

SUPPLEMENTAL COMMENT REPORT

I-5 Corridor Reinforcement Project

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INTRODUCTION

HOW TO USE THE REPORT

The Bonneville Power Administration (BPA) is a federal agency under the U.S. Department of Energy that serves the Pacific Northwest through operating an extensive electric transmission system and marketing wholesale electrical power. The purpose of this report is to serve as a supplement to the Scoping Report for the I-5 Corridor Reinforcement Project that was released in January 2010. This supplemental comment report identifies and summarizes new issues and information not included in comments submitted during the original public scoping comment period in 2009. It does not list all the comments received, but distills the comments into key themes. Although the purpose of this report is to present new or different ideas, some duplication from the January 2010 Scoping Report may occur where it is necessary to provide context.

This report represents comments received following the closing date of the public scoping comment period on December 14, 2009 through the release of centerline and transmission tower location information on November 18, 2010. Although the official public scoping comment period deadline has passed, BPA continues to analyze the comments it receives to determine issues of concern to stakeholders that will help shape the scope of the environmental analysis and the alternatives considered in the draft environmental impact statement (EIS). The time frame for this report was selected to align with key project milestones. Additional supplemental reports may be prepared for specific time periods as necessary.

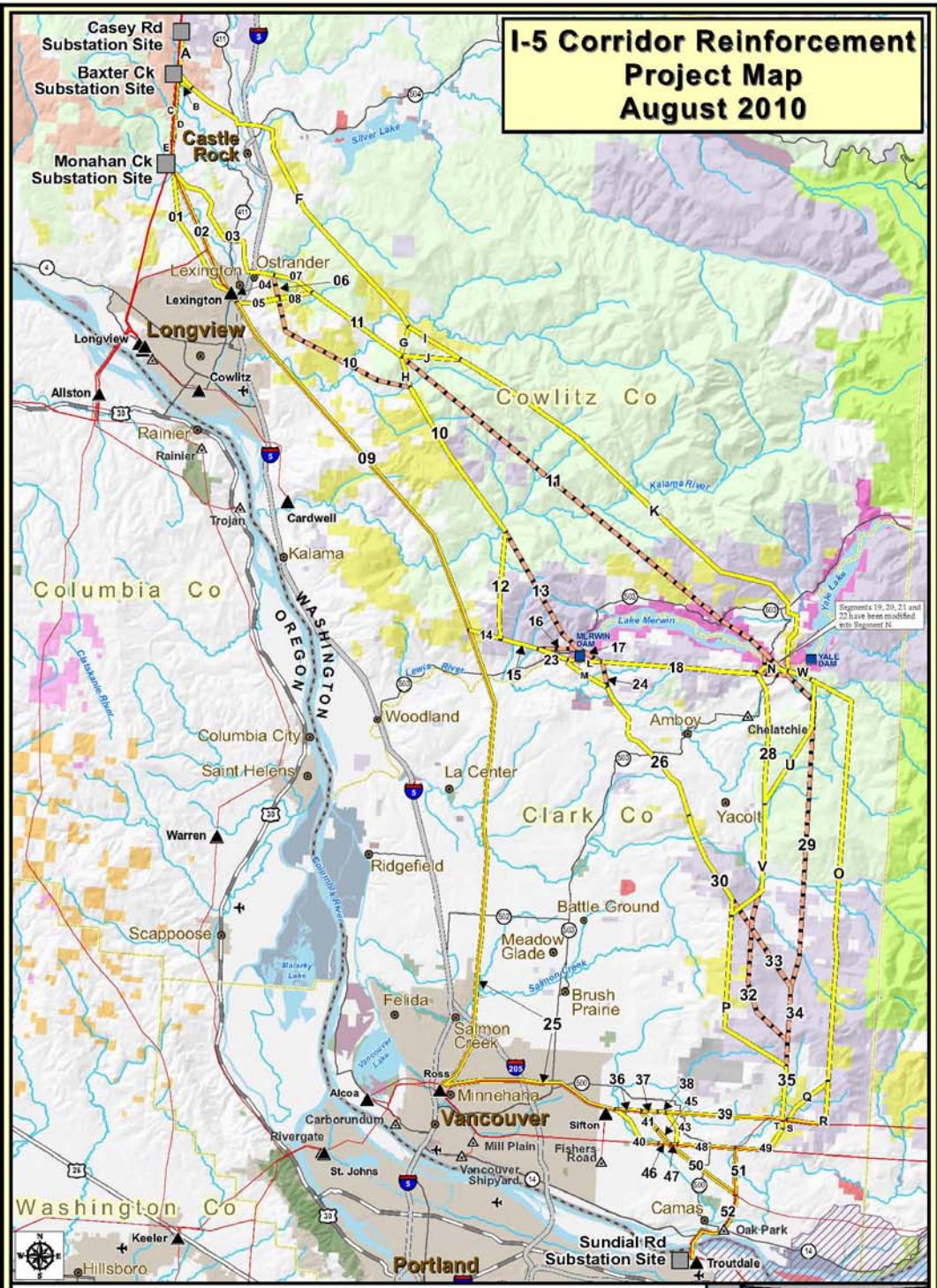
PROJECT DESCRIPTION

BPA is experiencing growing demand within its existing electrical transmission system in southwest Washington and northwest Oregon. To ease congestion and keep pace with these growing demands, BPA is proposing the I-5 Corridor Reinforcement Project (I-5 Project), a new 500-kilovolt (kV) transmission line and associated substations from Castle Rock, Wash. to Troutdale, Ore. BPA has identified multiple potential route segments for the proposed 70-mile long transmission line.

The August 2010 Project Map on page 3 is a revised version of the of project map originally released in December 2009. It includes all proposed route segments and indicates segments that have been added or removed from consideration by BPA in response to public input and further study of the project area. Some segments have also been combined and renamed since December 2009. The comments contained in this report are generally related to the information included on this map. The most current project map available was released in November 2010 and is available on the project website at www.bpa.gov/go/i5.

To implement the project, BPA must comply with the provisions of the National Environmental Policy Act (NEPA). The NEPA process is intended to promote better agency decisions by ensuring that high-quality environmental information is available to agency officials and the public before the agency decides whether and how to undertake a federal action. Under NEPA, BPA works closely with other federal agencies and state, local and tribal governments; public and private organizations; and the general public to better understand the potential environmental and community impacts.

I-5 Corridor Reinforcement Project Map August 2010



<ul style="list-style-type: none"> ■ Proposed New Substation Sites ▲ BPA Substation ▲ Non-BPA Substation — BPA Transmission Lines — Cities and Towns — Urban Areas — County Boundary — State Boundary — Columbia George National Scenic Area — Data 	<ul style="list-style-type: none"> — Proposed numbered route segments still under consideration — Proposed lettered route segments added for consideration — Segments no longer being considered 	<p>Land Ownership</p> <ul style="list-style-type: none"> — U.S. Forest Service — National Park Service — U.S. Fish and Wildlife Service — Bureau of Land Management — U.S. Dept. of Defense — WA State Dept. of Fish and Wildlife — WA State Parks and Recreation Commission — County Government 	<ul style="list-style-type: none"> — WA Dept. of Natural Resources — Oregon State Lands — Longview Timber Corp. — Sierra Pacific Holding Company — PacifiCorp — Weyerhaeuser Company
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SOLICITATION OF SUPPLEMENTAL COMMENTS UNDER NEPA

BPA published a Notice of Intent (NOI) (*74 Federal Register 52482, October 13, 2009*) to prepare a draft EIS for the I-5 Project in the *Federal Register* on October 13, 2009. This initiated the public scoping comment period, originally scheduled to close November 23, 2009. However, on November 18, 2009 BPA extended the comment period to December 14, 2009 in response to requests for more time to submit comments. Following the close of the public scoping comment period, BPA has continued to accept and review comments and will do so throughout the duration of the NEPA process.

In addition to the *Federal Register* notice, BPA directly notified more than 9,000 landowners within a 1,000 foot to one mile buffer of the proposed route segments, as well as other interested individuals, tribes, elected officials, organizations, and agencies in October 2009. On December 21, 2009, BPA dropped Segments 27, 31, 42, and 44 from further consideration for the project. In August 2010, BPA refined the project segments under consideration further by eliminating several route segments and adding others. This resulted in approximately 360 landowners being added to the notification list and 820 landowners being removed. As a result, previous and new landowners and interested parties were notified of the changes via project mailings and invited to participate in an additional series of public meetings, which offered opportunities to learn more about the project, submit comments and ask questions of BPA representatives.

BPA sent a press release to local media and placed paid ads in the following newspapers about these additional public meetings, held in August and September 2010:

- The Oregonian – August 22, 2010 and September 5, 2010
- Battle Ground Reflector – August 25, 2010, September 1, 2010 and September 8, 2010
- Longview Daily News – August 22, 2010, August 29, 2010 and September 5, 2010
- The Columbian – August 18, 2010, August 22, 2010, August 29, 2010 and September 5, 2010
- Camas-Washougal Post-Record – August 24, 2010, August 31, 2010, and September 7, 2010

BPA also posted information on the project website at www.bpa.gov/go/i5 and maintained an electronic comment form, allowing visitors to submit comments online at any time.

COMMENT METHODS

BPA continues to invite comments through a variety of methods, including:

- An online form for submitting comments
- A toll free comment and information voice messaging system
- Comment forms and written comments collected at public meetings
- Comments that are submitted by postal mail or fax

Though the official public scoping comment period deadline was December 14, 2009, BPA continues to accept and review comments throughout the life of the project. Comments are posted to the project website and may be viewed by the public as they are processed.

PUBLIC MEETINGS

In August and September of 2010, BPA held four additional public meetings. The meeting dates, locations and approximate attendance are listed in the table below.

Meeting Date	Meeting Location	Meeting Attendance*
August 30, 2010	Castle Rock, WA	205
August 31, 2010	Vancouver, WA	102
September 08, 2010	Amboy, WA	252
September 12, 2010	Camas, WA	121

* This column reflects the number of people who signed the meeting sign-in form. Some members of the public declined to sign the form.

These meetings followed the release of the August 2010 project map displaying refinements to the proposed segments. Each meeting featured an open house format, providing an opportunity for community members to speak directly with BPA staff, and at least one formal presentation followed by a question and answer session. A panel of BPA project staff with expertise in a variety of topic areas responded to questions from the public during the question and answer session.

Over 680 people attended these meetings and a summary of the meetings and questions asked by attendees is posted on the project website at www.bpa.gov/go/i5.

COMMENT ANALYSIS PROCESS

COMMUNICATIONS RECEIVED

This report summarizes the 589 communications received since the end of the public scoping comment period on December 14, 2009. BPA has received over 3,000 communications since the original *Federal Register* notice on October 13, 2009. Communications were received by BPA through a variety of methods (described in more detail in the section “Comment Methods”). All communications were reviewed to identify information requests that needed follow-up from BPA staff, such as project area map requests, and to identify and categorize comments (see “Processing Communications”). All communications received are included as part of Appendix B. Appendix B also includes an index of communications listed alphabetically by commenter.

PROCESSING COMMUNICATIONS

Communications for this report were processed in the same manner as the original Scoping Report, and according to protocols established for the project. Analysts recorded the name and contact information of each commenter in a computer database. Each communication was assigned a unique identification number and linked to its contact(s). This approach allows analysts to see all comments submitted by each contact.

Communications submitted were saved in portable document format (PDF) according to their unique identification number. The text of each communication was entered into the database. Once a communication was processed, personal information was removed before it was posted to the I-5 Project website. Commenters are able to view the communications they submitted, as well as those of others.

Once the commenters and their communications were entered into the database, analysts read through each communication to identify and code unique comments. Many communications contained multiple comments. The coding system for scoping was modified to include new categories, such as new segment

names, as required. Appendix C contains the final coding categories used for this report. Attachments to communications were also coded if they contained additional comments rather than supporting information.

Each communication was reviewed at least twice – once by the primary coding analyst, and then again by a second analyst. This process allows for any discrepancies or inconsistencies to be resolved during the coding process.

Throughout this process, BPA staff maintained access to the comment database, and were able to review and search the database contact information, comment categories, and perform keyword searches. They were also able to use the database to review and respond to information requests.

ANALYSIS METHODOLOGY

This report summarizes key themes distilled from the 589 communications received. This report complements the original Scoping Report and comprehensive review of individual comments by BPA staff. To create this report, analysts queried the database to generate reports organized by each comment category. These reports were used to synthesize comments into summary statements that captured the unique issues and concerns expressed by commenters. This process also served to eliminate redundant themes within the report.

For the purposes of this summary, every comment has equal value, whether it is stated only once or multiple times. The synthesis represented in this report did not seek to tally the number of comments received on any given topic, as scoping is not intended to function as a “voting” process.

COMMENT ANALYSIS RESULTS PER TOPIC

ORGANIZATION OF THIS SECTION

The following sections are organized into categories that reflect the new or different issues and concerns heard for the period of December 14, 2009 through November 17, 2010. These issues and concerns are summarized. The sections do not capture every comment for each category and are not quantified. Quotes highlighted in the comment analysis results are used to illustrate the range of comments received, but are opinions and not intended to represent statements of fact.

PROJECT PURPOSE AND NEED

A number of issues related to the project purpose and need were expanded upon by commenters. Many commenters continued to express doubts regarding BPA's stated need for the project, particularly the supporting information presented at the series of public meetings. Commenters also stated that BPA has described the potential for blackouts to create fear about the reliability of the regional energy transmission network.

Commenters continued to state beliefs that the project is being built for the benefit of people and businesses in areas outside of southwest Washington, particularly California, the Portland metropolitan area and Canada. They supported these statements by noting the project is intended to satisfy demand in these areas driven by population growth and aggressive renewable energy mandates. Others felt that the project was intended to create profits for BPA and wind energy project developers. Commenters also mentioned that BPA's contractual obligations to wind power providers may be driving the need for the line.

"I believe that all the facts are not in the open. Where will most of the power to be wheeled ultimately come from, Canada? To whom is it to be sold, California?"

Commenters stated they do not believe the current set of route options represent an adequate solution for regional congestion problems. They also felt that the project would provide no local benefit because it does not offer any interconnections for Clark and Cowlitz counties. Commenters expressed frustration that BPA had not made improvements to the transmission system on an ongoing basis to better position the agency to accommodate alternative energy development. They also felt the urgency of the project was directly related to an increase in funding capacity. Commenters also recommended that the project be postponed until BPA can produce new studies to more accurately identify the system addition(s) that would best serve the needs of the people of the region.

Other commenters stated that the project is essential to reducing dependence on foreign oil and providing electrical capacity that would facilitate the use of electric cars.

Commenters requested that BPA use an independent commission to verify the need for the project. Commenters also requested that BPA specifically include the following information in the draft EIS:

- All other projects that would benefit from the construction of the transmission line
- Load growth projections and existing power flows that are causing system congestion in the northwest Oregon/southwest Washington areas
- Any benefit to Washington state and to southwest Washington in particular that will be derived from the project

- The impact of Canada-California power transfers on the need for increased capacity in the I-5 corridor
- A description of the reliability of service criteria the agency is required to meet and whether BPA is currently able to meet the standard on a consistent basis

PROJECT PROCESS

DECISION-MAKING PROCESS

Commenters expressed concerns that route options traveling through Oregon have not been fully evaluated through the NEPA process and that they should also be studied in the draft EIS. Commenters stated beliefs that BPA has intentionally withheld information about the Oregon route options from the public and that the options were eliminated from the process earlier to minimize public opposition to the project. Commenters disagreed with BPA statements that adding Oregon route options at this point in the process would lengthen the project schedule by saying that any delays in the schedule could be overcome by adding staff to the project.

Commenters believed that BPA already knows which route they would ultimately like to use and are merely going through the public process because it is required by law. Commenters also felt that the addition of more eastern route options later in the process were only to appease the public and that they would not actually be used. Others felt that the additional eastern route options were a direct result of other segments in the area being dropped due to landowner resistance.

Commenters had concerns about Washington Department of Natural Resources (DNR) involvement in the decision-making process and asked that DNR publicly comment on the project and make any communications between BPA and DNR available to the public. Commenters also stated that impacts to fish and wildlife should have been studied prior to releasing information about the project to the public.

Commenters suggested methods for BPA to decide which routes would have the least impact or lowest cost, such as eliminating routes according to the number of residential properties affected or by comparing the costs of property acquisition along each route.

Commenters questioned about how different factors are weighted in the decision-making process and they also stated that the NEPA process is designed to give more weight to the environment rather than the human and built environment. Commenters also stated that the draft EIS could not adequately serve as a decision document

“The project will hurt the environment but if we have already decided to do the project - the environment will be hurt. I don't believe that the impact to the human environment (health & land values) are given enough weight as compared to environmental impacts.”

unless it takes into account lost opportunity costs, including future potential for timber production, the protection of water resources, the carbon sequestration potential to off-set climate change and habitat for fish and wildlife.

PUBLIC INVOLVEMENT

- *Notification:* Commenters felt local elected officials were not properly notified about the project. Commenters expressed confusion about how the notification area was determined. Other commenters described situations where they received some, but not all, project mailings and some new homeowners stated that they did not receive formal notification about the project. Commenters also requested specific information about the number of people notified along each segment.

Commenters cited concerns about the permission to enter property (PEP) forms including that they inadequately address landowner liability, implied no choice in denying access to property, and could allow BPA future access for appraisal purposes. Commenters also stated concerns about the timeliness of receiving notification when a nearby segment was eliminated from the NEPA process and further study for the project.

- *Maps:* Commenters wanted more information about where the towers would be located within the notification corridors. Some commenters were unaware that the online mapping tool was available and that it included a search function. Commenters also described difficulties associated with the GoogleMap interface of the online mapping tool because it did not take them to the correct location. Commenters also stated that some roads were not in the correct locations on the map. Commenters requested renderings or photos of what the towers would look like.

Commenters questioned why the locations of specific schools, neighborhoods, hospitals, roads and bridges, and water bodies were not included on the project map and some felt that it may be intentional. Others inquired why the City of Camas was not recognized and shaded as an “Urban Area” on the overview map. Commenters also stated that the Allston-Keeler 500kV and 230kV transmission lines near the Chehalis substation are represented differently on BPA’s regional system maps than they are on the I-5 Project maps.

- *Comment period:* Commenters stated that BPA should have extended the comment period deadline even further, to March 31, 2010. Some commenters cited difficulties using the online comment form. Commenters living along eastern routes added later in the process expressed frustration, stating that they are not being allowed enough time to gather information and comment prior to the release of the draft EIS. These commenters felt that they were not given equal consideration and that BPA was “fast-tracking” the NEPA process.

“I am concerned that BPA added the route at the last minute and we haven’t been able to voice our opinion in the normal process like people did in the fall of 2009.”

- *Public meetings:* Commenters stated that BPA should have provided more information about property acquisition, compensation and health issues at public meetings. Commenters also stated that the responses provided during presentations at the meetings regarding difficulties crossing Bonneville Dam as an option were not well supported. Commenters questioned why BPA did not record public meetings to make them available as documentation of the public process.

Commenters stated that small meetings held with property owners for adjustments to Segment K were insufficient compared to the larger meetings held through the initial process.

- *Opportunities for further public participation:* Commenters requested that BPA hold a public meeting to formally explain why Oregon route options are no longer being considered. Other commenters suggested that BPA fully disclose the eastern routes added in August 2010 to the hiking and conservation communities.

REGULATORY OBLIGATIONS, COORDINATION, AND DOCUMENTATION

Commenters stated opinions about the scope of the draft EIS, the NEPA process, and other regulations and coordination that should be met as BPA prepares the draft EIS analysis and documentation. Commenters questioned whether BPA would have to comply with state and federal regulations, such as the Clean Water Act, Endangered Species Act, and mandatory reforestation regulations regarding stream buffers, shade, and large woody debris.

DRAFT EIS APPROACH AND CONTENT

Commenters said that BPA must complete a comprehensive review of the regional electric grid and energy development plans to determine long-term grid capacity. They recognized BPA as the agency responsible for permitting all new connections to the grid and managing and expanding the transmission system, and therefore must consider environmental effects of potential interconnections and large-scale energy development throughout the region.

Commenters also requested that for each proposed alternative, BPA provide a detailed count of the number of properties, residences, and commercial land owners who will be directly impacted. They stated that this should include computer-generated image overlays, similar to those provided by commercial developers in support of wind farms.

Additional recommendations for draft EIS approach and content are contained within other sections of this report according to the topic area addressed.

COORDINATION

Commenters reminded BPA of its possible legal obligations to consult with the U.S. Department of Agriculture, National Forest Service, National Park Service, Bureau of Land Management, state and local

governments, and tribal governments regarding the likely impacts to resources that are within their jurisdictions or expertise, and stated that BPA has not yet complied with its consultation duties.

The Washington State Department of Ecology (Ecology) stated that if contamination is observed along the power line right-of-way during the project scoping or construction, sampling of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily visible, or is revealed by sampling, Ecology must be notified.

PROJECT DESIGN

GENERAL PROJECT DESIGN COMMENTS

Commenters stated that they believe the project is intended to serve the growing energy needs south of Oregon City, Ore. and west of Beaverton, Ore. and did not understand how a substation in Troutdale, Ore. would serve as an adequate solution. Commenters further stated that if the project were intended to increase capacity to serve needs in Clark and Cowlitz counties, the project objectives would better be achieved by installing new transformation at strategic locations within the project area. Commenters requested that BPA complete a thorough feasibility analysis of moving power between the proposed substations at Castle Rock, Wash. and Troutdale, Ore. and also a feasibility analysis of using existing transmission line rights-of-way through Oregon.

Commenters drew comparisons between the BPA's expenditures on fish and wildlife mitigation and the costs to minimize impacts by putting the line underground or increasing the length to run the line along unpopulated areas. Commenters recommended that BPA use Smart Grid Distributed Generation and demand-side management or other demand response technologies to assist in eliminating or delaying the need for the project.

"You are spending \$650 million on fish and wildlife. Don't quiver over spending \$60 million one time to keep the children of Vancouver safer."

Commenters also questioned whether the project was being designed to accommodate for future placement of another 500kV transmission line in the same corridor.

TRANSMISSION LINE DESIGN

TOWER, SUBSTATION, AND TRANSMISSION LINE DESIGN

Commenters had a variety of questions related to project design. Specific questions related to project design included:

- Dimensions of towers
- Distances between lines
- Tower replacements and/or upgrades
- Activities and crops that are permitted within the right-of-way
- Feasibility of attaching cell phone equipment to the towers

Commenters offered a number of observations related to the current project design. Commenters stated that the number of towers needed to negotiate the Yale Valley are excessive compared to other areas. Commenters felt that if BPA has eliminated the Pearl substation from consideration, it must also be eliminated from any future projects. Other commenters pointed out that Portland General Electric may use an existing right-of-way at the Pearl substation that BPA claims cannot be used for this project.

Commenters also recommended measures to help protect landowners, which included grounding the towers to prevent harmful effects from lightning strikes and creating agreements with landowners that if the towers, lines and right-of-way are ever abandoned they will be removed and the property returned to the property owner.

TRANSMISSION RIGHTS-OF-WAY

Commenters inquired whether there were standard or varied widths for 500kV transmission line rights-of-way. Many commenters had questions about design specifics in their area including whether additional acquisition would be necessary.

Commenters described concerns about using existing rights-of-way which included having to de-rate the existing lines, safety and security risks involved with co-locating transmission lines, and that this approach was counter to BPA’s stated objectives of separating lines and building redundancy into the system. Commenters requested that the draft EIS include a thorough risk assessment detailing the vulnerability of using existing rights-of-way.

“It is also questionable whether the existing right-of-way could be widened sufficiently to avoid de-rating the new line for reliability purposes. Choosing a route forbidding operation of the new powerline at its full power rating seems rather wasteful.”

Others stated they did not believe redundancy was necessary, citing that other infrastructure systems, like roadways, are not planned with the same methodology. Commenters encouraged BPA to use creative solutions similar to those employed along Segment 52 to make use of existing rights-of-way, the most favorable option to these particular commenters. Still, others encouraged BPA to make upgrades to the existing infrastructure to the maximum extent possible to avoid creating new rights-of-way. Commenters had questions about how close trees would be permitted to the rights-of-way and

recognized that creating new rights-of-way through forested land could require clearing or modifications to trees well beyond the 150-foot right-of-way needed.

LINE DESIGN AND ELECTRIC AND MAGNETIC FIELDS

Discussion of line design and electric and magnetic fields (EMF) can be found in the section “Health and Safety, Electric and Magnetic Field Effects.”

UNDERGROUNDING LINES

Commenters stated that BPA could protect nearby residents from EMF by running lines underground through shielded conduits. The underground transmission lines could utilize existing road rights-of-way and should especially be used in neighborhoods. Some commenters supported the latter idea, by stating that BPA should have to follow existing local regulations which require all lines within one mile of existing residences, schools and businesses to be buried underground and built along existing paths.

“A lot of opposition would dissolve if BPA buried its lines in conduits placed six feet underground, such as in street rights of way. EM Shielded conduits underground would get an even better reception.”

Commenters had questions about the design specifics of underground transmission rights-of-way and how close timber could be grown to it. Commenters requested that the analysis of an underground alternative in the draft EIS be completed by using a lifecycle costing model as opposed to initial construction analyses. Others requested that the draft EIS provide a comparative cost analysis between underground and overhead transmission lines.

TRANSMISSION TECHNOLOGY

No additional comments at this time.

GENERATION/DISTRIBUTION

No additional comments at this time.

TRANSMISSION LINE CONSTRUCTION

Many commenters had questions about how BPA would work with landowners. These questions primarily centered on property appraisal, negotiation, compensation, and acquisition.

ACCESS ROADS AND RIGHTS-OF-WAY

ACCESS ROAD SITING

Commenters also had concerns that new roads through private timberland would increase erosion and create liability for landowners under new federal environmental regulations. Other commenters described portions of their property that were inaccessible to vehicles due to environmental and cultural restrictions.

NUISANCE/SAFETY/MAINTENANCE ISSUES

Commenters identified a number of concerns related to nuisance, safety, and maintenance issues. In addition to the specific nuisance activities previously described in the Scoping Report, commenters identified “mudding,” hunting and increased noise as potential problems that may occur along the rights-of-way. In addition to off-road vehicle (ORV) use being disruptive to private landowners, commenters also stated that it may create access pathways to DNR hiking and recreation areas that currently prohibit ORV use.

“How will BPA keep the hunters and mud lovers out of King Creek? For decades we have worked to keep this backcountry secure.”

Commenters expressed concerns about how enforcement against nuisance activities along access roads and rights-of-way would occur. Property owners located adjacent to DNR land indicated that current DNR nuisance enforcement resources are already stretched to their limit.

Commenters stated that living near access roads and rights-of-way creates undue burdens on landowners, resulting in expenditures of time and money to install security gates and fencing and to monitor the area. They also described burdens related to legal, procedural, liability, damage assessment and bureaucratic processes that would be particularly cumbersome for small landowners. Commenters were concerned that BPA would not allow for monetary or other compensation for these increased burdens unless acquisition occurred on their parcel. Commenters also stated that gates along existing BPA rights-of-way are inadequate and they requested that BPA provide trespassing signage.

ACCESS ROAD CONSTRUCTION

Commenters asked whether they would be able to use access roads for personal use and asked for specifics regarding the responsibility, costs and coordination of road design, construction, maintenance, and repair for jointly used access roads or roads that cross the right-of-way. Others questioned whether new and existing roads would be brought up to DNR road standards.

PROJECT MONITORING AND MITIGATION

MITIGATION AND MONITORING OF IMPACTS TO NATURAL RESOURCES

Some commenters doubted whether BPA would adequately maintain any mitigation measures it implemented and whether BPA would participate in any follow-up activities if initial mitigation efforts were found to be inadequate.

Commenters suggested design measures to mitigate visual impacts which included darkened towers in forested areas, non-shiny conductors, adjusting tower designs to be more compatible with a particular environment, and locating lines and towers such that they avoid visually sensitive areas.

ROUTE SEGMENTS

BPA received additional comments on the 60 proposed route segments. Comments included discussion of recommended siting alternatives, including both general preferences and specific suggestions based on several criteria and siting concerns. Recommendations referenced one or more of the proposed route segments, suggested changes to these routes, and new route segments. Commenters also made recommendations about minor adjustments to the proposed segments, primarily to reduce viewshed impacts.

ROUTE ALTERNATIVE RECOMMENDATIONS

Commenters identified criteria BPA should use to make transmission line siting decisions and discussed their recommendations for the development of project alternatives. The following are criteria and recommendations for various route alternatives; where mentioned, route segments and other areas are referenced.

PHYSICAL DESIGN

- Additional alternatives that travel through Oregon. Specific suggestions included:
 - An Allston substation to Pearl substation alternative (with Longview-vicinity modifications), originating in Centralia, rather than Castle Rock
 - Along the eastern edge of the Coast Range to serve load growths in the western portion of the Willamette Valley and on the coast

- Routes that run to the Pearl substation, with commenters offering a variety of technical recommendations for how the line could be designed to overcome issues with the Columbia River crossing and line separation issues
- Routes that would connect to either a substation in Sherwood, Ore. or one in Rainier, Ore.
- Alternatives that travel underground in populated areas

SOCIAL AND ECONOMIC

- Alternatives that avoid communities that rely heavily on tourism as part of their local economy
- Alternatives in areas where viewsheds already include urban facilities, such as subdivisions and strip malls
- Alternatives along private property where commenters felt that social effects would be limited to one generation
- Alternatives that minimize costs that would be absorbed by taxpayers and ratepayers

LAND USE

- Alternatives were encouraged that avoid residential areas, are less populated, and use larger parcels such as rural areas, forested areas, and public (state and federal) lands. Specific suggestions included:
 - Bypassing the higher concentration of residents in the Yale Valley by running the transmission line across or north of Yale Lake, which would extend Segment O and move Segment K north to meet it
 - Running the line through unpopulated areas in Skamania County, near Mt. St. Helens, east of the Cascade Mountain Range and in central Washington
 - Following an eastern route that would run north of Silver Lake
 - Routes that would run east of Merwin Dam
 - Routes that would cross at the Bonneville Dam
 - The proposed route segments A, F, I, K, O, P, R and W
- Alternatives that avoid children's camps, such as Royal Ridges Retreat

- Alternatives that avoid recreational areas like Gifford Pinchot National Forest, Silver Star Mountain and the Tarbell Trail system
- Alternatives that avoid small timber farms, where project impacts are difficult to absorb
- Alternatives that avoid co-locating with natural gas pipelines due to safety risks
- Alternatives outside of urban growth area boundaries
- Alternatives that use designated energy corridors on federal lands as dictated by the federal Energy Policy Act of 2005
- Alternatives that run through industrial areas in Portland due to existing industrial impacts

NATURAL RESOURCES

- Alternatives that avoid forested areas where extensive clearing of trees may be necessary

SOCIO-ECONOMICS

GENERAL SOCIO-ECONOMIC COMMENTS

Commenters said that the highest priority in the draft EIS should be given to studying the socio-economic impacts that could be caused by the project.

COST TO LANDOWNERS

Commenters described the current impacts of the project on landowners trying to sell their property. Commenters stated that uncertainty about the project has and will cause real estate agents to refuse to list homes, an increase in time on the market, and create difficulties for buyers trying to obtain a home loan. Commenters also described how difficulty in selling homes disproportionately impacts those that may need to move quickly due to life changes such as a new job, retirement or death or illness in the family.

“Buyers are not willing to risk investing in a property that could depreciate significantly in value if this line goes in. Those who need to move due to job loss, death of a family member, illness or retirement, are literally stuck.”

Commenters pointed out that the U.S. Department of Housing and Urban Development (HUD) and the Federal Housing Administration (FHA) are no longer financing easement connected property or property within the tower fall zone, which limits the pool of potential buyers. Commenters also described difficulties obtaining or maintaining traditional loans on properties near the proposed corridors.

Commenters stated that they have had to postpone plans to build, improve, or remodel their homes due to the uncertainty of the project.

Many commenters disagreed with BPA's previous studies indicating that transmission lines have not been shown to decrease property values, and cited several other studies and experts that have found different results. Commenters stated that drops in property value near the proposed corridor could have far-reaching effects for other homes within the community because their valuation may be based on comparable properties along the corridor. Commenters requested that impacts to property value be addressed in the draft EIS and that these impacts should be comparatively analyzed by segment. Commenters stated that the external costs of decreased property values should be accounted for in the decision-making process.

Commenters that owned and operated small timber farms were concerned that BPA would not adequately value their timber and timberlands, which they stated tend to be more valuable than publicly logged lands due to higher site/soil productivity at lower elevations, higher volume yields due to intensive management, ability to export timber, higher value land and lower administrative costs. They further stated that tree farmers use timber that will mature at a later date as part of their retirement plan or to provide income for future generations. Many commenters also described multi-generational tree farms that could be driven out of business if a portion of their farm were occupied by an easement, particularly those located on urban fringes. Other tree farmers stated that growing trees is the only legal use of their property and they would have no way to make up for impacts to their property.

Commenters had concerns that bisection or trans-section of a property may restrict access within the parcel or make land on the opposite side unusable. Commenters inquired whether BPA would compensate landowners for these effects. Commenters stated that if a drop in property values or acquisition occurs on their property, it may force them to remove their land from programs aimed at conserving natural resources on private land.

Commenters were also concerned about potential damages that could occur to homes, timber, and buildings on the property if the transmission line caused a fire and wanted to know if BPA would provide compensation to landowners if a fire occurred.

Commenters discussed eminent domain, easement, and compensation issues. Further discussion can be found in the section "Eminent Domain and Compensation."

LOCAL, REGIONAL, AND STATE ECONOMY

Commenters stated that if recreational and scenic areas were impacted, it could reduce the number of people that visit and support small, local economies. Commenters specifically mentioned the Yale Arts Festival as drawing tourists to the area. Commenters also described potential impacts to rail line improvements in Clark County that are intended to boost the economy in rural parts of the county.

INCOME, BUSINESS OPERATIONS, AND EMPLOYMENT

Commenters identified a variety of income, business operations, and employment issues. Commenters identified businesses that rely upon scenic and tranquil settings to host guests, weddings and special events and stated that the transmission line would seriously compromise their ability to operate, attract clients, and provide jobs for their employees. They also identified other local businesses that depend on the guests they attract to survive. Commenters described impacts to horse training facilities that may have difficulty effectively operating near a transmission line.

“This would not only impact our business but also the local employees, local businesses and the already depressed economy of the area. This would mean loss of jobs for our employees, loss of revenue for local businesses like the Lone Fir and less people that would be visiting our recreational sites here.”

Commenters stated that anticipated losses in property value near the proposed route may limit the funds available for residents to support local businesses, particularly those whose goods and services rely on expendable income and are focused on realty transactions. Commenters also stated that a reduction in tax revenue from anticipated property devaluations could result in lay-offs of public service employees.

Commenters described specific effects on small timber farmers including reductions in forest land use, management latitude, forest productivity and revenue potential. Commenters suggested that BPA reimburse landowners for lost timber income.

Commenters suggested that using the project to help create trail system linkages could help create jobs.

TAXES

Commenters expressed concerns that if decreases in property value occur along the rights-of-way, all property owners within Clark and Cowlitz counties may be affected by the project, stating that those outside of the project area may have to bear tax increases to account for lost tax revenues along the project corridor. Commenters also inquired whether BPA paid local taxes on easement property. Commenters stated that DNR revenue from timber lands that could be impacted by the project only contributes a small portion of funds towards schools.

Commenters requested that BPA study and quantify the reduction in future property tax revenue to counties and cities that could occur due to potential reductions in property values. They further requested that this information be incorporated in to the decision-making process as an external cost.

SCHOOLS AND EDUCATION OPPORTUNITIES

Commenters described more restrictive regulations in other states, counties and cities that dictate transmission lines cannot be placed within certain distances of schools.

Commenters described additional schools where they believed that potential impacts from the project could occur, including Washington State University-Vancouver, Camas High School, Yale Elementary School, and Green Mountain School District. Commenters also identified two schools in Vancouver, Minnehaha Elementary School and Crestline Elementary School, situated near existing power lines, stating they had demonstrated a higher incidence of childhood leukemia.

Commenters also mentioned that if local property values are reduced it could reduce the amount of money available to fund schools in the project area. Commenters found this particularly troublesome because many of these schools are already facing budget cuts.

HOUSING

No additional comments at this time.

DEMOGRAPHICS

No additional comments at this time. Some demographic information is contained within specific topic sections.

QUALITY OF LIFE

Commenters noted that the project has added undue stress and anxiety to those located within the project area. Commenters described years of work they had invested into improving their property that they feared would be lost if they were forced to or chose to move away due to the project. Commenters stated that the transmission line would detract from their ability to enjoy being outdoors on their own property due to noise and aesthetic intrusions.

Commenters described sacrifices they made to live in rural, forested, and recreation areas, free of urban development. Other commenters detailed the reasons they enjoyed living on a particular property and described how project impacts may cause them to give up a place for which they have a strong emotional attachment. Commenters expressed concerns over losing neighbors and cohesive neighborhoods because they or their neighbors may feel compelled to relocate even if their property was not acquired for the project.

“Everyone living in this community has made a conscious decision to escape the noise, pollution, traffic, and intrusion of urban life. We pay a high price in the price of gasoline and travel time just to get to and from our homes every day, because we want to be here and desire that our neighborhood remains forested and untouched by commercial development.”

Commenters stated that if property values become depressed surrounding the rights-of-way, it could change the demographic of their neighborhood.

HEALTH AND SAFETY

GENERAL HEALTH AND SAFETY COMMENTS

In addition to the health conditions mentioned in the Scoping Report, commenters indicated that the transmission lines could cause high blood pressure, cancers, migraine headaches, fibromyalgia, asthma, attention deficit hyperactivity disorder (ADHD), neurodegenerative disease, dementia and brain tumors. Commenters asked what would happen if someone in their household needed a medical device, such as a pacemaker, after the project is constructed. Commenters also stated that placing the transmission lines in park or recreation areas may prohibit those that have medical devices from utilizing those resources.

Commenters, particularly those with children, stated a preference for leaving their homes and losing money rather than dealing with the uncertainty of health problems. Commenters mentioned that courts in other states had ruled that only a reasonable doubt was needed to create larger setbacks of 350 feet between schools and 500kV transmission lines, but that no such rulings had yet occurred in the State of Washington. Commenters described regulations and guidance from other federal, state and local jurisdictions regarding placement of transmission lines in populated areas.

Commenters thought that effects on medical devices such as pacemakers serve as an indicator that exposure exists to people living near the lines. Commenters also made similar remarks about monitors and protective measures for employees working around power lines as reason to believe that there was the potential for harmful exposure. Commenters inquired how BPA would track any health effects to people that live near the line.

“If BPA felt there were no risks then why do they require all of this protection for their employees? Should all the children attending the 95 schools and the adults working in those schools all wear monitors and leave the area each day when the level reaches the specific level?”

Commenters continued to emphasize worries about disproportionate health impacts upon children. Commenters expressed concern about grandchildren that frequently visited their homes and also identified areas where children regularly congregate that may provide chronic exposure such as schools and camps.

Commenters identified that in the Yacolt/Amboy area there are many large families with multiple children and stated that if there are health effects due to the project, more children would be impacted in that particular area. Commenters also specifically mentioned that greater health impacts could be

incurred upon senior populations, particularly those already struggling with medical issues. Commenters also cited increased risk for people already suffering from cancer.

Commenters stated that no comparable project involving a 500kV transmission line has been placed close to schools and residences and therefore there is no comparable example for BPA to study potential health effects. Commenters stated that due to the inconclusiveness of existing studies on health impacts, BPA should be precautionary by not placing lines anywhere near residences. Commenters questioned what BPA would do if long-term health effects were discovered years after the project is constructed. Commenters stated that if BPA were to take into account future liability and medical costs associated with the project, lines through populated areas would not be a cost-effective option.

ELECTRIC AND MAGNETIC FIELD EFFECTS

GENERAL ELECTRIC AND MAGNETIC FIELD EFFECTS COMMENTS

Commenters disagreed with BPA assertions that similar EMF levels come from household appliances, and also stated that appliance usage varies throughout the day while transmission line EMF is constant. They further noted that EMF due to transmission lines adds to existing levels of EMF within the home.

HEALTH EFFECTS

Commenters believe EMF can interfere with a healthy body's proper conduction of electrochemical signals in the cardiovascular and nervous systems. Other commenters were concerned that hearing aids and dental fillings may be affected by EMF. Others inquired how people using public sidewalks and recreation areas nearby would know that they may be at risk for EMF exposure. Commenters had concerns about whether the transmission lines would cause confusion for animals if the lines were overhead or underground.

Commenters provided BPA with numerous studies related to EMF and health and stated that BPA must be able to guarantee no negative health effects from EMF. Commenters requested that health hazards related to EMF be addressed in the draft EIS. They requested that the study be very detailed and written in such a way that an average person can understand the significance of the impacts.

ELECTRONIC AND MAGNETIC INTERFERENCE

In addition to interference with equipment mentioned in the Scoping Report, commenters questioned whether EMF would cause interference with metal buildings, gas-powered vehicles and equipment, livestock with bells or chains, magnetic north, surveying equipment, local utility metering systems, security systems/alarms, and electric fences for livestock.

TRANSMISSION LINE DESIGN

No additional comments at this time.

EMF AND COMMUNITY SAFETY

Commenters had questions about whether burying the transmission lines would actually decrease EMF levels. Commenters had concerns about BPA's EMF expert statements that 500 feet is a safe distance when the line may be as close as 50 feet to some homes. Commenters stated that the extra investment cost to create a longer route away from human populations would be offset by lower future liability once a stronger causal link between EMF and medical conditions is found.

"Someday it will be proven that the EMF's DO cause health problems. Why would BPA want to extend their future liability by locating this new line adjacent to existing residences."

COMMUNITY SAFETY

Commenters identified a variety of community safety issues. Physical safety issues included:

- Risk of electrocution, particularly while using metal tools or water-based appliances, such as a hot tub near the line
- Risks associated with a break in the line or a tower falling

Commenters identified a variety of design-related community safety issues including:

- Poor security along rights-of-way leading to trespassing and illegal lighting of fires
- Susceptibility to solar flare damage for overhead transmission lines
- Intersections with gas pipelines would create attractive targets for terrorist activity. Commenters felt that the Department of Homeland Security should be involved in BPA's decision-making process. Others felt that it would be unnecessary for BPA to separate transmission lines and gas pipelines due to concerns about terrorism.

Additionally, commenters expressed concerns about public safety, which included:

- Children playing in the existing rights-of-way because fences are not provided

Commenters also asked BPA to identify any hazards resulting from the transmission line that BPA would track once the line is constructed and in operation.

NOISE

Commenters indicated that noise from the lines could impact businesses that depend on a quiet environment to be successful, such as special event venues and retreat centers. Commenters from rural areas stated that they had specifically chosen an environment that was free of urban noise pollution. Others felt that the noise may detract from their ability to enjoy being outdoors.

“I choose a country setting to raise my family so that they are not pol[l]uted by the noises of urban areas. These towers would create unwanted noise.”

Commenters suggested that health problems could be caused by the noise and specifically mentioned concerns about being kept awake at night by the noise.

AESTHETICS

Commenters stated that the visual impacts related to the project could hinder people’s ability to enjoy hiking, biking, horseback riding and other activities in eastern portions of the project area. Commenters specifically stated that they anticipated aesthetic impacts to the following areas:

- Larch Mountain
- Silver Star Mountain
- The Columbia River Gorge National Scenic Area, including a newly established Cape Horn Trail
- Lewis and Clark National Historic Trail
- Any designated Wild and Scenic Rivers within the project area
- A designated scenic highway, from Amboy, Wash. to Woodland, Wash.

Commenters suggested avoiding unsightly towers near the Columbia River by moving the Troutdale substation further up the Columbia River. Commenters anticipated that the towers would block views from their property of the Yaacolt Burn State Forest and nearby valleys, Mount Hood and the cities of Vancouver and Portland. Commenters along Segment P stated that the transmission line may be visible by residents on top of Spud Mountain and Livingston Mountain.

“The towers and clear-cut right-of-way would tarnish the scenic vistas enjoyed by thousands as they hike, bike or ride their horses up Larch Mt. and Silver Star Mountain.”

Commenters also described areas and businesses in north Clark County that rely on their aesthetic appeal to draw tourists and guests, specifically Yale Valley, the Lewis River Valley, and Anderson Lodge,

which serves as a wedding venue. Commenters also stated that a transmission line running close to Royal Ridges Retreat in Yacolt, Wash. would detract from the camp and retreat experience the facility offers.

Commenters cited specific covenants in place in their subdivisions which restrict structures that would have visual impairment to local views. Commenters living along existing rights-of-way stated that current maintenance practices have made the area aesthetically unappealing.

CUMULATIVE IMPACTS

Commenters described limitations and impacts already imposed by existing lines including restrictions on growing timber and time and monetary burdens caused by poor communication between the utility and landowner, damages from pesticide applications, poor road maintenance and access, vandalism and trespass, and fire caused by arcing incidents.

Commenters described parcels or portions of parcels that have already been difficult to utilize due to zoning changes, review, and litigation as well as existing easements and setbacks that are already in place. Commenters expressed concerns that any financial impacts caused by the project may exacerbate current economic difficulties in communities where slowdowns in the logging industry and impacts from the eruption of Mt. St. Helens have occurred.

“In the past 30 years this valley has been hit with major financial, job and other domestic problems. This was a logging community. Then the spotted owl stopped many jobs. Then the eruption of Mt St Helens, red zone, businesses closed and people moved away.”

Commenters also described landowners in the project area that have already faced financial hardship and relocation due to the Aldercrest-Banyon subdivision landslide in Kelso, Wash.

Commenters described the significant impacts of other projects that will be facilitated by an interconnection with the new transmission line. Commenters recommended elements to be included in the cumulative impacts analysis including:

- All proposed and likely foreseeable projects in addition to existing projects that would utilize the new transmission line
- The amount of new energy sources that would be accommodated by all new transmission lines and the impacts of that development, including wind energy development and any new sources of power that would be required to mitigate the intermittent production of energy from wind facilities

Commenters also stated that the rapid development of wind energy and other new projects necessitated BPA to complete another comprehensive review of the transmission system, similar to one that was completed in 1995. Commenters specifically requested that impacts to bird and bat populations be included in the review.

LAND USE

EXISTING AND PLANNED LAND USES

Commenters discussed potential impacts to areas of existing land uses within the notification area. Land uses identified included:

- Universities
- Wilderness areas
- Event venues, retreat centers, bed and breakfasts, and youth camp facilities
- Unique rural areas located within close proximity of a major urban area
- Shooting ranges
- Emergency communications facilities and equipment located on private property
- Buried utility cables, water pipes, gas pipelines and compressor stations, and sewer lines
- DNR-managed land recently harvested and replanted

Commenters identified areas with specific land use designations and relationships to comprehensive planning efforts, including:

- Agreements with the county to keep timbered land available
- Recently annexed areas, including 1,000 acres north of Lacamas Lake
- Proposed sports complexes
- Designated scenic drives or Wild and Scenic Rivers
- Future school sites, including the Green Mountain School District

Commenters identified parcels with partially constructed buildings or septic systems, roads, or landscaping that had been put in place in preparation for developing a site and lands recently purchased

for the intent of developing homes on a site. Commenters made observations about how the transmission line could change the composition of their community through bisection or by discouraging high-density housing adjacent to the corridor. Commenters also described how forest landscapes would be affected if the eastern routes were selected.

TRANSPORTATION

No additional comments at this time.

RECREATION

Commenters stated that many of the recreation areas that a proposed transmission segment could cross are a major draw for residents in the entire southwest Washington and Portland area for boating, water sports, hunting, cross-country skiing, snowmobiling, and fishing. Commenters mentioned specific potential impacts, including:

- Chinook Trail, a designated National Recreation Trail
- Tarbell Trail
- Three proposed trails included in DNR's Yacolt Burn Recreation Plan located near Segment O
- A newly dedicated public trail near Goot Park with a proposed dog park
- Groomed hiking areas at Anderson Lodge
- Royal Ridges Retreat youth camp facility
- Proposed Segments 26, O and K

Commenters also stated that the cities of Fairview and Troutdale and the Port of Portland were recently awarded a \$2.3 million grant to construct a paved multiuse trail along the levee between Marine Drive in Fairview and Sundial Road in Troutdale, which would be aligned in the vicinity of the proposed Troutdale substation that could be impacted. Other commenters suggested using the project to incorporate new trails and parks in the area. They suggested the desire of many groups to have a trail that goes north from the existing trail system in Vancouver.

Commenters stated that they believed Segment 32 was changed to Segment P to avoid a proposed ORV park that DNR is planning. Based on this premise, commenters disagreed with BPA's segment adjustment decision because the park is in planning

"Silver Star... It's the most beautiful hike in the area in my opinion (It would be fine if you would improve the road leading to the trail head) But, I implore you to leave the trail and viewpoint and wild flowers alone!!"

stages with no funding and they stated that recreation areas would provide infrequent exposure to EMF.

MINING

No additional comments at this time.

EMINENT DOMAIN AND COMPENSATION

Commenters conveyed their dissatisfaction with the ability of any government agency to exercise eminent domain, no matter for what purpose. Comments included general statements of concern surrounding what they consider to be a “taking,” “legalized stealing” of their land and “government takeover of private property.” They also stated that BPA should not use eminent domain when there are other viable alternatives, particularly longer routes that would not involve the costs associated with eminent domain. Commenters questioned whether BPA would really only use eminent domain as a last resort.

Commenters expressed the emotional anguish caused by not knowing whether they could lose their home. Commenters described complications with displacing property owners including those that are financially unable to purchase another home, are physically unable to relocate due to health problems or the possibility of children having to change schools. Commenters expressed the difficulty of selling their home while eminent domain was a possibility.

“Never in our wildest imagination would we have considered that ANY of our property would be forcibly taken from us, especially not from our own government. This is exactly what construction of a mammoth power line would do to our family.”

Commenters described homes and outbuildings that they thought would potentially be taken due to their location within the proposed segments. Commenters stated that one of the proposed segments may run through Green Mountain School District property and would necessitate the relocation of the entire school facilities and its 139 students. Commenters asked whether BPA would relocate houses to another property.

Commenters stated that a one-time payment for use of the right-of-way is unacceptable and suggested other forms of compensation including leasing the land underneath the transmission line, paying royalties according to the kilowatts transmitted, and offering free electricity to landowners. Commenters expressed frustration that compensation would only be provided to landowners if acquisition of property occurs. Commenters also stated that federal government policies need to be updated to more adequately allow for compensation. Commenters had concerns about being able to recover the money they had already invested in their home given the recent economic downturn.

Commenters inquired about the appraisal methods for land and any timber removed from it as well as whether BPA would cover relocation costs.

NATURAL RESOURCES

Commenters provided a wide range of comments on the effects of transmission line construction and operation on natural resources within the study area. Commenters discussed impacts to wildlife and habitat, including upland areas such as forests, meadows, and prairies; riparian habitats; and aquatic in-stream habitat and species. In addition to the specific resource concerns outlined below, commenters also described what they believed to be rainforest habitat within the project study area.

GENERAL WILDLIFE/HABITAT COMMENTS

Commenters had general concerns that the project could cause a loss in biodiversity. Commenters also described how wildlife present in the area increased their quality of life and that the transmission corridor could drive them away.

Commenters had concerns about how the wildlife inventory would be conducted for the draft EIS and also about whether the transmission corridor could provide any value to wildlife. Commenters requested that BPA analyze the potential impacts to Washington Department of Fish and Wildlife-designated Priority Habitats for both the development of the transmission lines and any associated wind energy development.

- *Route segments:* O, P
- *Other areas:* Green Mountain, Silver Star Mountain, Mill Creek

NATIVE WILDLIFE/HABITAT (UPLAND)

Commenters located on parcels adjacent to land where DNR conducts timber sales, described influxes of large animals on their property when logging occurs. Commenters also described the displacement of animals in general that could occur with the clearing of a new right-of-way.

Commenters identified multiple species and habitats on or adjacent to their properties that could be impacted by a transmission line, including large and small mammals, a variety of birds, reptiles and amphibians, and insects. Particular native wildlife species and habitats mentioned include the following:

AMPHIBIANS AND REPTILES

Commenters identified additional locations where amphibians and reptiles were present within the project area, including:

- *Route segments:* 30, 32

BIRDS

Commenters requested that BPA analyze the potential impacts to National Audubon Society-designated Important Bird Areas for both the development of the transmission lines and any associated wind energy development. Commenters also reminded BPA to be compliant with both the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act.

- *Species:* Waterfowl, including Bufflehead. Other birds including chickadees, juncos, black-headed grosbeaks, evening grosbeaks and shikepokes
- *Route segments:* 9, 26, 32, 49, N, P
- *Other areas:* Anderson Lodge, Lewis River Valley

SMALL MAMMALS

Commenters identified additional locations where small mammals were present within the project area, including:

- *Route segments:* 32
- *Other areas:* Anderson Lodge

LARGE MAMMALS

Commenters identified additional locations where large mammals were present within the project area, including:

- *Route segments:* 9, 25, 30, 32, N, P
- *Other areas:* Green Mountain, Anderson Lodge

INSECTS

Commenters identified additional locations where insects were present within the project area, including:

- *Route segment:* 30, P

RIPARIAN AND AQUATIC WILDLIFE/HABITAT

Commenters described riparian and aquatic habitat and species that could potentially be impacted by transmission line siting. Commenters had questions about how BPA would comply with fish protection regulations, such as leaving riparian buffer zones intact. Commenters identified multiple species and habitats on or adjacent to their properties including:

- *Species:* Salmon (including Kokanee), trout including Native Cutthroat, Brook and Rainbow
- *Route segments:* P
- *Other areas:* Boody Pond, King Creek

WETLANDS

Commenters expressed concerns about the effect of herbicides on wetlands. Commenters identified additional wetlands that may potentially be impacted. Specific wetland areas mentioned include:

- *Route segments:* N
- *Other areas:* NE 48th Circle (Vancouver), Cedar Creek, Johns Creek

FLOODPLAINS

Commenters identified Chelatchie Creek as a specific area of floodplain activity.

SURFACE AND GROUND WATER RESOURCES

Commenters mentioned specific surface and ground water resources in addition to those previously mentioned in the Scoping Report, including:

- Boody Creek, Chilton Creek, Johns Creek, tributaries of Lacamas Creek, Pup Creek and an unnamed spring along segment 43

Commenters discussed concerns about disruption of water supply during construction and well contamination, particularly in the Saddle Creek community, where many wells are drilled through sand. Commenters also noted there are some people that take water directly from local creeks for drinking and cooking purposes. In addition to the contaminants mentioned in the Scoping Report, commenters are concerned about the use of defoliants and pesticides. Commenters identified areas with a high water table as well as concerns about the effects the project could have on the level of the water table. Commenters expressed concern about disturbance to estuary waters.

Commenters expressed concern that the proposed project may cross creeks on their property for which they have been informed by other government agencies that they cannot cut trees or vegetation within 50 feet. Commenters identified acreage that is currently enrolled in Conservation Reserve Programs (CRP), Conservation Reserve Enhancement Programs (CREP) and other federal programs that intend to protect water resources. Commenters also identified a pond and rebuilt dam that accommodate fish passage on their property, created in partnership with WDFW and DNR that could be impacted by erosion from the project.

Commenters mentioned that Clark County has a National Pollutant Discharge Elimination System (NPDES) permit under the Clean Water Act through an agreed order with Ecology that requires any new development to create no new net impacts on stormwater. Commenters requested that treatment and containment of any additional stormwater caused by the removal of vegetation be addressed in the draft EIS and stated that this requirement could also require BPA to build and maintain stormwater facilities that may result in the additional acquisition of private property.

Additional discussion of water quality can be found under the section “Resources, Riparian/Aquatic.”

NATIVE VEGETATION

Commenters stated that the removal of mature trees along existing rights-of-way would negate their ability to act as noise buffers for both general noise and highway noise, filter the air, absorb stormwater run-off, shelter wildlife, and provide an aesthetic benefit to homeowners. Commenters questioned the compatibility of different types of vegetation within the right-of-way, including fruit trees. Commenters mentioned specific species and areas of concern, including:

- *Species:* vine maples, native blackberries, salmonberries, Oregon iris, tiger lilies
- *Route segments:* 15, 25, 26, 30, O
- *Other areas:* Silver Star Mountain

NON-NATIVE VEGETATION

Commenters inquired how BPA would prevent the proliferation of noxious weeds by construction and maintenance crews. Commenters identified species of concern within the project area including:

- *Species:* Tansy Ragwort, Evergreen Blackberry

THREATENED, ENDANGERED, AND SENSITIVE SPECIES

Commenters specifically described impacts to salmon and steelhead habitat that are currently or have been previously involved in recovery projects sponsored by National Oceanic and Atmospheric Administration (NOAA), Washington Department of Fish and Wildlife, Fish First and the Lower Columbia Fish Enhancement Group. Commenters also reminded BPA of its obligation to consult with the NOAA and the U.S. Fish and Wildlife Service (USFWS) to determine impacts to threatened or endangered species.

Commenters identified listed or sensitive species observed or believed to be within the project area including:

- *Species:* Indian Pipe and Indian Paintbrush
- *Route segments:* 35, N
- *Other areas:* Rose Valley, Boulder Creek

AIR QUALITY AND CLIMATE

No additional comments at this time.

CULTURAL AND HISTORIC RESOURCES

Commenters identified their property as declared Indian artifact land, which includes state-imposed restrictions on digging in the area.

Commenters stated that additional activities enabled by the transmission line could cause damage to cultural resources, such as ground disturbance for wind turbine construction and road building. Commenters requested that BPA perform a comprehensive review and consult with tribal governments to determine the full extent of potential damage to cultural resources and identify avoidance and mitigation measures.

Commenters mentioned potential impacts to the Lewis and Clark National and Historic Trail and requested that any impacts to the trail or its scenic values be described in the draft EIS. Other areas of concern mentioned include the following:

- *Route segments:* 21
- *Other areas:* upper Lewis River pioneer burial site, Chelatchie Indian trading marker

GEOLOGY AND SOILS

Commenters described specific areas that have been previously identified as landslide or erosion hazard areas, including:

- Several parcels near the proposed rights-of-way for Segment P
- The hillside above Hazel Dell Road and Trout Lake Estates along Segment 2

Commenters asked that any potential landslide or erosion hazards be addressed in the draft EIS. Commenters requested that the draft EIS address the risk of volcanic eruption from Mt. St. Helens using the same radius and destructive force as the 1980 eruption, but with a blowout occurring on the southwestern side, particularly as this would pertain to Segments F, I and K.

ENVIRONMENTAL JUSTICE

No additional comments at this time.

NEXT STEPS

BPA staff and contractors are continuing to collect and analyze more information about the route segments and substation sites. The segments will be developed into alternatives, which will be evaluated and compared in the draft EIS. The draft EIS is expected in Fall 2011. BPA will publicly circulate the draft EIS and solicit additional comments during a public comment period. BPA will then revise the draft EIS and address all comments received in a final EIS. A record of decision is expected in 2013 that will identify the agency's decision on whether or not to build the project. At that time, if the decision is to build, a final route would be identified.

APPENDIX A – PUBLIC NOTIFICATION MATERIALS

Following the close of the public scoping comment period, BPA has distributed two additional mailings to landowners and interested parties to inform them of project developments. Each mailing included an updated version of the project map reflecting any changes made to segments included. All project documents are also located on the project website at www.bpa.gov/go/i5.

- December 21, 2009 – Letter announcing the release of Segments 27, 31, 42 and 44 from the NEPA process
- August 2, 2010 – Letter announcing refinements to the segments included in the project study area



Department of Energy

Bonneville Power Administration
P.O. Box 491
Vancouver, Washington 98666-0491

TRANSMISSION SERVICES

December 21, 2009

In reply refer to: TEP-TPP-3

To: Parties Interested in the I-5 Corridor Reinforcement Project

Thank you for taking the time to share your ideas and concerns about this project with us.

After several months of study, the Bonneville Power Administration has determined it will no longer consider four of the 52 potential route segments for its proposed I-5 Corridor Reinforcement Project between the Castle Rock, Wash., area and Troutdale, Ore. The segments no longer being considered stretch from northeast of Amboy, Wash., to northwest of Camas, Wash., and are shown as segments 27, 31, 42 and 44, on the enclosed project map.

For the past few months, BPA has been identifying and investigating the potential line routes it will consider in its environmental review consistent with requirements of the National Environmental Policy Act. BPA initially included the segments that are being eliminated from further consideration because they follow an existing vacant easement owned by PacifiCorp. The existing easement is only 100 feet wide. BPA would need to acquire 50 additional feet of right-of-way width to accommodate its proposed 500-kilovolt transmission line. After on-the-ground review, we have concluded this expansion is substantially less feasible than other segments. Other segments currently under consideration either already have a BPA line on an existing right-of-way or allow for wider study corridors in less populated areas. We will now devote our resources and efforts to studying these remaining segments.

BPA is proposing the I-5 Corridor Reinforcement Project because congestion on its transmission system in southwest Washington and northwest Oregon has reached limits that now threaten power system reliability. BPA has not built new transmission in the area for 40 years. The agency has used a combination of aggressive conservation measures and technical solutions to keep pace with the area's energy needs.

Energy demand in the Portland/Vancouver area is generally forecast to grow at about 1 to 2 percent per year, including demand for new renewable energy resources. However, in recent years, growth has exceeded that amount and in some cases grown up to 5 percent per year.

Next Steps

BPA staff and contractors will continue studying the route segments and substation areas to collect more information for the draft environmental impact statement. You may see these specialists working in the area. They will either stay on existing rights-of-way or access only those properties that landowners have given BPA permission to enter.

In late January, the agency will conclude its scoping efforts by issuing a “scoping summary.” In spring 2010, the agency intends to release a more detailed description of the potential routing alternatives that it will consider. Between now and spring 2010, BPA may drop, modify and, possibly, add other segments. All alternatives will be evaluated and refined, and the draft EIS will include a thorough analysis of potentially viable alternatives. The draft EIS is slated for completion in early 2011. BPA will publicly circulate the draft EIS and take additional comments, after which it will prepare a final EIS. The agency expects to decide whether to build the line in 2012. At that time, if the decision is to build, a final route would be identified.

For more information

We are committed to keeping all parties – from individual landowners to state agencies and elected officials – fully informed at every step of the project by sharing information, providing timely updates and notifying them of changes. Please visit the project Web site at www.bpa.gov/go/I-5 if you would like more information.

Thank you for your interest in this project.

Sincerely,

/s/ Mark Korsness, 12/21/09

Mark Korsness
Project Manager

Enclosure:
Updated I-5 Corridor Reinforcement Project Study Area Map



Department of Energy

Bonneville Power Administration
P.O. Box 491
Vancouver, Washington 98666-0491

TRANSMISSION SERVICES

August 2, 2010

In reply refer to: TEP-TPP-3

To: Parties Interested in the I-5 Corridor Reinforcement Project

The Bonneville Power Administration has refined the potential transmission line route segments and substation sites for the proposed I-5 Corridor Reinforcement Project. The refinements are a result of additional field work and extensive public input we received during and after the scoping period. This letter and the enclosed map, along with the public outreach we will conduct over the coming months, are part of our commitment to keep you informed and involved as the project moves forward.

Background

BPA is a not-for-profit federal agency that provides about a third of the electric power and 75 percent of the high-voltage electric transmission in the Pacific Northwest. We are dedicated to providing low-cost, reliable, environmentally responsible electricity to support our regional economy, recognizing that we are accountable to the people we serve.

It has been 40 years since we built transmission facilities to serve the area that includes southwest Washington and northwest Oregon, while the population has more than doubled in that time. We have aggressively implemented conservation, energy efficiency and technical measures to stretch the transmission system to avoid new construction. But now the regional transmission system is close to its limits, and we must consider adding new high-voltage lines to our network to maintain reliability.

Recent changes

In response to input from the public, private timber landowners and the Washington State Department of Natural Resources, BPA has refined several of the previously proposed segments and added segments that are farther north and east. We have removed some segments and portions of others from further consideration and have identified additional segments and substation sites. We also have expanded the options we are considering for a substation site near Castle Rock. See the enclosed map and description for more information about these changes.

Public meetings

BPA will host four public meetings in August and September for interested members of the public to learn about the project, provide comments or input and ask questions of BPA representatives. The meetings will begin and end with an open house during which you can talk directly with us. At the three evening meetings, BPA will give a brief presentation starting at 5:30 p.m. and take questions afterward. On Sunday, September 12, BPA will give presentations at 1 and 4 p.m. and take questions afterward.

Aug. 30, 2010

4 to 7 p.m.
Castle Rock Elementary
700 Huntington Ave S
Castle Rock, WA

Aug. 31, 2010

4 to 7 p.m.
Skyview High School
1300 NW 139th St.
Vancouver, WA

Sept. 8, 2010

4 to 7 p.m.
Mountain Valley Grange
40107 NE 221st Ave
Amboy, WA

Sept. 12, 2010

12 to 6 p.m.
Union High School
6201 NW Friberg Strunk St.
Camas, WA

Get involved

If you are unable to attend one of the meetings, there are a number of other ways to send us your comments or ask questions at any time. Comments can be made online at www.bpa.gov/go/i5. You may send letters to I-5 Corridor Reinforcement Project, PO Box 9250, Portland, OR, 97207, or by fax to 888-315-4503. You also may call our toll-free line at 800-230-6593. Submitting comments ensures that our project team can consider your suggestions. Your participation helps us learn about the issues that are important to you and will help us reach a better decision.

Next steps

As part of our ongoing environmental review, we will continue to identify and analyze the potential impacts of this project to nearby communities, including impacts on the human environment such as health and safety and property values as well as impacts to natural resources such as land, water, and wildlife. Our engineering analysis and design work will continue. We plan to share more information including more specific route details for all proposed segments and substation sites with you at additional public meetings this fall.

We now expect to release the draft environmental impact statement (EIS) in late summer 2011 for public review and comment. The draft EIS will include a thorough environmental analysis of the proposed alternatives. We expect to publish a final EIS and decide whether to build the line in early 2013. If the decision is to build, a final route will be identified and selected at that time.

More information

If your segment has been dropped from further consideration and you have already signed and sent in your PEP form, BPA is releasing the rights on any property in that segment, as long as your parcel is not part of any additional segment (for example, where two might cross). To check to see if this includes your parcel, please use the interactive map tools (using Google Maps or Google Earth) on the project website www.bpa.gov/go/i5.

We are committed to keeping all parties – from individual landowners to state agencies and elected officials – fully informed during every step of the project by sharing information, providing timely updates and notifying you of changes. Please visit the project website at www.bpa.gov/go/i5 for more maps and factsheets.

Thank you for your interest in this project.
Sincerely,

/s/ Mark Korsness, Aug. 2, 2010

Mark Korsness
Project Manager

Enclosures:

Refinements to the I-5 Corridor Reinforcement Project August 2010
I-5 Corridor Reinforcement Project Map August 2010

APPENDIX B – COMMUNICATIONS RECEIVED

Appendix B includes all communications received between December 15, 2009 and November 17, 2010 and is available on the project website at:

www.bpa.gov/corporate/i-5-eis/documents/comment_summary_appdxB_April2011.pdf

If you do not have access to the Internet and would like to receive a CD or hard copy of this appendix (465 pages), please call our toll free document request line at 800-622-4520 and leave a message with your name and mailing address, and ask for “I-5 Project Supplemental Comment Report, Appendix B.” Please specify CD or hard copy.

APPENDIX C – CODING CATEGORIES

The following comment categories were used to code individual comments contained within each communication included in the supplemental comment report. Each communication was given a unique number, and each comment within the communication was categorized by subject. Categories assigned to comments included the following:

Transportation	Mitigation/monitoring	Segment 19
Land Use	Visuals	Segment 20
Eminent Domain	Permits	Segment 21
Irrigation	Other	Segment 22
Mining	Data request	Segment 23
Wetlands	Recreation	Segment 24
Floodplains	Access/road construction	Segment 25
Water	Vegetation/weeds	Segment 26
Electromagnetic fields	GHG/climate change	Segment 27
Noise	Geology/soils	Segment 28
Air quality	Social issues	Segment 29
Fish/wildlife	Demographics	Segment 30
Water fowl	Public services	Segment 31
Passerine birds	Housing	Segment 32
Migratory birds	Education	Segment 33
Raptors	Community Safety	Segment 34
Bats	Environmental justice	Segment 35
Amphibians/reptiles	Health	Segment 36
Small mammals	Segment 1	Segment 37
Large mammals	Segment 2	Segment 38
Fish (non-salmon)	Segment 3	Segment 39
Invertebrates	Segment 4	Segment 40
Threatened/endangered species	Segment 5	Segment 41
Salmon	Segment 6	Segment 42
Cultural resources	Segment 7	Segment 43
Alternatives/siting	Segment 8	Segment 44
Project need	Segment 9	Segment 45
Cumulative impacts	Segment 10	Segment 46
Project design	Segment 11	Segment 47
Process design	Segment 12	Segment 48
Economics	Segment 13	Segment 49
Employment	Segment 14	Segment 50
Income	Segment 15	Segment 51
Taxes/taxpayers	Segment 16	Segment 52
Cost to landowners	Segment 17	Segment A
	Segment 18	Segment B

Segment C
Segment D
Segment E
Segment F
Segment G
Segment H
Segment I
Segment J
Segment K
Segment L
Segment M
Segment N
Segment O
Segment P
Segment Q
Segment R
Segment S
Segment T
Segment U
Segment V
Segment W
Lexington Substation
Castle Rock Substation
Ross Substation
Sifton Substation
Troutdale Substation
Baxter Creek Substation
Casey Road Substation
Monahan Creek Substation