by equipment in the future.

The immediate off shoot of this most recent roadwork project has been the extreme proliferation of several varieties of vegetation that are categorized as noxious and/or toxic weeds throughout the areas where work was done. This includes the most annoying 'wild daisy', several varieties of common groundsel, tansy ragwort, and foxglove to name the ones that represent the largest concern for my livestock. These weeds are opportunistic by nature, and disturbed ground left exposed is one of the most common methods for growth, and proliferation. Controlling these weeds within the adjacent pastures has become a significant issue due to their toxic nature and the fact that some of them are prolific enough to take over commonly used pasture grasses without extreme intervention. As such, there has been an increased economic impact on our pasture management programs, and increased risk of livestock loss to potential consumption.

My concern with this project and any additional project activities is obviously directed at what BPA has within its project plan to minimize or eliminate the impact of proliferation of noxious and toxic weeds post project? While certainly not an expert, my observed impact specific to noxious and toxic weed proliferation would appear to have some potentially significant additional impacts on other livestock owners as well in addition to both Noxious Weed Control Boards, and Conservation Districts in counties within the boundaries of the project.

I look forward to hearing from you, and can make myself available for you or a representative from the BPA to see first hand the impact I have shared in my comments. I can also provide electronically transmitted photos if you wish of the impact mentioned. If you require this document be mailed in order to be included in the formal comment process, please let me know as soon as possible so I can get it mailed in a timely fashion.

Thank you for time and consideration.

Gary and Chloe Kaufman, dba Roads End Llamas
Olympia, WA

Response

Thank you for your comment about the close of comment date. The January 2007 date that is referenced by the comment was the close of comment date for the public scoping period for the EA. The letter accompanying the Preliminary EA indicated the official close of comment date for comments on the Preliminary EA, which was March 6, 2008.

Regarding the spread of noxious weeds, it is acknowledged that past BPA activities in the area may have contributed to the spread of these weeds. However, as discussed in the response to Comment 0001 above, BPA staff is working with landowners and local agencies to address this ongoing problem. BPA has taken, and will continue to take, varied actions to help control the spread of these weeds. In the Preliminary EA, BPA identified reseeding disturbed areas and following its Vegetation Management Program as methods for addressing this problem.

Comment 0004

Public comment (via telephone) on the Olympic Peninsula Reinforcement Project:
In Section 4.4 of the EA, final paragraph, include discussion of the determination of eligibility of for the substation.

Russell Holter, Project Compliance Reviewer
Washington Department of Archaeology and Historic Preservation

Response

Additional text has been added to this section to address this comment.

Comment 0005

Skokomish Indian Tribe

Tribal Center (360) 426-4232

N. 80 Tribal Center Road **FAX (360) 877-5943** **Skokomish Nation, WA 98584**

March 6, 2008

Gary O. Beck/ Project Manager
Bonneville Power Administration
Public Affairs Office –DKE-7
P.O. Box 14428, Portland, OR 97293-4428

Re; Olympic Peninsula Transmission Line Reinforcement Project

Dear Mr. Beck

The Skokomish Tribe has no comments regarding the preliminary environmental assessment for the Olympic Peninsula Transmission Line Reinforcement Project, to our knowledge we have no documented or undocumented sites within the proposed project areas.

Thank you,

Kris Miller
Tribal Historic Preservation Officer

Response

Thank you for your comment.

Comment 0006

03/03/2008 14:10 FAX

BONNEVILLE POWER ADMINISTRATION

Olympic Peninsula Reinforcement Transmission Line Project

"I'd like to tell you . . . "

1. Please consider:

2. I need more information about:

Am I in the transmission line removal area?
If yes, which lines exactly are to be removed?
When will this occur?

3. I have these other comments:

Please put me on your project mailing list. (You are already on the mailing list, if you have received mailed notices.)

Name Robert Sheffer

Address

City Olympia State WA Zip 98512

Please mail your comments by **March 6, 2008** to:
Bonneville Power Administration
Public Affairs – DKE-7
PO Box 14428, Portland, OR 97293-4428
Fax (503) 230-3285, E-mail to *comment@bpa.gov* or submit them through the BPA Web site at *www.bpa.gov/comment/*.

Response

The third transmission line north of your home would be removed, but would not be replaced.

Regarding the project schedule, if BPA makes a decision to proceed with the proposed rebuild project in early 2008, some preparatory work likely would be done in 2008, including most of the substation work. Most of the work to rebuild the line (i.e., removal of existing structures, installation of new structures, and restringing of cable) likely would be undertaken in 2009.

Comment 0007

OPR-0007
Rec: 3/4/08

From: Bob Albaugh
Sent: Tuesday, March 04, 2008 4:54 PM
To: Lynard,Gene P - KEC-4
Cc: DON GILLIS
Subject: concerns with the Olympic Peninsula Transmission Line Reinforcement Project

Gene Lynard,
As you recommended I am sending you an e-mail with a list of concerns about the Olympic Peninsula project. Please add this to the Environmental Assessment during final review. We at Gillis Auto Center understand the purpose and need for action, however the safety of our employees and customers as well as our business is paramount to us.

1) Where will the new lattice structure be placed as in relation to our buildings? Our storm drain settlement? Our parking lot? The creek? The natural gas lines?

2) Will the new lines be closer to our buildings?

3) We have read 3.13.1 health and safety, the electrical magnetic field (EMF) is a concern, your current assessment states that possible health issues *should* not increase with the new project, it is not clear on the effects of EMF on people or electronic equipment, IE: wireless or hard wired diagnostic equipment, computers, satellite signals, cel phone signal or on board navigations equipment, all of which are major factors to our business. Is the EMF going to be higher?

4) Will the Corona generated noise be louder?

Thank You,

Bob Albaugh
Service Manager
Gillis Auto Center
Ford, Mercury, Chrysler, Dodge, Jeep
Shelton, WA

Response

Location of new lattice structure

Response: The rebuilt line would be located in the same right-of-way as the Olympia – Shelton No. 1 line, which is the line in the middle of the right-of-way directly west of Gillis Auto Center. The transmission line that is closest to Gillis Auto Center is the Olympia – Shelton No. 2 line and the one farthest away is the Olympia-Kitsap No. 3 line.

The new lattice steel tower would be located about where the H-frame wood pole structure is located now, north of the pipeline, north of the parking lot and south of Goldsborough Creek.

Construction would not affect the existing storm drain settlement pond is outside the construction area and will not be affected by the project.

Location of rebuilt line

Response: The rebuilt line would not be closer to the commenter's buildings than the existing transmission lines. Since the proposed transmission line would replace the line in between the other two lines, the distances would all remain the same.

EMF

Response: As explained in Section 3.13 of the EA, the electric fields of the proposed transmission line would be at the same levels as the electric fields emitted at the eastern edge of the transmission line corridor with the existing transmission lines. The magnetic fields of the proposed transmission line would be less than what is currently measured at the eastern edge of the transmission line corridor with the existing transmission lines. Additionally, the radio-interference and other EMI (electromagnetic interferences) would be less than what is currently experienced from the existing transmission lines; therefore, the interference to the devices cited above should be less with the proposed transmission line together with the other lines than what is experienced today. BPA is not aware that any of the equipment or signals mentioned by the commenter currently are affected by the existing transmission lines in the area, and does not expect that the rebuilt line would cause any such effects.

Corona generated noise

Response: The audible noise from the proposed transmission line, together with the other lines, would be slightly lower (3 dBA) than what is experienced today. This change may not be noticeable because it is at the threshold level for perceiving changes in noise levels – that is, it may be perceived by some, but not others. This would be especially true at first when the conductors may have oil and dirt on them.

Comment 0008

OPR-0008
Rec: 3/6/08

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

March 6, 2008

Mr. Gary Beck
Bonneville Power Administration
Public Affairs – DKE-7
PO BOX 14428
Portland, OR 97293-4428

Dear Mr. Beck:

Thank you for the opportunity to comment on the NEPA/EA for the Olympia Peninsula Transmission Line Reinforcement project (EA-1576) located in Clallam, Jefferson, Kitsap, Harbor, Mason, and Thurston Counties. The Department of Ecology (Ecology) reviewed the NEPA/EA and has the following comment(s):

SHORELANDS & WETLANDS: Rick Mraz (360) 407-6221

Placement of fill in wetlands may require an individual or general (nationwide) permit from the U.S. Army of Corps of Engineers (Corps). We advise the applicant to contact the Corps to determine if a permit is needed. Should an individual Corps permit be required, a Water Quality Certification will also be required from Ecology. If the wetland is determined to be isolated and not subject to the Corps jurisdiction it remains a jurisdictional wetland for Ecology, and will require permitting by this agency. For more information, please contact Lori Ochoa, Ecology's Federal Permit Coordinator, at (360) 407-6927.

SOLID WASTE & FINANCIAL ASSISTANCE: Al Salvi (360) 407-6287

Property owners, developers, and contractors are encouraged to recycle all possible leftover construction, demolition, and land clearing (CDL) materials and reduce waste generated. Recycling construction debris is often less expensive than landfill disposal. Please call Ecology's 1-800-RECYCLE hotline for facilities in the area that will accept your CDL materials for reuse or recycling.

The applicant proposes to remove a structure(s) that may contain treated wood. Please refer to Ecology's publication "Focus on Treated Wood Exclusion," available at http://www.ecy.wa.gov/pubs/0304038.pdf, for suggested best management practices and disposal requirements for treated wood. For additional information or clarification, please contact Dee Williams with Ecology's Hazardous Waste and Toxics Reduction program, at (360) 407-6348.

TOXICS CLEANUP: Connie Groven (360) 407-6254

If contamination is suspected during removal of the existing transmission line or construction of new transmission line, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily visible, or is revealed by testing, Ecology must be notified. Contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Ms. Groven at the phone number given above.

Since PCBs will be handled according to Toxic Substances Control Act (TSCA) requirements, this issue has been addressed by SEPA. However, should an accident occur during removal of the older

structures that involves PCBs, both Environmental Protection Agency (EPA) and Ecology will need to be notified.

WATER QUALITY: Roberta Woods (360) 407-6269

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or storm drains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the state of Washington, and is subject to enforcement action.

Proper disposal of construction debris must be on land in such a manner that debris cannot enter streams, streams buffers. wetlands, wetlands buffers and natural stormwater drainage systems or cause water quality degradation of state waters.

All temporary erosion control systems should be designed to contain the runoff from the developed two year, 24-hour design storm without eroding.

A permanent vegetative cover should be established on denuded areas at final grade if they are not otherwise permanently stabilized.

This project will require a Construction Stormwater National Pollution Discharge Elimination System (NPDES) permit. This project is located in an area that has perennial and seasonal drainages. Some of these cross the project area. This establishes that the project area has offsite discharge of stormwater. The *Preliminary Environmental Assessment* document indicated that there will be about 5 acres of new roads associated with the transmission line reinforcement. The project therefore meets the two conditions for having a NPDES permit. The permit application form, called a Notice of Intent, is available on Ecology's website at:
http://www.ecy.wa.gov/programs/wq/stormwater/construction/#Application.

To avoid project delays, we encourage the applicant to submit a completed application form and to publish public notices more than 60 days before the planned start of the project.

Ecology's comments are based upon information provided by the lead agency. As such, they do not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(SM: 08-1212)

cc: Chuck Cline, TCP
Josh Klimek, HQ/WQ
Connie Groven, TCP
Rick Mraz, SEA
Al Salvi, SW&FAP
Stephanie Werkman, WQ
Roberta Woods, WQ

Response

Shorelines and Wetlands

As discussed in Sections 3.7 and 4.9.3 of the EA, BPA has designed the proposed project to avoid and minimize impacts to waters of the U.S., including wetlands. BPA has been working with the Corps to determine if a Section 404 Clean Water Act permit is required for the proposed project. BPA will comply with all federal requirements for wetland permitting. BPA also will comply with other requirements concerning wetlands to the extent practicable.

Solid Waste and Financial Assistance

Thank you for the information about recycling in the project area and about treated wood disposal. BPA will collect the conductor and recycle it. BPA will encourage its contractor to recycle as much material as possible during structure removal and construction.

BPA also will dispose of any treated wood poles appropriately. Sections 03.01.04-11 of our Master Specification provides direction regarding wood pole removal. In general, experience with past projects suggest there would little residue to clean up. The Master Specification requires the use of proper personal protective apparel (e.g., rubber boots, overalls, neoprene gloves, and safety glasses) and equipment (e.g., vehicles with approved containers for collection of chemical residue). Prior to removing poles, only the chemical residue that has accumulated at the ground line is collected, not the stained soil that surrounds the poles. After removing and lowering poles, additional chemical residue that may have fallen off the poles or was created by saw-cutting poles is collected at the ground line.

All chemical residue is placed, stored, and secured in barrels furnished by BPA, in full compliance with all federal, state, and local requirements for labeling, marking, and storing barrels containing chemical residue. Once a barrel has been filled, the barrel is sealed and label legibility is verified. Barrels containing chemical residue are transported to BPA.

For removal of wood poles, these poles are first cut off at ground line. Contractors are required to minimize the amount of handling and transporting of poles on the project site, and may not drag or skid poles on the ground. If wood poles are temporarily stored on site, approval of landing areas must be obtained, and compliance with federal, state, and local requirements for environmental protection, cleanup, and restoration of landing areas is required. Removed wood poles must be disposed of or recycled within 180 days after pole removal. All badly broken wood crossarms, wood cross braces, and miscellaneous treated wood not suitable for recycling must be disposed of in accordance with federal, state, and local hazardous waste disposal regulations.

Toxics Cleanup

Thank you for the information concerning the discovery of unexpected contamination. No equipment containing PCBs will be removed.

Water Quality

Thank you for the information concerning water quality. Measures to protect water quality during project construction are identified in Section 3.6 of the EA. BPA will employ all appropriate BMPs and will apply for and adhere to all required permits, including a NPDES permit (see Section 4.9.2 of the EA).

Comment 0009

JAMESTOWN S'KLALLAM TRIBE

1033 Old Blyn Highway, Sequim, WA 98382 360/683-1109 FAX 360/681-4643

OPR 0009

March 10, 2008

Gary O. Beck
Project Manager
Bonneville Power Administration
P.O. Box 61409
Vancouver, WA 98666-1409

RE: TEP-TPP-3

Dear Mr. Beck:

Thank you for the letter and the preliminary environmental assessment for the above referenced project.

The Jamestown S'Klallam Tribe will not be consultants on this project. Please contact the Skokomish and the Squaxin Island Tribes as they are in the target area.

Should you have any questions, please feel free to contact me at 360.681.4638 or by email at kduncan@jamestowntribe.org.

Sincerely,

K. Duncan

Kathleen Duncan
Enrollment Officer/Cultural Resource Spec.
Jamestown S'Klallam Tribe

Response
Thank you for your comment. We have also contacted the Skokomish and Squaxin Island Tribes.

Comment 0010 (includes all comments received by telephone)

Question from Bill Faler: Mr. Faler wanted to know which line will be removed. He can't tell from the map and he does have some crossing his property.

Response
One wood pole would be removed from Mr. Faler's property in 2009.

Question from Wendy Childs: Ms. Childs wanted to know if BPA was taking out a line on the project, then vacating the ROW. She was also interested in the timeline for removing the line.

Response
BPA would be doing all the work inside the existing ROW, but would keep the rights to use the ROW for future needs, if any. No ROW would be released.

Questions from Francis Dana: What is the timing of the line removal? How long will the removal take?

Response
If BPA decides to implement the project, line removal would likely take place in summer 2009 in her area. BPA would only be removing one of its wood pole lines in the area of your interest and would retain the land rights on the ROW.

Question from Jeffery Banik: Mr. Banik wanted to know what impact if any the project would have on his land.

Response
BPA is not proposing any work in the corridor south of Olympia Substation that would affect Mr. Banik's property.

Question from Don Sink: Don would like to know what the effect on power will be in the valley area if we are removing part of a line. How would this project effect electricity in his area? He also wanted to know if this project will result in any outages at his home.

Response
The main purpose of this project is to support the City of Shelton area. This project would not have any effect on Mr. Sink's area near Olympia.

Question from Kurt Henneck: Mr. Henneck lives next to Olympia Substation and wanted to know if the lines at the Olympia Substation would be replaced or buried and to confirm that the project will only be on the last 14.5 miles and therefore not near his home.

Response
BPA would be removing approximately the first mile of the Olympia - Kitsap No. 3 and miles 2 through 6 of the Olympia - Shelton No. 1 transmission lines. BPA will not be burying any of the lines and no new lines will be installed near Olympia Substation. BPA will be connecting into the Olympia - Satsop 230-kV transmission line 6 miles from Olympia Substation and installing a new double-circuit line from there to Shelton Substation. No new line will be installed in the first 6 miles from Olympia Substation.

Question from Sandra Steeneck: Landowner would like to know if the line crosses her property. She inquired if BPA would put up new or improved wire, if it would be bigger or carry more power. Also, she would like to know if there would be any dangerous emissions from the proposed changes.

Response

The 115-KV single-circuit Olympia - Shelton No.1 wood pole line would be removed and replaced with a new double-circuit 230-kV lattice steel structure transmission line. The existing wire (0.78 inch diameter) would be replaced with new (1.3 inch diameter) wire. The proposed double-circuit line will have a greater capacity.

As to whether there would be any dangerous emissions associated with the proposed transmission line, Section 3.13 of the EA explained that a review of the literature on this subject suggests that there is little evidence that electric fields cause long-term health effects, and stated that national and international organizations have established public and occupational EMF (electric and magnetic fields) guidelines on the basis of short-term stimulation effects, rather than long-term health effects. In doing so these organizations did not find data sufficient to justify the setting of a standard to restrict long-term exposures to electric or magnetic fields.