

Keeler to Tillamook Transmission Line Rebuild Project Final Environmental Assessment

Bonneville Power Administration
DOE/EA-1931
January 2014

Summary

Bonneville Power Administration (BPA) is proposing to rebuild about 58 miles of the existing 115-kV Keeler to Tillamook transmission line in Tillamook and Washington counties, Oregon. BPA released the Draft Environmental Assessment (EA) for the Keeler to Tillamook Transmission Line Rebuild Project on November 1, 2013 for public comment. The EA describes the project, its potential environmental impacts, and mitigation measures to reduce these impacts. BPA sent the Draft EA to agencies and interested parties. In addition, BPA notified all others on the project mailing list and known potentially affected parties about the availability of the Draft EA, as well as how to request a copy.

This document provides the changes made to text of the Draft EA as well as the comments received on the preliminary EA and BPA's responses to those comments. The Draft EA, with the addition of these changes and response to comments, constitutes the Final EA, which will not be reprinted. The preliminary EA is available on the project webpage at <http://www.bpa.gov/goto/keelertillamookrebuild> or by calling 1-800-622-4519.

Revisions to the EA

Revisions and clarifications to the Draft EA based on refined design plans are summarized below. The information and analysis presented in the Draft EA were based on the project design as of October 2013. Project details were presented and described in Chapter 2 (*Proposed Action and Alternatives*), and the impact analysis in Chapter 3 was based on those project details. As BPA continues to prepare for the Rebuild Project, certain aspects of the project design have been refined. In particular, details regarding the access road information (including the number of bridge crossings and culverts) have been updated. A portion of the revised Table 2-2 summarizes the information based on BPA's latest project design. Some of the specific numbers differ slightly from the numbers presented in the Draft EA, and Table 1 provides a comparison between the information presented in the Draft EA and the current project details. However, BPA has reviewed the resource-specific analyses in Chapter 3 and determined that the impact conclusions, as documented in the Draft EA, have not changed. Because the impact conclusions have not changed, specific sentences in the Draft EA that refer to the access road distances and other details have not been revised; rather, the inclusion of Table 1 in this Revision Sheet serves to incorporate the revisions by reference (i.e., the latest numbers are reflected in the table, not necessarily the text in the Draft EA).

Table 2-2. Revised Project data on access roads.

Proposed Activity	Quantity as Presented in Draft EA	Revised Quantity based on Refined Design
Access Road Work		
New construction	1.13 miles	1.06 miles
Improvements or reconstruction	18.94 miles	19.58 miles
Acquisition of access roads or travel route easements	46.47 miles	45.33 miles
Release of access roads easements	0.26 mile	0.26 mile
Temporary travel routes (Route of Travel)	89.08 miles	91.16 miles
Culvert installation	20	21
Bridge installation or replacement	3	3

BPA is providing an updated Figure 3.7-1d, adding Slide Creek, between Smith Creek and Fern Creek, east of the marker for Line Mile 40. This is in response to a comment received during the Draft EA comment period. BPA has also addressed the potential project-related effects on Slide Creek in its response to comment below. (Note: there is also a second Slide Creek shown on this figure, west of Beaver Creek. This is a separate waterway.)

Other minor changes were made to the Draft EA, and are presented below by the chapter and section in which they appeared in the Draft EA. Where text has been modified, deleted text is indicated in “~~strikethrough~~” format and new text is underlined.

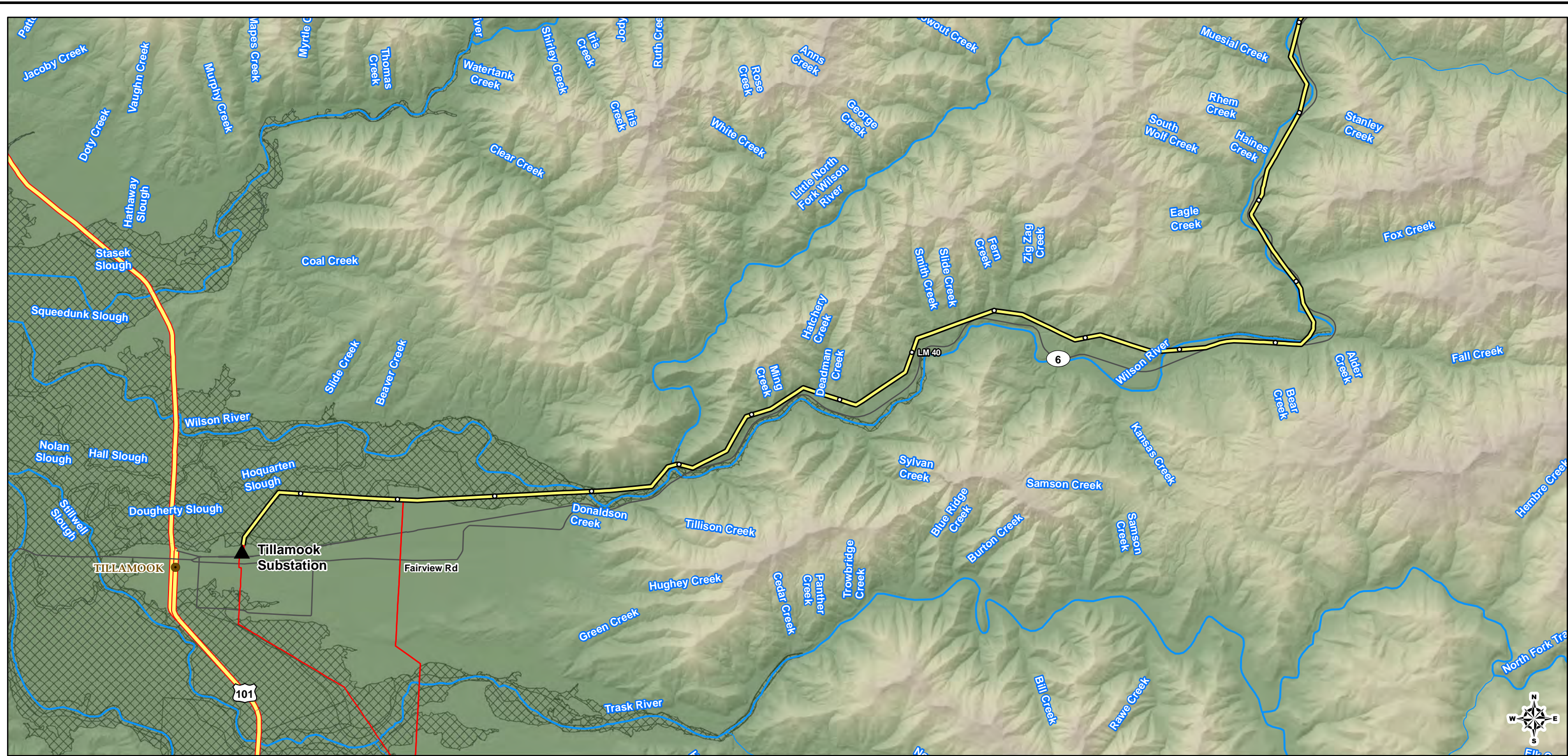
Chapter 3 Affected Environment and Environmental Consequences

3.9 Visual Resources

3.9.3 Mitigation – Proposed Action (page 3-121 of the Draft EA)

One mitigation measure in this section has been revised as follows:

- Leave plants less than 4 10 feet in height undisturbed within the 100-foot-wide ROW (where they would not interfere with the safe operation of the transmission line) to reduce the effect of the cleared ROW on visual resources.



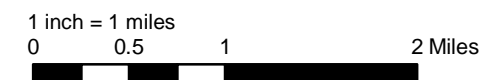
Legend

- ▲ BPA Substation
 - Line Mile (LM)
 - Keeler - Tillamook No. 1 Transmission Lines
 - BPA Transmission Line
 - Cities or Towns
- Water Resources**
- Waterway
 - ▨ 100 Year Floodplain

**Keeler to Tillamook 115-kV
Transmission Line Rebuild Project**

**Figure 3.7-1d
Waterways, Water Quality,
and Floodplains**

This product was made for informational and display purposes only and was created with best available data at time of production. It does not represent any legal information or boundaries. Sources: BPA Regional Geodatabase 2013; ODEQ 2010, USGS National Hydrography Dataset 2010, OregonExplorer 2013. Print Date: November 27, 2013



Public Comments and BPA's Responses

This section presents comments received on the Draft EA and BPA's responses to those comments. Comments were received via letter, comment form, and on the Project website (www.bpa.gov/go/keelertillamookrebuild). The official public comment period was from November 1 to 18, 2013. To facilitate public review and share project information, BPA hosted a meeting with the residents of the Narrows neighborhood on September 14.

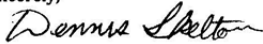
BPA received a total of 16 comments, which were numbered in the order they were received, from 13 commenters. All comments received were from individuals with an interest in the project (in general, residents in the vicinity of the transmission line corridor). No comments were received from regulatory agencies. Commentors submitted comments after the Narrows neighborhood meeting, during the official comment period, and after the close of the comment period. All comments were considered.

Table 1-1 lists the comments received, and is followed by copies of each comment and BPA's response.

Table 1-1. Public Comments on the Draft EA

Comment Number	Comment Author	Comment Format
KLTM13 0001	Skelton	Letter
KLTM13 0002	Skelton	Letter
KLTM13 0003	Lund	Project website response form
KLTM13 0004	Lund	Project website response form
KLTM13 0005	Rilette	Project website response form
KLTM13 0006	Rilette	Letter
KLTM13 0007	Hoskinson	Comment form
KLTM13 0008	Gobel	Letter
KLTM13 0009	Besel	Letter
KLTM13 0010	Duyck	Comment form
KLTM13 0011	Walsh	Comment form
KLTM13 0012	Romike	Comment form
KLTM13 0013	Boom	Project website response form
KLTM13 0014	Vanasche	Comment form
KLTM13 0015	(unable to decipher)	Comment form (<i>received after close of comment period</i>)
KLTM13 0016	Priestley/Harrod	Comment form (<i>received after close of comment period</i>)

Comment KLTM13 0001

<p>Date: Sept 14, 2013</p> <p>Re: My wish list for Tract # FG-T-36-MT-05</p> <p>Dear Brian,</p> <p>Please, do not remove my trees #'s 44-56. I had a previous agreement with BPA representative Bill Reynold's that my trees would only be topped and pruned. There are very important reasons for keeping these trees.</p> <ul style="list-style-type: none">A. Protecting the bank from erosion and to provide stabilization of the highway bank.B. Riparian Zone – to preserve tree shade for protective habitat for fish runs.C. Summer sun heat and road noise protection.D. Loss of privacyE. Loss of property values due to all of the above reasons <p>Also important; Already topped trees can now only be pruned. My trees lean northward toward the Wilson River and not southward toward the power lines.</p> <p>I would like to thank you Brian and Harley too for repeatedly traveling down here, walking the lane with us and listening to our concerns.</p> <p>I have enclosed a copy of my letter to the BPA dealing with the environmental impacts.</p> <p>And finally could you please send me a copy of the map with final planned pole placement. And also if possible, I would like a hard copy of the 330 page EA Draft.</p> <p>Sincerely,  Dennis Skelton</p>

Comment KLTM13 0002

<p>Date: 11/14/2013</p> <p>Reply to: TEP-TPP-1</p> <p>To: Whom this may concern,</p> <p>I am a 'NARROWS COMMUNITY-TRANSMISSION LINE REBUILD' committee chair person.</p> <p>The following is a Narrow's Community "WISH LIST".</p> <p>#1. Trees marked for removal in the 1st Edition to The Narrow's (eastern end of Narrow's lane-Meyer, Skelton, Marten, Hogan, Peterson, Laurin, McCann, Nichols), all D.T. (danger trees) must remain - permission to BPA is for tree topping and pruning only (as our previous agreement with BPA representative Bill Reynolds). Trees that have been previously topped can now only be pruned.</p> <p>Collective reasons for non-removal of D.T. (danger trees)</p> <ul style="list-style-type: none">A. Protection of bank from erosion, and stabilization of highway bankB. Riparian Zone must be preserved (tree shade, to provide protective habitat for migrating fish runs). At the eastern end of the Narrow's Lane, properties are very slim between the Highway and river.C. Summer sun heat and road noiseD. Loss of privacyE. Loss of property values due to all the above reasons <p>I've walked the lane quite a few times with Harley Canaday and Brian Brady and they recognize these concerns.</p> <p>Collectively, we would like to see brush, trees, plantings cut back only 50' around new poles instead of completely mowing everything down between poles. This is a major concern for property owners, Feickert, Weithman, Rilette.</p> <p>Addressing removal of all Holly trees under power lines – we would like Laurel as a replacement (a type that grows to 6' within three years, spaced closely together to create a hedge). The Narrow's community will be responsible for future pruning. We request that all Rhododendrons and Azaleas (east and west of mail boxes to western end of Mary Young property) be dug up – put into plastic potting tubs (which we will acquire, but BPA must reimburse for this purchase) to be moved to</p>	<p>the north side of our lane, and BPA to replant them where they originally were. The Narrows can organize a work party to help BPA with removal and their replanting.</p> <p>Property owners B. Rooney, T. Wagner, M. Meyer (their property is west of our entrance gate) are very concerned about any tree removal on the north side of our lane (proposed removal is for P.U.D. temporary pole placement). These trees provide highly important stabilization on the top of the high bank above their homes.</p> <p>All of the above concerns were brought up in our Sept 14, 2013 meeting with BPA.</p> <p>Finally, I would personally like to thank Harley and Brian for taking their time to meet with us explaining BPA's "wish list" and listening to our concerns.</p> <p>Sincerely, Dennis Skelton</p>
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BPA's Response:

BPA has reviewed Comment KLTM13 0001 in concert with Comment KLTM13 0002, which was submitted by the same individual and addresses the same issues. BPA has prepared this single response to address both comments.

BPA has and actively continues to coordinate with the residents of the Narrows neighborhood regarding the project and associated danger tree removal in the neighborhood. BPA met with residents of the Narrows neighborhood on September 14th to discuss their specific concerns. For safety and reliability of the transmission line, BPA removes trees directly under the transmission line. Trees outside the immediate area of the transmission line might not be removed if they are not an imminent risk to the safety and reliability of the transmission line, though BPA may have to top, side-limb, or otherwise prune the trees for safety and reliability. Shrubs and other plants that would not present a danger to the transmission line may be allowed in the ROW if they are less than 10 feet potential mature height and if they would not interfere with the safe operation of the transmission line. BPA is working with the landowners in the Narrows to come up with an agreeable solution (e.g. fencing, acceptable plantings) that respects the desires and wishes of the residents to maintain privacy, summer sun shade and road noise protection, and also maintains the safety and reliability of BPA's transmission lines. Specific to the trees referenced by Mr. Skelton in comment letter KLTM13 0001, BPA has determined that the trees will be topped and side-limbed, but not removed.

The EA assessed the project's expected impacts on erosion from danger tree removal (see Section 3.3, *Geology and Soils*, specifically Section 3.3.2, *Environmental Consequences – Proposed Action, Danger Tree Removal*). When danger trees and vegetation are removed from a ROW, they are typically cut above-ground, leaving the roots in place. This will help stabilize soils and reduce erosion potential.

The EA assessed the project's expected impacts on riparian shading and fish habitat (see Section 3.4, *Fish*). The EA acknowledges that removing danger trees would decrease cover and shading along portions of some waterways; however, considering the overall danger tree removal plan, including the number of trees, location of trees, and proximity to waterways, the EA concluded that the project would have low impacts on stream temperature. BPA and its contractors will implement a number of mitigation measures designed to reduce or eliminate project impacts on fish and fish habitat (see *Fish*, Section 3.4.3, *Mitigation – Proposed Action*).

BPA cannot make decisions regarding the tree removal by Tillamook PUD for their temporary pole placement and suggests the landowners contact the PUD to discuss potential solutions.

Comment KLTM13 0003

KLTM13 0003 - Lund

No identification of private and overlooking many public drinking water systems. This is an amendment to a prior comment that I made which was never posted on the web site as promised. After talking with BPA EA staff on the phone, they still never acknowledged or posted my prior comment. I find NO private water sources, wells, springs, or creek identified. Both private and public drinking water source impacts or mitigation are not listed within the EA. While some sources are identified, no mitigation is listed, contact information obtained, nor any plan to notify private or public water users. Without any effort I personally know of water sources located within feet of either roadways they intend to use or within the actual right of way in which they intend to work. How can potable water meant for human consumption not be a priority concern? While the BPA acknowledges that "The accidental release of fuels, oils, or chemicals during construction, including uncured concrete (if any)used for bridge abutments, could result in hazardous materials entering surface water, floodplains, or groundwater." (pg 3-87) and that "BPA uses herbicides (a kind of pesticide) during vegetation management. Herbicides are used on the transmission line ROW, along access roads, and in substation yards to control vegetation, including noxious weeds." (Section 4.10.2 Public Health) There has apparently been no effort to identify private or public water systems that will or could be affected. I know of no effort by the BPA to ask landowners in or adjacent to the ROW for information as to water sources nor do I see any documentation of drinking water sources locations in relation to any and all BPA activities. Apparently there are generally no plans or measures within the BPA to protect, mitigate or maintain awareness of personnel, and especially sub contractors, of location and consequences of portable water pollution or disturbances during routine or during this rebuild process.

Comment KLTM13 0004

KLTM13 0004 - Lund

No identification of private or public drinking water sources, impacts or mitigation within the EA. While the BPA acknowledges that "The accidental release of fuels, oils, or chemicals during construction, including uncured concrete (if any)used for bridge abutments, could result in hazardous materials entering surface water, floodplains, or groundwater." (pg 3-87) and that "BPA uses herbicides (a kind of pesticide) during vegetation management. Herbicides are used on the transmission line ROW, along access roads, and in substation yards to control vegetation, including noxious weeds." (Section 4.10.2 Public Health) There has apparently been no effort to identify private or public water systems that will or could be affected. I find no documentation of potable water sources in the EA. I know of no effort by the BPA to ask landowners in or adjacent to the ROW for information as to water sources nor do I see any documentation of drinking water sources in relation to any and all BPA activities. Further, there appears to be no notification system or means to report or stop people from consuming such water should it be contaminated. Apparently there are generally no plans or measures within the BPA to protect, mitigate or maintain awareness of personnel, and especially sub contractors, of location and consequences of portable water pollution or disturbances during routine or during this rebuild process.

BPA's Response:

BPA has reviewed Comment KLTM13 0003 in concert with Comment KLTM13 0004, which was submitted by the same individual and addresses the same issues. BPA has prepared this single response to address both comments.

Groundwater and drinking water resources are described in Section 3.7.1 of the EA (*Affected Environment, Waterways, Water Quality, and Floodplains*) and shown on Figure 3.7-2, *Groundwater Drinking Water Source Areas*. This information was collected from publically available databases as noted in the EA. *Waterways, Water Quality, and Floodplains* Section 3.7.2, *Environmental Consequences – Proposed Action* describes the expected potential impacts on water quality, including surface waters and groundwater. There is a potential that an accidental release of fuels, oils, or chemicals used during construction of the Proposed Project could occur; however, as described in the EA, a number of mitigation measures will be implemented to protect water quality (see *Waterways, Water Quality, and Floodplains*, Section 3.7.3, *Mitigation – Proposed Action*). Specifically, BPA and its contractors will implement a Spill Prevention and Response Procedures Plan and a Stormwater Pollution Prevention Plan, use sediment barriers to control erosion and runoff, refuel and service vehicles in designated areas away from waterways, and other specific measures to protect water quality.

BPA has analyzed the need for herbicides during the construction phase of the project and determined that herbicides are only necessary for weed control at one location, near structure 4/1 of the Keeler-Forest Grove No. 1 transmission line where no drinking water sources are present. Any vegetation clearing necessary for construction access would be mechanical or manual.

BPA must manage vegetation along all transmission line corridors and transmission-related facilities in order to protect the safe and reliable operation of the transmission system. BPA's vegetation management program, including the use of herbicides, is guided by the BPA's Transmission System Vegetation Management Program Final Environmental Impact Statement (EIS) and Records of Decision (ROD) (DOE/EIS-0285; BPA 2000). The use of herbicides is carefully controlled. BPA and its contractors will implement a number of best management practices (BMPs) for the use of herbicides to protect water quality and public safety.

Also, In Chapter III of the vegetation management program EIS BPA identified several steps it would take before applying herbicides near water resources: Site Specific Planning Steps, Part 3: Identify Natural Resources, (pg 65): BPA identifies well locations and other water resources prior to vegetation management on a site-specific plan and implements a buffer around known wells of 50 m (164 ft) radius for any herbicide having a ground/surface water advisory (as stated on the label), or 15 m (50 ft) radius for any other herbicide. Thus, the application of herbicides near water is strictly controlled according to the vegetation management EIS; federal, state, and local laws; and current herbicide-application data to prevent impacts on surface water, wells, groundwater, or other water resources.

The full vegetation management EIS and RODs are available here:

http://efw.bpa.gov/environmental_services/Document_Library/Vegetation_Management/FEIS0285.pdf
http://efw.bpa.gov/environmental_services/Document_Library/Vegetation_Management/VegROD.pdf
http://efw.bpa.gov/environmental_services/Document_Library/Vegetation_Management/VegROD_SA.pdf

Additional information regarding BPA's vegetation management program is available here:

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

BPA has concluded that this project, and similar types of transmission line rebuild projects, have limited potential for adverse effects on drinking water sources whether surface water or groundwater; and those potential effects can be minimized by implementing the mitigation measures described in the EA and committed to in the FONSI, and vegetation management program EIS.

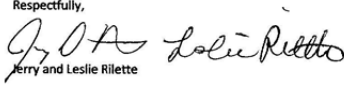
BPA requires construction personnel to have spill response and clean-up materials on-site at all times, and to train employees to immediately respond to and contain accidental releases or spills. The project contractor is also required to prepare and follow spill prevention and response procedures that include specific regulatory reporting requirements and procedures that meet or exceed all applicable federal, state, and local regulations. BPA and its contractors will be in contact with landowners during project activities, and any potentially affected landowners would be notified in the event of a spill that may have an impact on public health and safety, such as wells or drinking water sources. Based on BPA projects of similar scope and the types of typical construction equipment required for the proposed project, potential accidental releases or spills are expected to be rare and of relatively small volume (less than a few gallons). Regardless of the volume of the spill or release, BPA contractors are required to respond immediately to contain the spill, notify parties based on the type of spill and reporting thresholds, clean up and remove any contaminated material, and dispose of the material at an approved landfill.

Comment KLTM13 0005

KLTM13 0005 - Rilette

Draft EA does not address economic loss of property value due to loss of sound/visual/security barrier, as it effects "Narrows" home owners Will increase amperage levels increase corona? Specifically, what are BMP for the K O P 3 area? Will this be a "scrape" between poles? As one BPA representative indicated Often the term "moderate" is used. Need better definition of that term. Absolutely no clear plan of action has been presented to homeowners affected. Why? Once we were told all of our trees would be left as is, then other times maybe not. What is the plan specific to the Narrows and my property? Mr. Bill Reynolds (BPA) had Narrow's danger trees trimmed 3-4 yrs ago. This was a "strong" pruning and topping. Why will you now remove them? We have 19 families that travel on our privately maintained road. Will this road be in better shape/same shape/worse shape after this project is completed? We have numerous families that live here year round. Will this road be useable during construction? Why can't this transmission line rebuild project utilize Hwy 6 instead of our private road? Will you supply replacement trees for those that BPA removes? If so, how many, what type? Removing the trees around our security gate will open the access. What plans do you have to restore our security. Currently, my low elevation trees and shrubs are not in the danger zone and you have a hard time seeing Hwy 6 (and travelers on Hwy 6 have a hard time seeing down into our property). Will this be the same when you are done with this project? My families security is paramount. We have a gate and lots of trees for a reason. This EA does not give specific information as it relates to homeowners. When will this information become available?

Comment KLTM13 0006

<p>Reference: "The Narrows" TEP-TEP-1</p> <p>Mr. Brady,</p> <p>Thank you for coming to the Home Owners Association Meetings this summer. I did not, and have still not, received any answers to questions that were brought up. I am very concerned for items that were brought up and basically "shined on" about this project. I had been in contact with the Lead Engineer for TPUD prior to the summer meeting, and his comments at that time, and at the meeting, could be summarized as "we don't have a contract....so we don't know the plan".</p> <p>This project will impact my family in the following ways:</p> <ul style="list-style-type: none"> Decrease Safety Loss of sound buffer Loss of sight buffer Decreased property value. <p>Decrease Safety: The Narrows is hidden away due to the Holly trees and low vegetation from Hwy 6. According to one of our conversations much of the low vegetation and Holly trees will be, in effect, scraped away. We installed a security gate at the entrance and that will be basically useless if this scraping occurs due to the loss of privacy and the protection the trees surrounding the gate provides.</p> <p>Loss of sound and sight buffer: Our existing low height trees, along with the low vegetation, absorb much of the road noise and block the vehicles traveling along highway 6 from seeing down into our property. This ties into our safety also, as vehicles have gone over the guard rail along this highway.</p> <p>Decreased property value: Currently, even with the leaves off the trees I have a filtered view of Hwy 6.</p>	<p>In the summer time we cannot see the Hwy 6. If "scraping" does occur we will have a year round view of Hwy 6. Real estate brokers have stated that we will definitely have a loss of property value. We are one of 3 Narrows property owners that live here year round. Our home is not a vacation home. It is our only residence.</p> <p>We are asking that you do not scrape our hillside and that you leave the low height trees in place. The Narrows is only a very small portion of this project and it is unique compared to the rest of this tower and line replacement project.</p> <p>Of the 131 trees that were marked for removal, none of them were on our property. We are thankful for that, but are still very concerned about the rest of the project as it effects the Narrows. Also, many of the trees that are marked (on a North Facing Slope) provide much shade for the Wilson River. Our fish are already having a problem with habitat loss and increased water temperatures. We do need to protect them.</p> <p>Finally, we are asking for a plan, in writing, that describes what will happen to our property.</p> <p>Respectfully,</p>  <p>Jerry and Leslie Rilette</p>
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BPA's Response:

BPA has reviewed Comment KLTM13 0005 in concert with Comment KLTM13 0006, which was submitted by the same individuals and addresses the same issue. Regarding the issues associated with danger tree removal and vegetation maintenance in the vicinity of the Narrows neighborhood, please see BPA's response to comment KLTM13 0001 and KLTM13 0002. Specific to the Rilette property, BPA has not identified any trees that need to be removed.

Section 3.11.2, *Environmental Consequences –Proposed Action (Socioeconomics and Environmental Justice)*, assesses potential impacts on property values as a result of the Proposed Action as a short-term, low impact. Section 3.9.2, *Environmental Consequences–Proposed Action* and Section 3.9.3, *Mitigation—Proposed Action (Visual Resources)* describe anticipated effects on Key Observation Point (KOP) 3 as a result of the Proposed Action. Danger tree removal and vegetation management would be visible during construction and would result in disturbances to the ROW and viewsheds of KOP 3. BMPs such as construction site clean-up, and replanting of shrubs and other plants less than 10 feet potential mature height would minimize impacts to visual resources. Leaving tree and shrub root systems intact during vegetation clearing would lessen erosion potential, particularly on hillsides where risk of erosion is higher.

Section 3.13.2, *Environmental Consequences–Proposed Action (Noise, Public Health, and Safety)*, assesses the potential noise impacts from the Proposed Action. The rebuilt Keeler-Tillamook transmission line would operate at the same voltage, 115 kV, as the existing transmission line. Table 3.13-4 of the EA shows the corona noise levels of the existing conditions and the Proposed Action. The corona noise levels may decrease after completion of the Proposed Action, and overall noise impacts during project operation are expected to be low. In addition, shrubs and other plants that would not present a danger to the transmission line may be allowed in the ROW if they are less than 10 feet potential mature height and if they would not interfere with the safe operation of the transmission line. BPA is working with the landowners in the Narrows to come up with an agreeable solution (e.g. fencing, acceptable plantings) that respects the desires and wishes of the residents to maintain privacy, summer sun shade and road noise protection, and also maintains the safety and reliability of BPA’s transmission lines.

BPA’s construction crews cannot use SR 6 to safely work in the Narrows neighborhood, as the highway does not allow adequate access to the transmission line poles. BPA has access rights to use the Narrows private road for construction and maintenance of its line and has used the road to access areas that need to be cleared of vegetation in order allow for safe operation of the transmission line. BPA is committed to leaving all roads, including the road in the Narrows, in the same or better condition than before the project. BPA will work with the Narrows neighbors to plan and schedule construction to minimize as much as possible any delays or access restrictions during construction.

The EA assessed the project’s expected impacts on riparian shading and fish habitat (see Section 3.4, *Fish*). BPA acknowledges that removing danger trees would decrease cover and shading along portions of some waterways; however, considering the overall danger tree removal plan, including the number of trees, location of trees, and proximity to waterways, the EA concludes that the project would have low impacts to stream temperature. BPA and its contractors will implement a number of mitigation measures designed to reduce or eliminate project impacts on fish and fish habitat (see *Fish*, Section 3.4.3, *Mitigation – Proposed Action*).

Comment KLTM13 0007

KLTM13 0007 - Hoskinson

Comments on the Draft EA:

I need more information about:

I have these other comments:

Slide Creek, at about mp 9.5 is a water source for several hours. Please don't use chemicals or pollutants in that watershed.

Name/Address: Sam Hoskinson

You may also post your comments at www.bpa.gov/comment;
You may also call BPA at 1-800-622-4519, or FAX your comments to 503-230-4019.
Please mention "Keeler to Tillamook Transmission Line Rebuild" in your correspondence.

The comment period ends November 18, 2013.

BPA's Response:

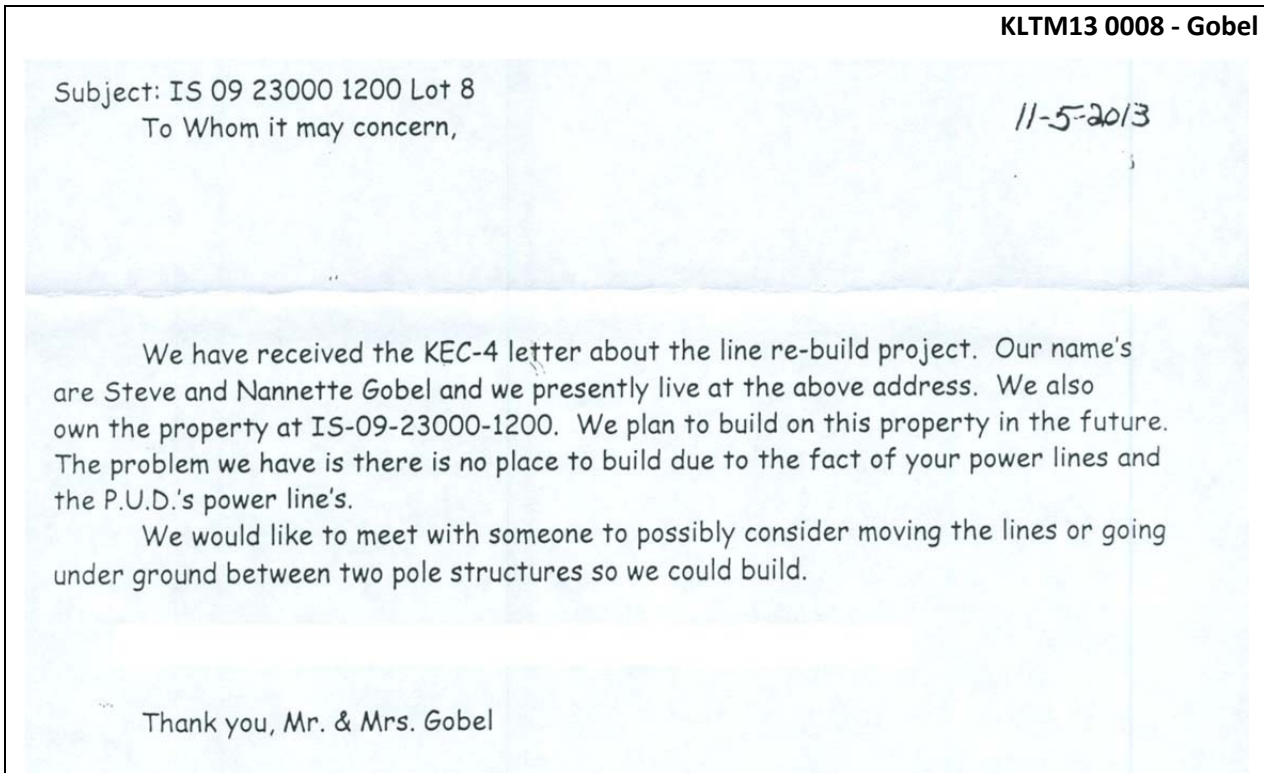
Slide Creek is located between Smith Creek and Fern Creek, east of Line Mile 40. Slide Creek was previously not labeled on Figure 3.7-1d of the Draft EA; however, as noted above, Slide Creek has now been added to the revised Figure 3.7-1d. No structure replacements or access road work will occur within 100 feet of Slide Creek; as such, it was not listed in Tables D-1 or D-2 (Appendix D). The closest structure is 39/3 of the Forest Grove-Tillamook Line, located approximately 190 feet east. The closest access road work is at the same location, structure 39/3. Impacts to Slide Creek are not expected because the transmission line spans the creek and construction work would be located more than 100 feet away.

As described in Section 3.7.2, effects on waterways are expected to be low to moderate during construction and low during operations and maintenance. BPA will implement the mitigation measures described in 3.7.3 to reduce potential effects on waterways.

For information on the use of herbicides, please see BPA's response to comment KLTM13 0003.

BPA has concluded that this project, and similar types of transmission line rebuild projects, have limited potential for adverse effects on drinking water sources whether surface water or groundwater; and those potential effects can be minimized by implementing the mitigation measures described in the EA and the vegetation management program EIS.

Comment KLTM13 0008



BPA's Response:

BPA has considered rerouting and moving portions of the transmission line in the Hillsboro and Forest Grove area (see Section 2.3, *Alternatives Considered but Eliminated from Detailed Study*). It was determined that moving the transmission line to a new ROW would result in much greater environmental impacts as compared to rebuilding the transmission line in place, and would also be significantly more expensive. For these reasons, rerouting the transmission line was considered but eliminated from further study in the EA. As noted in Section 2.3 of the EA, if a landowner would like to continue to pursue the option of rerouting BPA transmission lines, they can submit a formal Land Use Application (LUA) to BPA. The LUA would begin an internal evaluation process to determine the merits of the proposal as a separate project. Any changes to BPA's lines or infrastructure would be at the applicant's expense and would require additional environmental review.

KEELER TO TILLAMOOK TRANSMISSION LINE REBUILD

Comments on the Draft EA:

There are memories of the events of the 2000 project by Bonneville power and Tillamook PUD on the line maintenance project at that time. There was a law suit filed on the damages incurred at that time. I have property on the Wilson river area called the Narrows (13 mile post) and want to maintain the tree and growth of greenery on my property. There was a representative from PUD at our last area meeting in September to discuss the upcoming project. There was voiced much concern about the upcoming project as it would affect property owners at the Narrows. The PUD representative indicated that Bonneville would advise us more when defined plans were available. We (the Narrows) would be advised regarding the existing easement areas to be potential clearance area. Also of concern is the replacement of existing line poles and what effect that would have on Narrows entrance and land owners property. (easements). Attached are a couple pictures of your lines and our access road behind my property.

Eugene Besel



BPA's Response:

Please see BPA's response to comment KLTM13 0001, which addresses the issues associated with danger tree removal and vegetation maintenance in the vicinity of the Narrows neighborhood. Specific to the Besel property, BPA has not identified any trees that need to be removed.

As noted in the EA Section 3.11.3, *Mitigation – Proposed Action (Socioeconomics, Environmental Justice, and Public Services)*, BPA will compensate landowners for any damage to property during construction or operations and maintenance of the project. BPA does not anticipate acquiring any new easements in the Narrows neighborhood. Section 3.11.1, *Affected Environment, Property Taxes and Values*, states that if BPA needs to acquire a new easement, landowners would be offered fair market value for their land as established through the appraisal process.

Comment KLTM13 0010

KLTM13 0010 - Duyck

Comments on the Draft EA:

Blank lines for comments on the Draft EA.

I need more information about:

Joe Finigan is renting this ground and planting this crop and its up to the weather when he can plant and harvest this crop.

I have these other comments:

I hope you people wait till the crop is harvest till August to work on power line. The crop should be off by harvest by August 1-2014. The field is going to be planted in beans and will irrigate by then the irrigation pipe should be pick up. P.S. (Call before you come or work before). Please reply soon. Vernon Duyck

Name/Address: Vernon Duyck

You may also post your comments at www.bpa.gov/comment; You may also call BPA at 1-800-622-4519, or FAX your comments to 503-230-4019. Please mention "Keeler to Tillamook Transmission Line Rebuild" in your correspondence.

The comment period ends November 18, 2013.

BPA's Response:

BPA is scheduled to work in the area near the Duyck property between August 4 and September 8, 2014. BPA and its contractors will notify individual landowners of the specific construction schedule for their property as the time approaches and more specific dates are available.

BPA is committed to coordinating with the residents, farmers, and other land users along the project area. While the overall project impact on agriculture is expected to be low during construction and operation, BPA recognizes that individual land users may be affected by the project.

In addition, and as stated in the EA, Section 3.2.3, Mitigation – Proposed Action, BPA has included the following mitigation measures designed to reduce project impacts on agriculture:

- Plan and conduct construction activities to minimize temporary disturbance, displacement of crops, and interference with agricultural activities.
• Contact and provide a schedule of construction activities to all potentially affected landowners.
• Compensate landowners for damage to property or crops, as appropriate.

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

KEELER TO TILLAMOOK TRANSMISSION LINE REBUILD

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

Comments on the Draft EA:

We realize the importance of maintaining healthy transmission lines however if you check the file of our property near Lees Camp you will notice that there have been issues in the past with the logistics used. Please see below.

I need more information about:

We will require that all sub-contractors be licensed, bonded and insured, all workers need to be either US citizens or of legal status in the USA. All government requirements (i.e. social security etc) need to be in order. Please provide us with the above mentioned documentation prior to crews working in our area. Additionally please advise us of the exact scope of the work to be done prior to commencement.

I have these other comments:

Name/Address: *Mike & Judith WALSH*

You may also post your comments at www.bpa.gov/comment;
You may also call BPA at 1-800-622-4519, or FAX your comments to 503-230-4019.
Please mention "Keeler to Tillamook Transmission Line Rebuild" in your correspondence.

The comment period ends November 18, 2013.

BPA's Response:

BPA and its contractors comply with applicable rules and regulations regarding hiring and employment. Contractors must be licensed, bonded, and insured. The scope of work of the project is included in the EA Section 2.1, *Proposed Action*. Once selected, the prime contractor will designate a land liaison representative. This person will be available to discuss the project scope of work and answer questions from landowners.

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

KEELER TO TILLAMOOK TRANSMISSION LINE REBUILD

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

Comments on the Draft EA:

Blank lines for comments on the Draft EA.

I need more information about:

I am a senior citizen so would you be so kind as to let me know just how the Bonneville Project will affect me both in monetary & physically.

Thank you
Charlene Givens Romike, TFF
Romike Family Trust

I have these other comments:

Blank lines for other comments.

Name/Address: _____

You may also post your comments at www.bpa.gov/comment;
You may also call BPA at 1-800-622-4519, or FAX your comments to 503-230-4019.
Please mention "Keeler to Tillamook Transmission Line Rebuild" in your correspondence.

The comment period ends November 18, 2013.

BPA's Response:

The Proposed Action's expected impacts on humans and the natural environment are addressed in the EA. Specific to human health, safety, and socioeconomics, please see Section 3.11, *Socioeconomics, Environmental Justice, and Public Services* and Section 3.13, *Noise, Public Health, and Safety*. The EA has concluded that the project would have a low effect on public health and safety, and a low effect on employment and income, property taxes, and property values. *Section 3.2.3, Mitigation — Proposed Action* includes measures that would reduce potential disruption to adjacent landowners, including the installation of barriers, gates, or signage during construction, and conducting noise-generating activities only during normal daylight hours to the extent possible.

Comment KLTM13 0013

KLTM13 0013 - Boom

The last time work was done on the BPA lines near our house they used a chemical to keep the blackberries away from the area. The chemicals poison the whole area and makes the blackberries in our yard unusable for human consumption. Please just cut back the berries. Not only will it limit human access after the work is done, but it will encourage a more natural scene. I was very frustrated the first time the chemicals were used and I request in the strongest terms that they not be used again.

BPA's Response:

BPA has analyzed the need for herbicides during construction of the project and determined that herbicides are only necessary for weed control at one location, near structure 4/1 of the Keeler-Forest Grove No. 1 transmission line, which is not within the Boom property boundaries. Any vegetation clearing necessary for construction access would be mechanical or manual.

BPA must manage vegetation along all transmission line corridors and transmission-related facilities in order to protect the safe and reliable operation and maintenance of the transmission system. BPA will contact landowners prior to vegetation management projects and can identify areas where no herbicides will be used at the landowners' request. BPA can also add a landowners' property to the no-herbicide list for future vegetation management.

11-16-13

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

KEELER TO TILLAMOOK TRANSMISSION LINE REBUILD

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

Comments on the Draft EA:

Our farm is aware of the rebuilding of the Keeler - Forest Grove lines. We are a commercial family farm established in 1896. This line goes through @ least four farms we own or lease. Our owned farms are listed as Dave & Ellen Vanasche & Vanasche Farm Trust. We operate our farm operation as Vanasche Farm LLC. From the time of construction of this line in the late 1940's until October of 2012, our farm had excellent rapport with your maintenance crews. They always asked permission to enter our farms I need more information about: and they have used our 3/4 mile private access road for 60 years and they never created crop damage. In October 2012 your crews destroyed the crop on one of our farms. (Obviously no concern for our environmental damage) the follow-up process, after this damage, by the contractor and BPA was less than amiable. We were also confronted and pressured several times to sign a permanent easement to BPA for our farm access road, which BPA has freely used for 60+ years and we plan to continue to grant this access.

Have these other comments:

Please give us consideration on the following issues:
 Work with us and don't destroy our crops.
 We want to plant hazelnut trees on our Liesy Road farm. (IN3W-23 TL 400 - 87 Acres) BPA has power lines on this farm. We can plant a variety called Vanahill which grows to a 10-15' height. It is a dwarf variety. See Oregon State University Extension Service Jeff Olson e-mail.

Our farm is willing to continue our positive relationship with BPA. Are you willing to work with us.

Thank you

Name/Address:

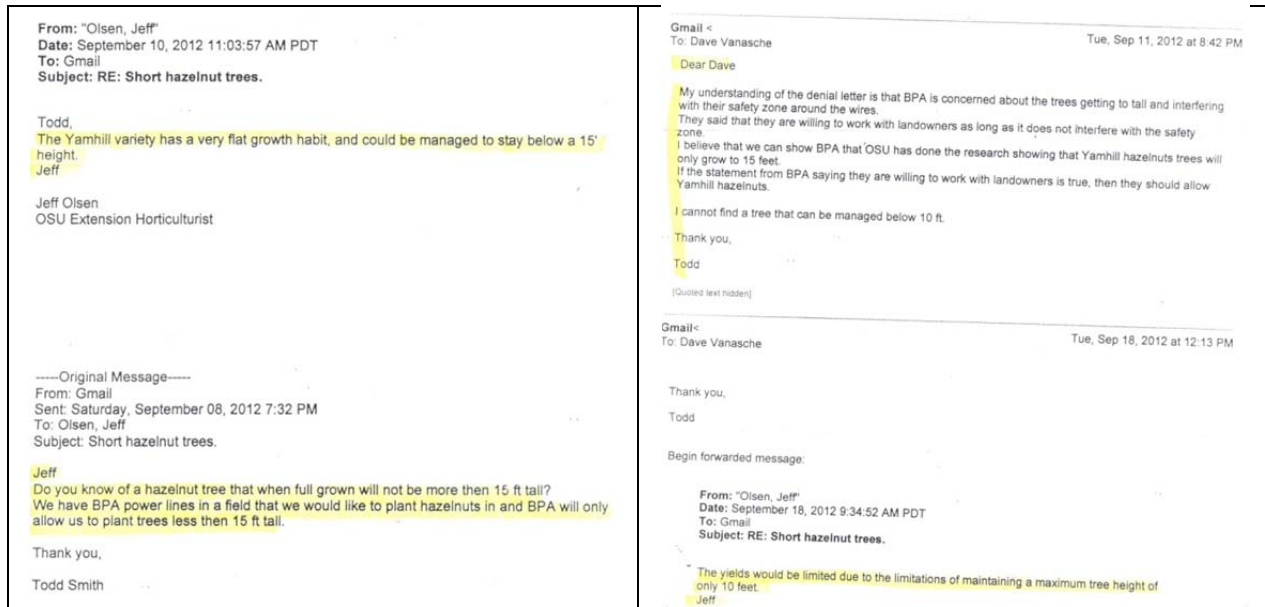
Dave Vanasche

You may also post your comments at www.bpa.gov/comment;

You may also call BPA at 1-800-622-4519, or FAX your comments to 503-230-4019.

Please mention "Keeler to Tillamook Transmission Line Rebuild" in your correspondence.

The comment period ends November 18, 2013.



BPA’s Response:

BPA is scheduled to work in the area near the Vanasche property between August 4 and September 8, 2014. BPA and its contractors will notify individual landowners of the specific construction schedule for their property as the time approaches and more specific dates are available.

BPA is committed to coordinating with the residents, farmers, and other land users along the project area. While the overall project impact on agriculture is expected to be low during construction and operation, BPA recognizes that individual land users may be affected by the project.

In addition, and as stated in the EA, Section 3.2.3, *Mitigation – Proposed Action*, BPA has included the following mitigation measures designed to reduce project impacts on agriculture:

- Plan and conduct construction activities to minimize temporary disturbance, displacement of crops, and interference with agricultural activities.
- Contact and provide a schedule of construction activities to all potentially affected landowners.
- Compensate landowners for damage to property or crops, as appropriate.

It is BPA policy to not allow trees or vegetation with a potential mature height of greater than 10 feet to be planted under transmission lines. In certain circumstances, a variance may be requested for certain agricultural and orchard crops. If a variance is granted, a landowner must enter into a maintenance agreement with BPA to ensure the safety and reliability of the transmission line. BPA looks forward to discussing these options as well as access options in the future.

Comment KLTM13 0015 (received after close of the comment period)

KLTM13 0015

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

KEELER TO TILLAMOOK TRANSMISSION LINE REBUILD

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

Comments on the Draft EA: *Looks like "make work" to me
No mention of how much it costs or how we
Are going to pay for it, or if it is even
Necessary.*

I need more information about:

I have these other comments: *It is ludicrous to replace things that are only
10 years old. If its not broke don't fix it. In case you
Are wondering Money is a little tight.*

Tillamook County Property owner

Name/Address: *John Selmer*

You may also post your comments at www.bpa.gov/comment.
You may also call BPA at 1-800-622-4519, or FAX your comments to 503-230-4019.
Please mention "Keeler to Tillamook Transmission Line Rebuild" in your correspondence.

BPA's Response:

Comment letter KLTM13 0015 was received after the close of the comment period.

Chapter 1 of the EA describes the purpose and need for the Proposed Action. As described in the EA, Section 1.2, *Need for Action*, the Keeler to Tillamook transmission lines were originally built in the 1950s. The conductor has never been replaced and does not meet current National Electrical Safety Code standards. In general, wood poles for transmission lines have an expected service life of 55 to 60 years, at which point they are usually replaced due to age, rot, or other forms of deterioration. Some structures on the Keeler to Tillamook transmission lines are less than 10 years old, and these structures are not proposed to be replaced at this time (see Section 2.1, *Proposed Action*). The estimated project cost is \$17,695,138, as shown in Table 2-5 of the EA.

BPA has a statutory obligation to ensure that its transmission system has sufficient capability to serve its customers while maintaining a system that is safe and reliable. BPA is a self-funded power marketing agency and covers its costs by selling its products and services. BPA also owns, operates, and maintains three-fourths of the high-voltage transmission lines in its service territory.

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

KEELER TO TILLAMOOK TRANSMISSION LINE REBUILD

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

Comments on the Draft EA:

We are extremely unhappy that you intend to cut down so many trees on our property without our permission, especially because this was already done a few years ago and an enormous mess was left on our land.

I need more information about: How to prevent killing as many trees as possible. These trees are our only barrier to incredibly noisy, dangerous, 60 mph traffic on the highway.

I have these other comments:

Joanna Priestley
Paul Harrod

Name/Address:

You may also post your comments at www.bpa.gov/comment;
 You may also call BPA at 1-800-622-4519, or FAX your comments to 503-230-4019.
 Please mention "Keeler to Tillamook Transmission Line Rebuild" in your correspondence.

The comment period ends November 18, 2013.

BPA Response:

Comment letter KLTM13 0016 was received after the close of the comment period.

Please see BPA's response to comment KLTM13 0001 regarding the issues associated with danger tree removal and vegetation maintenance in the vicinity of the Narrows neighborhood.

BPA plans to exercise its rights to remove vegetation on the Priestley/Harrod property consistent with its existing easement rights. BPA has identified 156 trees for removal as a result of the Rebuild Project. These trees need to be removed because they have made parts of the transmission line ROW inaccessible for construction and maintenance, and because many are at risk of striking the line. Previous vegetation management was required on the property to remove vegetation that grew too close to the existing line. BPA continues to offer to meet with the landowner to discuss the trees identified for removal and to come up with an agreement that would respect the desire for privacy and road noise protection, while also maintaining BPA's right to safely and reliably operate and maintain the transmission line.