

**Walla Walla–Tucannon River Transmission Line
Rebuild Project**

Revision Sheet for the Environmental Assessment

Finding of No Significant Impact

Mitigation Action Plan

DOE/EA-1731

Bonneville Power Administration

May 2011

Revision Sheet

for the

Walla Walla–Tucannon River Transmission Line Rebuild Project Final Environmental Assessment

DOE/EA-1731

Summary

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

On April 8, 2011, 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 April 25, 2011. BPA received a total of six comment letters. The “Public Comments” section below presents the comments received and BPA’s responses to those comments.

Revisions to the EA

A number of minor changes were made to the Preliminary EA and are presented below by the chapter and section in which they appeared in the Preliminary EA. In addition to the revisions listed below, a number of mitigation measures have been added to the Proposed Action since the Preliminary EA was released. New mitigation measures and changes to existing mitigation are identified in the attached Mitigation Action Plan.

Chapter 2—Proposed Action and Alternatives

2.1 Proposed Action

2.1.4 Access Roads (Page 2-6)

In the summary of stream crossings, the Coppei Creek and Wolf Fork Creek bullets have been updated to clarify the size of rock used in the ford crossings. The new text reads as follows:

...a layer of cobble or rock measuring at least six inches in diameter

The following text has been added to the description of the Coppei Creek crossing:

In Coppei Creek where the entire ford would be hardened, a low-flow channel would be constructed to concentrate low water flows instead of water being spread across at a low depth.

Chapter 3—Affected Environment, Environmental Consequences, and Mitigation Measures

3.2 Land Use and Recreation

3.2.1 Affected Environment

City of Walla Walla (Page 3-5)

The following text has been added after the second paragraph in this section:

The City of Walla Walla and Port of Walla Walla are exploring the potential of developing a light industrial business park on the easternmost parcel of the City's landfill property adjacent to the Washington State Department of Corrections ground. The current alignment of the transmission line is adjacent to this parcel.

3.2.2 Environmental Consequences—Proposed Action

Plans and Policies (Page 3-7)

The following statement is found in the Preliminary EA:

The future acquisition of easements for the expanded ROW would not affect the underlying land ownership and is not anticipated to change the use of the land in such a way that it would result in noncompliance with county and local ordinances and codes.

The statement has been revised to read:

The future acquisition of easements for the expanded ROW would not affect the underlying land ownership and is not anticipated to change the existing use of the land in such a way that it would result in inconsistency with county and local ordinances and codes. However, future changes to land uses and zoning could be limited by the expanded ROW, if they were incompatible with the safe operation and maintenance of the transmission line.

Agriculture (Page 3-8)

The following text has been added following the last paragraph in this section:

Easements acquired by BPA to allow for widening of the transmission line ROW would occur predominantly in land that is currently in agricultural use. Although the legal rights to the land would be acquired by BPA, it is not anticipated that this would result in significant impacts on existing agricultural land use. Agricultural cultivation would be allowed to continue in these easements so long as they did not interfere with the safe construction, operations, or maintenance of the transmission line.

3.5 Fish and Wildlife

3.5.2 Environmental Consequences—Proposed Action

Wildlife and Their Habitat

Operations and Maintenance (Page 3-38)

The following text has been added after the fourth paragraph in the section:

The spacing of conductors on 115-kV transmission line is wide enough that electrocution of raptors and large birds is generally not a problem as it is with distribution lines.

3.12 Cultural Resources

3.12.3 Mitigation Measures

The following mitigation measure has been added to this section:

BPA will provide for a cultural resource expert to monitor all ground-disturbing activities in the vicinity of structures 7/3, 23/1 through 23/4, and 36/2.

Chapter 4—Environmental Consultation, Review, and Permit Requirements

4.2 State, Areawide, and Local Plan and Program Consistency

4.2.6 City of Walla Walla Comprehensive Plan

The following statement is found in the Preliminary EA:

The future acquisition of easements for the expanded ROW would not affect the underlying land ownership and is not anticipated to change the use of the land in such a way that it would result in noncompliance with county and local ordinances and codes.

The statement has been revised to read:

The future acquisition of easements for the expanded ROW would not affect the underlying land ownership and is not anticipated to change the existing use of the land in such a way that it would result in inconsistency with county and local ordinances and codes. However, future changes to land uses and zoning could be limited by the expanded ROW if they were incompatible with the safe operation and maintenance of the transmission line.

Public Comments

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

Table 1. Public/Agency Comments on the Preliminary Environmental Assessment

Comment	Commenter	Commenter's Organization
WTEA 0001	Jim Shepard	Shepard Farms Inc.
WTEA 0002	Johnson Meninick	Confederated Tribes and Bands of the Yakima Nation
WTEA 0003	Maxey	
WTEA 0004	Michael Ritter	Washington Department of Fish and Wildlife
WTEA 0005	Dean Abrams	City of Walla Walla
WTEA 0006	Thorn	

Comment WTEA 0001

	WTEA 0001 Shepherd/Shepherd Farms, Inc.
0001-1	To BPA: I represent the Shepherd Family who owns Shepherd Farms. We are Mile 18 on the BPA Walla Walla-Tucannon Transmission Line. We have five poles on our place. Four of the five poles are surrounded by wheat this year. If you go into these fields before harvest, you will destroy substantial amounts of wheat. Will you please wait until after August 1, 2011? By this time, all wheat will be harvested. Your contractor may then access these poles through wheat stubble. There will no crop damage. This will be the cheapest and easiest time for access. It will be the best time for farmers on this part of the line. I also understand that you want to move some of the poles from their existing positions.
0001-2	In our situation, it will make it more inconvenient to farm around the poles in the new, proposed positions. Furthermore, it will take more farm land out of production. Please replace these poles in their existing positions. Thank you. Sincerely, Jim Shepherd

Responses

0001-1

BPA does not know the exact timing of when our construction contractor will be working in line mile 18; however, BPA will attempt to accommodate the August 1st date. The contractor will contact you to help coordinate construction activities with your farming activities.

0001-2

Because of the physical contours of the land in line mile 18, it was necessary to relocate two structures and add three structures in that line mile. BPA minimized the impact by placing four of the five structure locations near the edge of the fields. These changes to the line will assure that our energized conductor will maintain the minimum ground clearance necessary so that farming activities can safely continue as they do today.

Comment WTEA 0002

WTEA 0002

Meninick/Confederated Tribes and Bands of the Yakima Nation



Confederated Tribes and Bands of the Yakama Nation
Established by the Treaty of June 9, 1855

Post Office Box 151
Toppenish Washington 98948

April 19, 2011

Bonneville Power Administration
PO Box 491
Vancouver, WA 98666-0491
ATTN: ERICH ORTH

**Subject: TEP-TPP-3
Walla Walla – Tucannon River Transmission Line Rebuild Project**

Mr. Orth,

Thank you for contacting the Cultural Resources Program (CRP) of the Confederated Tribes and Bands of the Yakama Nation (Yakama) in regard to the Walla Walla – Tucannon Transmission Line Rebuild Project. As expressed in the letter addressed Ms. Breeden, BPA Environmental Coordinator, on January 22, 2010 (attached), this project falls within the Usual and Accustomed Territory of the Yakama, which the Yakama have reserved rights to the land as defined in the Treaty of 1855 (12 STAT., 951).

We have reviewed the preliminary Environmental Assessment (EA) and the Yakama do not concur with the findings of no significant impact to cultural resources.

This was determined upon examination the Cultural Resource Survey completed by Plateau Archaeological Investigations, LLC cited in the preliminary EA. This is because of two reasons: the lack of Tribal involvement in determining traditional cultural properties (TCPs) and the absence of subsurface testing within areas of possible ground disturbance.

0002-1 TCPs should be identified by knowledgeable *people* not by merely conducting ethnographic research. This is further predicated through the President's Executive Order 13007, which outlines the methods in determining a sacred site. This will ensure that areas cultural importance are protected pursuant to the American Indian Religious Freedom Act (PL 95-351, 42 USC 1996 and 1996a).

0002-2 Subsurface testing should also be completed in areas where ground disturbance is going to occur. Plateau Archaeological cites 48 FR 44716, which states that a reconnaissance survey is conducted in order to determine the "presence or absence of expected property types." This includes material below the surface, which is especially important when the

area of potential effect is within an area used for agriculture that disturbs the first 45 centimeters of the soil (often referred to as the "plow zone"). It should be noted that several discoveries important to the archaeological record have been uncovered regardless of the lack of cultural material on the surface (e.g. the Richey-Roberts Clovis Site). Furthermore, inadequate testing has led to controversy in Washington State, which occurred at the village site *Tse-whit-zen* when over 300 intact skeletons were uncovered, costing the State of Washington approximately \$80,000,000 as a result of mitigation, project delay (and eventual shutdown), and out-of-court settlement.

0002-3

Therefore, the Yakama CRP urge that the Bonneville Power Administration work closely with the Yakama in order to adequately document TCPs and that subsurface testing occurs within areas of ground disturbance, which includes, but not limited to, road improvements, pole replacement, and staging areas.

If you have any questions in regard to what is stated in this letter, feel free to contact myself at 509-865-5121, extension 4737, email johnson@yakama.com or Gideon Cauffman, CRP Archaeologist, at extension 4609, email cauffmang@gmail.com.

Respectfully,



Johnson Meninick
Manager
Cultural Resources Program
Confederated Tribes and Bands of the Yakama Nation

Responses

0002-1

Following the receipt of this letter, BPA engaged in communication with Gideon Cauffman, Archeologist for the Confederated Tribes and Bands of the Yakima Nation, to identify areas of concern and determine adequate measures to avoid or mitigate impacts. As part of that communication, Traditional Cultural Properties were discussed and no specific concerns were identified.

0002-2

Following the receipt of this letter, BPA communicated with Gideon Cauffman, Archeologist for the Confederated Tribes and Bands of the Yakima Nation, to identify areas of concern and determine adequate measures to avoid or mitigate impacts. As part of that communication, specific areas were identified where cultural resources could be affected. BPA has agreed to add the following mitigation measure to Section 3.12.3 of the EA.

BPA will provide for a cultural resource expert to monitor all ground-disturbing activities in the vicinity of structures 7/3, 23/1 through 23/4, and 36/2.

0002-3

BPA is consulting with the Confederated Tribes and Bands of the Yakima Nation pursuant to Section 106 of the National Historic Preservation Act, and will continue to work with them throughout the construction of the Proposed Action. This includes providing notification and seeking input should artifacts or remains be discovered.

Comment WTEA 0003

WTEA 0003
Maxey

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 Walla Walla – Tucannon River Transmission Line Rebuild
Project Comment Form**

Does the preliminary EA analyze the resources important to you?

Mostly

Are there other ways to lessen potential resource impacts?

Not Realistic ones

Other comments?

The last time some Poles were replaced (7-8 years ago) equipment associated were staged on my property causing damage. The crew supervisor told me before they left they would repair the damage. This never occurred! I had to fix the excessive repairs myself. I hope this type of situation will be addressed in the upcoming line rebuild

Name: *David Maxey*
Address: *2020 Tucannon River Road*
City: *Power* State: *WA* Zip: *99137*

Please mail your comments by **April 25, 2011** to:

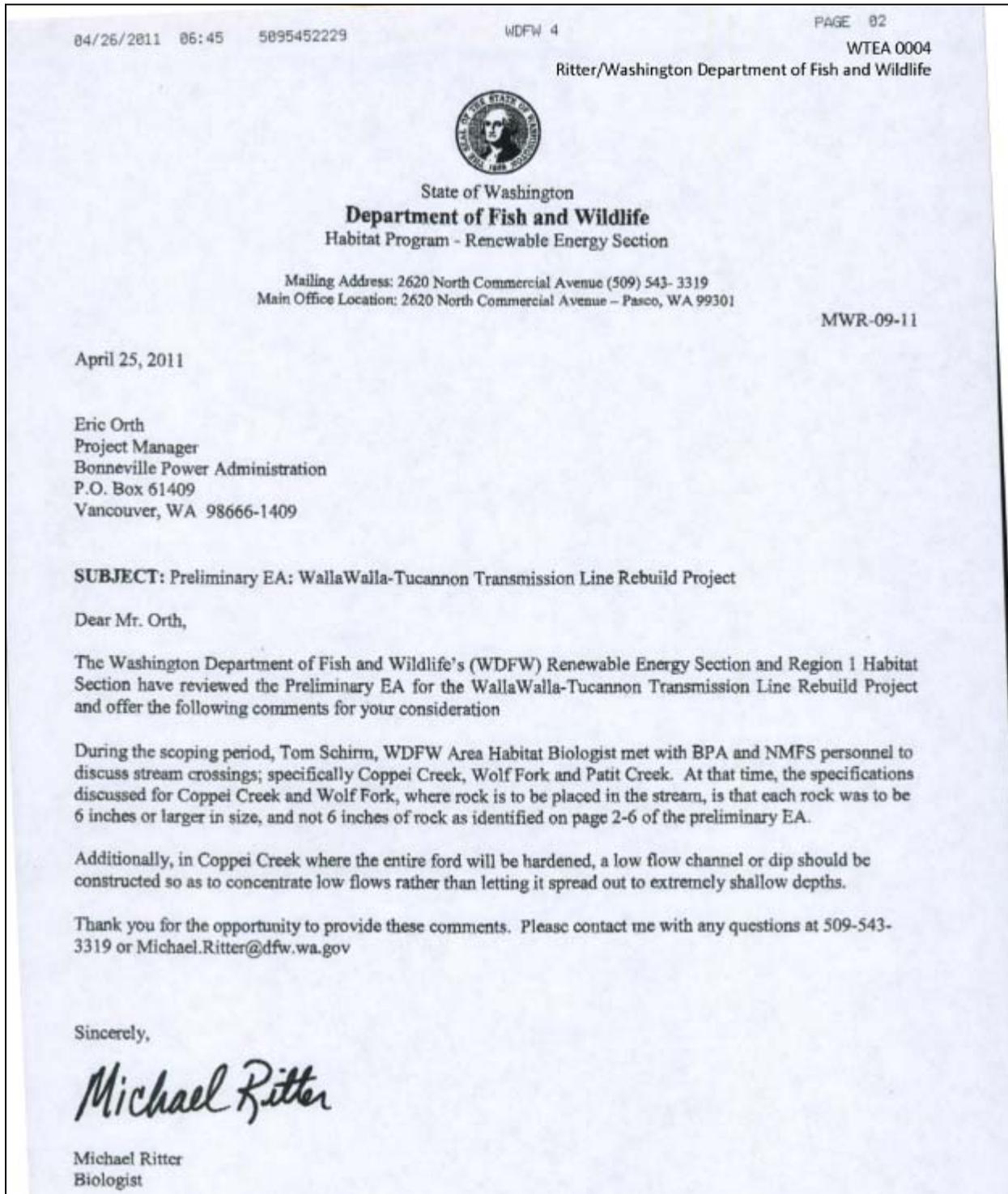
BPA Public Affairs - DKE-7
PO Box 14428
Portland, OR 97293-4428.

You may also fax your comments to 503-230-3285, call: 800-622-4519,
or submit comments online at www.bpa.gov/comment

Response

BPA will require the construction contractor to return all land to existing conditions or to better condition than before construction was initiated.

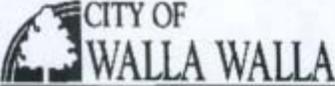
Comment WTEA 0004



Response

Section 2.1.4 of the EA has been revised to clarify the size of the rock used in the ford crossings and to specify that a low-flow channel would be constructed.

Comment WTEA 0005

04/25/2011 17:12 5271951	WTEA 0005 Abrams/City of Walla Walla	PAGE 01/02														
		PUBLIC WORKS SERVICE CENTER P.O. Box 478 Walla Walla, WA 99362-0216														
		<table border="0"><tr><td>Administration</td><td>(509) 527-4463</td></tr><tr><td>Engineering</td><td>(509) 527-4537</td></tr><tr><td>Equipment Pool</td><td>(509) 527-4506</td></tr><tr><td>Landfill</td><td>(509) 527-4591</td></tr><tr><td>Sanitation</td><td>(509) 527-4479</td></tr><tr><td>Streets</td><td>(509) 527-4363</td></tr><tr><td>Water</td><td>(509) 527-4380</td></tr></table>	Administration	(509) 527-4463	Engineering	(509) 527-4537	Equipment Pool	(509) 527-4506	Landfill	(509) 527-4591	Sanitation	(509) 527-4479	Streets	(509) 527-4363	Water	(509) 527-4380
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<p>April 25, 2011</p>																
<p>Bonneville Power Administration Public Affairs – DKE -7 VIA Facsimile</p>																
<p>Subject: Walla Walla-Tucannon River Transmission Line Rebuild Project Environmental Assessment Comments</p>																
<p>Gentlemen:</p>																
<p>This correspondence is in response to the Notice of Availability and draft Environmental Assessment published by the Bonneville Power Administration for the Walla Walla-Tucannon River Transmission Line Rebuild Project</p>																
<p>While the City is supportive of rebuilding the subject transmission line, we do need to bring forward some discussion items.</p>																
<p>1. Right of Way Acquisition (2.1.1, pg 2-2)</p>																
0005-1	<p>The resource important to the City of Walla Walla with regards to this project is the references to the acquisition of additional rights of way along the existing alignment and how that will affect the market value and full potential use of City owned land. The parcel most affected is the approximately 77.3 acre orphaned parcel created by segregation with the State Highway 12 realignment project. That parcel is currently zoned as Public Access and is currently farmed. However, the City has initiated a process to re-zone the parcel to R 72 Residential. The City has considered developing the parcel to its highest and best use or selling it with the potential to develop as a residential subdivision. An additional 40 feet of right of way would greatly reduce the usable portion of that parcel, and future value.</p>															
<p>The City would prefer that the alignment be moved north of State Highway 12 in the Sudbury Landfill parcel along its southern border. This would relieve the existing parcel south of State Highway 12 of encumbrances and provide the opportunity for its fullest potential development.</p>																
<p>2. Land Use and Recreation (3.2.1, pg 3-3)</p>																
<p>Fix Numbers • Service Center (509) 525-0845 • Equipment Pool (509) 527-3769 • Landfill (509) 522-4570 www.ci.walla.walla.wa.us</p>																

0005-2

We feel that it is important to note that together with the Port of Walla Walla, the City is exploring the potential of developing a light industrial business park on the easternmost parcel of the City's landfill property adjacent to the Washington State Department of Corrections ground. The BPA's current alignment is adjacent to that parcel.

We ask that the Environmental Assessment consider the impacts to this potential development.

3. State, Areawide, and Local Plan and Program Consistency (4.2.6, pg 4-4)

0005-3

The City does not agree with the statement that "The future acquisition of easements for the expanded ROW would not affect the underlying land ownership and is not anticipated to change the use of the land in such a way that it would result in noncompliance with the municipal code". Whether the City-owned parcels are utilized as landfill, light industrial, residential or farmland, the acquisition of additional right of way will impact the potential uses.

We ask that the full impact to the parcels be considered.

I hope this information is helpful and we look forward to continued involvement with this project.

Sincerely,



Dean Abrams
Civil Engineer

Copy: Ki Bealey, Public Works Director
Neal Chavre, Interim City Engineer

Responses

0005-1

The scope, schedule, and cost of the project are based on rebuilding the transmission line in its existing location. Any new alignments would require additional time in the schedule and the acquisition of new easements and would increase the cost of the project. BPA is open to consideration of moving certain sections of the transmission line; however, this would be at the expense of the City of Walla Walla.

0005-2

The EA has been revised to include a discussion of the possible impacts on future land use changes and developments that could occur as a result of the acquisition of easements to widen the transmission line ROW. The exploration of the potential development of a light industrial park has been disclosed in the EA.

0005-3

BPA respectfully disagrees with the commenter. Widening the ROW would not result in a de facto impact on the categories of land use identified by the commenter. As described in Section

2.1.1 of the EA, the underlying land owner would continue to have ownership of the property and could continue to use the property. As an example, agricultural uses that currently occur outside of the ROW would be permitted to continue after the easement is acquired, because agricultural uses typically do not interfere with the safe construction, operation, or maintenance of the transmission line. Only in the instances where it would interfere with the safe construction, operation, or maintenance of the transmission line would BPA restrict the use of the land in expanded ROW. The discussions of consistency with local plans and policies in Sections 3.22 and 4.2.6 of the EA have been revised to include this information.

Comment 0006

WTEA 0006
Thorn

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 Walla Walla – Tucannon River Transmission Line Rebuild
Project Comment Form**

Does the preliminary EA analyze the resources important to you?

Are there other ways to lessen potential resource impacts?

0006-1

*The request that the project start at the west end and proceed eastward toward the Tucannon. The higher elevation east end is much wetter and must be given time to dry out or landowners will not allow access.
~~Also we +~~*

Other comments?

0006-2

We need to know whether the line route will be changed, and if so, where. Will the poles be replaced in the same places?

Name: *John L. Thorn*
Address: *1000 1st St*
City: *Walla Walla* State: *OR* Zip: *97146*

Please mail your comments by **April 25, 2011** to:
BPA Public Affairs - DKE-7
PO Box 14428
Portland, OR 97293-4428.
You may also fax your comments to 503-230-3285, call: 800-622-4519,
or submit comments online at www.bpa.gov/comment

Responses:0006-1

BPA evaluated both options: 1) starting east and working west; and 2) starting west and working east. BPA believes that the preferred option is to begin at the east end and work towards the west because of the dense population of farmers on the west end of the line and the large potential for crop damage to these farmers in the early summer months prior to harvest, which could include financial implications to BPA. BPA recognizes that the weather will remain wet on the east end of the line through June; BPA will work with landowners to minimize the impact as much as possible. Because of the importance of the reliability of this transmission line, construction needs to be completed in one construction season (May–November), so that the line can be re-energized prior to the winter months.

0006-2

The transmission line route will not change. Most poles will be replaced in the same locations as they are today—as described in Section 2.1.5 of the EA—with some additional structures and location changes.