

Palisades-Goshen Transmission Line Reconstruction Project

**Revision Sheet for the Environmental Assessment
Finding of No Significant Impact
Mitigation Action Plan**

DOE/EA-1591
Bonneville Power Administration

May 2008

Revision Sheet
for the
Palisades-Goshen Transmission Line Reconstruction Project
Final Environmental Assessment
DOE/EA -1591

Summary

This revision sheet documents the changes incorporated into the Palisades-Goshen Transmission Line Reconstruction Project Preliminary Environmental Assessment (EA). With the addition of these changes, the Preliminary EA will not be reprinted and serves as the Final EA.

On April 23, 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 May 9, 2008. Four landowners and one tribe commented or asked questions about the project. Please see the **Public Comments** section for the comments and responses to those comments. Minor changes were made to the EA based on further availability of design information, editorial and printing corrections, and further coordination with cooperating agencies.

Revisions to the EA

There are no significant changes to the EA.

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.

Table of Contents

Page I, add

3.1 Introduction.....2

Chapter 2

2.1.2 New Transmission Structures

Page 7, the second paragraph of this section is modified as follows:

The proposed 230-kV wood pole structures would be between 50 and 120 feet tall, with most of the structures typically between 80 to 90 feet tall; ~~On average, the proposed structures would be~~

approximately 15 to 20 feet taller than the existing 115-kV structures (see Figure 2-2). The width between the vertical wood poles of the proposed structures would be 20 feet, as compared to the 12-foot spacing between poles of the existing 115-kV structures.

Page 7, the fifth paragraph of this section is modified as follows:

All new wood pole structures and cross arms would be assembled onsite. A temporarily disturbed area up to 150 feet by 150 feet around each structure would be needed for materials, structure assembly, equipment set-up and operation, and parking. The disturbance area at structures located in the Fall Creek drainage would be limited to avoid wetlands and riparian areas. Also, several structures and a section of Forest Service road between structures 15/8 and 16/1 in the Fall Creek drainage would be moved to avoid wetlands.

Page 8, the title of Figure 2-2 is modified as follows:

Figure 2-2. Existing wood structures and proposed replacement wood structures for the Palisades-Goshen Transmission Line (to be used at all locations except structures 1/2 to 2/7 and 4/1 to 4/8).

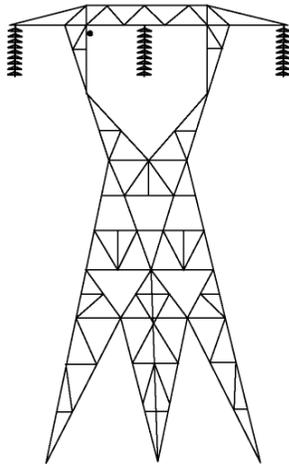
Page 8, the sixth paragraph of this section is modified as follows:

In addition to the new wood pole structures, BPA would use 230-kV steel pole-structures in a few locations. These structures are made of galvanized steel and come in both single-circuit and double-circuit configurations (see Figure 2-3). Double-circuit steel pole structures would be used for the segment of rebuilt Palisades-Goshen line to be located on new ROW from structure 1/1 at Palisades Dam to structure 2/7. These structures would be between 80 feet to 120 feet tall, and are typically approximately 110 feet tall (see Figure 2-3). Double-circuit structures would be used for this segment because the proposed structures would carry the conductors (wires) for the Palisades-Swan Valley transmission line proposed to be relocated to the new ROW (see Section 2.1.9), in addition to the conductors for the Palisades-Goshen line.

Page 8, a new paragraph is added after the seventh paragraph in this section:

Two single-circuit steel lattice structures would be used for the transmission line crossing over Henry's Creek between structures 40/5 and 41/1. These structures typically range from 70 to 120 feet tall (see Figure 2-3).

Page 9, a steel lattice structure is added to Figure 2-3:



SINGLE CIRCUIT
Poles 40/5 and 41/1

Page 9, the eighth paragraph of this section is modified as follows:

Construction methods for some of the new steel pole structures would be similar to those for constructing the new wood pole structures. Pole holes would be drilled at each new structure site, but these holes would be from 2.5 feet to 6 feet in diameter and deeper (25 feet deep on average) than the ones for the wood poles. The new poles would be directly embedded in these holes, but would be backfilled with $\frac{3}{4}$ -inch crushed rock aggregate concrete instead of excavated material. Other steel poles would have concrete pier footings. Holes for the concrete pier footings would also be drilled to a depth of 25 feet and 4.5 to 5.5 feet in diameter.

Page 9, a new paragraph is added after the eighth paragraph of this section:

Steel lattice structures have grill footings that require four separate excavated holes that each contain a grid of crossbeams. The crossbeams are connected to each structure leg. Footings holes are typically about 14 feet by 14 feet to a depth of 12 feet. The holes are then backfilled with excavated material and excess material would be spread around the tower legs.

Page 10, Table 2-2 is modified as follows:

TABLE 2-2.
Palisades – Goshen Transmission Line Structure Moves

Existing Structure Number	Direction, Distance, and Reason for Moving Structure
12/6	Move BOL 90' (Mine impairment, survey will determine whether we need to or not)
13/8	Move BOL 15' (Environmental issue mitigation)
14/4	Move AOL 100' (Engineering)
14/7	Move AOL 15' (Environmental issue mitigation)
15/4	Move BOL 50' (Environmental issue mitigation)
15/5	Offset 5' Northwest (away from road) (Engineering)
15/7	Offset 5' North (away from road) (Engineering)
15/9	Move AOL 175', offset 13' - away from road (Environmental issue mitigation)
17/4	Move AOL 25' (Environmental issue mitigation)
18/6	Move BOL 60' (Engineering)
19/6	Move BOL 80' (Engineering)
19/7	Move AOL 120' (Engineering)
48/4	Move BOL 53' (Avoid agricultural conflict)
48/5	Move BOL 128' (Avoid agricultural conflict)
48/6	Move BOL 244' (Avoid agricultural conflict)
48/7	Move BOL 304' (Avoid agricultural conflict)
48/9	Move AOL 300' (Avoid agricultural conflict)
49/1	Move AOL 310' (Avoid agricultural conflict)
49/2	Move AOL 210' (Avoid agricultural conflict)
49/4	Move AOL 7' (Avoid agricultural conflict)
49/6	Move AOL 156' (Avoid agricultural conflict)

BOL = Back on Line; AOL = Ahead on Line. Structure moves are shown in Appendix B.

2.1.10 Line Removal

Page 14, the second and third paragraphs of this section are modified as follows:

The soil around the structure legs would be dug away. The structure would either be entirely removed from the ground, cut off at ground level, or cut off legs would be cut about 2 feet or 3 feet below the ground surface, and backfilled with native material. ~~and a~~ A crane would lower the structure to the ground. The structures would be dismantled and hauled away on the back of a large truck.

The wood pole structures for the rest of the line would be removed individually in the same way as the new structures were being installed. In sensitive areas where disturbance must be kept to a minimum, wood poles would be cut off at ground level and poles dragged out or lifted out by crane to avoid bringing in construction equipment all the way to the structure.

2.1.12 Construction Timing

Page 14, the first paragraph of this section is modified as follows:

Construction would be phased over approximately 3 years, weather permitting. BPA has proposed to begin road work in June 2008 and to complete this work in August 2008. Replacement of the first 23 miles of line beginning at Palisades Dam, and the crossing at Henry's Creek in mile 38, is proposed to begin in July 16, 2008, and would be done by a contractor to BPA. At the same time, BPA crews would begin replacing structures from Goshen Substation east to mile 30. Line work would continue as far into the fall as weather permits. Construction of the line would then continue by BPA crews in 2009-10 during the summer construction months.

Section 2.6 Comparison of Alternatives

Page 19, Table 2-4 is modified as follows:

Visual Quality	Temporary impacts during construction. New structures would be <u>15 to 20</u> feet taller than existing ones. Low impacts expected.	No change from existing conditions.
Cultural Resources	<u>With mitigation, No to low</u> impacts are expected to with avoidance of all eligible and potentially-eligible sites.	No impacts expected.

Chapter 3

3.2.3 Mitigation Measures

Page 33, these mitigation measures are added as follows:

- Avoid replacing existing structures or developing new roads in NWI wetlands or observed wet or riparian areas.
- Work with the C-TNF to relocate existing structures and portions of access roads outside of NWI wetlands or observed wet or riparian areas.

3.3.3 Mitigation Measures

Page 54, this mitigation measure is added as follows:

- Line and road construction will be avoided in the vicinity of structure 4/9 to avoid disturbing an occupied osprey nest until chicks have fledged in late August.

3.4.3 Mitigation Measures

Page 59, the second mitigation measure is modified as follows:

- Where practical, Ssave topsoil removed for structure replacement and new access road (spur road) construction and use onsite for restoration activities, to promote regrowth from the native seed bank in the topsoil.

3.6.3 Mitigation Measures

Page 74, the third mitigation measure is modified as follows:

- Drive all construction vehicles at low speeds (15 mph) on access roads to minimize dust.

3.10.2 Environmental Impacts – Proposed Action

Page 91, Table 3-10 is modified as follows:

TABLE 3-10
Summary of Cultural Resources in the Project APE

Site #	Site Type and Historic Themes	NRHP Eligibility Determination/Recommendation	Location
10BM696	Historic Canal, Irrigation, and Agriculture	Recommended Eligible	Private Land
*10BV6	Prehistoric Campsite	Recommended Not Eligible	Caribou-Targhee National Forest
10BV62	Prehistoric Lithic Scatter	Recommended Potentially Eligible Under Criterion D	Caribou-Targhee National Forest
10BV76	Prehistoric Lithic Scatter	Recommended Eligible	BLM Land
10BV130	Calf Hollow Lithic Scatter	Recommended Eligible	Caribou-Targhee National Forest
10BV155	Prehistoric Lithic Scatter	Recommended Eligible	Caribou-Targhee National Forest
10BV158	Isolated Secondary Flake	Recommended Not Eligible	Caribou-Targhee National Forest
10BV159	Isolated Flakes	Recommended Not Eligible	Caribou-Targhee National Forest
10BV225	Henry Creek Historic Dump	Recommended Not Eligible	Private Land
10BV226	Willow Creek Lithic Scatter	Eligible	BLM Land
CH-1	Historic Farmstead	Recommended Eligible under Criterion A	Private Land
CH-2	Historic Farmstead	Recommended Eligible under Criterion C	Private Land
CH-3	Historic Farmstead	Recommended Not Eligible	Private Land
CH-5	Prehistoric Lithic Scatter	Recommended Eligible	Caribou-Targhee National Forest
CH-7	Historic Farmstead	Recommended Not Eligible	Private Land
CH-8	Prehistoric Lithic Scatter	Recommended Eligible	Caribou-Targhee National Forest
CH-9	Historic Cow Camp	Recommended Not Eligible	Caribou-Targhee National Forest
CH-10	Prehistoric Lithic Scatter	Recommended Not Eligible	Idaho State Lands
CH-11	Historic Farmstead	Recommended Not Eligible	Private Land
CH-12	Historic Farmstead	Recommended Not Eligible	Private Land
CH-13	Prehistoric Lithic Scatter	Recommended Eligible	Private Land
Goshen 2004-4	Palisades-Goshen 115 kV Transmission Line	Recommended Not Eligible	State Land, BLM Land, Caribou-Targhee National Forest, and Private Land

~~*Consultation with SHPO regarding NRHP eligibility ongoing.~~

3.10.2 Environmental Impacts – Proposed Action

Page 92, Table 3-11 is modified as follows:

TABLE 3-11
BPA Effect Determinations for Cultural and Historic Sites

Site	BPA Effect Determination	Notes
*10BV6	No <u>Adverse</u> Effect	BPA recommended Not Eligible; Site Obliterated <u>BPA Archaeologist will monitor during construction.</u>
10BV62	No Adverse Effect	Existing Route of Travel
10BV76	No Effect	Will be avoided; flag in field
10BV130	No Adverse Effect	Existing Route of Travel
10BV155	No Adverse Effect	Existing Route of Travel
10BV226	No Effect	Will be avoided; flag in field
10BM696	No Effect	Will be avoided
CH-1	No Effect	Will be avoided
CH-2	No Adverse Effect	Existing Route of Travel
CH-5	No Adverse Effect	Existing route of travel - BPA proposes to utilize filter fabric and a layer of sterile sediment on roadway. <u>BPA Archaeologist will monitor during construction.</u>
CH-8	No Effect	Will be avoided
CH-13	No Adverse Effect	Existing route of travel - BPA proposes to utilize filter fabric and a layer of sterile sediment on roadway. <u>BPA Archaeologist will monitor during construction.</u>

~~*Consultation with SHPO regarding NRHP eligibility ongoing.~~

3.10.3 Mitigation Measures

Page 92, the first paragraph is modified as follows:

SHPO recommends complete avoidance of all sites eligible for listing on the NRHP. If complete avoidance is not possible, mitigation measures would be implemented for affected sites. Mitigation measures identified ~~at this time~~ for sites that would be adversely impacted by this project include:

Page 92, the second mitigation measure is modified as follows:

- Flag and monitor culturally sensitive areas so that these areas may be avoided by project personnel.

Page 93, these mitigation measures are added as follows:

- BPA archaeologists will provide a briefing to construction crews regarding protocols to be used in the event that cultural material is discovered during construction.
- BPA will provide to SHPO a follow up letter report documenting any monitoring results.

Page 93, the first paragraph is modified as follows:

~~Implement any additional mitigation measures for cultural resources identified by the state SHPO through the Section 106 consultation process~~

Chapter 4

4.5 Cultural Resources

Page 120, continuation of the paragraph from the previous page is modified as follows:

with the C-TNF and BLM archaeologists before the report was sent to SHPO and the Tribes for review. No comments were received from the Tribes. SHPO concurred with BPA's recommendations and mitigation on April 30, 2008.

Page 120, the second paragraph is modified as follows:

~~The Idaho SHPO concurred with all but one of BPA's determination of eligibility findings for the cultural resources documented for this project. Consultation on NRHP eligibility for this site continues. BPA's project Determination of Effect for NHRP-eligible sites is found in Section 3.10. The SHPO recommends complete avoidance of all sites eligible or potentially eligible for listing on the NRHP. Since complete avoidance is not possible for all sites, mitigation measures would be implemented for affected sites.~~

Appendix B

Some of the maps in Appendix B were missing information due to a printing error. These maps have been reprinted and are included in this revision sheet.

In addition, three towers have been moved and a new map showing this change is also included.

Map Sheet 1

The AIZ symbol in the legend was revised and the following structures were moved:

48/9, moved 300 feet ahead-on-line

49/1, moved 310 feet ahead-on-line

49/2, moved 210 feet ahead-on-line

Map Sheet 28

The AIZ symbol in the legend was revised and existing BPA ROW was added from structures 1/1 to 2/7 of the existing Palisades-Goshen No.1 transmission line.

Map Sheets 4, 5, 6, 7, 10, 11, 15, 24, 25

Bureau of Land Management managed lands were added to maps.

Public Comments

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

Comment 0001

PEA0001

4/30/2008

John Murray, THPO
representing the Blackfeet Tribe

Blackfeet Tribe will not be submitting comments.

Response

Thank you for your comment.

Comment 0002

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Proposed Palisades-Goshen Transmission Line Reconstruction Project
"I'd like to tell you . . . "

PEA0002

1. Please have your environmental studies look at:

2. I need more information about:

3. I have these other comments:

Put both line's together now give ^{east side} ~~(Mason)~~ line to
Dept of Hwyt. For new road in better location
(Dept of Transportation) Help ~~Shaw~~ : lower
impact on all studies - sooner better
(Pool money co Dept) ~~etc.~~

Name Randy Huskey

Address P.O. Box 147

City Swan Valley State Id. Zip 83428

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

Please mail your comments by May 9, 2008 to:
BPA Public Affairs DKE-7
PO Box 14428
Portland, OR 97293-4428

Response

After receipt of this comment letter, the commenter was contacted by the BPA Project Manager to clarify the comment. The commenter clarified that BPA should double circuit the first seven to eight miles of both the Palisades-Goshen and Palisades-Swan Valley lines on the existing Palisades-Swan Valley ROW. The vacated Palisades-Goshen ROW could then be used to offer a new location for Highway 26.

As discussed in Section 2.1.2 of the EA, the Proposed Action includes double-circuiting the first approximately 2.5 miles of the Palisades-Goshen and Palisades-Swan Valley lines in a new ROW. Section 2.1.1 of the EA describes how this new ROW would be located generally next to an existing Palisades Dam access road and U.S. Highway 26.

BPA has considered the commenter's suggestion. However, double-circuiting the first seven to eight miles of the Palisades-Goshen and Palisades-Swan Valley lines on the existing Palisades-Swan Valley ROW would not offer additional technical, cost, or environmental benefits compared with double-circuiting just the first 2.5 miles of these lines on new ROW and rebuilding the remaining portion of the Palisades-Goshen line in place. From a technical standpoint, increasing the amount of double-circuiting would actually decrease reliability. For example, if one structure fails, both lines are removed from service. From a cost standpoint, double-circuiting as suggested by the commenter would be more expensive than rebuilding this section in place. BPA ROW already exists to accommodate the rebuild in this section, while a double-circuit of the first seven to eight miles on the existing Palisades-Swan Valley ROW would require the purchase of additional easement. From an environmental standpoint, environmental impacts would most likely increase slightly because the first seven to eight miles of the Palisades-Goshen line is in already-disturbed pastured land, while the section of Palisades-Swan Valley line suggested for double-circuiting is located in more undisturbed sagebrush. Also, slightly more access road would likely need to be improved for the double-circuiting.

In addition to these considerations, BPA is unaware of any problems with the present location of this section of Highway 26. Any plans to move the highway to a new location would require a large planning process by the State of Idaho. BPA would have no jurisdiction in a decision to move a large section of Highway 26. The suggestion of the commenter, therefore, has been considered but eliminated from detailed study.

Comment 0003

E O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Proposed Palisades-Goshen Transmission Line Reconstruction Project

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

PEA0003

1. Please have your environmental studies look at:

None

2. I need more information about:

None

3. I have these other comments:

I submitted the attached comments previously. In verbal discussions with your designers, we agreed that pole set 49/4 would be moved 7 feet west of its present location and that pole set 49/3 would remain in its current location. As long as these two items are implemented as agreed upon, I have no further comments.

If possible, I would like to have the old poles for use on my farm.

Name Brent Palmer 5-4-08

Address

City Shelley State ID Zip 83274

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

Please mail your comments by May 9, 2008 to:
BPA Public Affairs DKE-7
PO Box 14428
Portland, OR 97293-4428

Response

Thank you for resubmitting your comments. Our design engineer has confirmed that the two structures referenced in your comment are located as you have requested. Your request for poles has been forwarded to our Transmission Line Maintenance Foreman, Mark Hadley, in Idaho Falls. His number is 208-612-3170. We suggest that when the construction crews begin work on your property, you contact the crews and the Transmission Line Maintenance Foreman directly with your request so that they can respond at that time.

Comment 0004

PEA-0004

BPA Public Affairs DKE-7
P. O. Box 14428
Portland, OR 97293-4428

May 8, 2008

RE: Palisades-Goshen Transmission Line Reconstruction Project.

0004-1 You are calling this a reconstruction project. I do not feel this is a reconstruction because you are not using the same pole holes. You are going wider, using more land and going higher. Additional property used is not part of the original contract and no contracts have been signed to give authorization of additional land. This land is either farmed or in CRP contracts so where is the compensation for the use of additional land?

0004-2 Why isn't an Environmental Impact Study being done to protect the mule deer and sage grouse since this is prime habitat for them.

0004-3 Under the Badger Creek 208 Water Quality Conservation Project to protect water quality for the Willow Creek area, what will be done to stop erosion by putting in these new poles?

0004-4 If you are uncertain if there is a need to upgrade the existing system until 2027, why are you doing so since it will cost millions of dollars and impact the environment.

0004-5 To access the power line mentioned, the current roads are not anywhere near the power line, plus I have not seen any signed contracts granting authorization for access to the existing roads pictured on maps and they are not public roads.

0004-6 A substation is already in place with a line coming into it for the 250 proposed windmills in this general area with a corresponding line into the Goshen substation. Why do we need to upgrade the Palisades line? Where is the additional power coming from that warrants an upgrade to this line? What about the other power line coming out of Palisades into the Goshen substation?

0004-7 The Schiess and Associates survey contradicts the center line of the power transmission line and is in question. What do you plan to do about this?

1

0004-8

Was there any compensation paid to landowners for damages from the "Dump Fire" caused by the failure of an insulator? Is there any protection, insurance or compensation for the future to guard against this type of thing?

0004-9

Without authorization, on September 6, 2007 Aspen trees, less than 10 feet tall, were clear cut. Why, we do not know, and they trespassed to do so. What will be done to protect us from things like this from happening in the future?

0004-10

Power companies and suppliers have increases, but no increase or compensation has been given to land owners over the past 60 years. Is this fair?

0004-11

Changing the existing 8 foot pole placement for wider pole placement is a taking additional land. Are you willing to pay for the taking of that land?

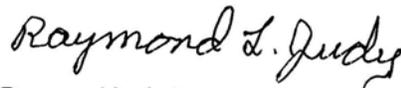
0004-12

It is my understanding that you are only reconstructing one of the two lines coming out of Palisades to the Goshen Substation and using the same conductor. Why do you have to go with higher and wider poles?

0004-13

I would like to see the original signed and dated contracts? Where can I view them?

Sincerely,



Raymond L. Judy

Idaho Falls, ID 83401
208 522-0193

Shannon Hildrith
Jamie Murray
Mark Korness

0004-14

I am still waiting for the information you were going to send me.

Responses (see numbered paragraphs above)

0004-1

Comment noted. BPA has used the term “reconstruction” to describe this proposed project because this project involves replacing an existing transmission line (structures and conductor) largely in its current alignment. It is acknowledged that other terms such as “replacement” or “rebuild” could be used, and indeed one of these or other terms could be viewed as being a more suitable term by some. However, BPA believes using the term “reconstruction” to describe the project is appropriate.

Regarding the need for additional easement rights, most of the rebuilt line can be built within existing ROW. Any new ROW needed for the rebuilt line would be acquired through the purchase of an easement from the underlying property owner. Compensation for an easement is negotiated between the landowner and BPA.

0004-2

National Environmental Policy Act (NEPA) regulations allow federal agencies such as BPA to prepare EAs to analyze the impacts of proposed federal actions on the manmade and natural environment. Under NEPA regulations, federal agencies can use an EA to determine whether a finding of no significant impact (FONSI) can be made for the Proposed Action, or whether the agency must prepare an Environmental Impact Statement (EIS) for the Proposed Action.

Section 3.3 of the EA discusses the presence of, and impacts to, wildlife in the project area. Both mule deer and sage grouse are discussed. Regarding mule deer, the existing transmission line has been in place since 1949 and the area is used extensively by the hunting and recreation community. Large mammals such as mule deer have had the opportunity to coexist with these activities and the presence of the transmission line for some time. In addition, reconstruction of the transmission line would disturb only a very small amount of available mule deer habitat in the area. Impacts to mule deer would be primarily temporary during construction and low overall.

Regarding sage grouse, while the proposed line reconstruction could impact individuals and habitat, the project would not significantly affect grouse populations, and would disturb only a very small amount of suitable grouse habitat in the area. In addition, Section 3.3.3, Mitigation, of the EA, identifies mitigation measures that would help avoid, minimize, or compensate for potential impacts to both the sage-grouse and sharp-tailed grouse. Impacts to sage grouse, like the mule deer, would be primarily temporary during construction and low overall.

The analyses of potential impacts to these species contained in the EA, as summarized above, indicate that the Proposed Action, with mitigation, would not result in significant impacts to these species. Accordingly, these impacts do not require preparation of an EIS.

0004-3

The two structures to be replaced on either side of Willow Creek are from 500-700 feet away from the banks of the creek, which would minimize the potential for sediment transport into the creek during construction. Construction will also take place during the summer dry season, which would help to prevent sediment movement off-site. Crews are instructed to use Best Management Practices that include devices to control sediment movement off-site into nearby waterbodies. In addition, in summer 2007, BPA replaced the ford across Willow Creek that was contributing to water quality degradation when used.

0004-4

As discussed in Section 1.2 of the EA, there is a current need to address the deteriorating condition of the existing Palisades-Goshen line. The majority of the line's wood structures and cross arms date to 1949 when the line was first built, and action needs to be taken now by BPA to ensure that stable and reliable transmission service can continue to be provided. Please see Sections 1.1, 1.2, and 2.3 of the EA for a complete description of the need for action and supporting information.

0004-5

Access roads used for transmission line construction and maintenance consist of both public and private roads. Closer to Palisades Dam and along Forest Service managed lands, most of the roads are very close to the existing ROW. After leaving Forest Service managed lands, up to about mile 45, the ROW is more remote and the limited number of access roads venture far from the existing ROW.

BPA would secure easements for existing and new access roads used for the construction and maintenance of this line. The process for securing access road easements is occurring and landowners will be contacted at a point in that process.

0004-6

Please see Sections 1.1 and 1.2 of the EA for a description of the background and need for this project. BPA is proposing to rebuild this line not to accommodate additional power from a new generating source in the general vicinity but rather, as discussed in the response to comment 0004-4, because of the deteriorating condition of the existing line. Section 1.1, Background, of the EA identifies the other transmission lines in the area that serve the local utility and the local load in eastern Idaho, northwestern Wyoming, and southwestern Montana; this area has and continues to experience tremendous load growth.

0004-7

BPA considers the existing transmission line ROW as being consistent with original surveys for the line. This ROW is correctly centered on the current physical location of the transmission line, unless there are records of the line being moved during construction (which there are none). It is similar to railroads, which have their easements centered on the center of the main track. BPA views transmission lines this way because the purpose of the ROW is to protect BPA and the public from the electrical hazards associated with building (or other similar activities) too close to transmission lines.

BPA does recognize, however, that there may be some discrepancies between modern surveys and the actual location of the transmission line. It is fairly common that original surveys for older transmission lines across sparsely populated regions like Palisades-Goshen No. 1 had no (or very few) cadastral corners to which the transmission line centerline could be tied. Often, fence intersections or road intersections (or any combination thereof), frequently many miles away, were used as the cadastral and/or property corners. Some of these corners have been lost (meaning there is no existing evidence as to their original location) or obliterated (meaning corners that have been destroyed, but can be re-established by accessories such as other reference monuments).

With the invention of the Global Positioning System (GPS) and modern total stations (which turn angles and “shoot” accurate distances), long distance traverses for modern surveys are more accurate. These traverses are usually performed from the nearest controlling corners to the North, East, West and South (unless the corner is on a Range or Township line) and sometimes these controlling corners can be 3-4 miles away or more. As a result, the cadastral corners used to establish a transmission line ROW often appear to have “moved” in the modern surveys. This can explain much of the discrepancy between modern surveys and the original surveyed location of a transmission line ROW.

0004-8

It was never determined how the “Dump Fire” got started or where it originated. An adjoining property owner who was on the site first thought it started in a small grove of trees. The Fire Marshall at that time could not determine the cause of the fire or where it started. There are occasions where BPA equipment fails and start fires. In those instances when the cause is determined to be BPA, BPA will compensate for any damages caused by the fire.

0004-9

Because of new, more stringent national standards for vegetation maintenance along transmission lines developed subsequent to the 2003 electrical blackout in the northeastern United States, BPA is taking a more pro-active approach to managing vegetation to ensure the long-term reliability and safety of BPA’s lines. The trees referenced by the commenter were removed not as part of the proposed rebuild project, but instead as part of this separate and

ongoing vegetation management approach. BPA has prepared a programmatic EIS for its vegetation management program and the vegetation management that was done on the ROW last summer was consistent with that EIS (BPA, 2000; see reference in Chapter 5, or at the following link:

http://www.efw.bpa.gov/environmental_services/Document_Library/Vegetation_Management/.

Existing ROW easements allow BPA to "...enter land, survey, construct, maintain, operate, control and use, and to remove objects interfering therewith..." transmission lines within those easements." A brochure describing the present BPA standard approach to vegetation maintenance along its ROWs has been sent to the commenter. The brochure can be viewed at the following link:

http://www.bpa.gov/corporate/pubs/Public_Service/Keeping_the_way_clear_brochure.pdf

0004-10

BPA provides fair compensation to landowners when it purchases property in fee or under easement. For this project, the existing line includes existing ROW for which property owners were compensated when the easement was first obtained. Easements generally are purchased in perpetuity. New ROW would require a new easement and compensation is negotiated between BPA and the underlying landowner. Access road ROW would be acquired in the same manner.

0004-11

See the responses to comments 0004-1, 0004-5, and 0004-10.

0004-12

Please see Sections 1.1, 1.2, 2.1, 2.1.9, and 2.3 of the EA for information concerning the need for the reconstruction of the transmission line as proposed, as well as consideration of other approaches to reconstructing the line that were considered but eliminated from further study in the EA.

0004-13

BPA previously sent a copy of the original documents for BPA's easement across the commenter's property to the commenter via regular mail. These documents were mailed to the commenter following the public scoping meetings for the EA held in May 2007. BPA will resend another copy of the original easement documents to the commenter via certified mail to confirm receipt.

0004-14

See the response to comment 0004-13.

Comment 0005

PEA 0005

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Proposed Palisades-Goshen Transmission Line Reconstruction Project ?

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

0005-1

1. Please have your environmental studies look at:

this farm is Project # 1 in the Badgercreek SAU/OP project, which is a clean water program, Willow creek is on the top 10 list of polluted streams. This proposal goes thru the middle of 436 acres in this project. The farm has a farm plan in effect for about twenty five (25) years, coming at a cost of \$37,013 in investment.

2. I need more information about:

3. I have these other comments:

0005-2

We are working with the Idaho Dept. of Fish & Game on a mule deer enhancement program - HIP/MD project also trying to keep our aspen groves for feed & cover for sage hen & sharp tail grouse. We also have moose & elk calving in this area. We are trying to encourage a larger mule deer population

Name

Richard Judy

Address

City

Id.

State

Zip

83406

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

Please mail your comments by May 9, 2008 to:
BPA Public Affairs DKE-7
PO Box 14428
Portland, OR 97293-4428

May 8 - 2008

Responses (see numbered paragraphs above)

0005-1

This comment suggests that there might be a number of BPA structures along this line that fall within the Badgercreek project. BPA is aware of a number of both intermittent and perennial streams within the project area. Some of these flow to Willow Creek. Sections 3.5.1 and 3.5.2 of the EA describe existing water quality in the project area and potential impacts to water quality from the Proposed Action. Impacts are expected to be temporary and low to moderate. During construction of the proposed project, crews would be instructed to use Best Management Practices that include using devices to control sediment movement off-site into nearby water bodies. Also, construction will take place during the summer dry season, which would help to prevent sediment movement off-site. Section 3.5.3, Mitigation Measures, of the EA describes these and other mitigation measures that would avoid or reduce potential impacts to water resources.

As discussed in response to comment 0004-3, the two structures to be replaced on either side of Willow Creek are from 500-700 feet away from the banks of the creek, which would minimize the potential for sediment transport into the creek during construction. In addition, in summer 2007, BPA replaced the ford across Willow Creek that was contributing to water quality degradation when used.

0005-2

Comment noted. BPA appreciates the commenter's efforts to aid in protecting certain wildlife species. Section 3.3 of the EA discusses the presence of, and impacts to, wildlife in the project area. Both large mammals (including mule deer) and sharp-tailed and sage grouse are discussed. As discussed in response to comment 0004-2, impacts to these species from the proposed action would be primarily temporary during construction and low overall.

